Opening Hours Policy and Proposals

Equality Impact Assessment: Final Report

1. BACKGROUND

Section 75 Duties

1.1 Section 75 of the Northern Ireland Act 1998 requires all designated public authorities carrying out functions in Northern Ireland to have due regard to the need to promote equality of opportunity:

- between persons of different
  - religious belief
  - political opinion
  - racial group
  - age
  - marital status
  - sexual orientation
- between men and women generally
- between persons with a disability and persons without
- between persons with dependants and persons without.

1.2 Without prejudice to these obligations, public authorities are also required to have regard to the desirability of promoting good relations between persons of different religious beliefs, political opinion or racial group.

1.3 Schedule 9 of the Act sets out the detailed procedure for the implementation of these duties including the conduct of screening exercises and Equality Impact Assessments (EQIA) of policies.

Screening

1.4 In line with Equality Commission for Northern Ireland (ECNI) guidance, the draft policy and proposals regarding opening hours were screened to determine whether there are potentially any significant implications for equality of opportunity and good relations. Briefly, the screening process identified that the policy may have a differential impact on people in some Section 75 groups whose access to libraries is restricted by their work and/or family commitments. These groups include, but are not necessarily limited to:

- children and young people
- people of working age
• older people
• disabled people
• people with dependants.

1.5 The screening process also identified that there may be some differential impacts on some members of staff.

1.6 It was therefore determined that an EQIA should be undertaken and be subjected to consultation in parallel with the consultation process on the draft policy and proposals.

**EQIA process**

1.7 When undertaking an EQIA, Libraries NI closely follows the ECNI guidance which recommends that there should be seven steps in the EQIA process:

- Step 1: Definition of the aims of the policy
- Step 2: Consideration of available data and research
- Step 3: Assessment of potential and actual impacts
- Step 4: Consideration of measures
- Step 5: Formal consultation
- Step 6: Decision and publication of the results of the EQIA
- Step 7: Monitoring for adverse impact.

1.8 A draft EQIA was prepared in February 2015 and made available for consultation from 18 February 2015 to 17 April 2015, together with a draft Rural Impact Assessment and a consultation document setting out the proposals for an opening hours policy and the impact of that policy in the context of the 2015/16 budget. The purpose of the draft EQIA was to present the preliminary findings of the EQIA with regard to the potential equality impacts on people in the Section 75 categories. Following the consultation period, a draft final EQIA was prepared taking account of the comments made during the consultation process and including the main findings and conclusions. This draft final EQIA was considered by the Board of Libraries NI on 13 May 2015, together with a draft final Rural Impact Assessment and a report on the outcome of the consultation process on the draft policy and proposals. The Board of Libraries NI, having considered all of the information provided, agreed an Opening Hours Policy together with the proposals for opening hours in 2015/16,

1.9 In accordance with ECNI guidance the Equality Impact Assessment has now been finalised and will be published on the Libraries NI website.
2. POLICY AND PROPOSALS

2.1 The principal aim of the Opening Hours Policy is to ensure a consistent approach to determining the opening hours of libraries.

2.2 The agreed Opening Hours Policy, is shown below. Substantive changes to the draft policy are highlighted in bold.

In establishing the opening hours of libraries, Libraries NI will seek to ensure that:

- a consistent approach is applied across all libraries; exceptions may be made for libraries serving areas of substantial social need and/or rural libraries
- opening hours relate to the historic level of use of a library
- the allocated hours are used in a way that best meets customer need
- the allocated hours in every library are sufficient to provide a range of opening hours to suit different customer groups and to allow a minimum range of programmes to be delivered in line with Libraries NI's priorities
- the opening hours are affordable
- the opening hours are sustainable i.e. ad hoc closures due to staffing shortages should be avoided other than in exceptional circumstances.

2.3 In the context of the 2015/16 budget, the Board agreed the following: (substantive changes to the original proposals are highlighted in bold)

- libraries will open for 54, 50, 45, 40, 35, 28, 25 or 18 hours, depending on the level of use in 2013/14
- no library should be open for fewer than 18 hours per week. If a library is open for less time than this, it is difficult to implement the policy of providing a range of opening hours to suit different customer groups and to allow a minimum range of programmes to be delivered in line with Libraries NI's priorities. Many of the libraries which are currently open for 18 hours per week are located in rural communities.
- no library serving areas of substantial social deprivation (as listed in the Libraries NI Business Plan 2015/16) and no rural library should have its hours reduced by more than 10%
• **the opening hours of Lisnaskea Library should be retained at 30 hours per week, given that it is a new library on a new site, and use would be monitored**
• **further consideration would be given to the opening hours of the Mellon Centre for Migration Studies following consultation with relevant parties and a report should be brought to the Board via Services Committee in due course.**

2.4 Although the total opening hours of each library in each band will be the same, there is flexibility to agree individual patterns of opening hours for each library. The pattern of opening hours in each library will be determined following engagement at a local level with customers on what best suits their needs.

2.5 Although the policy and the proposed reductions in opening hours will affect all users, some people will be able to adjust their pattern of library usage and will not be significantly affected. However, those who use libraries on specific days or at specific times of day may be adversely affected, although it is anticipated that all libraries will continue to operate with a mixture of morning, afternoon, evening and weekend hours, unless local consultation on the pattern of hours indicates a different approach is needed. This should reduce the level of impact.

2.6 This EQIA therefore focuses on identifying the impacts on users whose flexibility to access libraries is restricted. The EQIA also considers the impacts on staff.

3. **CONSIDERATION OF AVAILABLE DATA AND RESEARCH**

**Available data – library users**

3.1 Libraries NI maintains records of registered users and active borrowers and also measures usage of each library; however, limited information is currently available by Section 75 group.

3.2 This information below relates to age and gender as at 1 January 2015.

<table>
<thead>
<tr>
<th>Age Group</th>
<th>Number</th>
<th>Percentage of Registered Users</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>338,425</td>
<td>41%</td>
</tr>
<tr>
<td>Female</td>
<td>484,205</td>
<td>59%</td>
</tr>
<tr>
<td>Children (Under 16)</td>
<td>206,647</td>
<td>25%</td>
</tr>
<tr>
<td>Senior Citizens (60 and over)</td>
<td>104,094</td>
<td>13%</td>
</tr>
</tbody>
</table>

*Table 1: Registered users by age and gender*
3.3 The Continuous Household Survey (CHS) is a Northern Ireland wide household survey administered by the Central Survey Unit, Northern Ireland Statistics and Research Agency. DCAL places questions related to public library use annually in the CHS.

3.4 The Findings from the Continuous Household Survey 2013/14 ³ states as follows:

**Usage of the public library service**

Just under three out of every ten (29%) of the adult population had used the public library service in the last year, with a higher proportion of females (35%) than males (23%) having done so. The likelihood of having used the public library service was also related to age with more than a third (35%) of those aged 16-44 years having used the public library service in the last year, a higher proportion than those aged 45 years or more (23%).

A higher proportion of the population who had dependants had used the public library service in the last year (36%) compared with those who do not have dependants (24%) (see Figure 1 below). In particular, adults with a dependent child were more likely than adults who did not have a dependent child to have used the public library service in the last year (38% and 24%, respectively).

Adults who state their religion as ‘Other’ or ‘None’ were more likely to have used the public library service in the last year (36%) than both Catholic (30%) and Protestant (26%) adults. In addition, Catholic adults were more likely to have used the public library service than Protestant adults.

Adults who have a disability were less likely to have used the public library service in the last year (25%) than adults who did not have a disability (30%).

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Findings from the Young Persons’ Behaviour and Attitudes Survey 2013 is a report prepared by the Research and Statistics Branch of the Department of Culture, Arts and Leisure (DCAL). It presents findings from the 2013 Young Persons’ Behaviour and Attitudes Survey (YPBAS) which is a triennial school based survey carried out among 11-17 year olds and covers a wide range of topics relevant to the lives of young people today.

It states:

More than half (57%) of all young people had used the public library service at least once in the last year, with girls (62%) more likely to have used the service than boys (52%).

Usage of the public library service decreased with age, with those aged 12 years and under almost twice as likely to have used the public library service than those aged 16 years and over (78% and 40%, respectively).

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There were no differences in usage of the public library service by religion, whether a young person has a disability or whether they are entitled to free school meals (see Figure 2 below).

![Figure 2: Used the public library service in the last year]

Findings from the Young Persons’ Behaviour and Attitude Survey 2013

Figure 2  Used the public library service in the last year

Available data - staff

3.7 Libraries NI maintains monitoring information on staff by community background and gender. The latest figures (1 January 2015) show that:
- the workforce is predominantly female – approximately 80%
- in terms of community background, there is a good balance within the workforce, with approximately 43% from a Catholic community background and 51% from a Protestant community background and 6% unknown.

3.8 Traditionally women are regarded as caregivers and they tend to take the major role in looking after children and elderly/disabled relatives. There is therefore a strong possibility that some members of staff have caring responsibilities and this may affect their ability to cope with new working hours and/or locations. However, there is no data at this stage on the number of staff with dependents; the key issues will be explored with staff and Trade Unions during the consultation period.
Available research

3.9 Libraries NI carried out a review of opening hours in 2011/12. The EQIA carried out at that stage and the associated consultation process indicated:

- children and young people make use of libraries, particularly after school in the late afternoon and early evening, in order to do homework
- children and young people do not have options to travel to the library at varying times, other than after school, due to lack of access to transport and cost
- young people, who do not have access to a computer or have restricted access due to network coverage, use the library to access the computer on a regular basis to do homework
- older people tend to use libraries during daylight hours and many older people’s clubs and group activities are held in the library on a regular basis
- older people use the library for a variety of reasons, on a daily basis, other than for accessing books. The library service impacts greatly on their social inclusion, health and wellbeing. Reduced opening hours may impact on the availability of activities and events
- parents of young children (under school age) make extensive use of Rhythm and Rhyme sessions which tend to be held during morning hours
- young children make extensive use of a range of activities in the library and a reduction in opening hours will result in a reduction of activities
- car ownership and use of public transport among disabled people is substantially lower than for people without a disability and they rely on family and friends whose availability is restricted
- people with learning difficulties find it particularly difficult to change their routines and also need evening and weekend activities to enable them to participate more fully
- disabled people require a range of opening times as they are not always well enough to go to the library at set times
- people with a range of mental health issues find the library a safe environment and use it frequently
- newcomer people find the library service a great resource to meet people and access computers. Reduced hours will increase usage of computers at busy times and may therefore reduce access to computers
- people who work normal office hours tend to use libraries in the evenings and at weekends
• people of a working age, who are unemployed, use the library extensively to access job opportunities

• people with caring responsibilities need to manage their time and have less flexibility in terms of when they use libraries.

3.10 In recent years reviews and consultation exercises in relation to library provision and opening hours have been undertaken in England, Scotland and Wales.

3.11 The documents associated with a number of these consultations have been examined for potential learning points. The documents align with the points made in paragraph 3.9.

4. CONSULTATION ON THE EQIA

Consultation Process

4.1 Libraries NI is committed to consultation which is timely, open and inclusive. The consultation process in respect of the opening hours policy and the potential equality impacts was undertaken from 18 February 2015 to 17 April 2015. The process included:

• publication of a consultation report, draft EQIA and draft RIA

• a questionnaire for children and adults available in libraries in both hard copy and electronic format;

• opportunities to comment in writing directly or via the Libraries NI website;

• opportunities to meet with Libraries NI, if requested.

4.2 All consultation documents were made available on the Libraries NI website and could be obtained in hard copy and alternative formats on request. In addition, all Equality Scheme consultees were notified of the availability of the draft EQIA report and invited to comment.

4.3 The consultation questionnaire on the opening hours policy and proposals included questions designed to seek the views of respondents on equality impacts. In total, 3,484 adults and 317 children completed questionnaires:

• 16% of adult respondents believe the draft opening hours policy would have an effect on them in terms of at least one Section 75 equality category. Of these 46% said they would be affected because they have dependents, 36% because of their age and 23% because they have a disability. 12% said they would be affected due to religious belief, 10% because of political opinion, 5% because of marital status, 5% because
of racial group and 4% because of sexual orientation.

4.4 A small sample of the comments on the equality related impact of reducing opening hours is shown below:

- As a parent who studies full-time and also works, it can be difficult to get my children to the library during 9-5 hours Monday to Friday. I would be concerned that, if hours are reduced, their ability to make use of the library for education and leisure purposes would be adversely affected because of my working hours.

- I am housebound and dependent on others to take me to the library.

- I am nearing retirement and I would like to be able to use the library more often – but if hours reduced this could be affected.

- As I am retired, I will shortly be giving up my car. This will mean that the library will become even more important to me. Other libraries are not easily accessible by public transport if, as is possible, my mobility levels reduce.

- As I have a hearing loss disability I am somewhat limited in choices for recreation and study. For this reason I make great use of libraries and any reduction in opening hours will affect me disproportionately.

- At my age there are no other outlets to meet and greet. The library is protective in the therapeutic treatment it provides for me.

- Because of my MPN I am unable to travel easily. My Library is within walking distance for me. Were it to close I would be bereft.

- Difficulty in travelling time away from dependant.

- Due to illness I am unable to just go to library - I have to be feeling able to health wise.

- I am a full-time carer for my Mum and the reduced hours would make it harder for me to use the library, as my free time is already limited.

- I believe that access to a library is essential for all members of society, irrespective of a person’s status. Libraries are places for people to learn, relax, access PCs etc. for children, especially, libraries act as a bedrock for reading, regardless of whether information is hard copy (books) or digital (via PC) access is essential if all in society are to thrive.

- I cannot attend the library at the same time or day every week and there are times that I have to give it a miss entirely due to lack of transport or if the children are sick etc.

- I feel very strongly that libraries are necessary for both young and old also students and people who are lonely. I think people should be encouraged to join not deterred.
I have 2 young children and work 30 hours per week. I need flexible opening hours to enable my family and I to enjoy the library. In addition, my husband is self-employed and relies on using the library to work from his Mac.

I have a son who is adopted from Thailand and having the use of our local library has helped him immensely to develop his social and language skills.

I have mobility issues and a fixed rate of income. I use the library on average three times a week, to read/interact with local people, read the paper - without the library I would not be able to read and keep my mind active.

I look after children who have autism, and they enjoy visiting the library. Any change in hours because they are rigid to routine, will completely confuse and cause them severe hardship.

I need the library to keep up to date with what is happening, my age and disability make it hard for me to get about, but the library I go to is easy to get into and the staff are helpful if I have a problem.

If funds are cut, I will have nowhere quiet to study and my exam performance will suffer from this.

If hours are cut and books not bought then my child will have fewer opportunities than other children from previous years.

If the hours of opening are reduced then pressure will be put on the library during opening time. As a person suffering mental health issues I like quiet environments with less people and judge my visits accordingly. Hence this will/may prevent me from being able to enjoy or avail or the service if hours are rationed making client numbers peak continuously instead of low peak times convenient and healthier for me.

It is hard enough to be foreign and make a new life in different country as that of my birth. I have set my goals and only because Northern Ireland’s library services are so great and available for me, now I have a chance for better life for myself and my children. If coming to libraries will not be possible for me in a future then to gain my degree will be pretty hard time wise.

My child has special needs she absolutely loves the library and we can only take her on a Tuesday evening or Saturday morning so it is limited already.

My elderly parents are “very” dependent on the books I get them every week (9 books each usually), particularly my father, who is housebound.

No family in Northern Ireland so need the library to keep me sane and
my 2 kids sane too!

- Older people may be more dependent on public transport and so library opening hours should take account of public transport availability.
- Older library users want to use the library at its quietest time. The proposals would mean that there are fewer, if any, such times.
- Libraries and their use and opening times – widest range needed due to restricted individual spare income so quality of life for me and my dependent would be adversely affected by any reductions in opening times and supportive staff services. This must be the case for a very large numbers of carers and those who also work in addition to carer responsibilities and to large numbers of dependents too across Northern Ireland.

4.5 Two organisations made written submissions in relation to the draft EQIA: Disability Action and the Northern Ireland Commissioner for Children and Young People (NICCY).

4.6 Disability Action made a number of comments about the process, specifically that the consultation period was too short and that engagement with local customers should have taken place earlier. It referred to lack of accessible public transport in rural areas and stated that disabled and older people and other low income families do not have the economic power to purchase computers and internet services. It made a number of suggestions about the local engagement process.

4.7 NICCY chose not to give a detailed response but to draw attention to the relevant Articles in the United Nations Convention on the Rights of the Child (UNCRC) and to urge Libraries NI to include children in the consultation.

4.8 Other written submissions referred to the potential impact of the policy on users in the age, disability and people with dependants categories.

4.9 The Action Ability Group which uses Whiterock Library met with library staff to express their views. They emphasized the importance of the library in their lives and were critical of the consultation questionnaire.

5. KEY FINDINGS

5.1 The EQIA process is designed to identify the aspects of the proposals under consideration which may have an impact on various people, whether the impacts are likely to be differential in respect of people in the nine categories defined in Section 75, and whether any of the differential impacts are likely to be adverse.

5.2 The assessment in Table 2 is based on the analysis of available data and
research and the findings of the consultation process. It is set out under the categories in Section 75, but it is acknowledged that the effects of the proposals will be different for each individual person and will not necessarily relate to a specific Section 75 characteristic.

5.3 Libraries NI has found no evidence to suggest that people with different community backgrounds, racial groups, marital status, sexual orientation or gender will be differentially affected by the proposals.
<table>
<thead>
<tr>
<th>Category</th>
<th>Groups</th>
<th>Specific needs</th>
<th>Potential adverse differential impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community background</td>
<td>People with a Catholic community background</td>
<td>None identified</td>
<td>None identified</td>
</tr>
<tr>
<td></td>
<td>People with a Protestant community background</td>
<td>None identified</td>
<td>None identified</td>
</tr>
<tr>
<td>Racial group</td>
<td>People from a Black or Minority Ethnic background</td>
<td>None identified</td>
<td>None identified</td>
</tr>
<tr>
<td>Age</td>
<td>Children and young people of school age</td>
<td>Make extensive use of libraries, particularly after school in the late afternoon and early evening</td>
<td>May be affected if their local library reduces afternoon and/or evening opening hours</td>
</tr>
<tr>
<td></td>
<td>People of working age (16-64)</td>
<td>People who work normal office hours tend to use libraries in the evenings and at weekends</td>
<td>May be affected if their local library reduces evening and/or weekend opening hours</td>
</tr>
<tr>
<td></td>
<td>Older people (65+)</td>
<td>Older people often prefer to use libraries during daylight hours</td>
<td>May be affected if their local library reduces morning and/or afternoon opening hours</td>
</tr>
<tr>
<td>Marital status</td>
<td>None identified</td>
<td></td>
<td>None identified</td>
</tr>
<tr>
<td>Sexual orientation</td>
<td>None identified</td>
<td></td>
<td>None identified</td>
</tr>
<tr>
<td>Gender</td>
<td>None identified</td>
<td></td>
<td>None identified</td>
</tr>
<tr>
<td>Category</td>
<td>Groups</td>
<td>Specific needs</td>
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</tr>
<tr>
<td>---------------------------</td>
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<td>-------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Disability</td>
<td>Disabled people</td>
<td>Car ownership and use of public transport among disabled people is substantially lower than for people without a disability</td>
<td>May be affected by any changes to opening hours</td>
</tr>
<tr>
<td>People with learning difficulties</td>
<td>People with learning difficulties</td>
<td>People with learning difficulties find it particularly difficult to change their routines and need more evening and weekend activities</td>
<td>May be affected by any changes to opening hours  May also be affected by reduced evening and weekend closures</td>
</tr>
<tr>
<td>People with dependants</td>
<td>People with dependent children</td>
<td>Parents of young children (under school age) make extensive use of library activities such as Rhythm and Rhyme which tend to be held during morning hours</td>
<td>May be affected if their local library reduces morning opening hours but Libraries NI will try to ensure that such sessions are still provided</td>
</tr>
<tr>
<td>People providing unpaid care</td>
<td>People providing unpaid care</td>
<td>People with caring responsibilities need to manage their time and have less flexibility in terms of when they use libraries</td>
<td>May be affected by any changes to opening hours</td>
</tr>
<tr>
<td>Staff with caring responsibilities</td>
<td>Staff with caring responsibilities</td>
<td>People with caring responsibilities need to manage their time and have less flexibility in terms of their working hours</td>
<td>May be affected by any changes to opening hours</td>
</tr>
</tbody>
</table>
6. CONCLUSIONS

Adverse differential impact

6.1 The EQIA shows that there is potential for people in a number of Section 75 groups to be differentially and adversely affected by the proposed reduction in opening hours. The groups identified include:

- children and young people
- older people
- people of working age
- people with dependants.

Mitigating measures

6.2 The key mitigating measure identified by Libraries NI is the flexibility to determine the optimal pattern of opening hours for each library in conjunction with the library customers. It is intended that each library (even those which are to be open for only 18 hours per week) should offer some morning, afternoon, evening and weekend hours.

6.3 Libraries NI will engage with customers in each library in June 2015 about the pattern of opening hours. Libraries NI will aim to provide a spread of opening hours across libraries which are geographically close to each other, as far as possible, to enable users to access library services for as many hours as possible.

6.4 Libraries NI is aware of the concerns expressed that reduced opening hours may impact on the provision of activities for younger people and older people. Libraries NI will pay particular attention to monitoring activity and usage to determine whether revised opening hours meet the needs of users. Libraries NI will, where possible, consider the possibility of rescheduling activities and events to meet the needs of users.

6.5 In addition, Libraries NI will ensure good communication of any changes to allow library users to plan future visits. Particular attention will be paid to communicating with children, disabled people and people with learning difficulties.

6.6 Libraries NI will engage with staff on an individual basis about their working patterns in order to mitigate any adverse impacts.

7. FURTHER ACTION

7.1 This final EQIA report will be made available through the Libraries NI website.
7.2 The results of ongoing monitoring will be reviewed on an annual basis and included in the annual review on progress to the Equality Commission. This review will be published on the Libraries NI website. This will complete Step 7 of the EQIA process.

7.3 If the monitoring and analysis of results over a two year period show that there has been a greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, Libraries NI will take steps to achieve better outcomes for the relevant equality groups.