

# Equality Impact Assessment / Equality Analysis

(Version 4)

Item name	Details
<b>Title of service or policy</b>	Relocation of B&NES Operational Services from Lewis House to Parkside and The Guildhall
<b>Name of directorate and service</b>	Capital Programme and Project Management, Sustainable Communities
<b>Name and role of officers completing the EqlA</b>	Jennifer Ragas (Project Manager)
<b>Date of assessment</b>	First Assessment: 22/05/2024 Updated: 11/06/2025

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website following relevant service lead approval.

## 1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> <li>• How the service/policy is delivered and by whom</li> <li>• If responsibility for its implementation is shared with other departments or organisations</li> <li>• Intended outcomes</li> </ul>	<p>The purpose of this service is to support the relocation of Council services currently based at Lewis House in Bath, following the Council’s decision to dispose of the property as part of its 2024/25 capital programme. The service is being delivered by the Council’s Capital Programme team, in coordination with Corporate Estate Property Services and other internal departments.</p> <p>The relocation involves moving operational services to alternative corporate properties — specifically the Guildhall and Parkside — and includes refurbishment works to ensure these buildings are fit for purpose.</p> <p>The intended outcomes of this policy are to:</p> <ul style="list-style-type: none"> <li>• Rationalise the Council’s corporate estate, reducing the number of properties and associated running costs.</li> <li>• Generate capital receipts from the disposal of Lewis House to support the wider capital programme.</li> <li>• Improve sustainability by delivering carbon reduction improvements at Parkside and the Guildhall, contributing to B&amp;NES’s 2030 Decarbonisation targets.</li> </ul>

	<ul style="list-style-type: none"> <li>• Ensure continuity of service delivery by relocating key operational services such as Housing Welfare &amp; Advice, Safeguarding, Youth Justice, CCTV, Emergency Planning, and Mailroom to suitable alternative locations.</li> </ul>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> <li>• Is it a new service/policy or review of an existing one?</li> <li>• Is it a national requirement?).</li> <li>• How much room for review is there?</li> </ul>	<p>This is a review of the existing Services, in response to the Council's decision to dispose of Lewis House. It is not a national requirement, but a locally driven strategy to rationalise the Council's estate, reduce operational costs, and improve asset efficiency.</p> <p>The services currently operate from the ground and lower ground floors of Lewis House. Despite efforts to lease the upper floors, they remain vacant, and the building incurs ongoing running costs. The proposed policy involves relocating these services to Parkside and The Guildhall, both of which are retained Council-owned properties.</p> <p>As part of the relocation, there is also an opportunity to deliver sustainability improvements at both sites. These works are designed to support the Council's 2030 Decarbonisation targets and contribute to its Climate Emergency response.</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The aims of this policy do not conflict with any other Council policies, the policy supports the delivery of the Council's Corporate Strategy, particularly in the areas of:</p> <ul style="list-style-type: none"> <li>• Efficient use of resources through estate rationalisation and cost reduction.</li> <li>• Climate and environmental responsibility, by incorporating sustainability improvements aligned with the Council's 2030 Decarbonisation targets.</li> <li>• Improved service delivery, by relocating services to more suitable and accessible locations.</li> <li>• This policy complements ongoing initiatives related to asset management, sustainability, and financial planning, ensuring a coordinated and strategic approach across departments.</li> </ul>

## 2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<b>2.1</b> What equality focussed training have staff received to enable them to understand the needs of our diverse community?	<p>All Council staff involved in the project have completed mandatory equalities training, which equips them with the knowledge and awareness needed to understand and respond to the needs of our diverse community.</p> <p>The project team, though relatively small, is made up of built environment professionals from a range of specialisms, each bringing their own expertise. The team is also diverse in terms of age, ethnicity, and gender, which further supports inclusive thinking and decision-making throughout the project.</p> <p>This combination of formal training and diverse lived experience helps ensure that equality considerations are embedded in the planning and delivery of the project.</p>
<b>2.2</b> What is the equality profile of service users?	Operational Services that are moving as a result of any decisions will be relocated to appropriate safe and accessible locations with adequate facilities and where necessary, suitable provision for members of the public to attend.
<b>2.3</b> Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	N/A
<b>2.4</b> What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>Regular monthly engagement has been carried out with senior staff managing the affected services. This proactive approach ensures that service needs are clearly understood, and that appropriate support is in place to minimise disruption. While not all staff have been formally informed yet, this early planning is helping to lay the groundwork for a smooth transition.</p> <p>Early engagement with HR has also begun to develop a comprehensive communication and support plan for staff. This includes clear and timely updates, access to training and resources,</p>

	<p>and the establishment of support systems to help staff adapt confidently to their new work environments.</p> <p>In addition, the Council's Communications Team has been involved to ensure that both staff and members of the public who use services at Lewis House are kept well-informed about the proposed changes. This helps build awareness, confidence, and readiness across all stakeholders.</p> <p>Initial feedback from staff and management has been positive, with many welcoming the proposed relocations. As the new locations are still within Bath, there is minimal impact on commuting or travel arrangements, which has helped maintain staff satisfaction and engagement.</p>
<p><b>2.5</b> If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?</p>	<p>As part of the next phase of the project, further consultation with staff and service users is planned to support the relocation process. Equality considerations will be embedded throughout this engagement to ensure that the needs of all individuals and groups are recognised and addressed.</p> <p>This will include:</p> <ul style="list-style-type: none"> <li>• Inclusive communication methods, ensuring information is accessible to all staff and service users, including those with disabilities or language barriers.</li> <li>• Opportunities for feedback from a diverse range of staff, including those from underrepresented groups, to ensure their views are heard and considered.</li> <li>• Collaboration with HR and Equalities teams to identify and mitigate any potential impacts on protected characteristic groups.</li> <li>• Monitoring and evaluation of feedback to ensure that any emerging equality issues are addressed promptly and appropriately.</li> <li>• The aim is to ensure that the relocation process is not only efficient but also fair, inclusive, and supportive of the Council's wider equality and diversity commitments.</li> </ul>

### 3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equality groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
<b>3.1 Issues relating to all groups</b> and protected characteristics	<p>Refurbishment plans include accessibility improvements to ensure compliance with the Equality Act 2010.</p> <p>Services are being relocated to central, well-connected locations (Guildhall, Parkside, Pixash), supporting continued access for all community members.</p>	<p>Temporary service disruption could affect vulnerable groups. Mitigation includes clear communication, temporary access arrangements, and phased relocations.</p> <p>Some new locations may initially lack full accessibility features. Mitigation includes planned refurbishments to address these needs.</p>
<b>3.2 Sex</b> – identify the impact/potential impact of the policy on women and men.	<p>Services such as Housing Welfare &amp; Advice and Safeguarding are gender-sensitive and will continue to provide tailored support in new locations.</p> <p>Facilities will include safe spaces for confidential consultations, benefiting both women and men.</p>	<p>Individuals may feel less safe accessing services in unfamiliar locations. Mitigation includes ensuring well-lit, secure environments and proximity to public transport.</p> <p>Ensuring that gender-specific support remains uninterrupted during the move.</p>
<b>3.3 Pregnancy and maternity</b>	<p>New locations will be equipped with accessible toilets and baby-changing facilities.</p>	<p>Pregnant individuals may find it harder to travel to new locations. Mitigation includes ensuring central locations with good transport links and offering remote support where possible.</p>

	Services will continue to support pregnant individuals and new parents, particularly through Housing Welfare & Advice.	
<b>3.4 Gender reassignment</b> – identify the impact/potential impact of the policy on transgender people	<p>Staff are trained in equality and diversity, including gender identity awareness.</p> <p>Confidentiality and dignity in service provision are maintained across all locations.</p>	<p>Individuals may feel anxious about new environments. Mitigation includes inclusive signage, gender-neutral facilities, and staff training.</p> <p>Ensuring private consultation spaces are available to protect identity and dignity.</p>
<b>3.5 Disability</b> – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)	<p>All new locations are being refurbished with accessibility in mind, including physical access (ramps, lifts), sensory considerations, and mental health-friendly environments.</p> <p>Services will continue to offer reasonable adjustments.</p>	<p>New locations currently may not be fully accessible. Mitigation includes prioritising accessibility in refurbishment and providing alternative access arrangements.</p> <p>Busy or unfamiliar environments may affect neurodivergent individuals. Mitigation includes quiet spaces and clear signage.</p>
<b>3.6 Age</b> – identify the impact/potential impact of the policy on different age groups	<p>Youth Justice services will continue to support young people in a safe, accessible environment.</p> <p>Older adults accessing Housing Welfare &amp; Advice will benefit from central, accessible locations.</p>	<p>Individuals may face mobility or transport challenges. Mitigation includes ensuring proximity to public transport and offering phone consultations.</p> <p>Individuals may feel disconnected from services during transition. Mitigation includes youth-friendly spaces and communication strategies.</p>
<b>3.7 Race</b> – identify the impact/potential impact on across different ethnic groups	Services such as Housing Welfare & Advice and Youth Justice are designed to be culturally sensitive and inclusive.	Ethnic minority groups with limited English proficiency may face challenges.

	Staff receive training in equality, diversity, and inclusion, including racial and cultural awareness.	<p>Mitigation includes access to translation services.</p> <p>Relocation may disrupt established relationships. Mitigation includes continuity of staff and community outreach to rebuild trust.</p>
<b>3.8 Sexual orientation</b> – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people	<p>Services are committed to non-discrimination and inclusivity, regardless of sexual orientation.</p> <p>Staff are trained to support LGBTQ+ individuals with sensitivity and confidentiality.</p>	New environments may cause anxiety. Mitigation includes visible inclusion symbols, inclusive policies, and private consultation spaces.
<b>3.9 Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?	<p>Services treat all individuals equally, regardless of marital or civil partnership status.</p> <p>Policies ensure equal access to services for married, single, and civil-partnered individuals.</p>	No specific adverse impacts identified. Continued monitoring will ensure equality is maintained.
<b>3.10 Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	<p>Services respect all faiths and beliefs, including those with no religion.</p> <p>Staff are trained in religious sensitivity and cultural competence.</p>	New locations may not initially have these facilities. Mitigation includes identifying quiet spaces during refurbishment planning.
<b>3.11 Socio-economically disadvantaged*</b> – identify the impact on people who are disadvantaged due to factors like family background,	Services like Housing Welfare & Advice directly support individuals facing financial hardship.	Some may struggle to access relocated services. Mitigation includes offering telephone/online appointments and travel support where needed.



educational attainment, neighbourhood, employment status can influence life chances <b>(this is not a legal requirement, but is a local priority).</b>	Central locations are accessible by public transport, reducing travel costs.	
<b>3.12 Rural communities*</b> identify the impact / potential impact on people living in rural communities	Services remain accessible via public transport from rural areas.	Rural residents may face longer travel times. Mitigation includes outreach services, digital access, and ensuring transport links are considered in planning.
<b>3.13 Armed Forces Community **</b> serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).	Housing and welfare services are aware of the specific needs of veterans and service families.	Staff may not always identify service-related needs. Mitigation includes ongoing training and liaison with Armed Forces Covenant leads.
<b>3.14 Care Experienced ***</b> This working definition is currently under review and therefore subject to change:  In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care,	Youth Justice and Safeguarding services are experienced in supporting care-experienced young people.  Services are trauma-informed and designed to build trust and stability.	Relocation may unsettle care-experienced individuals. Mitigation includes continuity of key workers and trauma-informed transition planning.

kinship care, or a special guardianship arrangement.		
--	--	--

\*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

\*\* The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

\*\*\*The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

## 4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Gaps in accessibility at new locations (e.g., physical access, sensory needs).	Conduct full accessibility audits of Guildhall, Parkside, and Pixash. Implement necessary adjustments during refurbishment.	Accessibility audits completed; Adjustments integrated into refurbishment plans.	Property Services Project Manager	September 2025

Risk of service disruption during relocation, especially for vulnerable groups.	Develop and implement a phased relocation plan with clear communication to service users.	Communication plan published; Phased move schedule agreed.	Service Leads Project manager	September 2025
Potential barriers for socio-economically disadvantaged groups (e.g., travel costs).	Access proposed relocation of Services within Bath based buildings.	Remote access options reviewed and in place.	Project Manager Service Leads	October 2025
Risk of reduced engagement from rural communities	Develop outreach strategy and assess transport links to new locations.	Outreach plan developed; Transport access reviewed.	Community Engagement	November 2025
Lack of inclusive facilities (e.g., gender-neutral toilets, quiet spaces)	Ensure inclusive facilities are included in refurbishment specifications.	Facility designs approved; Construction completed	Projects Manager Service Leads	February 2025
Need for staff training on equality and inclusion in new settings.	Deliver refresher training on equality, diversity, and inclusion, including for frontline staff in new locations.	Training sessions delivered; Staff feedback collected.	HR & Training Manager Service Leads	Ongoing

## 5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's website. Keep a copy for your own records.

**Signed off by:** Richard Holden, Head of Corporate Estate & Development (Divisional Director or nominated senior officer)

**Date:** 12/06/2025