

Full Equality Impact Analysis - LB Hammersmith and Fulham West King Street Renewal / Town Hall Programme

The purpose of this document is to ensure that the major regeneration programme for West King Street/Town Hall is compliant with the Public Sector Equality Duty. The document sets out measures taken to meet the PSED and affected protected characteristics. A key point to note is that this document is a working document and will continuously be revised until the point of completion of works that fall within this programme.

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	Nov 2018
Name and details of policy/initiative/re-structure/re-organisation	<p>The West King Street Renewal (WKSR) / Town Hall programme is a major regeneration programme for the London Borough of Hammersmith & Fulham (H&F). It is set to transform West King Street into a civic, cultural and commercial destination; delivering a new four-screen cinema, commercial space (including affordable business space), 204 homes (of which 52% are affordable homes for local people), café, restaurant and retail establishments, a public events space and the extension and renewal of the Grade II listed Town Hall. In doing so it will transform the way the Council currently operates and delivers its services to residents.</p> <p>To enable the redevelopment of the Town Hall site, there is a requirement to decant approximately 1,000 members of staff from the Town Hall, Town Hall Extension and 181 King Street. The Decant Programme is required to empty the buildings and relocate staff and services to alternative space. The staff involved include those based in the Town Hall and Town Hall Extension, although there will also be some impact on those based at 145 King Street. The Decant Programme will deliver modern, accessible and flexible workplace environments for those moving to the new sites and will seek to improve the existing workplace environment for other staff where possible.</p>
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Date of completion of final EIA	TBC

Section 02	Scoping of Full EIA		APPENDIX 3
Plan for completion	Timing: Resources:		
Analyse the impact of the policy/initiative/re-structure/re-organisation	<p>The purpose of the Equality Impact Assessment (EQIA) is to determine how the WKSR/Town Hall programme will have an impact on, or affect, different groups or communities. It enables the Council to assess whether the impacts are positive, negative or unlikely to have a significant impact on each of the protected characteristics groups.</p>		
	<p>The EQIA reflects the Public Sector Equality Duty (PSED) which highlights three areas in which public bodies must show compliance. The duty states that a public authority must, in the exercise of its functions, have due regards to the need to:</p> <ol style="list-style-type: none"> 1. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act; 2. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and 3. foster good relations between persons who share a relevant protected characteristic and persons who do not share it. 		
	<p>The equality duty is a continuing duty and consideration of equality impacts has taken place throughout the preparation and publication of the WKSR Business Case and Delivery Strategy.</p>		
Protected characteristic	Analysis	Impact: Positive, Negative, Neutral	
Age	<p>The West King Street Renewal Programme will benefit people of all ages by providing a range of amenities that can be enjoyed by all. The cinema and retail, restaurant, commercial space, housing, Town Hall and improved public realm will be designed to accommodate all age groups and meet accessibility requirements as part of a modern, inclusive new build renewal programme.</p> <p>Carer responsibilities for the elderly and children will need to be taken into account, however the flexibility of 'office' based hours within the new ways of working should give such carers certainty of scheduled attendance and the flexibility to work around their carer responsibilities where appropriate.</p>		Positive

		<p>A new, up to date office environment is likely to be attractive to the younger generation (<35). However, research shows that an open office environment is less attractive to the older generation (50+). Profile data published in 2016 shows that 24% of the staff population are older than 55, therefore it will be important to monitor the ongoing impact of the new office environment and make reasonable adjustments where necessary.</p>	APPENDIX 3
	Disability	<p>The West King Street/Town Hall Renewal Programme has been designed in accordance with the latest statutory guidelines on disability access.</p> <p>The design team has engaged regularly with the Disabled Residents' Forum to test design principles and seek guidance on how to deliver the most inclusive and accessible scheme to accommodate the needs of disabled people. This is a particular challenge given the listed heritage assets within the Town Hall, however, the design team continues to identify opportunities wherever possible to maximise accessibility for all. Features include a full Changing Places facility, which will create a more inclusive and accessible Town Hall for disabled people and their carers.</p> <p>In terms of the Decant Programme, carer responsibilities for disabled dependants will need to be taken into account, in addition to individuals with age-related mobility issues. However, the flexibility of 'office' based hours within the new ways of working should give such carers certainty of scheduled attendance and the flexibility to work around their carer responsibilities where appropriate.</p> <p>Access to the new decant sites (and the refurbished Town Hall) will be much improved from the existing buildings, particularly the Town Hall Extension, as the main entrances will be all a) at ground level and b) provide access for all through the same door. Customer services currently based on the first floor of the Town Hall Extension will be consolidated in the existing main customer services centre at 145 King Street, which also benefits from one, ground floor, level access entrance for all visitors.</p>	Positive

		<p>Staff that currently have a workplace assessment for special furniture will have this reviewed as part of the decant move programme as they will require a new assessment in their new location. Within departments, managers will engage with officers to ensure health-related issues are effectively supervised, potentially resulting in self-assessments and preferred desks arrangements. The programme will ensure that new ergonomic chairs are purchased for all Council employees subject to the decant, which are expected to meet the requirements of most specialist chair users, therefore reducing the number of additional chairs required.</p> <p>Likewise, 20% of the work stations will be height adjustable providing multiple users with the opportunity to make reasonable adjustments to their work station easily without the need for a designated desk.</p> <p>Where working remotely, the Council will continue to provide staff with specialist equipment where required. This means that it will be easier for a member of staff to have access to up-to-date IT and DDA-compliant office equipment for use at home as well as in the office. If they choose to use personal equipment for work purposes it will also mean less need to carry equipment between work and home.</p> <p>All these factors will be considered and monitored throughout via staff consultation (HR Change management) and the unions will be consulted and kept informed. It should be noted, however, that the current office accommodation is largely open plan and, therefore, does not represent a significant change for most members of staff.</p>	APPENDIX 3
	Gender reassignment	Both the proposed decant sites provide gender neutral toilets, as will the refurbished Town Hall building, which is expected to have a positive impact for this protected characteristic.	Positive
	Marriage and Civil Partnership	As part of the West King Street Renewal Programme, the redesign and consolidation of the Council's services will benefit the community as residents will benefit from new facilities and the added event space for ceremonies within the Town Hall.	Neutral

		No further impact on this protected characteristic is expected as a result of the WKSR / Town Hall Programme.	APPENDIX 3
	Pregnancy and maternity	<p>HR holds pregnancy and maternity data on an individual basis and a workstation assessment is generally triggered by the individual.</p> <p>The decant programme and Town Hall refurbishment will give consideration to providing facilities for expressing milk and its storage within the new/refurbished office areas.</p> <p>All these factors will be considered and monitored throughout via staff consultation (HR Change management) and the unions will be consulted and kept informed.</p>	Neutral
	Race	No specific impact on this protected characteristic is anticipated as a result of the WKSR / Town Hall programme.	Neutral
	Religion/belief (including non-belief)	Space for reflection, meditation and prayer will be provided on both decant sites, as well as in the refurbished Town Hall. This is therefore expected to have a positive impact on this protected characteristic.	Positive
	Sex	No specific impact on this protected characteristic is anticipated as a result of the WKSR / Town Hall programme.	Neutral
	Sexual Orientation	No specific impact on this protected characteristic is anticipated as a result of the WKSR / Town Hall programme.	Neutral
	Socio-economic factors	<p>Although 'new ways of working' is promoted as a staff benefit, to enhance work/life balance, the potential economic implications (perceived as 'cost-transfer') on staff are acknowledged if staff are working from home rather than working remotely in an alternative location. These could be:</p> <ul style="list-style-type: none"> • Increased travel costs (offset by decreased travel costs) • Increased utility costs (offset by choice of working in the office) • Increased cost of using personal telephones (offset by using Skype) 	Neutral

		<ul style="list-style-type: none"> • Outlay on appropriate furniture & ICT equipment (offset by the option to work in the office/new ICT rollout) • Outlay to install broadband (offset by choice of working in the office or other public locations where Wi-Fi is available e.g. coffee shops, libraries etc.) <p>Additionally, from a social perspective, there may be staff that are unable to work at home due to environmental issues, including:</p> <ul style="list-style-type: none"> • lack of suitable space • potential over-crowding • other familial work patterns. <p>Staff will be encouraged to consider working in a more agile way, for example from alternative locations (e.g. other Council sites, the local library, coffee shops, drop in centres etc.) Space will also be available for staff to work in an office location if they choose to.</p> <p>All these factors will be considered and monitored throughout via staff consultation (HR Change management) and the unions will be consulted and kept informed.</p>	APPENDIX 3
	<p>Human Rights or Children's Rights If your decision has the potential to affect Human Rights or Children's Rights, please contact your Equality Lead for advice</p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998? No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? No</p>		

Section 03	Analysis of relevant data Examples of data can range from people profile reports, management reports, departmental equality data, data from the Human Rights Commission. Data should where possible, be disaggregated by different equality strands. Read guidance for rules on confidentiality.
Documents and data reviewed	The following documents and data have been used to help inform this Equality Impact Analysis: Equality Framework for Local Government (EPLG) 2018 Hammersmith and Fulham Equality Objectives and Measures 2018-2020 Local Plan 2018 Statement of Community Involvement (SCI) 2015 The Disabled People's Commission – Co-Production Statement
New research	Not required.

Section 04	Consultation
Consultation	<p>The Disabled People's Commission (set up in December 2015 by the Leader of Hammersmith and Fulham Council) consists of 10 disabled people who live in Hammersmith and Fulham. They work closely with the Council and other partners to look at barriers experienced by local disabled people in a strategic and planned way and were commissioned to ensure the WKSR scheme was designed to be inclusive and accessible for disabled people.</p> <p>The Commission produced a Co-Production Statement (in collaboration with the Council, the Design Team, Barton Willmore, Proudlock Associates and Rogers, Stirk, Harbour and Partners), which provided a record of the active pre-application engagement and inclusive design discussions in relation to the West King Street Renewal programme. The Co-Production Statement is a 'live document' which provides detailed examples of the inclusive design discussions that have taken place, how Disabled Residents' Team (DRT) comments have been reviewed and incorporated into the proposals and reflects on the successes and challenges of the process. The Co-production is focused on meaningful engagement at an early stage to ensure inclusive design principles are considered as part of the evolution of the development proposals, with the end goal of delivering a fully accessible development for all.</p>

The project Design Team comprises representatives from LBHF and A2Dominion as clients with an appointed technical design team comprising RSH-P (lead architects), Barton Willmore (planning and environmental planning consultants), Instinctif (communications / PR), TPP (highways consultant), Proudlock Associates (access consultant), Gillespies (landscape consultant) and Olsson (fire consultant).

The Commission listened to many disabled (and non-disabled people) and looked at lots of information and examples of co-production. Most of the time disabled people are not given the chance to take part or start important policy work from the beginning. For this reason, a lot of policy does not benefit disabled residents as well as it could.

LBHF prepared a development brief for the DRT on the 24 October 2017 and a series of introductory meetings followed. The Design Team provided the DRT with a background to the West King Street Renewal project, described the proposals, including detail on the residential, Town Hall, parking and public realm elements and explained the scheme evolution to date. The DRT decided that due to time pressures it would form a smaller working group to attend the design workshop meetings. It was also agreed that the DRT would consider a list of key issues to assist in the preparation of agendas and material to present.

On 19 December 2017 an initial meeting was held at Hammersmith Town Hall between the DRT, LBHF officers and LBHF Councillor Andrew Jones (Shepherds Bush Green Ward) and the Design Team. Councillor Andrew Jones and the DRT set out their roles and desire to co-produce plans for the West King Street Renewal development to ensure the highest standard of inclusive design.

The DRT Workshop meetings took place every 3 weeks in Hammersmith Town Hall, which was facilitated and supported by an officer from LBHF and documented by Barton Willmore. Regular design updates were given by RSH-P at the start of each meeting and it was agreed that the DRT would treat the proposals as confidential as pre-application discussions were not normally public. Meetings were held on:-

- Workshop #1 (Town Hall): 10 January 2018
- Workshop #2 (Highways and Public Realm): 12 February 2018
- Workshop #3 (Residential and Other Uses): 21 February 2018
- Workshop #4 (Draft Access Statement and Matters Outstanding): 14 March 2018

As a result of the workshops, the summary below sets out what the final scheme has achieved:-

- ⇒ An inclusive environment that reflects many aspects of best practice has, in principle, been accommodated and some of the key features in support of this are given below:
- ⇒ A Changing Places Facility is provided very near to the main entrance to the Town Hall, which has level access from any part of the development and semi-automated / power assisted entrance doors;
- ⇒ Approaches, communal circulation and interiors of the residential dwellings are designed to at least meet the required category of housing, with 90% meeting M4(2) and 10% M4(3) standards. The requirement states 10% need to meet M4(3) standards.
- ⇒ In the detail of the M4(3) and M4(2) standards, these are exceeded in many key parts, including wheelchair storage being provided near the front doors and the entrance doors and circulation doors exceed the required widths.
- ⇒ The wheelchair accessible/adaptable (M4(3)) units are dispersed across the residential blocks in terms of location, being on different levels. They are also located in different parts of the block, and are near to at least one lift. In addition, they are provided across all tenure types (and although tenure types are generally associated with different blocks, the affordable dwellings are divided between Block A and Block C). These measures allow for a greater choice for disabled residents when it comes to choosing a home in terms of not only tenure but views, access to amenities, proximity to transport, access to the high street for example - which are just some of many important considerations to endeavour to offer.
- ⇒ Standards for the spaces outside private dwelling entrances are provided or exceeded for all units, including at least 1500mm circulation outside M4(3) units.
- ⇒ Steps and ramps have been designed out of all primary access routes in the landscape.
- ⇒ Approaches to homes and entrances do not differ where they serve wheelchair accessible dwellings, but meet the higher standards everywhere. This includes the approach paths.
- ⇒ Dual lift access is best practice under the London Plan, and provided in Block C.
- ⇒ Within the larger (private) part of Block A the best practice standard is exceeded as there are three lifts.

⇒ Car parking provision commits all the available spaces to an accessible standard.

⇒ Adapted cycle spaces and spaces for mobility scooters can be provided within cycle stores, where space has been created in each. This is a helpful addition for families and disabled people; deaf-blind people may use a tandem for example and many mobility-impaired people use scooters. These provisions being made are also useful for independent tricycle riders including those with balance issues. These are not required by regulation or standards but best practice to provide.

Through engagement with the DRT, the Design Team have gained a more detailed insight into the different disabilities of the wider community who will be accessing the Town Hall, the challenges they face and their expectations in terms of their access requirements. The DRT have played an important role at Workshop meetings in raising their concerns and questioning the design rationale to ensure that inclusive design considerations for access points and disabled parking layout, for example.

The process has challenged the Design Team to go beyond the relevant Building Regulations and industry standards in achieving inclusive design and finding design solutions that enhance accessibility but does not compromise design quality.

Overall, the DRT Workshops have ensured that the proposed WKSR programme will achieve a high design quality and will be an inclusive and accessible development for all. The comments from the DRT have been incorporated into the development proposals where practical and feasibly possible subject to design, access and other associated considerations. This process has ensured a robust and comprehensive scheme has been prepared and includes early detailed design consideration for inclusive design that are typically responded to in detail post-planning submission during and after public consultation.

Analysis of consultation outcomes

The design team has actively engaged Disability Planning Forum and members of the Disabled People's Commission (a key stakeholder group) using the Council's new co-production approach to planning for the West King Street development. Where relevant the results of this engagement will be applied to design ideas in the proposed decant sites. Consultation with the group will continue throughout the project.

Engagement with the Trade Unions to discuss the relocation and associated matters will commence in late 2018.

Section 05	Analysis of impact and outcomes
Analysis	<p>Co-production has fostered a sense of ownership in the development process due to the increased active participation from the DRT. Members have had the opportunity to attend design Workshops and provide their comments, whilst seeing the direct impact on the scheme. The Co-production process and circulation of design material and responses by the Design Team has provided a written record of how the design of the scheme has evolved and response to their comments. This has provided reassurance to DRT members that their inclusive design comments have been heard and actioned.</p> <p>The Workshops have allowed the DRT to become more involved in early planning discussions, freely offer their experiences and provide design comments that would enhance accessibility of the scheme.</p>

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	<p>The equalities impact analysis of the West King Street/Town Hall Renewal Programme has found that in general, there is unlikely to be any potential unlawful discrimination against protected groups associated with the implementation of the programme. However, the Council welcomes comments from the public and other stakeholders on the findings of this equalities impact analysis.</p> <p>The analysis has shown that not all protected characteristics will be affected in a similar manner by the development and that generally, the redevelopment will have a positive or neutral impact upon all protected groups and characteristics and will improve the overall quality of life among people in these groups. The WKSR programme is unlikely to adversely impact upon Human and Children's rights.</p> <p>The Council will take the following actions to promote its equalities duties:</p> <ul style="list-style-type: none"> • it will monitor the issues raised in this report on an ongoing basis. Potential issues that may adversely impact on the protected characteristics will be reported and a statutory review will take place to help resolve these issues; • it will provide people with an opportunity to comment on the EQIA; and • it will monitor the development of equalities legislation and associated case law to help ensure that the Council remains legally compliant.

Section 07	Action Plan	APPENDIX 3
Action Plan	N/A	

Section 08	Agreement, publication, and monitoring	
Chief Officers' sign-off	Name: Position: Email: Telephone No:	
Key Decision Report (if relevant)	Date of report to Cabinet/Cabinet Member: 03/12/18 Key equalities issues have been included: Yes	
HR Business Partner	Name: Position: Date advice / guidance given: Email: Telephone No:	