

Due Regard Statement re: Gloucestershire Archives' policies, September 2021.

Please use this statement to evidence how 'due regard to' the three aims of the public sector equality duty has been made (section 149 of the Equality Act 2010) during the development of the 'policy'.¹

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited by the ACT;
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- Foster good relations between people who share a protected characteristic

Name of the 'policy':	All of the policies relevant to the service delivered by Gloucestershire Archives at Gloucestershire Heritage Hub. For a list of these, and to read them, please go to www.goucestershire.gov.uk/archives
Person(s) responsible for completing this statement	Sally Middleton Community Heritage Development Manager
Briefly describe the activity being considered including aims and expected outcomes	All of Gloucestershire Archives' policies were revised in September 2020, and such revisions will be undertaken every 3 years. Minor amendments were made to some of the policies, and a link to the policies was sent to stakeholders and partners, asking for comments, by way of public consultation. Since the last due regard statement was written (in 2019), GAMT has adopted 2 new policies – on the use of CCTV onsite, and on unacceptable behaviour. The policies are underpinned by GCC corporate frameworks, such as the safeguarding and complaints procedures. The Gloucestershire Archives' suite of policies have been agreed by GAMT (Gloucestershire Archives Management Team), and written by members of GAMT, following best practice.

¹ For 'policy': any new and existing policy, strategy, services, functions, work programme, project, practice and activity. This includes decisions about budgets, procurement, commissioning or de-commissioning services, service design and implementation.

The purpose of the policies is to guide and inform what we do; and to make explicit what we will do in all areas of activity. The policies make explicit the values behind the delivery of the service.

The policies are written in plain English, and can be accessed 24/7 on the website at www.gloscestershire.gov.uk/archives

The policies pay regard to national legislation (eg. GDPR) and sector guidance (e.g. the National Archives policies)

Documenting use of sufficient information

Please document below the data and information sources that you have used to understand the needs, participation and experiences of each protected group. Evidence must be gathered as the policy is developed and used to inform decisions.

Service user data

Service user data is an important source of evidence and should be collated as part of routine monitoring of in- house or external services. If service user data is not available record 'not known' and use the action plan to identify what improvement actions will be used to gather data going forward.

[Service user diversity reports](#) are available on our website and give an indication of service user participation across commissioning areas, for example adult residential services and youth services. It does not include participation data at individual service level.

Needs analysis

[Gloucestershire population demographics](#) data is available to understand the representation of different protected groups across the county and help with needs analysis. Data like this may also be useful for benchmarking to identify under or over representation of a service by any of the protected groups. For example, a service is open to all residents and from monitoring you know that 2% of service users are disabled: However, demographic data indicate that 16.7% of Gloucestershire residents report having a disability or long term limiting illness. This finding can be used to explore if there are barriers to participation by residents with disabilities and how this can be addressed as part of the development of your 'policy'.

Data gaps

You may find that you have more information about some of the protected groups for example, gender, age, disability and less about others, for example, sexual orientation and religion and/or belief. If data is not available and you intend to start collating data about a protected characteristic please use the action plan to outline how this data will be collated. You can find equality monitoring guidance on our [website](#) including an equality monitoring template.

If you have no plans to start collating data about a protected characteristic please state the rationale why.

Service information (if applicable) or Needs analysis (if applicable)

Who is responsible for delivering the service?	Gloucestershire Archives, part of GCC's Policy, Performance & Governance.
Service user data/Needs analysis information	
Age	From documented and anecdotal evidence, customers are largely older people, especially the over 65's (i.e. post-retirement). We know that the proportion of older people in the Gloucestershire population is above the national average, owing to inward migration by older people, and that we need to make adequate provision for them.
Disability	There is a higher incidence of age related disability amongst our largely older customer base, including mobility issues, and sensory impairment. Gloucestershire Archives has sought advice on making its remodelled public space user friendly for older people, and in particular dementia-friendly. A number of staff have received Dementia Awareness training. In 2021, there is a planned access audit of our premises by a disability access consultant. All reasonable adjustments will be made, in line with legislation.
Sex	We know from previous customer surveys that historically we have slightly more female than male user. However, the most recent survey shows that there are marginally more male than female users.

Race (including Gypsy & Traveller)	Not known. Since 2016-17, Gloucestershire Archives has worked with at least 4 black and Asian community groups, supporting some of them to participate in the Gloucester History Festival in 2020, and in 2021. In 2018-19, a volunteer enhanced the metadata included in the online catalogue so that searches could be made for items relevant to the search term "Black history", making the collections more accessible to contemporary audiences. In 2021, a trainee archivist researched and wrote a guide to black history resources and catalogue references in our collections. In our most recent customer survey, April-May 2021, 96% of our users / volunteers described themselves as white.
Gender reassignment	Not known – data not routinely gathered. We know, in the last 5 years, we have had one or two trans customers, and staff have been advised as to the correct pronouns to use and the fact that some trans individuals prefer the title, "Mx", rather than Miss, Mrs, Ms or Mr.
Marriage & civil partnership	Not relevant.
Pregnancy & maternity	Not relevant, although we did receive a query, in 2019-20, from an expectant mother asking if she could bring her new-born baby to the Heritage Hub, and we informed her that all children were welcome, whatever their age. As a result, we have identified a quiet, private space available for breastfeeding, and would support parents with young children, meeting their needs wherever reasonable.
Religion or Belief	Not relevant, although we are actively trying to increase the number of accessions from various religious groups not only the Church of England, so that our collections are more representative.
Sexual Orientation	Not known – data not routinely gathered, although we do have information online (e.g. an online exhibition) which will be of particular interest to people who may identify as LGBTQ+.

Other information

The policies formed part of Gloucestershire Archives' successful submission for reaccreditation by The National Archives, in November 2020.

We log and monitor all instances of complaints, comments and compliments, and some of these may well have an impact on policies or written guidance. For example, in 2021, a customer reported that they felt upset at reading the challenging contents of some of our documents. As a result, we uploaded FAQs to our website on this phenomenon, which is known as “vicarious trauma.” Staff training on this phenomenon is pending.

Workforce data

Please document details of GCC staff only if they will be affected by the proposed activity. This could include GCC staff transferring under TUPE to a new service provider, relocating, employment at risk. **GCC [Workforce diversity reports](#)** are available on our website.

If the proposed activity does not affect GCC staff, please state ‘Not affected below’.

Total number of GCC staff affected	
Age	Not affected
Disability	Not affected
Sex	Not affected
Race (including Gypsy & Traveller)	Not affected

Gender reassignment	Not affected
Marriage & civil partnership	Not affected
Pregnancy & maternity	Not affected
Religion or Belief	Not affected
Sexual Orientation	Not affected

Consultation and engagement

List all types of consultation that has taken place during the development of this activity. Include on-line consultations, events, meetings with stakeholders, community events, employee consultation exercises etc

Service users	Policies, as and when reviewed and / or amended (at least every 3 years) are posted online, and links sent to partners and stakeholders for comment; the last time this was done was in October 2020. Public consultation is welcomed, and is an integral part of our policy reviews.
Workforce	Subject specialists have worked directly with the Archives Management Team to review and rewrite the policies, September 2020.
Partners	Policies were available online, in draft form, for comment, in October 2020. Members of the Heritage Hub User

	Group were specifically invited to comment.
External providers of services	Policies are all available to view online, and comments are always welcome. Copies of the policies were sent to South Gloucestershire Council, with whom Gloucestershire Archives has an SLA, for consultation and sign off in November 2020. Also to the diocese, one of major depositors of archives.

Equality analysis: Summary of what the evidence shows and how has it been used

This section will allow you to outline how the evidence has been used to show 'due regard' to the three aims of the general equality duty. It is important that this consideration is thorough and based on sufficient information. Consideration should be relevant and proportionate.

- Eliminate discrimination
- Advance equality of opportunity
- Promote good relations..

Protected group	Challenge or opportunity considered and what we did
Age(A)	The majority of our customers are aged 65+ and the policies do not discriminate in terms of age, although we expect that new volunteers may be younger people and those customers accessing the virtual Hub may well be younger (e.g. working age adults or children and young people)
Disability (D)	We are actively removing barriers around access for disabled people. Our volunteering policy makes it clear that volunteering is for everyone. Our commitment to this means that we will not only make reasonable adjustments to accommodate disabled people, but will look to actively recruit them. The policies have a positive impact on disability. In 2019-20, we set up a regular work experience opportunity for students with disabilities from the National Star College.
Sex (S)	We know that our user group is fairly evenly split in terms of the number of females and males, with slightly more female customers than males. The policies have a neutral impact on sex.
Race (including Gypsy & Traveller)(R))	We are actively engaging with people from BAME groups. The policies have a neutral impact on race, although we realise that our collections are very much about white communities and are seeking to address this in various ways (e.g. through our learning and outreach policy). In the run up to Gloucester History Festival 2020, and 2021, Gloucestershire Archives worked with several

	Black and Asian community groups, including offering practical support for one group so that they could successfully contribute to the Festival and beyond, as well as mentoring for other groups.
Gender reassignment(GR)	The policies have a neutral impact on gender reassignment.
Marriage & civil partnership (MCP)	The policies have a neutral impact on marriage and civil partnership.
Pregnancy & maternity (PM)	The policies have a neutral impact on pregnancy and maternity.
Religion and/or Belief (RAOB)	The policies have a neutral impact on religion and / or belief. The Collecting Policy is specifically designed to address areas of society not currently represented in GA's collections. GA will actively seek to acquire collections other than Anglican and non-conformist which are well represented in GA's collections.
Sexual Orientation(SO)	The policies have a neutral impact on sexual orientation. The Collecting Policy is specifically designed to address areas of society not currently represented in GA's collections. GA will actively seek to acquire collections representing the LGBTQ+ community.

Strengthening actions: Planning for further improvements

Please outline here what actions are required for further improvements to address challenges or opportunities, for example:

- Arrangements for continued/new engagement with stakeholders, staff, service users
- Plans to close data gaps across any of the protected characteristics through reviewed contract management arrangements
- Identify other plans already underway to address the challenges or opportunities identified in this statement
- Share findings with partner organisations.

If none, state 'none' below.

Action Plan

Action	Who is accountable	Time frame
None.	N/A	N/A

Monitoring and Review

Please indicate what processes/actions will be put in place to keep this 'activity' under review. For example will progress be monitored/ reported to a board, scrutiny committee, project board etc

All policies will be revised every 3 years. Heather Forbes (Head of Archives) will be responsible for this, along with colleagues in the Gloucestershire Archives' Management Team. The next review is due in 2023, with further reviews every 3 years thereafter.

Sign off and Scrutiny

By signing this statement off as complete you are confirming that 'you' have examined sufficient information across all the protected groups and used that information to show due regard to the three aims of the general duty. This has informed the development of the activity

Senior level sign off: 	Date: February 4 th 2022
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I am in agreement that sufficient information and analysis has been used to inform the development of this 'activity' and that any proposed improvement actions are appropriate and I confirm that I as the decision maker have been able to show due regard to the needs set out in section 149 of the Equality Act 2010.

Name of relevant Portfolio Holder/Cabinet Member: N/A	
Signed by Portfolio Holder/Cabinet Member:	Date:

Publication

If this statement accompanies cabinet paper it will be published as part of the cabinet report publication process. Statements accompanying cabinet reports are also published on our website. If this statement is not to be submitted with a cabinet paper please maintain a copy for your own records that can be retrieved for internal review and also in case of future challenge.