Consultation on proposed changes to the new customer centre at the Lambeth Civic Centre

Consultation Report October 2020

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1. Introduction

1.1 Background

The Civic Centre face to face service has been closed due to COVID-19. Prior to the closure, people using the service told us that the Civic Centre was too noisy, too open, and that it was difficult to know where to go. The large number of visitors also made it difficult for us to provide a consistently high quality of service for those who most needed our help. During lockdown, the council introduced ways for residents and businesses to make contact without the need to visit, mainly through telephone, video calls, and emails. We are also investing in our website and improving our call centre so that it is becoming easier for customers to get the information and services they need quickly. Continuing to provide more services via the website and telephone will help save the council money that it can reinvest in other services.

1.2 Our proposals

The closure of the face to face service has provided an opportunity to develop proposals to provide a new face to face service specifically for those who cannot, or who find it very difficult to access council services online or by phone. Our proposal was that the new face to face service would be provided specifically for those who:

- Find it very difficult or impossible to access council services via the web or phone and need one to one support, for reasons such as English not being their first language, mental health conditions, learning difficulties, sensory or speech impairment, do not have computers or scanners at home, or need help to use them or are at risk of homelessness
- Have an appointment with a council service

This will enable the service to provide a high quality and personal approach for a smaller group of customers than before.

The plans to redesign the ground floor of the Civic Centre and invest in staff and technology are intended to provide:

- A welcoming, safe and calm environment
- Clear communication and signage about how we do things
- Improved privacy for customers
- Highly trained staff who will provide an excellent quality of customer care and respond well to a variety of individual needs
- Improved technology to enable customers to use services easily
- A space that meets the needs of those with impaired mobility
- A space that ensures the safety of customers and protection against the spread of viruses

2. The consultation

2.1 Consultation objectives

The objectives of the consultation were to tell people about our plans and provide a range of opportunities for people to have their say.

In line with the Public Sector Equality Duty we made particular efforts to reach those people who are protected under the Equality Act 2010. The Equalities Impact Assessment (EIA) prepared prior to consultation, emphasised that the new service is specifically targeted at vulnerable residents and that there should be a positive impact on those people who will need to use the service.

Due to current COVID-19 restrictions, we were constrained in our opportunities for face to face engagement but have used a range of other methods to reach out and engage.

2.2 Who we consulted

Our aim was to reach and gather views on the proposals from:

- Those people who are the expected beneficiaries of the service when the building reopens, namely those who find it very difficult or impossible to access council services via the web or phone and may need one to one support
- Those people who might have expected to continue to receive face to face services but who will in future be encouraged to access services online or on the phone.

We reached out to those on the Council's communications contact lists, to GPs and healthcare settings and to the following external groups and teams within the council:

Group/Team	Lambeth/ External	Specialist need
Age UK	External	Older people
ARCS	External	Children with autism/ADHD
Autism lead	Lambeth	Autism
Bright Centres	External	Young people and Somali speakers
Care Leavers	Lambeth	Care Leavers
Children's centres	Lambeth	General
Commissioning Manager, Youth and Play Services	Lambeth	Young people
Disability Advice Service Lambeth	External	People with disabilities
Friends of the Horn Foundation	External	Somali community
High Trees Community Development Trust	External	Anchor organisation in Tulse Hill
Indoamerican Refugee & Migrant Org.	External	Refugees and migrants from Latin America
Lambeth SEND team	Lambeth	Parents of children with SEND needs
Lambeth Forum Network	External	Residents
Lambeth Made	Lambeth	Young people
Lambeth Pensioners Action Group	External	Elderly

Group/Team	Lambeth/ External	Specialist need
Leap parent champions programme	Lambeth	Parents of 0-5s in Vassall, Stockwell, Coldharbour, Tulse Hill wards
Respeito	External	Portuguese speakers and those experiencing domestic violence
Sensory Impairment lead	Lambeth	Sensory impairment
Sheltered Housing	Lambeth	General
SHP, refugee support agency	External	Refugees
Solace Women's Aid	External	General
St Matthews Project	External	Young people
Stockwell Partnership	External	Stockwell residents - also Portuguese speaking communities
Streatham Academy	External	Young people and Somali speakers
Streatham Youth and Community Trust	External	Young people
We Are 336	External	Hub for disability groups
Schools	Lambeth	General
Young people	Lambeth	General
Youth Council lead	Both	Young people
Learning Disability Assembly	External	Learning Disabilities

2.3 When we consulted

The consultation ran between 26 August and 7 October 2020

2.4 How we consulted

2.4.1 Press activity

There was no specific press activity

2.4.2 Digital activity

Residents and service users were directed to the online survey, accessed through the consultation section on the Council website. The survey was available in English as well as the fourteen other most used languages in Lambeth. It was also available in an easy-read version. This was promoted via:

- Emails to residents and support groups as outlined above
- Raising awareness amongst colleagues who provide support to vulnerable residents and encouraging them to promote it through word of mouth
- Posters advertising the online consultation, placed at the Civic Centre and in the borough's libraries.

Due to COVID-19 restrictions, some activities that would have been carried out in person took place digitally. These included:

• Two 'virtual drop-in sessions', hosted on Microsoft Teams, promoted via email

- Members of the team attending approximately 15 virtual events hosted by groups, including Lambeth Learning Disability Assembly, Disability Services Lambeth, and a support group for care leavers
- Many other calls and email exchanges were had with support groups and colleagues (approximately 10), particularly those who support young people and those with neuro disabilities

2.4.3 Print activity

Paper copies of the survey were distributed to all Lambeth libraries as well as the Civic Centre. Posters promoting the survey were placed in libraries and the Civic Centre (see above).

2.4.4 Event activity

Despite the Covid-19 restrictions 2 socially-distanced walk-throughs of the space took place on 17th August and 17th September, attended by 7 people.

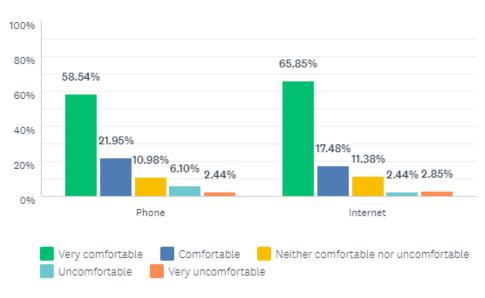
3. Responses from members of the public

3.1 Summary of results

We received 272 responses to the questionnaire. 252 were completed online and 20 on paper. Responses to individual questions are set out below:

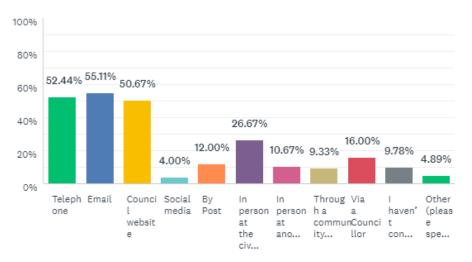
3.1.1 How comfortable are you using the phone and the internet?





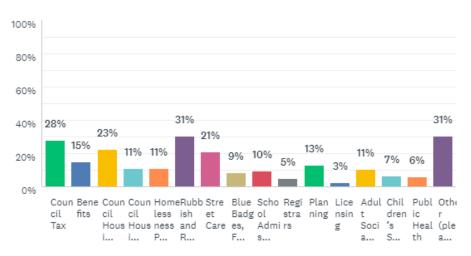
3.1.2 In what ways have you contacted Lambeth Council in the last 12 months?

Answered: 225 Skipped: 47



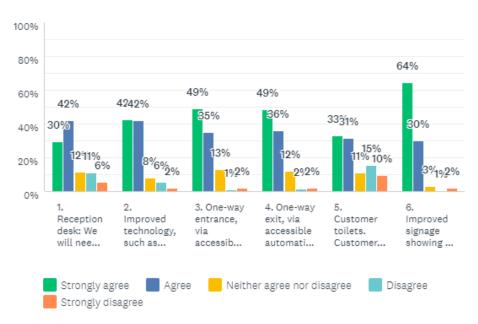
3.1.3 If you have contacted the Council in the past 12 months, please tell us which service/s you contacted us about

Answered: 200 Skipped: 72



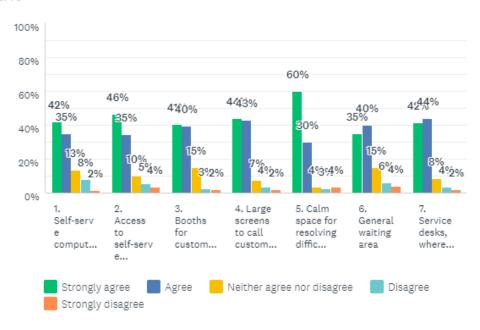
3.1.4 To what extent do you agree that the following design changes support our objective to achieve a better experience for our customers?

Answered: 202 Skipped: 70



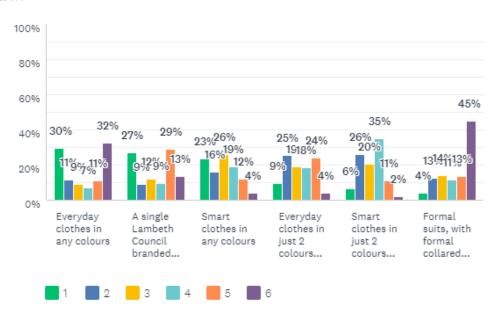
3.1.5 To what extent do you agree that the following design changes support our objective to achieve a better experience for our customers?

Answered: 196 Skipped: 76



3.1.6 Please tell us your preferences for how the council staff that serve you should dress, where 1 is your highest preference, and 6 is your lowest preference

Answered: 158 Skipped: 114

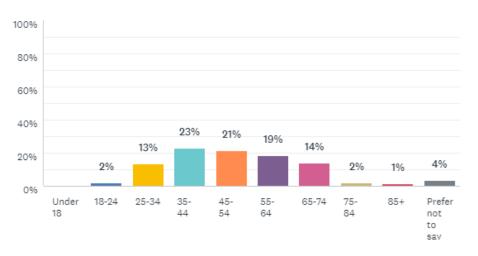


3.2 Summary of post code analysis and demographics

80% of all respondents live in Lambeth. Of the 20% who do not live in Lambeth, just under half work for Lambeth Council, with just under one third working for a voluntary or community organisation. Specific demographic information is provided below.

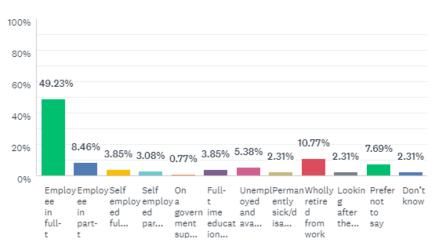
3.2.1 Which age group applies to you?

Answered: 135 Skipped: 137



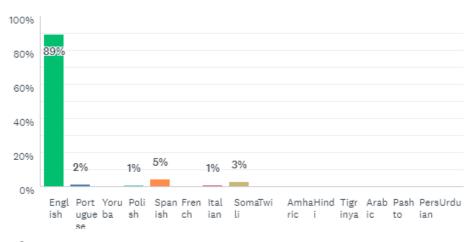
3.2.2 Which of these activities best describes what you are doing at present?

Answered: 130 Skipped: 142



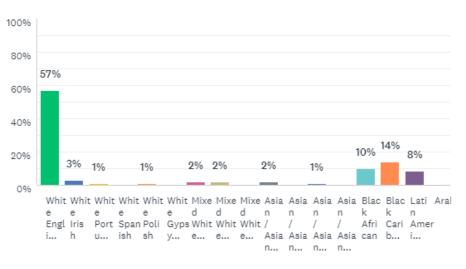
3.2.3 What is your main language?

Answered: 132 Skipped: 140



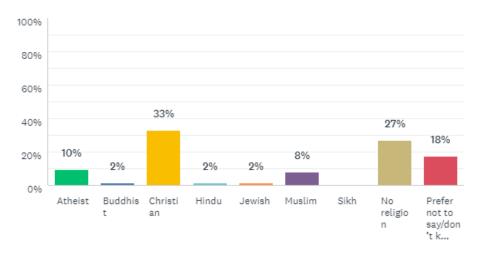
What is your ethnic group?

Answered: 109 Skipped: 163



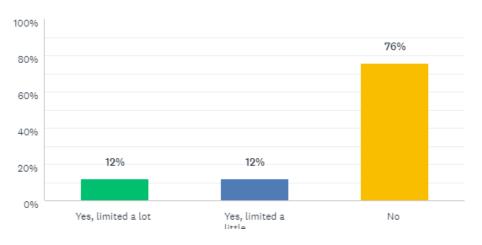
3.2.5 Which of these best describes your religion?

Answered: 125 Skipped: 147



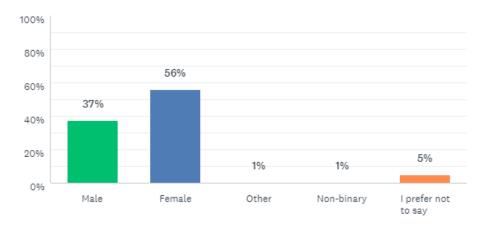
3.2.4 Are your day to day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? Please include problems related to old age

Answered: 133 Skipped: 139

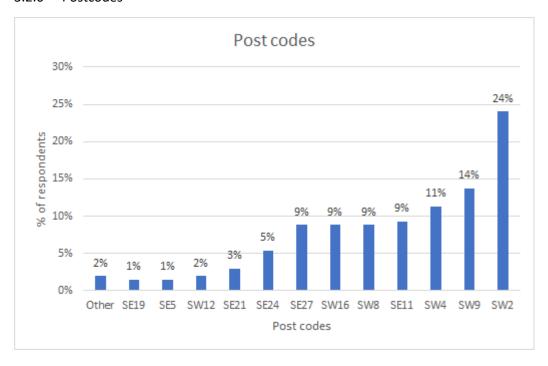


3.2.5 What is your sex or gender identity?

Answered: 134 Skipped: 138



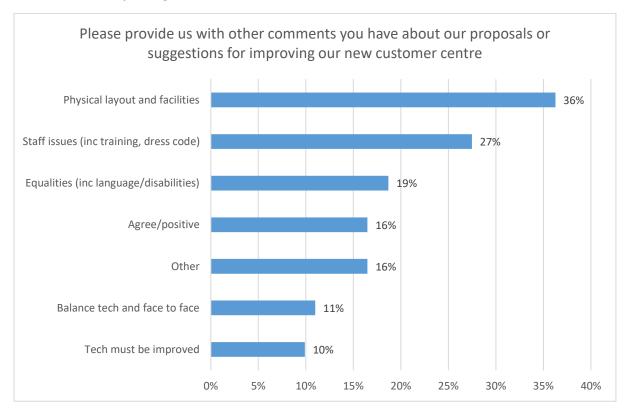
3.2.6 Postcodes



3.3 Additional comments

Outlined below are the responses to the three questions which invited responses as free text. Not everyone who responded to the survey answered these questions. The responses have been grouped thematically.

3.3.1 'Please provide us with other comments you have about our proposals or suggestions for improving our new customer centre'



91 people provided a response to this question

Physical layout and facilities

When asked for other comments about the proposals most (36%) focused on the physical layout and facilities. These comments included the need for more seating for people, particularly older and disabled residents as well as being user friendly for wheelchair users, those with visual or hearing impairments and people with autism. People were concerned about the space being too big and open, and the colours being too bright, however others suggested the colours were 'cold' and 'dreary'. Other people questioned if the screens were big enough for all users to see and if there was appropriate space for private or difficult conversations. Some also mentioned the need for better signage.

'Colleagues in the staff disability forum have mentioned that the current layout isn't as user-friendly as we believed for wheelchair users, visually and hearing impaired people, people with autism etc (multicoloured and crowded). I know these are the kinds of things we're hoping to design out'

Other people mentioned specific concerns over Covid -19, specifically the need to for Perspex screens and questioning the fact that there was no mention of sanitising stations and surfaces.

Staffing issues

Around a quarter (27%) of responses mentioned staffing issues. In the main, these related to the need to have enough staff and floor walkers around who are welcoming and knowledgeable and able to help customers on all areas of council business. People commented on the need for good communication skills including in different languages.

Equalities (including language/disabilities)

19% of comments raised equalities issues which were predominantly about catering for people who speak different languages both in written communications and on the phone or in person. This chimes with the comments picked up in relation to the need for staff to have good communications skills in relation to non-English speakers. Other comments were about ensuring the building was suitable for older people and those with disabilities, some also mentioned the requirement of people who were not comfortable with technology, in particular with reference to the self-service points. These comments reinforced those made in relation to the physical layout and facilities.

Other comments mentioned the need for booking in face to face appointments or to book a time when interpreters can be present.

Some people felt it was important for staff to be easily recognisable, and easy to identify. This seemed to be more important than what it was they were wearing.

Other

Other comments contained some very specific requests such as asking if we could do preassessments with people to find out their needs before they came to the civic centre and asking if vulnerable residents could be escorted to the Civic Centre by an advocate.

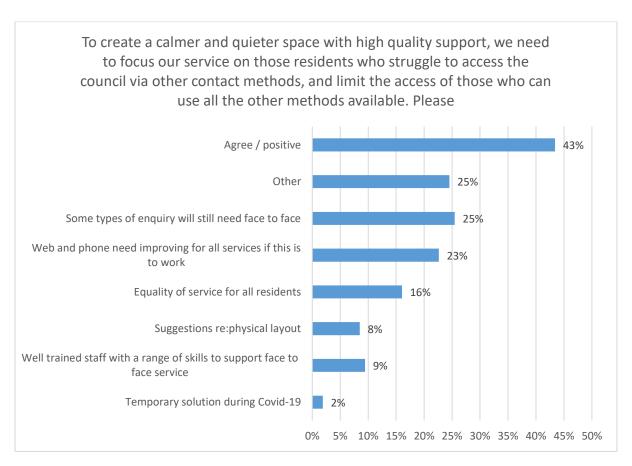
Balance technology and face to face

Just over one in ten (11%) of comments highlighted the need to balance face to face customer service with technology. While there was some support for the principle that those who could use technology should do so to free up resources this was qualified by the observation that the other avenues of communication must be of a good quality.

Technology must be improved

One in ten (10%) of comments also highlighted the need for technology to be improved for this model to be successful. This was focused on increased usability of the website, the introduction of a virtual chat function and making it easier to get through on the telephone.

3.3.2 'To create a calmer and quieter space with high quality support, we need to focus our service on those residents who struggle to access the council via other contact methods, and limit the access of those who can use all the other methods available. Please tell us your thoughts on this.'



106 people provided a response to this question

When asked their thoughts on our need to focus our service on those residents who struggle to access the council via other contact methods, and limit the access of those who can use all the other methods available nearly half of the comments received (43%) were generally supportive. Many of these simply agreed whereas others contained caveats which will also be covered below.

Other

Around a quarter (25%) of responses included very specific suggestions not included in the other categories, these included:

- Splitting services that required a more sensitive approach such as social services and temporary housing, from more transactional services.
- The changing nature of people's lives requiring flexibility of services
- Allowing other ways of having real time conversations with staff.

Some types of enquiry will still need face to face

Around one in four (25%) expressed that there would always be a residual need for face to face contact. These were generally because of a need due to a complex or sensitive issue or as a last resort if the situation could not be resolved by other means.

Web and phone need improving for all services if this is to work

Similarly, around a quarter (23%) of comments suggested that the website and phone services would need improvement for this model to work. A number of respondents stated that they felt the current customer services offer is not good enough, that they are unable to find the right information online or the correct form. Others mentioned the response times were too long or stated that the options on the phone were not good for people for whom English is not their first language.

Some mentioned coming in in person was a last resort after failing to get their issue resolved through online or on the phone.

Equality of service for all residents

16% of comments felt that everyone deserved the same access regardless of who they are, and this was the only fair way to do it. Some conceded that perhaps people could be given face to face access if they made an appointment beforehand.

Suggestions re: physical layout

8% of comments made suggestions about the physical layout. These included appropriate seating, screens, cleaning and reducing background noise.

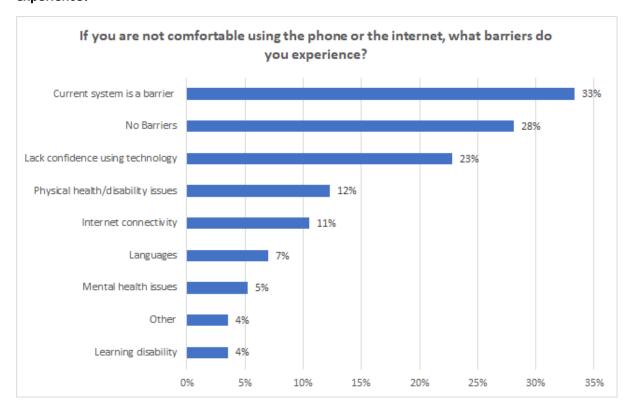
Well trained staff with a range of skills to support face to face service

Another 9% of comments talked about the need for well trained staff. This included comments such as being welcoming, being able to speak different languages, and having access to the information needed in order to be able to provide excellent customer service.

Temporary solution during Covid-19

A small number (2%) of comments suggested that these changes were needed now as a temporary solution during COVID-19 but that services should go back to normal after the situation returns to normal.

3.3.3 'If you are not comfortable using the phone or the internet, what barriers do you experience?'



57 people provided a response to this question

Around a third (28%) of responses to this question were people saying they did not have any barriers or were comfortable.

Current system is a barrier

33% of comments related to issues with the current system. Many of these were to do with the telephones, people said they had difficulty with the long list of options when they call and struggle to get through to the right departments. Others spoke about phones not being answered and being cut off. For online enquiries, people raised concerns over security and finding it difficult to use and navigate the website.

Lack confidence using technology

23% of comments suggested a lack of confidence using technology, this included online and the telephone, and ranged from being unable to understand people on the phone to finding the internet confusing.

Physical health / disability issues

Around one in ten (12%) of comments raised physical health and disability issues which included hearing and speech problems on the phone and issues holding mobiles phones or using a mouse.

Internet connectivity

One in ten (11% of comments) mentioned poor internet connectivity and slow loading pages as an issue.

Languages

Another 7% of comments were around having problems communicating in other languages.

Mental health issues

5% of comments mentioned concerns over mental health issues including anxiety and stress when communicating online or over the phone.

Learning disability

A small number of comments (4%) mentioned that those with a learning disability may find it quicker and easier to communicate with us face to face.

Other

Other concerns raised included if people needed to talk confidentially away from other members of the household the phone may not be a safe way to do so.

3.4 Feedback from virtual/online events

3.4.1 Disability Services Lambeth (DASL) coffee morning – 9th September (15 attendees) Issues covered included:

- The need for wheelchair accessibility
- The need for excellent signage to ensure taxi drivers know how to reach the entrance to the Civic Centre
- The need for longer slots for those who may have communications issues

3.4.2 Virtual drop in – 17th September (4 attendees)

Issues covered included:

- If web and phone services for the majority are not significantly improved, the move to focus face to face services on vulnerable residents will not be successful.
- Feedback on specific physical aspects of the new design, particularly around lighting and floor coverings.
- Transactional services lend themselves well to online and phone contact but it may be more difficult to provide more complex services remotely
- There is a real need for staff to be well trained and able to answer a broad range of enquiries
- The council needs to keep on improving its service to speakers of other languages

3.4.3 Virtual drop in – Learning Disability Assembly – 22nd September (27 attendees)

The proposals were generally well received however the presentation was given towards the end of the session.

3.4.4 Virtual drop in -1st October (2 attendees)

Issues covered included:

- Detailed discussion about physical layout
- Support for inclusive nature of the consultation
- 3.4.5 Virtual meeting with care leavers 6th October (7 attendees)

Issues covered included:

- What could be done if the calm space was already in use
- How to support those people who might need support, perhaps due to social isolation

- Support for reconfiguring the space 'the space was so open, I'm glad they are removing the sofas, it was a waste of space'
- The extent to which confidential conversations can be overheard
- A desire to see better visualisations, perhaps 'digital walkthroughs' as part of future consultations

4. Responses from statutory bodies and other stakeholders

4.1 Response from Green Party Councillors

To supplement the survey, based on:

- (a) feedback from residents and those advocating for them;
- (b) volunteer sessions in the customer centre.

For those not comfortable using phone or internet, what barriers are experienced?

A barrier to progressing an enquiry or scanning a document is not having references on phone to be able to see Housing Benefit or National Insurance Number. Customer Centre staff have had either the awkward task of asking someone to return with the reference number or, when it is judged that this is unreasonable to expect e.g. in the case of older residents, a staff member is interrupted at a 'donut' to find out the Housing Benefit number.

A barrier to filling in Universal Credit applications is lack of confidence, language skill or internet fluency to engage a member of staff for help and/or no member of staff to be free.

The online application forms often require scanning a QR matrix barcode. This is not possible on some phones. Residents are expected to have a mobile phone number and an email address. The Customer Centre staff will testify to the fact that many people in Lambeth still do not have a mobile phone or an email address.

Customers often don't know how to set up an email address and lack the digital literacy skills to give them the confidence to accomplish the task without one-to-one help.

Pressure is on staff and volunteers to assist residents complete forms on-line. Staff are helpful and patient in doing this. It is in their interests to free up computers for further residents which can add to the pressure. Sometimes input data is lost during the process and this adds to the frustration. Form literacy is an issue and many residents need help interpreting a form e.g. when wanting to register a change in living circumstances or enter details of their health. If they don't know the name or the spelling of their medication, or know what it is for e.g. analgesic, this can cause anxiety. PCs often need adapting to the user e.g. in font size and whilst Centre staff are alert to difficulties and have on-going training to know how best to support customers, this may need some computer screens adapting.

It may not be possible to replicate the desirable ergonomic environment that evolve in homeworking with mouse-mats, wrist support, height-adjusted chair. If computers are all touchpad, hygiene is relevant. If people are allowed to use a mouse this needs to be able to be for people who are left-handed or disabled with room enough to have someone sitting beside them.

The comments above are alleviated with help from staff. The changes are being made because of safety measures and increasing the communication and contact generally reduces tension. At a time of the covid-19 pandemic, the issue arises of how to protect staff.

To what extent do you agree that the following design changes support our objective to achieve a better experience for our customers?

- 1.Reception desk: We will need to control the number of customers who are in the space, therefore slots will be booked either at the door, via the phone or online. This could mean that if you arrive at the Civic Centre without a pre-booked slot, we may have to give you a slot later.

 Observations:
- Allowing someone to book at the door is helpful. It means they do run the risk of someone coming after them who has booked a 9am slot and a frail person having to wait outside potentially. Well-trained staff plus security at this frontline position is essential. Weather and covid-19 might

make this an unsuitable activity 'at the door'. Suggestion would be to trial it and see what staff feedback concludes. The process can be adapted if necessary whilst maintaining clear guidance.

- A code of conduct needs to be sensitively gauged.
- On-line guidance needs to be clear.
- Prioritising a pre-booked slot means that those without the ability to book online are penalised.
- Being given a slightly later slot or the option of waiting up to 40 mins or returning is reasonable.
- Being given a later slot is inconvenient, for those who have commitments.
- Being able to get through easily by phone is helpful. Slots are unlikely to be as bookable by phone as online if the phoneline is 9-5 Mon-Fri. But this does ensure someone can speak to a person.
- An automated phoneline that is easy to use may assist but maybe superfluous.

2.Improved technology, such as translation services via smartphones (including British sign language) and the use of tablets to assist customers to check in for their appointments and monitor that appointments are being called on time.

For a year staff have had installed a translation app on their staff mobile phones to assist with non-English speaking customers. Microsoft Translator can translate speech, text, and photos, including photos of documents. It has an extensive (though not comprehensive) list of languages. Lambeth website also offers information in other languages. Staff has access to Big

Word translation services. Staff promote and offer translation tools on a needs basis to customers who visit the customer centre. It is worth providing revision training to staff. A simulated 2 hours where staff get to experience a variety of actor-customers with routine queries may help staff assess any team issues including training needs they may have. The success of this will rely heavily on the quality of the staff team.

- 3. One-way entrance, via accessible automatic door, to customer service area
- 4. One-way exit, via accessible automatic door, from the customer service area
- 5. Customer toilets. Customers will need to ask staff to access them, which is part of our steps to minimise the risk of the spread of infection.

6. Improved signage showing you where you need to go

Signage and information on the large computer screens need to be targeted appropriately i.e. information to help or entertain, rather than market products and sensitive to the difference between information and propaganda.

To what extent do you agree that the following design changes support our objective to achieve a better experience for our customers?

1.Self-serve computers. There will be staff floor walking in this area to identify any customers needing additional help.

Consideration to be given to security 'black spots'. CCTV as well as staff members not wearing alarms has been an issue in the past and critical in emergency response times and evidence for criminal prosecution. Equally CCTV focussed at close range on workstations flags up civil right to privacy. Union engagement and staff engagement should produce a workable solution.

2.Access to self-serve scanners to allow you to send us documents

The technology is simple and enables documents to be held securely and electronically. It also potentially a gateway experience for residents who succeed in uploading a physical document, and which then empowers them to engage in baseline electronic communication with the Council and understand the method of engagement is noting their Housing Benefit or National Insurance Number.

3.Booths for customer use, with priority given to any customers who are required to wait longer times

Wipe-clean surfaces needed in booths. The furniture elsewhere in the centre which has been used since the centre opened is stained and the upholstery not cleanable.

The example of furniture at desks is not hard-wearing nor easily adaptable for when someone needs to sit alongside (this may be a supportive friend, or it may be a staff member –neither should risk spinal injury in lugging furniture or bending over.

4.Large screens to call customers, if required, to their specific appointment desk Staff training in BSL helpful

5.Calm space for resolving difficult issues in privacy

6.General waiting area

Not knowing your Housing Benefits number, not owning or recalling your own mobile phone number and not having an email address puts customers at a disadvantage. Staff do their best to overcome this but if there can be a code to enter so this is later matched and residents told they might have to return if it can't be sourced, would be a relief to

residents and possibly even a time-saving to staff interrupted and staff pacifying residents whilst they wait.

&/OR: whilst people are waiting, might they be informed, though not made anxious, that their transaction will be simpler if they know these details.

7. Service desks, where appointments will be held

When the Customer centre re-opens it is likely that there will be a surge in need. The input of experienced staff will be needed especially at the start of each week. The mood in the Housing 'donut' tends to lift towards the end of the week.

Please tell us your preferences for how the council staff that serve you should dress?

I concur with staff preference which is to look professional but to wear their own clothes. The black and white clothing plus scarf that they have been wearing is fine but a badge or lanyard (with the advantage of being seen 360°) is a good alternative.

Staff security & welfare

Alarms are charged daily by Centre Manager for staff members to book out and need to be used. CCTV needs to be focussed on the 'carriages', 'donuts', 'podium' and booths. I presume 'queue combing' will be obsolete as staff will 'floor walk' but Security staff will need to keep an eye on residents waiting, particularly the most vulnerable.

Furniture

Furniture needs to be wipe-clean for durability, ethically sourced for sustainability, flexible to adapt to an individual's ergonomic use.

Support Signposting

From volunteers representing partner services —most recently: CAB, Age UK and Centre 70 needs to continue. This helps customers and staff and their opinions on the transition and involvement in training needs to be sought, incorporated and valued.

Signposting

Currently residents wanting to pay their Council Tax by coming to the Customer centre via the Buckner Road entrance are redirected to pay at a bank or post office. These are few and densely packed. When the Customer centre re-opens in mid-December, there needs to be a means to accept payments.

Training

Training in trauma – recognising it in customers and coping with their own is crucial. The working environment of podiums, donuts and the self-scanning area needs to be as stress-free as possible and those working in the multiple floor levels upwards need to have peace to work too.

4.2 Responses from Staff Disability Forum

• This certainly looks as though it will be a better system and space for people with a sensory loss. The workers walking around will be very helpful to someone who needs help plus a main reception desk instead of people not knowing where to go.

- One thing would be the reception being near the door as possible rather than someone having to cross the huge open space. Also maybe not having the reception desk white but a contrast to the floor so someone could see it a little way off.
- The idea that a member of staff at the door meeting disabled people arriving in taxis is a great idea.
- Hopefully with a better appointment system it will be far user friendly especially for disabled users.
- The new service (or access to the building) will be provided for those with certain vulnerabilities. How will staff establish if a walk-in customer has mental health conditions or learning difficulties? Will it be simply be by asking the customer, or will the customer have to already declared a condition which has been recorded by Lambeth (eg tenant) or will it be by assumption?
- Given that in general the people visiting will be in the group classed as most vulnerable how will cleanliness be ensured especially as the screens appear to be touch screen.
- It would be good if the booking of an appointment could include details of special requirements so that equipment is suitable for the resident e.g. a booth is made available for a wheelchair user where the chair has already been removed.
- Make sure the chairs are of a sufficient size to make it comfortable for those of us with more padding to sit comfortably.
- Whilst it is not a long walk having the entrance and exit on opposite sides of the building will
 make it more difficult for those residents with limited mobility. I realise this is ideal to
 reduce the risk of infection but my understanding is that passing someone briefly has a
 low risk. Especially difficult for those arriving by car and parking in the disabled bays.
- For those with a sight impairment is it possible to have voice activated equipment. I am
 assuming background colours for the screen have been considered to assist with
 understanding.

5. Next steps

The report will be submitted to Cllr Wilson together with a final Equalities Impact Assessment (EQIA) and covering report making final recommendations on the preferred approach.