

Diversity impact assessment

TITLE
Property Review and Future Management of Heritage Sites
DATE
16 December 2025
LEAD OFFICER.
Paul Cowell, Head of Culture & Libraries David England, Head of Valuation & Asset Management
1 Summary description of the proposed change What is the change to policy / service / new project that is being proposed? How does it compare with the current situation? The Cabinet is asked to grant delegated authority to the Director of Place to: <ul style="list-style-type: none"> • Renew the Local Management Agreement (LMA) in respect of Rochester Castle ensuring that Rochester Castle will remain under the management of Medway Council. • Make the necessary arrangements to hand back Upnor Castle and Temple Manor to English Heritage (EH), including terminating the LMA in respect of these two assets, so that EH takes on the full management. That Cabinet agrees to authorise the Council's legal department to conclude the resultant contractual documents.
2 Summary of evidence used to support this assessment E.g. Feedback from consultation, performance information, service user. E.g. Comparison of service user profile with Medway Community Profile Officers have met with EH on multiple occasions at the time of this report to discuss all the issues. The Council's Legal and Finance teams and the Portfolio Holders have all been consulted and have no objections to these proposals.
3 What is the likely impact of the proposed change? Is it likely to: Adversely impact on one or more of the protected characteristic groups Advance equality of opportunity for one or more of the protected characteristic groups Foster good relations between people who share a protected characteristic and those who don't (insert Yes when there is an impact or No when there isn't)

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Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age	N	N	N
Disability	N	N	N
Gender reassignment	N	N	N
Marriage/civil partnership	N	N	N
Pregnancy/maternity	N	N	N
Race	N	N	N
Religion/belief	N	N	N
Sex	N	N	N
Sexual orientation	N	N	N
Care experience	N	N	N
Other (e.g. low income groups)	N	N	N

4 Summary of the likely impacts

Who will be affected?

How will they be affected?

English Heritage has confirmed its intention to operate the sites for public visits on a seasonal basis, April to October, consistent with current arrangements.

English Heritage have suggested they will carry out a range of improvements works at the castle enhancing the visitor experience.

Therefore, we anticipate no impact to visitors.

As the operational responsibility for Upnor Castle reverts to English Heritage both parties have agreed that a Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) applies and that the two permanent staff employed by Medway Council in connection with the operational running of Upnor Castle are eligible for transfer under TUPE provisions.

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5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

What alternative ways can the Council provide the service?

Are there alternative providers?

Can demand for services be managed differently?

Council officers will continue to work with English Heritage to ensure a smooth handover of both sites.

6 Action plan

Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date
Continued working with English Heritage on operational handover	Paul Cowell	April 2026
Continued working with English Heritage on TUPE arrangements	Paul Cowell	April 2026

7 Recommendation

The recommendation by the lead officer should be stated below. This may be: to proceed with the change, implementing the Action Plan if appropriate, consider alternatives, gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

To proceed with the proposed change, implementing the action plan

8 Authorisation

The authorising officer is consenting that the recommendation can be implemented, sufficient evidence has been obtained and appropriate mitigation is planned, the Action Plan will be incorporated into the relevant Service Plan and monitored

Assistant Director

Date of authorisation