

Appendix 1: Equality Impact Assessment – ‘single shift’ operating model

Budget Equality Impact Assessment (EIA) Template 2024/25 – Service Users

The Budget EIA process is a legal duty supporting good financial decision-making. It assesses how proposals may impact on specific groups differently (and whether/how negative impacts can be reduced or avoided) so that these consequences are explicitly considered. Decisions must be informed by accurate, well-informed assessment of likely impacts so that they are fair, transparent, and accountable. Budget EIAs provide a record of this assessment and consideration.

For advice and guidance on completing this assessment contact [Emma McDermott](#), Head of Communities, Equality and Third Sector (CETS).

1. Budget Proposal

Title of budget saving being assessed:	Amend public toilets opening hours to end early opening and enable single, daytime staff shifts
Name and title of officer responsible for this EIA:	Lynsay Cook, Head of Strategy & Service Improvement
Directorate and Service Name:	Economy, Environment & Culture, City Environment
Budget proposal no.	17

Briefly describe the budget saving proposal: (use the wording in the budget spreadsheet and more detail if needed)

The Council is responsible for 36 public toilet sites across the city.

Under the Public Health Act 1936, local authorities in England and Wales have a power, but not a duty, to provide toilets for use by the public. Public toilets are not a statutory service.

The 2024/25 budget proposal is to amend the opening hours of public toilet sites across the city to enable single, daytime staff shifts.

Existing opening hours are:

Summer:

- 9am-8pm - Shelter Hall, West Pier Arches, Kings Road Playpark, The Colonnade, Daltons
- 9am-6pm - all other sites

Winter:

- 9am-6pm - Shelter Hall, West Pier Arches, Kings Road Playpark, The Colonnade, Daltons
- 9am-4pm - all other sites

All toilets are opened by 9am, though many are opened earlier but times vary due to traffic and resources as staff travel around the city to open facilities and ensure they are clean. Therefore, 9am is the earliest guaranteed opening time.

The proposed opening hours are:

Summer:

- 9am-8pm - Shelter Hall, West Pier Arches, Kings Road Playpark, The Colonnade, Daltons
- **10am-6pm** - all other sites

Winter:

- 9am-6pm - Shelter Hall, West Pier Arches, Kings Road Playpark, The Colonnade, Daltons
- **10am-4pm** - all other sites

The budget also allocated funding for the public toilets at the Royal Pavilion Gardens to reopen with a permanent attendant and security, until a new facility is developed, and the toilets in the Velo Café at the Level remain closed. New public toilets (and an adjoining café) are to be created at The Level in The MacLaren Pavilion. The toilets at this location will be maintained by the tenant of the new café.

Summarise the most significant impacts identified by this assessment including which groups will be disproportionately negatively affected drawing out intersectional impacts as applicable:

Reducing the opening hours of public toilets may have a greater impact on people who need to use facilities more frequently, those with limited mobility, and those with limited alternative means for accessing facilities. This may include older people, small children and their carers, disabled people and individuals with some health issues, and rough sleepers.

2. Consultation, engagement and supporting EIAs

What consultations or engagement activities are being used to inform this assessment?

If consultation is planned or in process – state this and state when it will done/completed even if indicative. If no consultation completed or planned, state this, giving an explanation.

Feedback from the public via the public toilet mailbox and Stage 1 complaints have been used to inform the EIA.

What other budget or service EIAs can assist/have been used to inform this assessment?

Public Toilet closure EIA, [Environment, Transport & Sustainability Committee, 17 January 2023](#)

3. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this proposal?

Consider all possible intersections (Delete and State Yes, No, Not Applicable)

Age	NO
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Disability and inclusive adjustments, coverage under equality act and not	NO
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	NO
Religion, Belief, Spirituality, Faith, or Atheism	NO
Gender Identity and Sex (including non-binary and Intersex people)	NO
Gender Reassignment	NO
Sexual Orientation	NO
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
Carers	NO
Looked after children, Care Leavers, Care and fostering experienced people	NO
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO
Socio-economic Disadvantage	NO
Homelessness and associated risk and vulnerability	NO
Human Rights	NO
Another relevant group (please specify here and add additional rows as needed)	NO

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered "NO" to any of the above, how will you gather this data to enable improved monitoring of impact for this proposal?

Public toilets are available for anyone who lives and works in, or visits, the city to use. As such, equality data is not held on service users.

What are the arrangements for monitoring, and reviewing the impact of this proposal?

The impact of the proposal will be monitored through customer feedback and feedback from services who work with residents in vulnerable groups, e.g., rough sleepers.

4. Impacts

Briefly state source of data or data analysis being used to describe the disproportionate negative impacts. Preferably provide link to data/ analysis if open data source.

Data and analysis sources may include (not an exhaustive list):

- **Consider a wide range (including but not limited to):**
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal 'staff as residents' consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Assess impact for different population groups	Is there a possible disproportionate negative impact? State Yes or No	Describe the potential negative impact, considering for differences within groups For example, different ethnic groups, and peoples intersecting identities e.g. disabled women of faith OR If no impact is identified, briefly state why.
Age including those under 16, young adults, multiple ethnicities, those with various intersections.	Yes	Older people may have mobility issues which limit access to other toilets. They may need to use the toilet more often and will have less opportunity to. Parents and carers may need more frequent access to public toilets for baby changing

		facilities. Small children have less control over their bladders and outings can be abruptly shortened if a child needs to use a toilet.
Disability includes physical and sensory disabled, D/deaf, deafened, hard of hearing, blind, neurodiverse people, people with non-visible disabilities.	Yes	Some disabled people and people with long term and or fluctuating health conditions may need to use toilet facilities more frequently may be disproportionately impacted. Some people with mobility issues may have limited access / opportunity to use other toilets.
Ethnicity, 'Race', ethnic heritage including Gypsy, Roma, Travellers	No	
Religion, Spirituality, Faith, Atheism, and philosophical belief	No	
Gender and Sex including non-binary and intersex people	Yes	Women and girls may need to use the toilet more often due to menstruation or experiencing the menopause but will have less opportunity to do so.
Gender Reassignment	No	
Sexual Orientation	No	
Marriage and Civil Partnership	No	
Pregnancy, Maternity, Paternity, Adoption, Menopause, (In)fertility (across intersections and non-binary gender spectrum)	Yes	Pregnant people may need to use the toilet more often and will have less opportunity to.
Armed Forces Personnel, their families, and Veterans	No	
Expatriates, Migrants, Asylum Seekers, and Refugees considering for age, language, and various intersections	No	
Carers considering for age, language, and various intersections		
Looked after children, Care Leavers, Care and fostering experienced	No	

people considering for age, language, and various intersections		
Domestic and/or sexual abuse and violence survivors	No	
Socio-economic disadvantage considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections	Yes	People on lower incomes may be disproportionately affected as businesses may expect their facilities to be used by only paying customers.
Homeless and rough sleepers considering for age, veteran, ethnicity, language, and various intersections	Yes	Rough sleepers may be disproportionately impacted as they have limited alternative access to toilet and handwashing facilities. They may feel a greater stigma when using other facilities and may not feel welcome.
Human Rights	No	
Another relevant group (please specify here and add additional rows as needed)	No	

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

5. Cumulative impacts

Are there other budget proposals from other service areas that might worsen or mitigate the impacts from your proposal? Please give a brief description including name of other service(s).

Other budget proposals that disproportionately impact on older and disabled people may worsen the impact of this proposal.

6. Action planning

What SMART actions will be taken to mitigate the disproportionate impacts identified in section 3? If no mitigating action is possible, please state and explain why. Add additional rows as required.

1. Continue publicising other toilets available, such as museums, shopping centres etc.
2. Place signage on the closed toilets, directing people to the nearest alternative and to the council website for more information.
3. Provide information on the facilities available to rough sleepers, including First Base, Antifreeze and the Clocktower Sanctuary.

7. Outcome of your assessment

Based on the information above give the proposal an impact score between 1 – 5.

1= proposal has minimal impact and/or mitigating actions will significantly minimise the impact

3= proposal will have a significant negative impact; however, mitigation actions will reduce the impact considerably.

5= proposal has significant impact and mitigating actions will have limited effect on reducing impact.

Proposal's impact score:	2
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8. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

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9. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Lynsay Cook, Head of Strategy & Service Improvement	05-Jan-24
Accountable Manager:	Rachel Chasseaud, Assistant Director City Environmental Management	05-01-24

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review and Approval:

Equality Impact Assessment sign-off

Signatory:	Name:	Date: DD-MMM-YY
Head of Communities, Equality, and Third Sector (CETS) Service:	Emma McDermott	18-01-24

Notes and recommendations (if any) from Head of CETS Service reviewing this assessment: