Equality Impact Assessment Corporate Assessment Template



Policy/Strategy/Project/Procedure/Service/Function Title:
Public Convenience Strategy
New/Existing/Updating/Amending: New

Who is responsible for developing and implementing the					
Policy/Strategy/Project/Procedure/Service/Function?					
Name: Robert Gravelle Job Title: Section Leader H&S, BSI, EqIA					
Service Team: City Operations	Service Area:				
Assessment Date: 06/07/2016					

What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?

The strategy outlines the mechanisms by which Council intends to better meet the needs of residents and visitors to the city, through reviewing and accounting for the quality and quantity of public conveniences in Cardiff, their usage, range of services, maintenance and opening hours.

2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]

1. Background

In March 2016 Welsh Government failed to agree the adoption of the Public Health (Wales) Bill, a bill that would have forced local authority to implement a strategy for the provision of public toilets.

Notwithstanding council has a continued commitment ethical and operational commitment towards WC provision in the City and as such will be implementing a strategy regardless.

As such the City of Cardiff Council intends in line with the recommendations of the aforementioned un-adopted Bill, to set out a strategy to address the toileting needs of the community; improving both the standards and availability of public conveniences under the local authority's control. This strategy includes details of how funding may be secured, partnership approaches, best practice adoption and use of new technologies and communications.

This outline strategy is the first step to delivering this commitment. Setting out recommendations that should be considered before a timetable for plans can be

	4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 1	
--	---------	---------	--------	-----------------------------	--------------------------	--------	--

Equality Impact Assessment Corporate Assessment Template

establish, in order to ensure that the City of Cardiff's Aspirations to provide good quality public convenience facilities for all residents and visitors is realised.

2. Issues

Historically, the management of public conveniences has been spilt across four service areas within the Authority:

- Street Cleansing, managing the city centre facilities,
- Parks managing the facilities in Parks
- Bereavement Services managing toilets in cemeteries, and
- The Harbour Authority being responsible for toilets in the Bay.

This strategy provides an overarching directional strategy for all Council in order to ensure consistent service delivery.

The provision of public conveniences provides infrastructure necessary to facilitate the enjoyment of the city by visitors and residents. They can make a significant impact upon the comfort of individuals and families who visit public spaces in the city and their perception of the city as a desirable place to visit.

Although the proposed Welsh Government, Public Health (Wales) Bill, Part 6 focuses on 'Provision of Toilets', currently a local authority provision of public conveniences is not a statutory duty. Increasingly Council faces challenges to maintain standards of toilet provision, maintenance and cleaning due to limited funding and pressure on resources and varying approaches across the service areas.

The 2007, Public Conveniences survey found 75% of respondents found public conveniences poor or very poor across Cardiff and in the city centre 48% thought the facilities were poor or very poor.

Changing demographics, human activity in the city and the regulatory provision of these facilities in private businesses (i.e. hotels and shopping precincts, St Davids Shopping Centre) has impacted on the demand for public conveniences. As such many modern toilet facilities are demanded by patrons of the private sector; who in meeting customers' needs, expectations and related legislation now provide high toileting that is of a high standards of cleanliness, accessibility and safety, ensuring within their licensing that hygiene and maintenance are achieved.

As such; the historic role of Local Authorities providing Toileting has become less of an imperative. Local authorities now mainly provide Toileting facilities where they create demand as service providers themselves e.g. libraries, Community hums and supported facilities.

This reduction in specific dedicated Council Toilet provision has over the last ten to

4.C.400	e 1 Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 2	
---------	------------	-----------------------------	--------------------------	--------	--

Equality Impact Assessment Corporate Assessment Template

fifteen years been further impacted in Cardiff by major infrastructure development and investment and the regeneration of many locations. By way of example many private retailers now provide public conveniences as part of their developments under building regulations Part M e.g. St David's shopping centre provides high quality separate toilet facilities, incorporating WCs, Baby and adult changing facilities and fully accessible toileting available over extended opening hours in excess of 18 hours a day and capable of satisfying increased footfall. This type of quality provision is designed to satisfy the demands of wide ranging demographic of customers including those with a range of disabilities, parents with children and the older community.

Understandably Cardiff is not alone in the growing pressure on public toilet provision, and in an attempt to address this the government produced in 2008 a document 'Improving Public Access to Better Quality Toilets – A Strategic Guide' providing a blueprint for local public toilet provision. Furthermore, the proposed Welsh Government; Public Health (Wales) Bill, expresses under Part 6 'Provision of Toilets' a number of duties that Local authorities must account for regarding WC provision. (A full legislation summary is attached in Appendix 4 (reorder).

However, as said increasing pressures on local authorities and the greater potential of improved diversity and quality of services held in the private sector delivery of Toileting, must raise the question; is local authority best placed to provide all local public conveniences? Is there a shared benefit to a greater partnership working approach?

3 Assess Impact on the Protected Characteristics

3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
Up to 18 years	✓		
18 - 65 years	✓		
Over 65 years	✓		

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

This strategy and the proposals within will it is expected have a positive differential impact on all Protected Characteristics.

In particular within the Protected Characteristics of Age, younger and older people will benefit from the increase in identifiable / publically available toilet facilities across the city; meaning, a reduction I individuals needing to travel extend distances to public conveniences, that accessible and age permissible / suitable.

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 3
---------	---------	--------	-----------------------------	--------------------------	--------

Equality Impact Assessment Corporate Assessment Template

What action(s) can you take to address the differential impact?

Further (generic) consideration needs to be given to:-

- Informing the community of the strategy for the provision of public conveniences in Cardiff
- Promoting and communicating the locations of all public conveniences to the wider community in a variety of ways including wed based, visual identification signage and active promotion within neighbourhoods.
- Signing more businesses up to the Community Toilet Scheme or similar.
- Adding and expanding the offering of more public conveniences e.g. hubs, partner locations etc.
- Partnership working with establishments that have high quality WCs provision.
- Identifying at the planning stage where locations could be made available for wider public use above that of just patrons.
- Promotion of locations via licensing.
- Creation of information sources and use of mobile phone apps for signposting.
- Implementing planning requirements where reasonable for retail / restaurant etc. to provide / allow access to their own on site public conveniences.
- An increase in identifiable / publically available toilet facilities will it is expected replace the offering lost by the removal of Automatic Public Conveniences (APCs) are were whole accessible and did not comply to building regulation Part M or the Requirements of the Equality Act 2010 (part 4 Premises)

3.2 Disability

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment	✓		
Physical Impairment	✓		
Visual Impairment	✓		
Learning Disability	✓		
Long-Standing Illness or Health Condition	✓		
Mental Health	✓		
Substance Misuse	√		
Other	√		

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

This strategy and the proposals within will it is expected have a positive differential impact on all Protected Characteristics.

In particular within the Protected Characteristics of Disability, it is anticipated that all Disabled people will benefit from the potential increase in available toilet facilities

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 4
---------	---------	--------	-----------------------------	--------------------------	--------

Equality Impact Assessment Corporate Assessment Template

across the city in variety of distinct ways.

This proposal could have a positive impact on disabled people with there being an overall increase in identifiable / publically available toilet facilities, meaning:-

- Individuals may have less distance to travel to locate accessible public conveniences.
- Individuals with a range of disabilities will have increased choice so feelings of exclusion from some locations will be reduced.
- An increase in the identifiable numbers of public conveniences / alternative locations will increase choice. Reducing the potential effect of some locations that may be considered as inaccessible e.g. have steps to their entrance, or even not have an accessible WC.
- Whilst there is still a potential that staff within some locations may not
 understand the needs of some disabled people e.g. BSL users, wheelchair users,
 those with learning disabilities etc. increased exposure and opportunity for
 socialising crated through increased numbers in public conveniences /
 accessible conveniences will it is expected improve awareness and
 understanding. This may also be aided by potentially increased opportunities /
 requirements for staff training in DET (Disability Equalities Training).
- In respect of Substance Misuse (whilst the City of Cardiff Council do not condone drug misuse / abuse) – it is hoped that an increase in identifiable / publically available toilet facilities will be cleaner locations for drug users to use, safely and cleanly admonishing drugs of all natures, both medicinal and recreational.
- An increase in identifiable / publically available toilet facilities will it is expected replace the offering lost by the removal of Automatic Public Conveniences (APCs) are were whole accessible and did not comply to building regulation Part M or the Requirements of the Equality Act 2010 (part 4 Premises)

What action(s) can you take to address the differential impact?

Further (generic) consideration needs to be given to:-

- Informing the community of the strategy for the provision of public conveniences in Cardiff
- Promoting and communicating the locations of all public conveniences to the wider community in a variety of ways including wed based, visual identification signage and active promotion within neighbourhoods.
- Signing more businesses up to the Community Toilet Scheme or similar.
- Adding and expanding the offering of more public conveniences e.g. hubs, partner locations etc.
- Partnership working with establishments that have high quality WCs provision.
- Identifying at the planning stage where locations could be made available for wider public use above that of just patrons.
- Promotion of locations via licensing.
- Creation of information sources and use of mobile phone apps for signposting.
- Implementing planning requirements where reasonable for retail / restaurant

4.C.400	Issue 1 Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 5	
---------	----------------	-----------------------------	--------------------------	--------	--

Equality Impact Assessment Corporate Assessment Template

etc. to provide / allow access to their own on site public conveniences.

3.3 Gender Reassignment

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
Transgender People	✓		
(People who are proposing to undergo, are undergoing, or have			
undergone a process [or part of a process] to reassign their sex			
by changing physiological or other attributes of sex)			

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

This Strategy could possibly have a positive impact on transgender people with there being is an increase in identifiable / publically available toilet facilities, meaning:-

- There is a potential for an increase in the provision / identification of unisex public conveniences; as such unisex facilities do not require an individual to express their gender, thus improving anonymity and discretion.
- Whilst there is no stature it is proposed that many locations e.g. pubs, shops
 restaurants will / potentially either provide definable standalone unisex
 facilities or change current male and female Wcs, into unisex provision. This
 alleviating social pressures / constructs affecting transgender individuals who
 may feel that they are expected to or that it is safer to use a WC that is
 designated contra to the way that they are defining themselves. E.g. a male
 transitioning to a Female may be forced to us a male Wc although they identify
 as female.
- Individuals may have shorter distances to travel to locate alternative / unisex / safe and accessible public conveniences.
- Individuals will have increased choice so reducing any feelings of exclusion or vulnerability.
- An increase in identifiable / publically available toilet facilities will it is expected replace the offering lost by the removal of Automatic Public Conveniences (APCs) which were unisex so of benefit to the transgender community.

What action(s) can you take to address the differential impact?

In addition to the below generic consideration that can be of benefit to all communities. Consideration would be made towards the following:-

- Improving awareness with WC providers of the needs of this particular community
- Improving information and consideration in planning applications regarding the benefits of creating unisex WCs in appropriate locations.

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 6
---------	---------	--------	-----------------------------	--------------------------	--------

Equality Impact Assessment Corporate Assessment Template

Further (generic) consideration needs to be given to:-

- The Creation of a unified strategy for the provision of public conveniences in Cardiff
- Promoting and communicating alternatives to the locations.
- Signing more businesses up to the scheme Community Toilet Scheme or similar
- Opening up more public facilities, e.g. hubs, partner locations etc
- Partnership working with establishments that have high quality WCs provision.
- Identifying at the planning stage where locations could be made available for wider public use above that of just patrons.
- Promotion of locations via licensing.
- Creation of information sources and use of mobile phone apps for signposting.

3.4. Marriage and Civil Partnership

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

		Yes	No	N/A
Marriage				✓
Civil Partnership				√

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the proposals will have a differential impact in terms of marriage and civil partnership, although this will be monitored and accounted for as necessary.

What action(s) can you take to address the differential impact?

N/A

3.5 Pregnancy and Maternity

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy	✓		
Maternity	✓		

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

	4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 7	
--	---------	---------	--------	-----------------------------	--------------------------	--------	--

Equality Impact Assessment Corporate Assessment Template

This proposal would have a positive impact on Pregnancy and Maternity given the increase in identifiable / publically available toilet facilities, meaning:-

- Individuals will have shorter distances to travel to locate alternative and accessible public conveniences.
- Individuals will have greater choice so will feel less excluded through greater range of locations e.g. pubs / restaurants.
- Improvements in the quality of Public conveniences will result in greater numbers of locations with baby changing facilities.
- Whilst there is still a potential that staff within some locations may not understand the needs of those who are pregnant or have maternity needs. Increased exposure and opportunity for socialising crated through increased numbers in public conveniences / accessible conveniences will it is expected improve awareness and understanding.
- Individuals will have increased choice so reducing any feelings of exclusion or vulnerability.
- Improved quality of public conveniences will improve choice for both male and female parents who can use them with male children and vice versa

What action(s) can you take to address the differential impact?

In addition to the below generic consideration that can be of benefit to all communities. Consideration would be made towards the following:-

- Improving awareness with WC providers of the needs of this particular community.
- Improving information regarding facilities availability / locations
- Improving information and consideration in planning applications regarding the benefits of creating baby changing facilities where appropriate.

Further (generic) consideration needs to be given to:-

- The Creation of a unified strategy for the provision of public conveniences in Cardiff
- Promoting and communicating alternatives / choice of public conveniences
- Signing more businesses up to the scheme Community Toilet Scheme or similar
- Opening up more public facilities, e.g. hubs, partner locations etc
- Partnership working with establishments that have high quality WCs provision.
- Identifying at the planning stage where locations could be made available for wider public use above that of just patrons.
- Promotion of locations via licensing.
- Creation of information sources and use of mobile phone apps for signposting.

3.6 Race

	4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 8	
--	---------	---------	--------	-----------------------------	--------------------------	--------	--

Equality Impact Assessment Corporate Assessment Template

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White	√		
Mixed / Multiple Ethnic Groups	✓		
Asian / Asian British	✓		
Black / African / Caribbean / Black British	✓		
Other Ethnic Groups	✓		

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

This proposal could possibly have a positive impact in respect of Race given the increase in identifiable / publically available toilet facilities, meaning:-

- Individuals may have to travel shorter distances to locate alternative / permissible public conveniences.
- Increased availability and choice will result in individuals being able to look for locations and use locations which would otherwise restrict their use due to religious and belief factors this individuals will feel less excluded from some locations e.g. pubs / restaurants (e.g. religious connotations about using locations serving alcohol).
- Individuals will have increased choice so reducing any feelings of exclusion or vulnerability.
- Whilst there is still a potential that staff within some locations may not understand the needs of some communities. Increased exposure and integration opportunities crated through increased numbers in public conveniences / accessible conveniences will it is expected improve awareness and understanding and potentially reduce anti-social behaviours.

What action(s) can you take to address the differential impact?

In addition to the below generic consideration that can be of benefit to all communities. Consideration would be made towards the following:-

- Improving awareness with WC providers of the needs of this particular community e.g. in locations that do not serve alcohol.
- Improving information regarding facilities availability / locations

Further (generic) consideration needs to be given to:-

- The Creation of a unified strategy for the provision of public conveniences in Cardiff
- Promoting and communicating alternatives / choice of public conveniences
- Signing more businesses up to the scheme Community Toilet Scheme or similar
- Opening up more public facilities, e.g. hubs, partner locations etc
- Partnership working with establishments that have high quality WCs provision.

4.C.400	Issue 1 Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 9	
---------	----------------	-----------------------------	--------------------------	--------	--

Equality Impact Assessment Corporate Assessment Template

- Identifying at the planning stage where locations could be made available for wider public use above that of just patrons.
- Promotion of locations via licensing.
- Creation of information sources and use of mobile phone apps for signposting.

3.7 Religion, Belief or Non-Belief

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist	✓		
Christian	✓		
Hindu	✓		
Humanist	✓		
Jewish	V		
Muslim	V		
Sikh	1		
Other	✓		

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

This proposal could possibly have a positive impact in respect of Religion, Belief or Non-Belief given the increase in identifiable / publically available toilet facilities, meaning:-

- Individuals may have to travel shorter distances to locate alternative / permissible public conveniences.
- Increased availability and choice will result in individuals being able to look for locations and use locations which would otherwise restrict their use due to religious and belief factors this individuals will feel less excluded from some locations e.g. pubs / restaurants (e.g. religious connotations about using locations serving alcohol).
- Individuals will have increased choice so reducing any feelings of exclusion or vulnerability.
- Whilst there is still a potential that staff within some locations may not understand the needs of some communities. Increased exposure and integration opportunities crated through increased numbers in public conveniences / accessible conveniences will it is expected improve awareness and understanding and potentially reduce anti-social behaviours.

What action(s) can you take to address the differential impact?

In addition to the below generic consideration that can be of benefit to all communities. Consideration would be made towards the following:-

 Improving awareness with WC providers of the needs of this particular community e.g. in locations that do not serve alcohol.

	4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 10	
--	---------	---------	--------	-----------------------------	--------------------------	---------	--

Equality Impact Assessment Corporate Assessment Template

• Improving information regarding facilities availability / locations

Further (generic) consideration needs to be given to:-

- The Creation of a unified strategy for the provision of public conveniences in Cardiff
- Promoting and communicating alternatives / choice of public conveniences
- Signing more businesses up to the scheme Community Toilet Scheme or similar
- Opening up more public facilities, e.g. hubs, partner locations etc
- Partnership working with establishments that have high quality WCs provision.
- Identifying at the planning stage where locations could be made available for wider public use above that of just patrons.
- Promotion of locations via licensing.
- Creation of information sources and use of mobile phone apps for signposting.

3.8 Sex

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

			Yes	No	N/A
Men			✓		
Women			✓		

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

This proposal could possibly have a positive impact in respect of Sex given the increase in increasing identifiable / publically available toilet facilities, meaning:-

- Individuals may have to travel shorter distances to locate alternative / permissible / personally appropriate public conveniences.
- Individuals will have increased choice so reducing any feelings of exclusion or vulnerability.
- Individuals may feel excluded from some alternative locations e.g. pubs / restaurants (e.g. religious connotations about using locations serving alcohol), so greater choice will reduce this impact.
- Greater choice will reduce Individuals feelings of exclusion of vulnerability in using some locations.

What action(s) can you take to address the differential impact?

In addition to the below generic consideration that can be of benefit to all communities. Consideration would be made towards the following:-

- Improving awareness with WC providers of the needs.
- Improving information regarding facilities availability / locations.

4.C.400	Nov 11	C.400	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 11
---------	--------	-------	-----------------------------	--------------------------	---------

Equality Impact Assessment Corporate Assessment Template

Further (generic) consideration needs to be given to:-

- The Creation of a unified strategy for the provision of public conveniences in Cardiff
- Promoting and communicating alternatives / choice of public conveniences
- Signing more businesses up to the scheme Community Toilet Scheme or similar
- Opening up more public facilities, e.g. hubs, partner locations etc
- Partnership working with establishments that have high quality WCs provision.
- Identifying at the planning stage where locations could be made available for wider public use above that of just patrons.
- Promotion of locations via licensing.
- Creation of information sources and use of mobile phone apps for signposting.

3.9 Sexual Orientation

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

		Yes	No	N/A
Bisexual		✓		
Gay Men		✓		
Gay Women/Lesbians		✓		
Heterosexual/Straight		✓		

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

This proposal could possibly have a positive impact in respect of Sexual Orientation given the increase in identifiable / publically available toilet facilities, meaning:-

- Individuals may have to travel shorter distances to locate alternative / permissible public conveniences.
- Increased availability and choice will result in individuals being able to look for alternative locations to ones that would otherwise restrict their choice or make them feel vulnerable.
- Individuals will have increased choice so reducing any feelings of exclusion or vulnerability.
- Whilst there is still a potential that staff within some locations may not understand the needs of some communities. Increased exposure and integration opportunities crated through increased numbers in public conveniences / accessible conveniences will it is expected improve awareness and understanding and potentially reduce anti-social behaviours.

What action(s) can you take to address the differential impact?

In addition to the below generic consideration that can be of benefit to all communities. Consideration would be made towards the following:-

4.C.400	1 Nov 11	4.C.400	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 12
---------	----------	---------	-----------------------------	--------------------------	---------

Equality Impact Assessment Corporate Assessment Template

- Improving awareness with WC providers of the needs of the broad community
- Improving information regarding facilities availability / locations

Further (generic) consideration needs to be given to:-

- The Creation of a unified strategy for the provision of public conveniences in Cardiff
- Promoting and communicating alternatives / choice of public conveniences
- Signing more businesses up to the scheme Community Toilet Scheme or similar
- Opening up more public facilities, e.g. hubs, partner locations etc.
- Partnership working with establishments that have high quality WCs provision.
- Identifying at the planning stage where locations could be made available for wider public use above that of just patrons.
- Promotion of locations via licensing.
- Creation of information sources and use of mobile phone apps for signposting.

3.10 Welsh Language

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on Welsh Language?

			Yes	No	N/A
Welsh Language			✓		
	The state of the s				

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is anticipated that the welsh community or those who speak welsh will not largely be impacted by the increase in Public Conveniences. Although this increase in public conveniences will likely improve some communities opportunity to interact in the welsh language.

Whilst it is a requirement that all literature and signage should be Bilingual in accordance with the Welsh Language Act, it is anticipated that much of the appropriate signage is pictorial.

What action(s) can you take to address the differential impact?

In addition to the below generic consideration that can be of benefit to all communities. Consideration would be made towards the following:-

Providing information and all policy in bilingual formats in accordance with the Welsh Language Act so as to:-

- Improving awareness with WC providers of the needs of this particular community e.g. in locations that do not serve alcohol.
- Improving information regarding facilities availability / locations

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 13
---------	---------	--------	-----------------------------	--------------------------	---------

Equality Impact Assessment Corporate Assessment Template

Further (generic) consideration needs to be given to:-

- The Creation of a unified strategy for the provision of public conveniences in Cardiff
- Promoting and communicating alternatives / choice of public conveniences
- Signing more businesses up to the scheme Community Toilet Scheme or similar
- Opening up more public facilities, e.g. hubs, partner locations etc
- Partnership working with establishments that have high quality WCs provision.
- Identifying at the planning stage where locations could be made available for wider public use above that of just patrons.
- Promotion of locations via licensing.
- Creation of information sources and use of mobile phone apps for signposting.

4. Consultation and Engagement

What arrangements have been made to consult/engage with the various Equalities Groups?

Relevant Consultation Pre 2016

Consultation within the subject of Public Conveniences Focused on the closure of Automatic Public Conveniences (APCs); the key information from which is below. This information indicates clearly that there is a need to mitigate against the closure of not only APCs but also all reducing public facilities.

• There was a period of public consultation, including a series of "Changes for Cardiff" "Cardiff Debate" engagement and consultation events, giving citizens and communities the opportunity to provide feedback on the draft budget proposals. The Consultation included members from a broad community including those from the Cardiff Council Access Focus Group and 50+ forum; as well as other communities that engaged during the Cardiff Debate phase from across Cardiff. Whereas there is detail of the numbers who use these facilities there are no details of the characteristic groups that might use these units.

Findings

- 79.1% of the respondents were in favour of the removal of the APC's;
- In terms of those respondents that expressed concern, the most frequent reason was in relation to the "minority numbers within the public for whom these services are an essential with the elderly, those with medical conditions, pregnant women and people with young children all identified as being in need of public conveniences."

Engagement during 2016 concluded that there was a need for a definable

4.C.400	sue 1 Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 14	
---------	--------------	-----------------------------	--------------------------	---------	--

Equality Impact Assessment Corporate Assessment Template

strategy and resolution of unified council approach to the provision of public convenience in partnership with commercial and retail operatives.

This it was concluded would provide opportunity to mitigate the effects of the removal of APCs and provide suitable WC provision in Cardiff.

February 2016

Consultation with the CCAFG (Cardiff Council Access Focus Group) and members of the 50+ forum.

Consultation and Engagement to date has been brief pending Cabinet support and adoption of the Public Convenience Strategy and approach.

5. Summary of Actions [Listed in the Sections above]

Groups	Actions
Age	Please see considerations under this protected
	characteristic
Disability	Please see considerations under this protected
	characteristic
Gender Reassignment	Please see considerations under this protected
	characteristic
Marriage & Civil	N/A
Partnership	
Pregnancy & Maternity	Please see considerations under this protected
	characteristic
Race	Please see considerations under this protected
	characteristic
Religion/Belief	Please see considerations under this protected
	characteristic
Sex	Please see considerations under this protected
	characteristic
Sexual Orientation	Please see considerations under this protected
	characteristic
Welsh Language	Please see considerations under this protected
	characteristic

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 15
---------	---------	--------	-----------------------------	--------------------------	---------

Equality Impact Assessment Corporate Assessment Template

Generic Over-Arching [applicable to all the above groups]	 Further (generic) consideration needs to be given to:- Informing the community of the strategy for the provision of public conveniences in Cardiff Promoting and communicating the locations of all public conveniences to the wider community in a variety of ways including wed based, visual identification signage and active promotion within neighbourhoods. Signing more businesses up to the Community Toilet Scheme or similar. Adding and expanding the offering of more public conveniences e.g. hubs, partner locations etc. Partnership working with establishments that have high quality WCs provision. Identifying at the planning stage where locations could be made available for wider public use above that of just patrons. Promotion of locations via licensing. Creation of information sources and use of mobile phone apps for signposting. Implementing planning requirements where reasonable for retail / restaurant etc. to provide / allow access to their own on site public conveniences. An increase in identifiable / publically available toilet facilities will it is expected replace the offering lost by the removal of Automatic Public Conveniences (APCs). Please note that due regard has been provided within this EIA towards:- Equality Act 2010. Wellbeing of Future Generations (Wales) Act 2015 Welsh Government Stautory Guidance - Shared Purpose Shared Delivery United Nations Convention on the Rights of the Child United Nations Principles for Older Persons Welsh Language (Wales) Measure 2011 Health Impact Assessment Habitats Regulations Assessment Strategic Environmental Assessment

6. Further Action

4.C.400	Issue 1	Nov 11	Process Owner: Rachel Jones	Authorised: Rachel Jones	Page 16
---------	---------	--------	-----------------------------	--------------------------	---------

Equality Impact Assessment Corporate Assessment Template

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By : Robert Gravelle	Date: 06/07/16
Designation: Section Leader H&S, BSI, EqIA	
Approved By:	
Andrew Gregory, Director of City Operations, Strategic	July 2016
Planning, Highways, Traffic & Transportation	
Designation: Director	
Service Area: City Operations	

7.1 On completion of this Assessment, please ensure that the Form is posted on your Directorate's Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council.

For further information or assistance, please contact the Citizen Focus Team on 029 2087 3059 or email citizenfocus@cardiff.gov.uk

