

CARDIFF COUNCIL

**Equality Impact Assessment
Corporate Assessment Template**



Policy/Strategy/Project/Procedure/Service/Function Title: Cardiff Council Local Toilets Strategy (in accordance with the requirements of the Public Health Wales Bill; specifically in relation to part 8 and local authorities facilitating a strategy to address the duties of the bill).
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: Planning Transport and Environment (PTE)	Service Area:
Assessment Date: 01/05/2019	

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

<p>The strategy outlines the mechanisms by which Council intends to better meet the needs of residents and visitors to the city, In line with the aspiration to become the most liveable European Capital City, through reviewing and accounting for the quality and quantity of public conveniences in Cardiff, their usage, range of services, maintenance and opening hours.</p> <p>This will be enabled in accordance with Part 8 of the Public Health (Wales) Act 2017; which places a duty on local authorities to ensure a provision of Toilets; placing new responsibilities on Local Authorities to provide local toilet strategies.</p> <p>There is no duty for local authorities to provide public toilets directly.</p> <p>Furthermore, the Public Health (Wales) Act 2017 as published by Welsh Government has no funding opportunities for local authorities to utilise or additional provisions attached to it.</p>
--

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.]

<p>1. Background</p> <p>July 2017, the Public Health (Wales) Act 2017 received Royal Assent, bringing together</p>
--

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

a range of practical actions for improving and protecting health. Part 8 of the Act includes Provision of Toilets and introduces new responsibilities for Local Authorities to provide local toilet strategies.

To deliver a strategic approach to the provision of toilets across Wales, the Public Health (Wales) Act 2017 requires Local Authorities including Cardiff Council to assess local needs and facilities, and to publish a local toilets strategy for its area.

Local authorities in Wales now have the responsibility to:

- assess the need for toilet provision for their communities;
- plan to meet those needs;
- produce a local toilets strategy; and
- review the strategy, update and publicise revisions

Importantly Although the Welsh Government, Public Health (Wales) Act 2017, Part 8 focuses on 'Provision of Toilets', the provision and maintenance of toilets in public places is a discretionary function of local authorities who have the power under section 87 of the Public Health Act 1936 to provide public conveniences. There is no duty for local authorities to provide public toilets directly.

However Local authorities must action a strategic view on how facilities can be provided and accessed; addressing such things as location, accessibility, facilities, frequency of use and quality of existing sites, as well as determining whether additional or fewer sites are required by their local population.

Furthermore, the Public Health (Wales) Act 2017 as published by Welsh Government has no funding opportunities for local authorities to utilise or additional provisions attached to it.

Cardiff Council holds the provision and value by which public conveniences are provided in critical importance. Having undertaken three separate reviews of toilet provision across the County over the last 10 years; making this new strategy now under the dedicated legislation of the Public Health (Wales) Act 2017, the third and most comprehensive, far reaching strategy to be developed and adopted by the authority.

These historic reviews have highlighted a number of key considerations including the cost effectiveness of public conveniences in comparison to tax payer value, impact of antisocial behaviour on sustainability of provision and factors relating to quality and accessibility. In some cases this has resulted in the removal of expensive non-inclusive / inaccessible public conveniences including the now debunked automatic public conveniences (APCS).

Therefore, Cardiff Council has adopted an integrated community cantered approach to

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

the provision of Public Conveniences. Actively supporting communities through providing access to high quality provision via existing toilets in Core Council buildings as well as developing targeted relevant provision within community Hubs, libraries sports/ leisure services enabling people to have confidence in using publicly available and supported locations.

This Strategy establishing a 2 year implementation action plan and strategy encompassing future consideration and opportunities. Utilising new but also historic and initiatives but further assessing the evolving needs of local communities. Generating sustainable co-production models for the provision of improvingly abundant high quality Public conveniences within the area.

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.

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 web based, visual identification signage and active promotion within neighbourhoods.
- Signing more businesses up to the requirements of the Public Health Wales Bill; specifically in relation to part 8 and local authorities facilitating strategy to address the duties of the bill.

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

- 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 (Contribute towards the national dataset for the "Lle" map. "Lle" is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment).
- 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 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

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

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 created 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).
- 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 web based, visual identification signage and active promotion within neighbourhoods.
- Signing more businesses up to the requirements of the Public Health Wales Bill; specifically in relation to part 8 and local authorities facilitating strategy to address the duties of the bill.
- 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.
- Creation of information sources and use of mobile phone apps for signposting (Contribute towards the national dataset for the "Lle" map. "Lle" is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment).

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

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.

CARDIFF COUNCIL

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 requirements of the Public Health Wales Bill; specifically in relation to part 8 and local authorities facilitating strategy to address the duties of the bill.
- 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 (Contribute towards the national dataset for the “Lle” map. “Lle” is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment).

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
--	-----	----	-----

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

Pregnancy	✓		
Maternity	✓		

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

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 created 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 requirements of the Public Health Wales Bill; specifically in relation to part 8 and local authorities facilitating strategy to address the duties of the bill.
- 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

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

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 (Contribute towards the national dataset for the “Lle” map. “Lle” is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment).

3.6 Race

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

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

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 requirements of the Public Health Wales Bill; specifically in relation to part 8 and local authorities facilitating strategy to address the duties of the bill.
- 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 (Contribute towards the national dataset for the "Lle" map. "Lle" is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment).

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	✓		
Muslim	✓		
Sikh	✓		
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

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

<p>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).</p> <ul style="list-style-type: none"> 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.
<p>What action(s) can you take to address the differential impact?</p> <p>In addition to the below generic consideration that can be of benefit to all communities. Consideration would be made towards the following:-</p> <ul style="list-style-type: none"> 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 <p>Further (generic) consideration needs to be given to:-</p> <ul style="list-style-type: none"> 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 requirements of the Public Health Wales Bill; specifically in relation to part 8 and local authorities facilitating strategy to address the duties of the bill. 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 (Contribute towards the national dataset for the “Lle” map. “Lle” is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment).

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	✓		

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

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.

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 requirements of the Public Health Wales Bill; specifically in relation to part 8 and local authorities facilitating strategy to address the duties of the bill.
- 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 (Contribute towards the national dataset for the "Lle" map. "Lle" is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment).

3.9 Sexual Orientation

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

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

	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 created 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 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 requirements of the Public Health Wales Bill; specifically in relation to part 8 and local authorities facilitating strategy to address the duties of the bill.
- 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.

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

- Creation of information sources and use of mobile phone apps for signposting (Contribute towards the national dataset for the “Lle” map. “Lle” is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment).

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	✓		

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

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 requirements of the Public Health Wales Bill; specifically in relation to part 8 and local authorities facilitating strategy to address the duties of the bill.
- Opening up more public facilities, e.g. hubs, partner locations etc

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

- 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 (Contribute towards the national dataset for the “Lle” map. “Lle” is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment).

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 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.

CARDIFF COUNCIL

**Equality Impact Assessment
Corporate Assessment Template**

February 2016

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

Public Consultation and 'Assessment of Need' 2019

Specifically in relation to the requirements of the Public Health Wales Bill 2017

Between Monday 21st January and Monday 4th March 2019, a Six week long Assessment of Need public consultation was conducted across Cardiff. Entitled 'Local Toilet Strategy; Consultation On A local Toilet Strategy for Cardiff Council'.

Accompanied with a review of existing toilet facilities to identify any gaps in current provision. This consultation involved engaging with communities and a wide range of interested parties to consider the requirements of the general population and specific user groups.

Engagement was conducted via a range of approaches including feedback from the public, on street poster advertising in social media, online content, emails, surveys and questionnaires as well as a range of community venues. Specifically this engagement acquired the input of the Cardiff Council Access Focus Group and 50 plus forums. Both identified as groups having relevant and specific interest in the topic of away from home public conveniences, as a result of identified historic need and general interest.

(The full results of the public consultation can be found on the Cardiff council website relating to the Cardiff Council Toilet Strategy).

Respondents were asked a wide variety of questions relating to areas most visited within the City boundary's, broken down into civic centres, times of visiting, details of toilet and changing facility provision, attractions and parks most visited, followed by a series of statements relating to facilities which respondents were asked to agree or disagree with. This questioning mirroring the needs assessments of other local authorities in Wales to ensure a unified and comparative approach.

Methodology

- The electronic online and conventional questionnaire / survey booklet was available to complete from Monday 21st January to Monday 4th March 2019.
- All questionnaires and related information were provided bilingually.
- All questionnaires and related information were available in a range of

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

formats including alternative languages upon request.

- Comments regarding the survey or requests for the survey in another language/format could be made by contacting public_conveniences@cardiff.gov.uk.
- Versions suitable for screen readers used by those with visual impairments were also provided.
- Bilingual paper questionnaire booklets and related information was available in retail locations / hubs etc. as well as distributed via engagement activities Cardiff Council Access Focus Group and 50+ forum etc.
- Links to the survey were available via Cardiff Council's dedicated web pages www.cardiff.gov.uk/haveyoursay.
- The survey was advertised via a repeating banner on the council's website homepage which had 92,171 visits during the 6 week consultation period.
- The survey was promoted as a 'Quick Link' on the council's Intranet pages.
- An email was sent out Via 'Staff Information' which goes to 8,182 email addresses across the council.
- All staff engagement groups including the Carers network and Disability network emailed the questionnaire and invited to comment.
- A communication campaign was conducted via social media. Cardiff Council's Twitter and Facebook accounts have a combined audience of 89,000 followers (78k Twitter, 11k Facebook).
- Promotional Posters were displayed across the council's 19 city-wide Hubs and Libraries.
- Posters were also displayed at shops in local shopping areas/districts across the City to further enhance visibility of the survey.
- A Cardiff Council Access Forum Group (CCAFG) meeting took place in County Hall on 08/02/19 to discuss the topic. The CCAFG is built up of a range over 400 organisations and individuals representing all strands of equalities including LGBT, Disability, Faith, and Age (both young and old) this meeting was also attend by members of the 50+ forum.
- Questionnaires were distributed via the secretary of the Hackney Carriage Alliance.
- All consultation literature and questionnaires were produced by Cardiff Research Centre.

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

Groups	Actions
Age	Please see considerations under this protected characteristic

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

Disability	Please see considerations under this protected characteristic
Gender Reassignment	Please see considerations under this protected characteristic
Marriage & Civil Partnership	N/A
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
Generic Over-Arching [applicable to all the above groups]	<p>Further (generic) consideration needs to be given to:-</p> <ul style="list-style-type: none"> • 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 web based, visual identification signage and active promotion within neighbourhoods. • Signing more businesses up to the requirements of the Public Health Wales Bill; specifically in relation to part 8 and local authorities facilitating strategy to address the duties of the bill. • 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 (Contribute towards the national dataset for the "Lle" map. "Lle" is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily

CARDIFF COUNCIL

Equality Impact Assessment Corporate Assessment Template

	<p>around the environment).</p> <ul style="list-style-type: none"> 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). <p>Please note that due regard has been provided within this EIA towards:-</p> <ul style="list-style-type: none"> Equality Act 2010. Wellbeing of Future Generations (Wales) Act 2015 Welsh Government Statutory 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

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: 01/05/2019
Designation: Section Leader H&S, BSI, EqIA	
Approved By: Andrew Gregory, Director of Planning Transport and Environment (PTE)	01/05/2019
Designation: Director	
Service Area: Planning Transport and Environment (PTE)	

CARDIFF COUNCIL

**Equality Impact Assessment
Corporate Assessment Template**

- 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