

EQUALITY IMPACT ASSESSMENT (EIA) FORM

Name of Policy:	Public Conveniences Review
Lead Officer (responsible for assessment):	Emma Grima
Department:	Director (Commercial & Corporate Services)
Others Involved in the Assessment (i.e. peer review, external challenge):	Public Conveniences Review Working Party
Date EIA Completed:	01/03/2016

What is an Equality Impact Assessment (EIA)?

As part of any effective policy development process, it is important to consider any potential risks to those who will be affected by the policy's aims or by its implementation. The Equality Impact Assessment (EIA) process helps us to assess the implications of our decisions on the whole community, to eliminate discrimination, tackle inequality, develop a better understanding of the community we serve, target resources efficiently, and adhere to the transparency and accountability element of the Public Sector Equality Duty.

The word 'policy', in this context, includes the different things that the Council does. It includes any policy, procedure or practice - both in employment and service delivery. It also includes proposals for restructuring, redundancies and changes to service provision.

(a) **What is the policy trying to achieve?** i.e. What is the aim/purpose of the policy? Is it affected by external drivers for change? What outcomes do we want to achieve from the policy? How will the policy be put into practice?

The purpose of the review is to identify the following:

- Cost analysis of the service;
- Determine whether existing provisions are fit for purpose;
- Determine whether all of public convenience facilities are required;
- Analyse the cost of improving and/or refurbishing the public conveniences;
- Consider any alternative delivery mechanisms;
- Identify and recommend any efficiency savings; and
- Explore potential income streams.

(b) **Who are its main beneficiaries?** i.e. who will be affected by the policy?

Users of public conveniences.

(c) **Is the EIA informed by any information or background data (quantitative or qualitative)?** i.e. consultations, complaints, applications received, allocations/take-up, satisfaction rates, performance indicators, access audits, census data, benchmarking, workforce profile etc.

A specific public consultation was carried out as to whether charges should be introduced to enable improvement of the service. The public consultation did not support introducing charging, however, representations were made by individuals that suggested closing some of the facilities in order to generate efficiency savings.

Barton Road

The facilities are located near the car park. There is adequate alternative provision of conveniences nearby. The survey indicated that the facilities were in poor condition.

Newnham Street

The facilities are located in a busy car park. There are other facilities close by. The survey indicated that the facilities were showing signs of ageing and the layout of the toilet increased cleaning time and encourages ant-social behaviour.

Sacrist Gate

The facilities are located close to the Cathedral, near the Palace Green facilities. The Council does not own these public conveniences, they are leased from the Cathedral and can only be used for the operation of public conveniences.

The Director (Commercial & Corporate Services) has met with representatives from the Cathedral to ascertain whether the Cathedral would continue to operate the facilities if the lease was to be surrendered. The Cathedral has confirmed that they would not continue to run the service as there is adequate provision nearby.

(d) Does this policy have the potential to cause a positive or negative impact on different groups in the community, on the grounds of any of the protected characteristics? (please tick all that apply)

Ethnicity	<input type="checkbox"/> N	Age	<input type="checkbox"/> Y
Gender	<input type="checkbox"/> Y	Religion and Belief	<input type="checkbox"/> N
Disability	<input type="checkbox"/> Y	Sexual Orientation	<input type="checkbox"/> N
Gender Reassignment	<input type="checkbox"/> Y	Marriage & Civil Partnership	<input type="checkbox"/> N
Pregnancy & Maternity	<input type="checkbox"/> N	Caring Responsibilities	<input type="checkbox"/> Y

Please explain any impact identified: i.e. What do you already know about equality impact or need? Is there any evidence that there is a higher or lower take-up by particular groups? Have there been any demographic changes or trends locally? Are there any barriers to accessing the policy or service?

The provision of public conveniences is not a statutory duty of the Local Authority.

Following consultation with the Local Access Group consideration has been given to how the proposed closures may impact on current users of the public conveniences, particularly those within the groups identified above.

The proposed closures are based on location and proximity to other facilities in the vicinity. There is adequate provision made at the Cloisters Shopping precinct to serve visitors to the City Centre- accessible facilities and a family room are available at this location, Ship Lane to serve visitors to the riverside- accessible facilities and a family room are available at this location, and Palace Green to serve visitors to Ely Cathedral and other local attractions- there are no accessible facilities at this location, however, there are public conveniences provided at the Cloisters to serve this need.

Disability- representations were made by the Local Access Group setting out concerns relating to

the disabled users of public conveniences.

Accessible facilities will still be available at Palace Green and Ship Lane. The proposed closures at Newnham Street and Sacrist Gate would not cause a negative impact on disabled users. Closure of the public conveniences at Barton Road may have an impact on users within this group as it is a coach drop off point. There are public conveniences located in the City Centre to serve this need.

Age- representations were made by the Local Access Group setting out concerns relating to the elderly members of the community using public conveniences.

Facilities will still be available at Palace Green, Ship Lane and the Cloisters Shopping Centre. The proposed closures at Newnham Street and Sacrist Gate would not cause a negative impact on the elderly. Closure of the public conveniences at Barton Road may have an impact on users within this group as it is a coach drop off point. There are public conveniences located in the City Centre to serve this need.

Gender- representations were made by the Local Access Group setting out concerns relating to male users accompanying female children to the facilities and that these users would feel more comfortable using accessible facilities.

Accessible facilities will still be available at Palace Green and Ship Lane. The proposed closures at Newnham Street and Sacrist Gate would not cause a negative impact on this group. Closure of the public conveniences at Barton Road may have an impact on users within this group as it is a coach drop off point. There are public conveniences located in the City Centre to serve this need.

Caring Responsibilities- representations were made by the Local Access Group setting out concerns relating to the space requirements of those carrying out caring responsibilities.

Accessible facilities will still be available at Palace Green and Ship Lane. The proposed closures at Newnham Street and Sacrist Gate would not cause a negative impact on this group. Closure of the public conveniences at Barton Road may have an impact on users within this group as it is a coach drop off point. There are public conveniences located in the City Centre to serve this need.

Gender reassignment- representations were made by the Local Access Group setting out concerns relating to those within this group finding it less challenging to be able to access an accessible facility.

Accessible facilities will still be available at Palace Green and Ship Lane. The proposed closures at Newnham Street and Sacrist Gate would not cause a negative impact on this group. Closure of the public conveniences at Barton Road may have an impact on users within this group as it is a coach drop off point. There are public conveniences located in the City Centre to serve this need.

There will remain sufficient provision on public conveniences, including accessible facilities and a family room, in Ely and as such the impact is not considered to be adverse.

(e) Does the policy have a differential impact on different groups?

NO

(f) Is the impact *adverse* (i.e. less favourable)?

NO

(g) Does it have the potential to disadvantage or discriminate unfairly against any of the groups in a way that is unlawful?

NO

(h) How have you engaged stakeholders in gathering evidence or testing the policy proposals? Who was involved, how and when where they engaged? Does the evidence show potential for differential impact? How will you mitigate any negative impacts? Where there is the potential for an adverse impact that cannot be addressed immediately, these should be highlighted in your recommendations and objectives at the end of the EIA.

The Local Access Group has been consulted on the proposals.

* The Consultation Register is available to assist staff in consulting with the Council's stakeholders.

(i) Summarise the findings of your research and/or consultation (please use a separate sheet if necessary).

n/a

(j) What are the risks associated with the policy in relation to differential impact and unmet needs/requirements? i.e. reputation, financial, breach of legislation, service exclusion, lack of resources, lack of cooperation, insufficient budget etc.

n/a

(k) Use the information gathered in the earlier stages of your EIA to make a judgement on whether there is the potential for the policy to result in unlawful discrimination or a less favourable impact on any group in the community, and what changes (if any) need to be made to the policy.

Option 1:	No major change - the evidence shows that the policy is robust and no potential for discrimination.	Y
Option 2:	Adjust the policy - to remove barriers or to better promote equality.	n/a
Option 3:	Continue the policy - despite potential for adverse impact or missed opportunity to promote equality, provided you have satisfied yourself that it does not unlawfully discriminate.	n/a
Option 4:	Stop and remove the policy – if the policy shows adverse effects that cannot be justified.	n/a

(l) Where you have identified the potential for adverse impact, what action can be taken to remove or mitigate against the potential for the policy to unlawfully discriminate or impact less favourably on one or more communities in a way that cannot be justified? Include key activities that are likely to have the greatest impact (max. 6). Identified actions should be specified in detail for the first year but there may be further longer term actions which need to be considered. To ensure that your actions are more than just a list of good intentions, include for each: the person responsible for its completion, a timescale for completion, any cost implications and how these will be addressed. It is essential that you incorporate these actions into your service plans.

n/a

This completed EIA will need to be countersigned by your Head of Service. **Please forward completed and signed forms to the Principal HR Officer.**

All completed EIAs will need to be scrutinised and verified by the Council's Equal Opportunities Working Group (EOWG) and published on the Council's Intranet to demonstrate to local people that the Council is actively engaged in tackling potential discrimination and improving its practices in relation to equalities. Please be aware that you may be asked to attend a half-an-hour session to summarise the findings of the EIA to the Scrutiny and Verification panel.

Signatures:

Completing Officer:	Emma Grima	Date:	01/03/2016
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Head of Service:	John Hill	Date:	01/03/2016
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