



Equality Impact and Outcome Assessment (EIA) Template - 2019

EIAs make services better for everyone and support value for money by getting services right first time.

1. Equality Impact and Outcomes Assessment (EIA) Template

First, consider whether you need to complete an EIA, or if there is another way to evidence assessment of impacts, or that an EIA is not needed.

Title of EIA	Public toilet closures	ID No.	
Team/Department	City Environment		
Focus of EIA	<p>The Public Toilet Team within City Environment is responsible for 36 public toilets sites across the city.</p> <p>Under the Public Health Act 1936, local authorities in England and Wales have a power, not a duty, to provide toilets for use by the public. Therefore, public toilets are not a statutory service.</p> <p>As part of the 2023/24 budget setting process, a £0.300m saving has been proposed for the public toilet budget. This Equality Impact Assessment assesses the impact proposed closures will have on the protected characteristics below.</p> <p>This document should be read in conjunction with the Public Toilet Report presented to Environment, Transport & Sustainability Committee on 17 January 2023.</p> <p>Within the report to Environment, Transport & Sustainability Committee there is also a proposal to introduce a charge to use some public toilets. This may have a cumulative impact on some protected characteristics.</p>		

2. Update on previous EIA and outcomes of previous actions

What actions did you plan last time? (List them from the previous EIA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action plan below)
An Equality Impact Assessment was not completed for the previous budget savings relating to public toilets.		

3. Review of information, equality analysis and potential actions

Groups to assess	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age	Public toilets are available to those that live and visit the city. As such, data is not held on all service users. The population in Brighton & Hove in November 2022 ¹ : <ul style="list-style-type: none"> • 0-15 years: 44,750 • 16-64 years: 207,971 • 65+ years: 39,017 	In October 2022, emergency closures were made to manage a forecasted £0.400m pressure within the public toilet budget at that time. Since then, four complaints have been received where the age of users was cited as a reason for the complaint, three for children and one for 65+ years.	Older people may be disproportionately impacted if some public toilets are closed. Older people may have mobility issues which limit access to other toilets. They may need to use the toilet more often. Parents and carers may need more frequent access to public toilets for baby changing facilities. Small children have less control over their bladders and outings can be abruptly shortened if a child needs to use a toilet.	Publicise other toilets available, such as libraries, museums, shopping centres etc. Place signage on the closed toilets, directing people to the nearest alternative and to the council website for more information. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.
Disability	Public toilets are available to those that live and visit the city. As such, data is not held on all service users. There are 44,569 people (16.3% of the population) in Brighton & Hove whose daily activities are limited in some degree by a long-term health problem or disability ² .	In October 2022, emergency closures were made to manage a forecasted £0.400m pressure within the public toilet budget at that time. Since then, three complaints have been received where a disability was cited as a reason for the complaint.	Some people with certain disabilities may be disproportionately impacted if some public toilets are closed. People with certain disabilities may have mobility issues which limit access to other toilets. They may need to use the toilet more often.	Publicise other toilets available, such as libraries, museums, shopping centres etc. Place signage on the closed toilets, directing people to the nearest alternative and to the council website for more information. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites

¹ [Local Insight \(communityinsight.org\)](https://communityinsight.org)

² [Equalities in Brighton & Hove: Data snapshot for equalities groups across the city \(bhconnected.org.uk\)](https://bhconnected.org.uk)

Groups to assess	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations over to third parties.
Gender reassignment	Public toilets are available to those that live and visit the city. As such, data is not held on all service users. It is estimated that at least 2,760 trans adults live in Brighton & Hove ¹ .	In October 2022, emergency closures were made to manage a forecasted £0.400m pressure within the public toilet budget at that time. No complaints have been received where gender reassignment was cited as a reason for the complaint.	Those undergoing or who have completed gender reassignment may be disproportionately impacted if some public toilets are closed. Transgender people may face discrimination due to people's perception about their gender.	Publicise other toilets available, such as libraries, museums, shopping centres etc. Place signage on the closed toilets, directing people to the nearest alternative and to the council website for more information. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.
Pregnancy and maternity	Public toilets are available to those that live and visit the city. As such, data is not held on all service users.	In October 2022, emergency closures were made to manage a forecasted £0.400m pressure within the public toilet budget at that time. No complaints have been received where pregnancy or maternity were cited as a reason for the complaint.	Pregnant people may be disproportionately impact if some public toilets are closed. Pregnant people may need to use the toilet more often.	Publicise other toilets available, such as libraries, museums, shopping centres etc. Place signage on the closed toilets, directing people to the nearest alternative and to the council website for more information. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites

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Groups to assess	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations over to third parties.
Race/ethnicity Including migrants, refugees and asylum seekers	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all races/ethnicities will be affected by the closure of some public toilets.	No feedback received from this group regarding closure of public toilets.	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all races/ethnicities will be affected by the closure of some public toilets.	Whilst there is unlikely to be a disproportionate impact on this characteristic, the actions detailed for the other characteristics will apply here.
Religion or belief	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all religions and beliefs will be affected by the closure of some public toilets.	No feedback received from this group regarding closure of public toilets.	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all religions and beliefs will be affected by the closure of some public toilets.	Whilst there is unlikely to be a disproportionate impact on this characteristic, the actions detailed for the other characteristics will apply here.
Sex/Gender	Public toilets are available to those that live and visit the city. As such, data is not held on all service users. In Brighton & Hove in November 2022 ¹ : <ul style="list-style-type: none"> • 147,035 males • 144,702 females 	In October 2022, emergency closures were made to manage a forecasted £0.400m pressure within the public toilet budget at that time. No complaints have been received where sex/gender was cited as a reason for the complaint.	Women and girls may be disproportionately impacted if some public toilets are closed. Women and girls may need to use the toilet more often due to being on their period or going through the menopause.	Publicise other toilets available, such as libraries, museums, shopping centres etc. Place signage on the closed toilets, directing people to the nearest alternative and to the council website for more information. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.

¹ [Local Insight \(communityinsight.org\)](https://communityinsight.org)

Groups to assess	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Sexual orientation	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all members of the public will be affected by the closure of some public toilets.	No feedback received from this group regarding closure of public toilets.	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all members of the public will be affected by the closure of some public toilets.	Whilst there is unlikely to be a disproportionate impact on this characteristic, the actions detailed for the other characteristics will apply here.
Marriage and civil partnership	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all members of the public will be affected by the closure of some public toilets.	No feedback received from this group regarding closure of public toilets.	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all members of the public will be affected by the closure of some public toilets.	Whilst there is unlikely to be a disproportionate impact on this characteristic, the actions detailed for the other characteristics will apply here.
Community Cohesion	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all communities will be affected by the closure of some public toilets.	No feedback received from this group regarding closure of public toilets.	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all communities will be affected by the closure of some public toilets.	Whilst there is unlikely to be a disproportionate impact on this characteristic, the actions detailed for the other characteristics will apply here.
Other relevant groups Those on lower incomes	Public toilets are available to those that live and visit the city. As such, data is not held on all service users. From January to December 2021 there were 8,300 workless households in Brighton & Hove (8.6% of households). No data is available on the number of children within these households ¹ .	In October 2022, emergency closures were made to manage a forecasted £0.400m pressure within the public toilet budget at that time. One complaint has been received which stated the user was able to buy a cup of coffee and use the facilities in a local café instead, but not everyone	Those on lower incomes may be disproportionately affected if some public toilets are closed.	Publicise other toilets available, such as libraries, museums, shopping centres etc. Place signage on the closed toilets, directing people to the nearest alternative and to the council website for more information. Explore the alternative options for public toilets to

¹ [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

Groups to assess	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	In November 2022, there were 7,860 (3.8% of the population) out-of-work benefit claimants ¹ .	can afford to do this.		remain open without council funds e.g. handing sites over to third parties.
Other relevant groups Parents and carers	Public toilets are available to those that live and visit the city. As such, data is not held on all service users. In Brighton & Hove in November 2022 ² : <ul style="list-style-type: none"> • 0-15 years: 44,750 	As above, since the emergency closures were made three complaints have been received where the young age of users was cited as a reason for the complaint.	Parents and carers of young children may be disproportionately affected if some public toilets are closed. They may need more frequent access to public toilets for baby changing facilities. Small children have less control over their bladders and outings can be abruptly shortened if a child needs to use a toilet.	Publicise other toilets available, such as libraries, museums, shopping centres etc. Place signage on the closed toilets, directing people to the nearest alternative and to the council website for more information. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.
Other relevant groups Rough sleepers	Public toilets are available to those that live and visit the city. As such, data is not held on all service users. In December 2021, the number of people sleeping on the streets on a given night in Brighton & Hove was 27 ³ .	In October 2022, emergency closures were made to manage a forecasted £0.400m pressure within the public toilet budget at that time. No complaints have been received where facilities for rough sleepers was cited as a reason for the complaint.	Rough sleepers may be disproportionately impacted if some public toilets are closed. They may feel a greater stigma when using other facilities and may not feel welcome.	Publicise other toilets available, such as museums, shopping centres etc. Place signage on the closed toilets, directing people to the nearest alternative and to the council website for more information. Explore the alternative options for public toilets to

¹ [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

² [Local Insight \(communityinsight.org\)](https://communityinsight.org)

³ [274,000 people in England are homeless, with thousands more likely to lose their homes - Shelter England](https://www.shelter.org.uk)

Groups to assess	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
				<p>remain open without council funds e.g. handing sites over to third parties.</p> <p>Provide information on the facilities available to rough sleepers, including First Base, Antifreeze and the Clocktower Sanctuary.</p>
Whilst not protected characteristics: other relevant groups	Public toilets are available to those that live and visit the city. As such, data is not held on all service users.	<p>In October 2022, emergency closures were made to manage a forecasted £0.400m pressure within the public toilet budget at that time.</p> <p>Three complaints have been received about the impact this has on people partaking in exercise across the city.</p> <p>One complaint was received above the impact this has on people working outside across the city.</p>	<p>Those partaking in exercise across the city and those working outside may be disproportionately affected if some public toilets are closed.</p> <p>They may have nowhere else to go nearby.</p>	<p>Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.</p> <p>Place signage on the closed toilets, directing people to the nearest alternative and to the council website for more information.</p> <p>Explore options for a Community Toilet Scheme whereby businesses allow non-customers to use their toilets.</p>
Cumulative impact	<p>There is also a proposal to charge for some public toilets in the city. An EIA for this is contained in Appendix 3 of the report to Environment, Transport & Sustainability Committee. This includes actions to reduce the impact on members of the public.</p> <p>The two proposals together may have a cumulative impact on some Groups.</p>			
Assessment of overall impacts and any further recommendations				

Groups to assess	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
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The closure of some public toilet sites will have a disproportionate impact on some protected characteristics. This will be mitigated, to some extent, by the actions detailed in section 5. The purpose of closing some sites is to ensure the service can operate within budget and not impact on other council services. Public toilets are a non-statutory service and statutory services have to be prioritised with the limited council budget available. In addition to the actions detailed in section 3 against relevant Groups, City Environment will also look at what the alternative options are to enable more public toilets to stay open without council funds. This includes handing over sites to third parties, where it is appropriate to do so.

4. List detailed data and/or community feedback that informed your EIA

Title (of data, research or engagement)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
As per footnotes in section 3			

5. Prioritised Action Plan

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.				
For all groups	Publicise other toilets available, such as libraries, museums, shopping centres etc.	Improved website content Residents and visitors are aware of the toilet facilities across the city	Members of the public informed of the toilet facilities across the city	The content on the website will be updated in February 2023
	Place signage on the closed toilets, directing people to the nearest alternative and to the	Improved website content Residents and visitors are aware of the toilet facilities across the city	Members of the public informed of the toilet facilities across the city	The content on the website will be updated in February 2023

	council website for more information.			
	Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.	Toilets currently planned for closure will be reopened, with other businesses and organisations taking on responsibility for them	The number of toilets currently planned for closure that have been reopened	12 to 36 months
Rough sleepers	Provide information on the facilities available to rough sleepers, including First Base, Antifreeze and the Clocktower Sanctuary	Rough sleepers are aware of the toilet facilities across the city	Rough sleepers informed of the toilet facilities across the city	Once a decision has been made at Budget Council on 23 February 2023, communications will take place

EIA sign-off: (for the EIA to be final an email must sent from the relevant people agreeing it or this section must be signed)

Staff member completing Equality Impact Assessment:

Date:

Directorate Management Team rep or Head of Service/Commissioning:

Date:

CCG or BHCC Equality lead:

Date:

