



**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.

<b>Title of EIA</b>	Public toilet charging	<b>ID No.</b>	
<b>Team/Department</b>	City Environment		
<b>Focus of EIA</b>	<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>To supplement the current public toilet budget and reduce the council’s overall budget gap, it is proposed that charging is introduced at sites across the city.</p> <p>This Equality Impact Assessment assesses the impact charging 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 &amp; Sustainability Committee on 17 January 2023.</p> <p>As part of the 2023/24 budget setting process, a £0.300m saving has been proposed for the public toilet budget. This may have a cumulative impact on some protected characteristics.</p>		

**2. Update on previous EIA and outcomes of previous actions**

<b>What actions did you plan last time?</b> (List them from the previous EIA)	<b>What improved as a result?</b> What outcomes have these actions achieved?	<b>What <u>further</u> actions do you need to take?</b> (add these to the Action plan below)
An Equality Impact Assessment has not completed before on the introduction of charging at 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)	<b>What can you do?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
<b>Age</b>	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 <sup>1</sup> : <ul style="list-style-type: none"> <li>• 0-15 years: 44,750</li> <li>• 16-64 years: 207,971</li> <li>• 65+ years: 39,017</li> </ul>	No feedback received from this group regarding charging at public toilets.	Older people may be disproportionately impacted if charging is introduced. Older people may need to use the toilet more often.	Publicise other toilets available, such as libraries, museums, shopping centres etc. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.
<b>Disability</b>	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 <sup>2</sup> .	No feedback received from this group regarding charging at public toilets.	Some people with certain disabilities may be disproportionately impacted if charging is introduced. People with certain disabilities may need to use the toilet more often.	Publicise other toilets available, such as libraries, museums, shopping centres etc. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.
<b>Gender reassignment</b>	Public toilets are available to those that live and visit the city. As such, data is not	No feedback received from this group regarding charging at public toilets.	Those undergoing or who have completed gender reassignment may be disproportionately impacted	Publicise other toilets available, such as libraries, museums, shopping

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

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

<b>Groups to assess</b>	<b>What do you know?</b> Summary of data about your service-users and/or staff	<b>What do people tell you?</b> Summary of service-user and/or staff feedback	<b>What does this mean?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
	held on all service users. It is estimated that at least 2,760 trans adults live in Brighton & Hove <sup>1</sup> .		if charging is introduced. Transgender people may face discrimination due to people's perception about their gender.	centres etc. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.
<b>Pregnancy and maternity</b>	Public toilets are available to those that live and visit the city. As such, data is not held on all service users.	No feedback received from this group regarding charging at public toilets.	Pregnant people may be disproportionately impact if charging is introduced. Pregnant people may need to use the toilet more often.	Publicise other toilets available, such as libraries, museums, shopping centres etc. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.
<b>Race/ethnicity</b> 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 charging at public toilets.	No feedback received from this group regarding charging at public toilets.	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all races/ethnicities will be affected by charging at public toilets.	Whilst there is unlikely to be a disproportionate impact on this characteristic, the actions detailed for the other characteristics will apply here.
<b>Religion or belief</b>	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all religions and beliefs will be affected by charging at public toilets.	No feedback received from this group regarding charging at public toilets.	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all religions and beliefs will be affected by charging at public toilets.	Whilst there is unlikely to be a disproportionate impact on this characteristic, the actions detailed for the other characteristics will apply here.

<sup>1</sup> [Equalities in Brighton & Hove: Data snapshot for equalities groups across the city \(bhconnected.org.uk\)](https://www.bhconnected.org.uk/equalities-in-brighton-hove-data-snapshot-for-equalities-groups-across-the-city)

<b>Groups to assess</b>	<b>What do you know?</b> Summary of data about your service-users and/or staff	<b>What do people tell you?</b> Summary of service-user and/or staff feedback	<b>What does this mean?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
<b>Sex/Gender</b>	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 <sup>1</sup> : <ul style="list-style-type: none"> <li>• 147,035 males</li> <li>• 144,702 females</li> </ul>	No feedback received from this group regarding charging at public toilets.	Women and girls may be disproportionately impacted if charging is introduced. 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. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.
<b>Sexual orientation</b>	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all members of the public will be affected by charging at public toilets.	No feedback received from this group regarding charging at public toilets.	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all members of the public will be affected by charging at public toilets.	Whilst there is unlikely to be a disproportionate impact on this characteristic, the actions detailed for the other characteristics will apply here.
<b>Marriage and civil partnership</b>	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all members of the public will be affected by charging at public toilets.	No feedback received from this group regarding charging at public toilets.	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all members of the public will be affected by charging at public toilets.	Whilst there is unlikely to be a disproportionate impact on this characteristic, the actions detailed for the other characteristics will apply here.
<b>Community Cohesion</b>	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all communities will be affected by charging at public toilets.	No feedback received from this group regarding charging at public toilets.	Whilst there is unlikely to be a disproportionate impact on this specific characteristic, all communities will be affected by charging at public toilets.	Whilst there is unlikely to be a disproportionate impact on this characteristic, the actions detailed for the other characteristics will apply here.
<b>Other relevant groups</b>	Public toilets are available to those that live and visit the city. As such, data is not	In October 2022, emergency closures were made to manage a	Lower income families and individuals may be disproportionately impacted	Publicise other toilets available, such as libraries, museums, shopping

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

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	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 <sup>1</sup> . In November 2022, there were 7,860 (3.8% of the population) out-of-work benefit claimants <sup>2</sup> .	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 can afford to do this.	if charging is introduced.	centres etc. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.
<b>Other relevant groups</b> <b>Parents and carers</b>	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 <sup>3</sup> : <ul style="list-style-type: none"> <li>• 0-15 years: 44,750</li> </ul>	No feedback received from this group regarding charging at public toilets.	Parents and carers of young children may be disproportionately impacted if charging is introduced. Parents and carers of young children may need more frequent access to public toilets for baby changing facilities and for young children to use the facilities.	Publicise other toilets available, such as libraries, museums, shopping centres etc. Explore the alternative options for public toilets to remain open without council funds e.g. handing sites over to third parties.
<b>Other relevant groups</b> <b>Rough sleepers</b>	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	No feedback received from this group regarding charging at public toilets.	Rough sleepers may be disproportionately impacted if charging is introduced. They may not be able to afford the charge to access	Publicise other toilets available, such as libraries, museums, shopping centres etc. Explore the alternative

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

<sup>2</sup> [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

<sup>3</sup> [Local Insight \(communityinsight.org\)](https://communityinsight.org)

<b>Groups to assess</b>	<b>What do you know?</b> Summary of data about your service-users and/or staff	<b>What do people tell you?</b> Summary of service-user and/or staff feedback	<b>What does this mean?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
	number of people sleeping on the streets on a given night in Brighton & Hove was 27 <sup>1</sup> .		the toilet facilities or to wash. They may feel a greater stigma when using other facilities and may not feel welcome.	options for public toilets to remain open without council funds e.g. handing sites over to third parties. Provide information on the facilities available to rough sleepers, including First Base, Antifreeze and the Clocktower Sanctuary.
<b>Cumulative impact</b>	There is also a proposal to close some public toilets in the city. An EIA for this is contained in Appendix 2 of the report to Environment, Transport & Sustainability Committee. This includes actions to reduce the impact on members of the public. The two proposals together may have a cumulative impact on some Groups.			
<b>Assessment of overall impacts and any further recommendations</b>				
The introduction of charging at 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 introducing charging is to sustain as much public toilet provision as possible and reduce the likelihood of further closures, which would have a further negative impact on some Groups. 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

<b>Title</b> (of data, research or engagement)	<b>Date</b>	<b>Gaps in data</b>	<b>Actions to fill these gaps: who else do you need to engage with?</b> (add these to the Action Plan below, with a timeframe)

<sup>1</sup> [274,000 people in England are homeless, with thousands more likely to lose their homes - Shelter England](#)

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		The content on the website will be updated in February 2023
	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:**

