

Equality Impact Assessment – Bedford Road toilet

The purpose of an assessment is to understand the impact of the Council's activities* on people from protected groups and to assess whether unlawful discrimination may occur. It also helps to identify key equality issues and highlight opportunities to promote equality across the Council and the community. The assessment should be carried out during the initial stages of the planning process so that any findings can be incorporated into the final proposals and, where appropriate, have a bearing on the outcome.

(*Activity can mean strategy, practice, function, policy, procedure, decision, project or service)

Name of person completing the assessment	Stuart Riddle	Date of assessment	26/11/21
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Name of the proposed activity being assessed	Potential closure of Bedford Road public conveniences	Is this a new or existing activity?	Existing
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Who will implement the activity and who will be responsible for it?	Implementation – Stuart Riddle Responsible – Chris Wheeler
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1. Determining the relevance to equality

What are the aims, objectives, and purpose of the activity?	To review Guildford Borough Council's public conveniences and determine which locations are feasible to close while considering limiting the negative impact on residents and visitors to Guildford Borough.
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Is this a major activity that significantly affects how services or functions are delivered?	Yes, a 25% reduction in Guildford Borough Council's directly provided toilets.	Who will benefit from this activity and how?	Guildford Borough Council via a £65k per year costs saving
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Does it relate to a function that has been identified as being important to people with particular protected characteristics?	Yes, Bedford Road toilets include a disabled toilet and baby changing facilities.	Who are the stakeholders? Does the activity affect employees, service users or the wider community?	Residents and visitors that use Bedford road to access Guildford's workplaces, shops, and hospitality
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Based on the above information, is the activity relevant to equality?

<p>Yes – continue to section 2</p> <p>No – please record your reasons why the activity is not relevant to equality</p>	Yes
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2. Is the proposed activity accessible for all the protected groups listed below? (Consider in what ways the activity might create difficulties or barriers to parts of the workforce, community, or protected groups. How might one or more groups be excluded because of the activity?)			
Protected groups	Yes	No	Evidence
Disability		No	No access for all individuals as proposed activity is closure.
Race		No	
Gender		No	
Sexual orientation		No	
Age		No	
Religion or belief		No	
Transgender or transsexual		No	
Marriage and civil partnership		No	
Pregnancy or maternity		No	

3. Is it likely the proposed activity will have a negative impact on one or more protected groups?			
Protected groups	Yes	No	Evidence
Disability	Yes		Closure of disabled toilets and closest toilets if Bedford Road car park used. The closest facility is not Council provided and is in the Friary Shopping Centre. Although, this facility also has disabled toilets it is not 24 hours like Bedford Road.
Race		No	Closure will affect all races equally – the next nearest facility has the same provisions as Bedford Road.
Gender	Yes		Bedford Road is 24 hours and the nearby, identical provision, in the Friary Shopping Centre closes at 6pm leaving the only late-night alternative as pop-up urinals, where usage is preferred by males, in North Street. However, the average use of the female toilets at Bedford Road toilets is zero between 6pm and 7am (2018 public toilet user count).
Sexual orientation		No	Closure will affect all sexual orientations equally - the next nearest facility has the same provisions as Bedford Road.
Age	Yes		Older residents and visitors have an increased chance of urinary incontinence.
Religion or belief		No	Closure will affect all religions and beliefs equally - the next nearest facility has the same provisions as Bedford Road. There are other public conveniences closer to Guildford's places of worship.

Transgender or transsexual		No	Closure will affect all sexual orientations equally - the next nearest facility has the same provisions as Bedford Road.
Marriage and civil partnership		No	Closure will affect all individuals, no matter marital or partnership status equally – the next nearest facility has the same provisions as Bedford Road.
Pregnancy or maternity	Yes		Closure of baby changing facilities and closest toilets if Bedford Road car park used. Pregnant women have an increased chance of urinary incontinence. The closest facility is not Council provided and is in the Friary Shopping Centre. Although, this facility also has baby changing facilities it is not 24 hours like Bedford Road.

4. What action can be taken to address any negative impact? What measures could be included to promote a positive impact? (*Consider whether it is possible to amend or change the activity due to the likely adverse impact whilst still delivering the objective. Is it possible to consider a different activity which still achieves the aims but avoids an adverse impact? Is an action plan required to reduce any actual or potential adverse impact?*)

The negative impact affects all individuals. The closure of Bedford Road toilets would have a greater negative impact on some protected groups, as outlined in part 3, but it is considered this impact is indirect. We will be placing notices on the relevant toilet doors informing residents of their nearest facilities, both when it goes out to consultation and at sites that are approved for closure following consultation. We will also be encouraging businesses to sign up to The British Toilet Associations Use our Loos Campaign in the hope that there are more alternatives nearby.

There is no way to achieve a positive impact while looking to fulfil the approved mandate.

5. What are the main sources of evidence that have been used to identify the likely impacts on the different protected groups? (*Use relevant quantitative and qualitative information that is available from sources such as previous EIA's, engagement with staff and service users, equality monitoring, complaints, comments, customer equality profiles, feedback, issues raised at previous consultations and known inequalities*).

In January 2021 there was a Budget Survey published, undertaken by SMSR research, and it asked residents to consider Council services in terms of importance, priority, and spending. The survey found that public facilities ranked 9th for all 3 categories, out of the 12 noted services Guildford Borough Council provides. The survey has a mix of responses from all age groups, BAME, transgender and around 10% of all responders identified as having a disability. However, the report does not separate out responses from those in protected groups and the results leading to the ranking are averages.

Usage numbers of male and female toilets are contained in a report by Healthmatic. The report, completed in 2018, was a user survey of all Guildford Borough Council provided facilities and could show the number of users per hour.

6. Has any consultation been carried out (e.g., with employees, service users or the wider community)? Please provide details

Not yet – a public consultation on the closure of public conveniences is due in January 2022.

7. Is further consultation required as a result of any negative impact identified? If so, what groups do you intend to engage with and how?

All groups will be encouraged to respond to the public convenience consultation starting in January 2022. Charities, Government support services, specialists and resident groups will be encouraged to engage. This will include groups like Guildford Access Group, Surrey Coalition, Age UK, Outline Surrey, and the local NHS trust.

8. Conclusion of Equality Impact Assessment - please summarise your findings

The potential closure of Bedford Road toilets is part of an approved mandate to generate cost savings of £65k per annum. This facility has existed for many years and although its closure would directly affect all regular or potential users of this public toilet, its potential additional negative effect on those in protected groups is indirect. Leaving facilities open purely for one or more protected group is not financially viable given the Council's financial position.

Name of person completing assessment: Stuart Riddle

Date: 26th October 2021

Job title: Project Lead - Public Conveniences Review

Senior manager name: Chris Wheeler

Date: 1st November 2021