

Equality with Human Rights Analysis Toolkit



voluntary group feedback, satisfaction and usage data

SECTION A

Name of policy / project / service	PUBLIC CONVENIENCES
Background and aims of policy / project / service at outset	A review of publicly provided toilet facilities so as to make the required savings for the MTFS, and retain adequate coverage at an affordable rate. Three key elements: - A- Reduction in locations and use of mobile attendants - B- Introduction of contactless payments. - C- Improved controlled access system (now deferred for further work prior to revised proposal being approved separately at a later date)
Person(s) responsible for policy or decision, or advising on decision, and also responsible for equality analysis	Drafting of proposal by Assistant Director Communities and Street Scene to underpin the Council's MTS. Final decisions to be taken by Executive.
Key people involved <i>i.e. decision-makers, staff implementing it</i>	Staff- Asst Director Communities and Street Scene . DCE. (Policy) Staff – Community Services Manager. Team Leader -Cleansing Services (Operational delivery) Legal Services- EIA advice Members- Portfolio Holder Remarkable Place Members- Executive Committee. Members – Policy Scrutiny Committee (advisory only)

SECTION B

This is to be completed and reviewed as policy / project / service development progresses

KEY

A-Reduction in locations and use of mobile attendants

B-Introduction of contactless payments.

C-Improved controlled access system

	Is the likely effect positive or negative? (please tick all that apply)			Please describe the effect and evidence that supports this and if appropriate who you have consulted with*	Is action possible to mitigate adverse impacts?	Details of action planned including dates, or why action is not possible
	Positive	Negative	None			
Age	B C	A		A- Reduced locations mean less access. However, loss of sites uphill means that Castle Square is still within 370m of any closed facility. Downhill, Tentercroft is within 425m of Lucy Tower and the Bus Station is just 183m from Sincil St (see diagram appended to the report) B /C - are positive as cashless means not having to have cash available/correct change, so improved access, and controlled access means that facilities will be available more of the time (less damage/abuse).	Yes	<u>Reduction in locations:</u> Selected sites are spread in the city centre and uphill area to give coverage. Note provision of facilities is also available to customers in many private shops for free. As a result of the public consultation, the proposal has now been amended to maintain provision for disabled users at the facility in Westgate car park Signage to and at facilities will be improved. People can still pay with cash.

						<u>Access control system:</u> New access system should make access to quality disabled toilets more reliable. Access system will not prevent entry for anyone in need of the toilet. Further work on this to be undertaken so will not be rolled out initially Consultation with suitable groups about potential changes to access controls. Examples :Citizens Panel/Housing Panel/ Age UK/ Lincoln County Peoples Partnership to make sure this is delivered in a considerate way/timetable, and with reference to city visitors.
Disability including carers (see Glossary)	B C	A		As above It has been suggested that not using the national Radar key system means that disabled visitors to the city will not be able to gain access. See mitigation -right.	Yes	As above. <u>Access control system:</u> Currently those with a legitimate need cannot always access out of hours facilities due to abuse/damage etc arising from the way that Radar keys are now openly available to all, including those intent on abusing the facilities

						The Controlled access system replaces Radar, so only card holders will be able to get access. Those without a card will not get access, so they will have to ask for access. In the bus station staff support are available all the time the bus station is open. At other sites it is planned that users can ring for assistance and doors will be unlocked remotely (so a card will not be compulsory for access). Signage to and at facilities will be improved. Consultation with suitable groups. Examples :Citizens Panel/Housing Panel/ Age UK/ Lincoln County Peoples Partnership to make sure this is delivered in a considerate way/timetable, and with reference to city visitors.
Gender re-assignment	B		A C	B - Positive as cashless means not having to have cash available/correct change, so improved access. A/C are not disadvantaged disproportionately as a result of this policy change.	N/A	Signage to and at facilities will be improved.

Pregnancy and maternity	B	A	C	A - Reduced locations mean less access. B - Positive as cashless means not having to have cash available/correct change, so improved access. C - Category are not disadvantaged disproportionately as a result of this policy change.	Yes	See Age / Disability sections above for context. Selected sites are spread in the city to give coverage. Note provision of facilities is also available to customers in many private shops for free. New access system should make access to quality toilets more reliable. Signage to and at facilities will be improved.
Race	B		A C	B - Positive as cashless means not having to have cash available/correct change, so improved access. A/C Category are not disadvantaged disproportionately as a result of this policy change.	N/A	Signage to and at facilities will be improved.
Religion or belief	B		A C	B - Positive as cashless means not having to have cash available/correct change, so improved access. A/C Category are not disadvantaged disproportionately as a result of this policy change.	N/A	Signage to and at facilities will be improved.
Sex	B	C	A	B - Positive as cashless means not having to have cash available/correct change, so improved access. A/C Category are not disadvantaged disproportionately as a result of this policy change but it is noted that men will have a reduction in two facilities that have traditionally been male only previously.	N/A	2 male urinals closed reducing what has traditionally been a higher level of provision for men. However, Castle Square facility is in very close proximity, and for those with a medical condition requiring access to a toilet -the disabled facility at Westgate

						Signage to and at facilities will be improved.
Sexual orientation	B		A C	B - Positive as cashless means not having to have cash available/correct change, so improved access. A/C Category are not disadvantaged disproportionately as a result of this policy change.	N/A	Signage to and at facilities will be improved.
Marriage/civil partnership	B		A C	B - Positive as cashless means not having to have cash available/correct change, so improved access. A/C Category are not disadvantaged disproportionately as a result of this policy change.	N/A	Signage to and at facilities will be improved.
Human Rights (see page 8)	B		A C	B - Positive as cashless means not having to have cash available/correct change, so improved access. A/C Category are not disadvantaged disproportionately as a result of this policy change.	N/A	Note- Homeless individuals and the street community will be affected – consultation with our own team and/ or other homeless charities will take place. It is not the intention of this change to restrict access to legitimate users, only to prevent abuse/damage. Signage to and at facilities will be improved.

**Evidence could include information from consultations; voluntary group feedback; satisfaction and usage data (i.e. complaints, surveys, and service data); and reviews of previous strategies*

Did any information gaps exist?	Y/N/NA	If so what were they and what will you do to fill these?
See consultation results.	N	See consultation.

SECTION C

Decision Point - Outcome of Assessment so far:

Based on the information in section B, what is the decision of the responsible officer (please select one option below):

- | | Tick here |
|---|-----------|
| • No equality or human right Impact (your analysis shows there is no impact) - sign assessment below | [] |
| • No major change required (your analysis shows no potential for unlawful discrimination, harassment)- sign assessment below | [] |
| • Adverse Impact but continue (record objective justification for continuing despite the impact)-complete sections below | [X] |
| • Adjust the policy (Change the proposal to mitigate potential effect) -progress below only AFTER changes made | [] |
| • Put Policy on hold (seek advice from the Policy Unit as adverse effects can't be justified or mitigated) -STOP progress | [] |

Conclusion of Equality Analysis (describe objective justification for continuing)	The provision of public toilets is not a statutory requirement, and thus there is no right to insist on their provision. The Council strives to provide these as beneficial facilities, but against an increasingly challenging financial climate is seeking to reduce provision, but safeguard and improve access to that which remains. As a consequence of this EIA and supporting public consultation, the proposal has been amended to include the opening up of the disabled toilet at Westgate and the access control system will be the subject of a further report and separate EIA if required, once the proposals are fully developed. During the interim the current Radar system will remain in place		
When and how will you review and measure the impact after implementation?*	Impact will be by assessing complaints received, also outcomes from the Citizen Panel public satisfaction ratings.		
Checked and approved by responsible officer(s) (Sign and Print Name)	Steve Bird	Date	Drafted Oct 2020 Reviewed Jan 2021 Reviewed March 2021 Reviewed April 2021
Checked and approved by Assistant Director (Sign and Print Name)	Becky Scott - Legal Services Manager	Date	290421

When completed, please send to policy@lincoln.gov.uk and include in Committee Reports which are to be sent to the relevant officer in Democratic Services

The Equality and Human Rights Commission guidance to the Public Sector Equality Duty is available via: www.equalityhumanrights.com/new-public-sector-equality-duty-guidance/

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