

# Equality Impact Assessment



Assessment Of: Full Council Report, July 2025, on the provision of public toilets.	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input checked="" type="checkbox"/> Other:	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Customer	Assessment carried out by: Chris Braines
Service Area: Environmental Services	Job Role: Head of Environmental Services
Version / Date of Sign Off by Director:	08/07/2025

## Step 1: What do we want to do?

*This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the Policy Officer early for advice.*

### 1.1 What are the aims and objectives/purpose of this proposal?

*Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.*

In order to meet the savings linked to the Modern 25 programme, Teignbridge District Council has reviewed the provision of toilets we provide to assess value for money and support our strategic priorities.

The accompanying report recommends that Teignbridge discontinue the provision of toilets at seventeen locations, and that these facilities are either transferred to other public organisations to run in the first instance, or that they are closed and alternative uses examined for the sites.

### 1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community	<input checked="" type="checkbox"/> Teignbridge workforce
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### 1.3 Will the proposal have an equality impact?

*Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?*

*If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by your manager.*

*If 'Yes' complete the rest of this assessment.*

<input checked="" type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b> [please select]
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There are possible impacts on health and quality of life for individuals, if we are unable to agree transfers to other bodies to continue the provision. At this stage prior to discussions with partner organisations about the transfer of facilities it is not possible to quantify these.

## Step 2: What information do we have?

### 2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics (listed in 2.2).

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data - from national research, local data or previous consultations and engagement activities.

Outline whether there are any over or under representation of equality groups within your service - don't forget to benchmark to local population where appropriate.

For workforce / management of change proposals you will need to look at the diversity of the affected team(s) using available evidence such as the employee profile data. Identify any under/over-representation for age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Please see: [Equality Act 2010 \(legislation.gov.uk\)](https://legislation.gov.uk).

Data / Evidence Source <i>[Include a reference where known]</i>	Summary of what this tells us
Taking the P***: Royal Society for Public Health <a href="#">459f4802-ae43-40b8-b5a006f6ead373e6.pdf</a>	<ul style="list-style-type: none"> <li>Between 2010 and 2013, one in seven public toilets were closed due to local council cuts.</li> <li>By 2018, 37 areas in the UK had no council-run public toilets</li> <li>Three in four UK residents believe there are not enough public toilets in their area.</li> <li>The lack of facilities disproportionately impacts the elderly, women, outdoor workers, and the homeless.</li> </ul>
Usage figures from all facilities, including Healthmatic footfall surveys, water and electricity costs, and the public consultation carried out.	<ul style="list-style-type: none"> <li>The usage of public toilets varies widely across the district with location and season.</li> <li>Within towns there are more popular sites – the toilets at The Lawn, Dawlish, are used 5-7 times more than those at Boat Cove.</li> <li>Usage is consistent across the week, with no visible peak at weekends.</li> <li>Usage peaks at lunchtime/early afternoon.</li> <li>Electricity and Water usage was cross-referenced with footfall data and public consultation responses.</li> <li>Public toilets are valued by respondents,</li> </ul>
Additional comments:	

### 2.2 Do you currently monitor relevant activity by the following protected characteristics? Information below relates to survey respondents.

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy/Maternity	<input type="checkbox"/> Race

☐ Religion or Belief

☒ Sex

☐ Sexual Orientation

## 2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps please state this clearly with a justification.

For workforce related proposals all relevant information on characteristics may need to be sought from HR (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require action to address and identify the information needed.

Several sources of background evidence were used in the compilation of this report. The public consultation which was undertaken following Full Council in October 2024 collected data on the age, sex and disability. These questions were optional, but most respondents (98.26%) completed them. Respondents were more likely to be female than the population of the district (62.64%), more likely to be older (32.47%) than the district as a whole (27%), and more likely to report as disabled (33.87%) than the district (18.6%).

One of the proposed disposals includes a changing places facility (Cricketfield Road), 9 of the 17 proposed facilities contain accessible facilities. These are specifically, Ashburton, Starcross, Widecombe, Dawlish (Barton Hill and Sandy Lane), Moretonhampstead, Shaldon, Chudleigh and Buckfastleigh.

These questions asked about facilities used, and facilities most valued, but did not provide information on the frequency of use.

Our datasets on the usage levels of different facilities came from a cross-referencing of Healthmatic football survey data alongside the water usage of each facility from the financial year 2023/24.

We have worked to map both public and quasi-public (e.g. library) facilities when assessing coverage.

## 2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this has been of Teignbridge's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to HR for advice on how to consult and engage with employees. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups, trades unions as well as affected staff.

Teignbridge has conducted a public consultation which received high levels of response and was shared with Town and Parish Councils and community groups. There were 5,577 and efforts to consult with groups likely to be adversely affected through Teign CVS.

## 2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Consultation Officer for help in targeting particular groups.

Site specific engagement will be completed with the Town and Parish Councils who may also consult their own public/ stakeholder engagement as they deem necessary.

## Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal.

### 3.1 Does the proposal have any potentially adverse impacts on people on the basis of their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

<b>GENERAL COMMENTS</b> (highlight any potential issues that might impact <b>all or many groups</b> )	
All efforts will be made to retain the level of toilet provision currently available in the district through supported transfers to towns and parishes or other interested parties.  Further analysis of community specific demographics will be undertaken and considered prior to any closures to assess disproportionate impacts based on protected characteristics, with a particular focus on age and disability.	
<b>PROTECTED CHARACTERISTICS</b>	
<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	A reduction in facilities can disproportionately affect those with this characteristic who may need to use public toilets more frequently. Small children have less control and outings can be curtailed when a child needs to use a toilet.
Mitigations:	Usage and coverage have been analysed to ensure that those toilets which are most used or further from alternatives remain open, including those at sites most visited by families such as country parks and seaside locations.
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	Many older adults live with health conditions such as incontinence, mobility issues, or chronic illnesses that necessitate frequent and reliable access to toilets. For example, around 75% of women over 75 are affected by, and 1 in 10 men over 65 experience urinary incontinence. A 2022 survey by Age UK found that 81% of older Londoners rated toilet

	provision in their borough as poor, 52% avoided drinking water before going out, and 90% considered toilet availability before planning a journey.
Mitigations:	We've looked closely at how often each toilet is used and how close it is to other facilities. This means we're keeping open the toilets that are used most often, particularly in popular spots like our destination shopping towns, country parks and resort areas.
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	The NHS reports that about 1 in 5 people in the UK live with a long-term illness or disability that makes everyday life more difficult. Many of these people need toilets that are easy to access or specially adapted. Conditions like irritable bowel syndrome (IBS), Crohn's disease, and ulcerative colitis can make people anxious about going out if they're not sure a toilet will be nearby. Bladder problems are also common. More than 1 in 20 women aged 15 to 44, and up to 1 in 7 women aged 45 to 64, experience them. Among working-age men, more than 1 in 33 are affected. Bowel incontinence—though less talked about—is also widespread. Between 1% and 17% of adults live with this condition, and it becomes more common as people get older.
Mitigations:	We have conducted early engagement with businesses, some of whom have indicated a willingness to allow members of the public to use their facilities.
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	Urinary incontinence affects more women than men. It is estimated that 34% women aged over 19 are affected by urinary incontinence (NICE 2015). Pregnant women or those at the menopause need to use the toilet more often, as do those with other conditions such as diabetes. About a quarter of all women of childbearing age will be menstruating at any one time and require access to toilets. Other health conditions such as prostate cancer disproportionately affect men and often impact their requirement to access toilet facilities.
Mitigations:	Review of toilet usage and proximity to other facilities undertaken. The proposals retain the toilets that are used most often or are in places where there are limited options such as destination shopping towns, country parks and resort areas.
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	A reduction in toilet provision has the potential for a greater impact upon those seeking baby changing facilities or with an increased need to use toilets.
Mitigations:	All efforts will be made to retain the level of toilet provision currently available in the district through supported transfers to towns and parishes. Usage and coverage have been analysed to ensure that those toilets which are most used or further from alternatives remain open. Pregnant women or those at the menopause need to use the toilet more often, as do those with other conditions such as diabetes. About a quarter of all women of childbearing age will be menstruating at any one time and require access to toilets.

<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	Awaiting clarification from Government on Equality and Human Rights Commission Guidance due Autumn 2025
Mitigations:	To be confirmed following clarification
<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Marriage &amp; civil partnership</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	

## OTHER RELEVANT CHARACTERISTICS

<b>Socio-Economic (deprivation)</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Other group(s)</b> <i>Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Rural/Urban Communities, Homelessness, Digital Exclusion, Access To Transport</i>	<p>Individuals with health conditions which may impact toilet requirements have been considered alongside individuals with disabilities above.</p> <p>Rurality – 4 of the In Scope facilities are considered rural with no nearby alternative facilities in the event of closure.</p> <p>Homelessness</p> <p>Mobile Workers including TDC operational staff</p> <p>Public Transport users</p>
Potential impacts:	<p>Local environment issues due to reduced availability of public conveniences.</p> <p>Impact on local businesses and tourism.</p>
Mitigations:	<p>All efforts will be made to retain the level of toilet provision currently available in the district through supported transfers to towns and parishes.</p> <p>Facilities are provided for waste and cleansing staff at waste transfer facilities</p>

### 3.2 Does the proposal create any benefits for people on the basis of their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group

- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

None

## Step 4: Impact

### 4.1 How has the equality impact assessment informed or changed the proposal?

*What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This content should be used as a summary in reports, where this full assessment is included as an appendix.*

*If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary and appropriate despite this.*

#### **Summary of significant negative impacts and how they can be mitigated or justified:**

All efforts will be made to retain the level of toilet provision currently available in the district through supported transfers to towns and parishes or third parties.

#### **Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:**

Opportunities to develop stronger relationships with Town & Parish Councils and local businesses.

### 4.2 Action Plan

*Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.*

Improvement / action required	Responsible Officer	Timescale
Provide data held based on protected characteristics, with a particular focus on age and disability, as part of transfer discussions with Town & Parish Councils .	Head of Assets	April 2026
Communications Plan to manage transfers and closures to include advanced warning and nearest alternative facility information.	Communications Manager	April 2026

### 4.3 How will the impact of your proposal and actions be measured?

*How will you know if have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.*

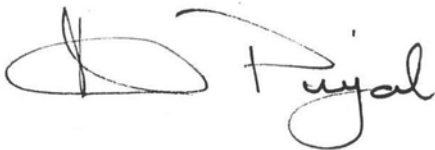
Monitoring of complaints and engagement with key stakeholders.

**4.4 Is there an opportunity to promote positive attitudes and good relations between different groups and communities?**

*The proposals generate opportunities for local businesses to provide facilities to people with protected characteristics and improve relationships. There are also potential business opportunities to develop facilities for alternative uses.*

**Step 5: Review & Sign-Off**

EIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek review and feedback from management before requesting it to be signed off. All working drafts of EIAs and final signed-off EIAs should be saved in G:\GLOBAL\EIA. Once signed-off please add the details to the 'EIA Register' of all council EIAs saved in the same directory.

<b>Reviewed by Service Manager:</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Instead was reviewed by:  	<b>Strategic Leadership Team Sign-Off:</b>  
Date: 08/07/2025	Date: 8/7/2025