

Equality and Rurality Impact Assessment Form

When completing this form you will need to provide evidence that you have considered how the ‘protected characteristics’ may be impacted upon by this decision. In line with the General Equality Duty the Council must, in the exercise of its functions, have due regard for the need to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This form should be completed in conjunction with the guidance document available on the Intranet

Once completed a copy should be emailed to cheryl.sloan@publicagroup.uk to be signed off by an equalities officer before being published.

1. Persons responsible for this assessment:

Names: Claire Locke	
Date of assessment: 21.07.25	Telephone: 01285 623427 Email: Claire.locke@publicagroup.uk

2. Name of the policy, service, strategy, procedure or function:

WODC Public conveniences service Is this a new or existing one? Existing

3. Briefly describe it aims and objectives

The Council currently provides 13 sets of public conveniences across the district. The facilities are charged, with a 20p per use fee in place. However disabled persons may gain entry to disabled access facilities free of charge with a RADAR key. The service aims to meet the needs of shoppers and visitors, with facilities located in the larger settlements close to shops and services.

4. Are there any external considerations? (e.g. Legislation/government directives)

The service is discretionary and heavily subsidised as the fees do not cover costs. With a discretionary service which requires circa £270K subsidy per year it will be vulnerable to future cuts particularly when larger unitary authorities are formed in 2028.

The service review has considered the availability of other local free public conveniences, which are provided by Town, Parish Councils or County (Library) Councils or others. It has not included provision of facilities where a customer may be expected to make a purchase before using the toilets (i.e. Cafes).

The review is proposing all facilities are offered to Town and Parish Councils to manage at a local level. If transfers are not agreed some facilities (low demand or alternative provision available) will be closed/leases surrendered. High demand or high need facilities would be retained by WODC.

5. What evidence has helped to inform this assessment?

Source	✓	If ticked please explain what
Demographic data and other statistics, including census findings	<input type="checkbox"/>	
Recent research findings including studies of deprivation	✓	Data on costs (cleaning contract, utilities & cash collection), income, footfall and a calculated 'cost to use' to indicate the relative value of the facilities and level of subsidy. Some facilities are disproportionately expensive as they have low usage. In Towns where multiple facilities are provided, transferring or closing a WODC owned or leased facility should have little or no impact on the public. Communications would need to be managed, with signage warning of future closure and directing to alternative facilities to ensure customers do not arrive at a facility to find it closed and not know where to go.
Results of recent consultations and surveys	✓	A survey of other free local public conveniences within a short walk of facilities being reviewed. Opening hours of alternative facilities has also been considered.

Results of ethnic monitoring data and any equalities data	<input type="checkbox"/>	
Anecdotal information from groups and agencies within Gloucestershire	<input type="checkbox"/>	
Comparisons between similar functions / policies elsewhere	<input type="checkbox"/>	
Analysis of audit reports and reviews	<input type="checkbox"/>	
Other:	<input type="checkbox"/>	

6. Please specify how intend to gather evidence to fill any gaps identified above:

There will be a discussion with the Town or Parish Councils in which the Public Conveniences are sited, once WODC Executive has made an in-principle decision to transfer facilities. The decision report notes that the recommended transfer and any future retention or closure may be subject to change following this consultation. There may be circumstances which affect how these facilities are provided, which WODC are not yet aware of.

7. Has any consultation been carried out?

No

Details of Consultation

If NO please outline any planned activities

See 6 above.

8. What level of impact either directly or indirectly will the proposal have upon the general public / staff? (Please quantify where possible)

Level of impact	Response
NO IMPACT – The proposal has no impact upon the general public/staff	<input type="checkbox"/>

LOW – Few members of the general public/staff will be affected by this proposal	<input type="checkbox"/>
MEDIUM – A large group of the general public/staff will be affected by this proposal	X
HIGH – The proposal will have an impact upon the whole community/all staff	<input type="checkbox"/>
Comments: e.g. Who will this specifically impact?	

9. Considering the available evidence, what type of impact could this function have on any of the protected characteristics?

Negative – it could disadvantage and therefore potentially not meet the General Equality duty;

Positive – it could benefit and help meet the General Equality duty;

Neutral – neither positive nor negative impact / Not sure

	Potential Negative	Potential Positive	Neutral	Reasons	Options for mitigating adverse impacts
Age – Young People	X			Very young children may need quick access to toilets	<p>Transfer to Town and Parish Councils will actually protect facilities into the future, so this is positive.</p> <p>However, any closure could have a negative impact. Closure or lease surrender is only being considered where there are alternative facilities within a short walk.</p> <p>Signage in advance of any changes would give regular users advance warning. Where any facilities close signage would clearly indicate where alternative facilities can be found.</p>
Age – Old People					
Disability	X			Those with mobility issues may struggle to travel further to access toilets and those with certain disabilities may need quick access to toilets	
Sex – Male					
Sex – Female					
Race including Gypsy and Travellers					
Religion or Belief					
Sexual Orientation					
Gender Reassignment					
Pregnancy and maternity	X			Those who are pregnant may need to access facilities more frequently	

Geographical impacts on one area					
Other Groups					
Rural considerations: ie Access to services; leisure facilities, transport; education; employment; broadband.					

10. Action plan (add additional lines if necessary)

Action(s)	Lead Officer	Resource	Timescale
Executive Decision	Claire Locke	-	September 2025
Contact relevant Town and Parish Councils with information relating to costs, usage etc and inviting discussion regarding transfer	Claire Locke/Susan Hughes	Project support required	October – December 2025
Review facilities that will transfer/close/be retained following above discussions	Claire Locke/Susan Hughes	Estates and legal teams will need to lead any transfer of assets or surrender of leases	By March 2026
Transfers & Closures	Claire Locke/Susan Hughes	Estates and legal teams will need to lead any transfer of assets or surrender of leases	Variable. TBC

11. Is there is anything else that you wish to add?

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Declaration

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where an negative impact has been identified actions have been developed to lessen or negate this impact. We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment.

Completed By:	-	Date:	-
Line Manager:	Claire Locke	Date:	21/07/25
Reviewed by Corporate Equality Officer:		Date:	21/07/25