

# Fairness and Equalities Impact Assessment (FEIA)

Version 3.6 May 2017

The purpose of this assessment is to provide balanced information to support decision making and to promote better ways of working in line with equalities (Equalities Act 2010), Welsh language promotion (The Welsh Language (Wales) Measure 2011), sustainable development (Wellbeing of Future Generations (Wales) Act 2015), and the four parameters of debate about fairness identified by the Newport Fairness Commission (NFC Full Report to Council 2013).

**Completed by:** Joseph Lewis **Role:** Equalities Officer

**Head of Service:** Gareth Price **Date:** 21/10/2019

**I confirm that the above Head of Service has agreed the content of this assessment**

Yes

**When you complete this FEIA, it is your responsibility to submit it to**  
impact.assessments@newport.gov.uk

**1. Name and description of the policy / proposal being assessed. Outline the policy's purpose.**

Local Toilets Strategy

The development of this strategy is a statutory requirement placed on the authority under the Public Health (Wales) Act 2017. The Act asks local authorities to develop a local toilets strategy and carry out an assessment of need.

**2. Outline how you have/ will involve stakeholders who will be affected by the policy/proposal**

3716 members of the public engaged via public bus WiFi  
53 residents completed a more detailed questionnaire (responses set out in appendix C of full strategy)  
Focus group held with Newport Access Group

**3. What information/evidence do you have on stakeholders? e.g. views, needs, service usage etc. Please include all the evidence you consider relevant.**

- Bus Wi-Fi responses (including Equalities monitoring information)
- Detailed 4-week consultation responses (including equalities monitoring information)
- Focus group feedback
- Wellbeing and ward profiles
- Customer service data

**4. Equalities and Welsh language impact**

Protected characteristic	Impact:			Provide further details about the nature of the impact in the section below. Does it: 1. Promote equal opportunity 2. Promote community cohesion 3. Help eliminate unlawful discrimination/ harassment/ victimisation?
	Positive	Negative	Neither	
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>It is anticipated that this policy will have a positive impact against the protected characteristic of age, with a particular benefit for older people. The strategy makes clear the importance of accessible toilet facilities for members of the public and contributes positively to the ability of different groups in society to enjoy public spaces.</p> <p>This strategy's action plan commits the authority to a number of positive outcomes including:</p> <ul style="list-style-type: none"> <li>• Decisions on future changes to publically accessible toilets provided or operated by the council will be taken with due regard to the Local Toilets Strategy.</li> <li>• Implementation of accessible toilets where council estate is being redeveloped to meet assessed public need</li> <li>• Improved signposting for public toilets in Newport</li> <li>• Continue to support appropriate groups to operate toilets following Community Asset Transfers or other agreements with the council.</li> <li>• Engagement with public and private sector partners (including retailers) to sign up to the voluntary scheme that indicated that toilets on the premises are available to the public.</li> <li>• Mapping these premises and making available on the NCC website.</li> </ul>

Protected characteristic	Impact:			Provide further details about the nature of the impact in the section below. Does it: 1. Promote equal opportunity 2. Promote community cohesion 3. Help eliminate unlawful discrimination/ harassment/ victimisation?
	Positive	Negative	Neither	
<b>Disability</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	It is anticipated that this policy will have a positive impact on disabled people in Newport. This strategy's action plan commits the authority to a number of positive outcomes including: <ul style="list-style-type: none"> <li>• Decisions on future changes to publically accessible toilets provided or operated by the council will be taken with due regard to the Local Toilets Strategy.</li> <li>• Implementation of accessible toilets where council estate is being redeveloped to meet assessed public need</li> <li>• Improved signposting for public toilets in Newport</li> </ul>
<b>Gender reassignment/transgender</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Guidance documents associated with the development of the strategy and appropriate advice will be shared with key partners, including developers, will emphasise the importance accessible toilet provision, which may include gender-neutral toilet provision.
<b>Marriage or civil partnership</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	It is not anticipated that this strategy will have a differential impact against those who are married or in civil partnerships.
<b>Pregnancy or maternity</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This strategy makes a number of positive commitments which are likely to have a positive impact against the protected characteristic of Pregnancy and Maternity.  The strategy makes clear the importance of accessible toilet facilities for members of the public and that this accessibility contributes positively to the ability of different groups, who may need greater access to toilet provision, to enjoy public spaces.  This strategy's action plan commits the authority to a number of positive outcomes related to the characteristic including: <ul style="list-style-type: none"> <li>• Decisions on future changes to publically accessible toilets provided or operated by the council will be taken with due regard to the Local Toilets Strategy.</li> <li>• Improved signposting for public toilets in Newport</li> <li>• Continue to support appropriate groups to operate toilets following Community Asset Transfers or other agreements with the council.</li> </ul>

Protected characteristic	Impact:			Provide further details about the nature of the impact in the section below. Does it: 1. Promote equal opportunity 2. Promote community cohesion 3. Help eliminate unlawful discrimination/ harassment/ victimisation?
	Positive	Negative	Neither	
				<ul style="list-style-type: none"> <li>Engagement with public and private sector partners (including retailers) to sign up to the voluntary scheme that indicated that toilets on the premises are available to the public.</li> <li>Mapping these premises and making available on the NCC website.</li> </ul>
<b>Race</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	It is anticipated that this strategy will have no differential impacts against the protected characteristic of race.
<b>Religion or Belief or non-belief</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	It is anticipated that this strategy will have no differential impacts against the protected characteristic of Religion or Belief.
<b>Sex/ Gender Identity</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	It is anticipated that this strategy will have no differential impacts against the protected characteristic of Sex.
<b>Sexual Orientation</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	It is anticipated that this strategy will have no differential impacts against the protected characteristic of Sexual Orientation.
<b>Welsh Language</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>This strategy will be available to members of the public in Welsh.</p> <p>The public have been able to contribute to the development of the strategy, and will be to future developments of the strategy, through the medium of Welsh.</p>

## 5 How has your proposal embedded and prioritised the sustainable development principle in its development?

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? Describe how.
 <p>Long Term</p> <p>Balancing short term need with long term needs</p>	<p>This strategy acknowledges changing demographics of the city and heightened need for toilet provision within certain groups.</p> <p>The strategy looks to balance the short-term financial constraints of toilet provision with innovative solutions which draw on the utilisation of community resources with the public, private and voluntary sectors.</p>
 <p>Collaboration</p> <p>Working together to deliver objectives</p>	<p>A key element of this action plan contained within the strategy is the commitment to work in partnership with the public, private and voluntary sector across Newport in order to make better use of the toilet facilities across the city.</p>
 <p>Involvement</p> <p>Involving those with an interest and seeking their views</p>	<p>3716 members of the public engaged via public bus Wi-Fi            53 residents completed a more detailed questionnaire (responses set out in appendix C of full strategy)            Focus group held with Newport Access Group</p> <p>Gwent Police have also provided comment on the issue of city centre toilets, specifically in relation to the night-time economy.</p>
 <p>Prevention</p> <p>Putting resources into preventing problems occurring or getting worse</p>	<p>This strategy represents the first time that the local authority has developed a comprehensive strategy dedicated to the provision of publically accessible toilets in Newport.</p> <p>The strategy looks to identify solutions to the need for more publically accessible toilets in the city, an issue which is frequently raised within public consultations. The strategy also looks to protect toilet provision where possible, particularly accessible provision.</p>

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? Describe how.
 <p>Considering impact on all wellbeing goals together and on other bodies</p>	<p>The outcomes within the strategy will be integrated into the authority's Strategic Equality Plan 2020 – 2024.</p> <p>Well-being plan interventions: the strategy fits with the <b>Strong and Resilient Communities</b> intervention as it ensures that access to key areas of the city (such as the city centre) are not limited due to limited toilet provision.</p>

**6 Will the proposal/policy have a disproportionate impact on a specific geographical area of Newport?**

In line with the statutory guidance and assessed Need, this strategy will likely have the greatest impact on the city centre, which hosts the city's main transport hub and a number of the city's main tourist attractions.

**7 Taking this assessment as a whole, what could be done to mitigate any negative impacts of your policy and better contribute to positive impacts?**

Existing provision will be added to the Welsh Government's Public Toilet app, so that where provision does exist, information about it will be accessible.

**8 Monitoring, evaluating and reviewing**

The implementation of this Strategy will be overseen by the Strategic Director for Place, Newport City Council. A report on the progress of the Actions set out in this Strategy will be presented to the director on a quarterly basis.

The Public Health (Wales) Act 2017 provides specific timescales that must be followed in relation to the review of this Strategy. In line with its statutory obligation the council will:

- Prepare an interim progress report setting out the steps taken in line with the Strategy every two years from the date of the last published strategy. The interim progress report will be published within six months of the end date of the two-year period.
- Review the Strategy within a year of each council election. If no changes are made to the Strategy following the post-election review, then the council will publish an interim progress statement covering a two-year period commencing from the date of the last election.

The council may also review this Strategy at any time as necessary. On completion of any review, the council will publish a statement of the steps it has taken in accordance with the Strategy. If following a

review, the Strategy is revised, the council will publish the revised Strategy and then prepare an interim progress report covering the two-year period commencing from the date of publication.

## 9 Involvement

The FEIA will be made available on the council website and the draft strategy will be subject of public consultation.

## 10 Summary of Impact (for inclusion in any report)

### **Equality Act 2010 AND Welsh Language**

This strategy looks to establish an action plan to ensure adequate toilet facilities are available in the future to meet the needs of the public. As the demographics of the city change we are likely to see an increase in the demand for accessible toilet provision in the city.

The strategy represents the first time the authority has taken an integrated approach to the delivery of publically accessible toilets in a way that seeks to utilise partners across the public, private and voluntary sector. The strategy and its subsequent action plan, looks to promote access to the city centre, which will have particular benefits on specific groups, the strategy can therefore be seen as making a positive contribution to the general duty as set out by the Equality Act 2010.

### **Wellbeing of Future Generations (Wales) Act 2015**

This strategy looks to establish an action plan to ensure adequate toilet facilities are available in the future to meet the needs of the public both now and in the future. As the demographics of the city change we are likely to see an increase in the demand for accessible toilet provision in the city, establishing a strategy which looks to secure long-term provision delivers on the overarching objectives of the act.

The strategy also represents the first time the authority has taken an integrated approach to the delivery of publically accessible toilets in a way that seeks to utilise partners across the public, private and voluntary sector, making clear contributions to the Five Ways of Working set out in the Well-being of Future Generations Act.