Name of EIA: Public Toilets

Is this a new policy? Service review

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<tr>
<th>Service / Business Unit</th>
<th>Service Area</th>
<th>Directorate</th>
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<tr>
<td>District Assemblies</td>
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<td>Communities, Environment, Adults and Health</td>
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<tr>
<th>Start Date</th>
<th>Completion Date (Expected)</th>
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<tr>
<td>November 2011</td>
<td>April 2012</td>
<td>To be completed by Corporate Performance</td>
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<tr>
<th>Lead Contact / Officer (extension)</th>
<th>Service Unit Manager Responsible</th>
<th>Publication Date</th>
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<tr>
<td>Andy Brennan</td>
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<td>To be completed by Corporate Performance</td>
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Is this a Service Review EIA or a Service Delivery EIA?
This EIA accompanies the Key Decision report that makes recommendations following the service review of public toilet provision in the Borough.

If linked to a Service Review please indicate using the Service Review code (where applicable)

http://intranet2.tameside.gov.uk/chiefexec/hr/servicereviewphase1.pdf

Name (lead contact first) | Job title | Service | EIA Trained – Y/N |
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<tr>
<td>Andy Brennan</td>
<td>Head of Neighbourhood Management and Community Engagement</td>
<td>District Assemblies</td>
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<td>Mike Round</td>
<td>AED District Assemblies</td>
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Summary Box
The Council currently operates four standalone public toilets which are located in the town centres of Mossley, Denton, Droylsden and Stalybridge. Residents have been consulted on the provision of public toilets in the context of the severe financial challenges facing the Council and all relevant views have been taken into account. The purpose of this EIA is to ensure that groups with recognised protected characteristics are specifically considered as part of the Key Decision associated with the service review.

Background & Scoping

Background & Scope
The provision and maintenance of toilets in public places is a discretionary function of local authorities who have a power under section 87 of the Public Health Act 1936 to provide public conveniences. There is no duty for local authorities to provide public conveniences. In considering the provision and maintenance of public toilets it is for each local authority to balance a competing local demand for a broad range of public services. Since public toilets were provided by local authorities, many changes have taken place in society with many shopping centres and retail outlets now providing toilets for their customers. Whilst these are not public toilets, they are facilities which may be used when visiting a particular store or shopping centre.
The operation and maintenance of public toilets in Tameside costs some £71K per annum. This includes the cost of utilities and cleaning together with general upkeep, repair and maintenance. In the current financial climate, and given the non-statutory nature of the service and changes in society, it is timely to review the provision of this particular service.

Following the consultation exercise, options regarding the future of the public toilets have been drawn up and are detailed in the Key Decision report.

**Anticipated impact on customer groups & rationale**

Removing the provision of public toilets in the existing locations will have an impact on several different groups.

The consultation exercise revealed that public toilets are considered a valuable public service to casual users such as shoppers, regular passers-by etc. but can also be a necessity to those whose use may be less frequent but may have greater reliance on the provision of public toilets generally, such as women, older people, those with disabilities, those suffering from illness, parents with small children and pregnant women.

**Analysis of evidence & impact**

**Data sources / evidence used**

- Usage data from each of the four public toilets
- Customer Surveys
- Help the Aged – Nowhere to Go (2006): a survey of older people’s views on public toilet provision in their local areas
- DCLG – The Provision of Public Toilets, Twelfth Report: this report considers simple and practical recommendations to improve provision and supports the Governments Strategic Guide (referred to above)

**Consultation & Engagement**

This EIA is aimed at helping to ensure that decisions taken around the future of public toilet provision takes into account the views of a characteristic representative cross-section of the local community.

Local consultation has been carried out geographically by the use of message boards posted adjacent to each of the public toilets, signposting individuals to the various means of participating in the consultation. As such a broad consultation exercise has engaged the local community and voluntary groups in specifically seeking the views of those who may experience a more negative impact should changes be made to current provision such as older people, those with disabilities, women, those suffering from illness, parents with small children.

The consultation formed part of the Council's Big Conversation and included a questionnaire which was available on line and in paper form. Assistance in completing the consultation was provided at libraries and customer service centres. This help was also available to the visually impaired, those with learning difficulties, those who required help with reading or writing and those that required translation assistance, in particular our Asian communities in Hyde and Ashton under Lyne.

The length of the consultation was one month which allowed adequate time to complete the consultation and ensure that those that may not be in the Borough for long periods of time were still able to take part in the consultation.

The returns were monitored regularly throughout the consultation period to ensure that the response was representative of our community and to ensure that returns were received from groups with a protected characteristics.
The makeup of the questionnaire respondents is as follows:
Female (61.8%); male (38.2%). The largest age bracket that took part in this survey was between 45-49 years old (15.2%), and the smallest age bracket was between 16-19 years old with 1.3% of the responses. 65.9% of the respondents who took part in the survey were aged 45 or above and 12.6% were over 65

17.7% of the respondents considered themselves disabled. 31 people skipped this question. 96.2% of the respondents who took part in the survey were from a white British origin. Only 1 respondent said they were from a Caribbean origin, 1 Asian or Asian British and 1 from an Indian origin. One person specified they are from another Ethnic Group. 32 respondents skipped this question.

Conclusions drawn from evidence & analysis of the effects on equality

110 respondents took part in the survey. The questionnaire covered four main themes:

(i) public toilet usage of the respondents
(ii) views on the potential closure of the four facilities
(iii) any alternative suggestions that respondents may have
(iv) the demographics of the respondent

76.7% (82 people) considered that the Council should not close any public conveniences. Although a clear majority, this figure is not surprising given that in principle those who object to certain proposals are most likely to spend time responding to consultation. However, despite this 20.5% (22 people) agreed with proposals to close the toilets (2.8% neither agreed nor disagreed or skipped the question) as a savings measure.

Of the 110 respondents, 82 people offered their comments on the potential closure of the public toilets and 28 respondents skipped this question.

Some of the key points are stated below:

- Elderly people and young children need these facilities in particular.
- People with bowel problems will face particular difficulties.

The survey also asked people who are against the closure of public toilets to put forward any alternative suggestions that the Council should consider. 66 people responded to this question and 44 skipped it.

Some key points are:

- Councils should negotiate with businesses to allow public use of their facilities (i.e. non-customers)
- The Council should start charging people to use these facilities (20p).
- Access to government buildings in order to use their toilets (e.g. town halls, libraries etc.)
- Supermarkets to share a part in the maintenance of these public toilets.
- Keep toilets opened but reduce the opening times.

The Survey also shows that more females (61.8%) took part in this survey in comparison to males (38.2%). The largest age bracket that took part in this survey was between 45-49 years old (15.2%), and the smallest age bracket was between 16-19 years old with 1.3% of the responses. 65.9% of the respondents who took part in the survey were aged 45 or above.

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respondent said they were from a Caribbean origin, 1 Asian or Asian British and 1 from an Indian origin. One person specified they are from another Ethnic Group. 32 respondents skipped this question.

From the consultation and the analysis, it is clear that the closure of the four public toilets will affect some users more than others. Respondents advise that those with particular chronic illnesses and those who require more frequent and immediate toilet usage could potentially be disadvantaged more than others. These groups might include pregnant women, older people, parents with children. The table below gives details of actions that can be taken to mitigate the negative effects on these groups should the facilities be closed.

There is no evidence from the consultation exercise that closure of the toilets would adversely affect people in terms of race, sexuality or religion or belief.

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<th>Issue</th>
<th>Action</th>
<th>Lead officer</th>
<th>Timescale</th>
<th>Equality LPI</th>
<th>Further comment</th>
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<tr>
<td>Closure of toilets will impact upon certain groups more than others (see above)</td>
<td>For each closure location an alternative within reasonable proximity has been identified (see maps in Appendix 2 of the main report).</td>
<td>Andy Brennan</td>
<td>Before closure</td>
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<td>Alternative locations identified may be open for fewer hours (current DA facilities open Mon-Sat 9 to 5, 48 hours per week)</td>
<td>The hours of opening of the alternative facilities have been identified and are as follows (where alternative commercial facilities exist the hours of opening by far exceed the existing DA public toilets): Droylsden library: hours per week opening: 48 hours Denton Town Hall: 41 hours Mossley library: 43.5 hours Mossley health centre: 53.5 hours Stalybridge library: 48 hours Stalybridge civic centre: 40 hours minimum (more when events take place in evenings and weekends) In conclusion, the alternative commercial and public facilities offer a variety of opening hours which would not cause significant disadvantage in comparison with opening hours of the DA public toilets</td>
<td>Andy Brennan</td>
<td>Complete</td>
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**Lack of information about alternative facilities**

Ensure information around alternative facilities is publicised with closure notices. List and map of alternative facilities attached.  

**Closure of the toilets may result in a reduction of disabled access facilities.**

Alternative disabled access provision has been assessed and is as follows:

- **Denton:**
  - Town Hall - accessible
  - Local commercial facilities - accessible

- **Droylsden:**
  - Library/Concord Suite - not accessible
  - Local commercial facility – accessible

- **Stalybridge:**
  - Civic Centre - accessible
  - Library - not accessible
  - Local commercial facility – accessible

- **Mossley:**
  - Library - not accessible
  - George Lawton Hall - accessible (however, the building is only open at certain non-specific times)
  - Mossley Health Centre (not marked on appendix 2 but adjacent to public toilets) - accessible

Adequate alternative accessible provision is available in all locations.

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**Monitoring**

The officer who has overall responsibility of ensuring the action plan is monitored is Andy Brennan.

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**Contact officer(s)**

Andy Brennan, Head of Neighbourhood Management and Community Engagement
Mike Round, Assistant Executive Director, District Assemblies

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**Sign off**

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<th>Signature of Service Unit Manager</th>
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<tr>
<th>Signature of Assistant Executive Director / Assistant Chief Executive</th>
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