

Equality Impact Assessment
For
Withdrawal of Bromley Central
Library from the Community
Toilet Scheme

EQUALITY IMPACT ASSESSMENT FORM

Stage 1 – screening to establish if the function has any relevance to any equality issue and/or monitored group i.e.

- Could the function affect one or more equality group in a different way to another group?
- Establish whether different equality groups have different needs
- Establish whether the function contributes to or hinders equality of opportunity

1a	<p>Please give a brief description of the function and its purpose*</p> <p>Withdrawal of Bromley Central Library from the Community Toilet Scheme</p> <p>Background</p> <p>At the full Council meeting in February 2011, a decision was taken to agree to the closure of public toilets. A further decision was made in February 2015 to close the remaining public toilets from 31st March 2015 in the borough's town centres of Beckenham, Penge and West Wickham and the toilet nearest to the Central library in Church House Gardens..</p> <p>The Community Toilets Scheme (CTS) commenced in 2009 and from March 2015 fully replaced the traditional public toilets with a greater number and variety of modern conveniences . The aim is that community toilets should at least match, and if possible improve, on the kind of provision made by the Council both in terms of opening hours and facilities for the disabled, baby change facilities etc</p> <p>There is no statutory duty to provide public conveniences,(it is a discretionary activity under section 47 of the Public Health Act 1936, as amended) but it is a Council policy to work with a range of organisations to facilitate the wide provision of such convenience</p> <p>In addition to Bromley's CTS the following toilet facilities are also available</p> <ul style="list-style-type: none">• The Mayor of London operates the Open London Scheme which encourages businesses to make their toilet networks available to the wider public• RADAR (Disability Rights network) operates a network of approximately 9,000 lockable toilets. Although seven are currently in Bromley, this would reduce to six as one would be closed under this proposal <p>In addition to the toilets provided by the Council other organisations, private companies also provide facilities, with town centres having more than ever before with cafes and major shops being the main providers.</p> <p>The three conveniences that were closed were .replaced with 14 new and five existing CTS facilities, eight in Bromley, six in Beckenham and Five in West Wickham.CTS facilities in Central Bromley are listed below</p> <ul style="list-style-type: none">• BHS (New entrant)• Central Library (pre-existing arrangement)• Marks and Spencer (new entrant Open London scheme)• McDonalds (new entrant Open London Scheme)• Pavillion Leisure Centre (new entrant)• Sainsburys (new entrant-Open London Scheme)• Waitrose (new entrant –Open London Scheme) <p>Bromley Central Library had been a member of Bromley's CTS for several years. Disabled toilet facilities are available on floor 4, standard toilet facilities which are provided for hall hirers are available on both floors 4 and 5. Since the closure in April 2015 under the above scheme of the public toilets in Church House Gardens which were located in close proximity to the Central Library, demand for the library toilets dramatically increased .Within days of the closure of the Church House Gardens toilets , the increase in usage of the Library toilets had put a severe strain on the plumbing and toilet facilities. This increased use together with several incidents of vandalism caused a severe blockage-. The consequent leak caused</p>
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	<p>major damage to the offices on the floor below rendering them uninhabitable for several weeks. It was then necessary to close the toilets for a period of repair to take place. The repair took several weeks, meaning there were no toilet facilities available to customers during this period. Due to the wide scale damage caused by such heavy use, the extensive repair required and expensive alterations to the infrastructure that would be required to enable the facilities to handle much increased levels of use, a recommendation was made to remove the Central Library from the Community Toilet Scheme. Following on from the repair of the facilities in order to deter future vandalism, library public toilets including disabled toilet facilities were fitted with locks to control use.</p> <p>In order to ensure that those with protected characteristics are not disadvantaged in any way by this decision, those in the following groups</p> <ul style="list-style-type: none"> • Disability • Age • Pregnancy and Maternity <p>are permitted to use the disabled toilet on request and can obtain a key from the front desk or from a member of Library staff to enable them to use the disabled toilet.</p> <p>*Function can mean process, service, policy or project</p>										
1b	<p>How would you classify the function type?</p> <p><input type="checkbox"/> The service is provided on the basis of an application and /or targeted then go to question 1c</p> <p><input checked="" type="checkbox"/> The service is open to all go to question 1d</p>										
1c	<p>Is the function accessible for all groups? Either tick the box 'Accessible to all groups' and provide <u>relevant evidence</u> OR tick the box for each group to whom the function is <u>not accessible</u> or for whom there may be needs or considerations to accommodate.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;"> <input checked="" type="checkbox"/> *Accessible for all groups </td> <td style="width: 50%; padding: 5px;"> <input type="checkbox"/> Pregnancy & maternity </td> </tr> <tr> <td style="padding: 5px;"> <input type="checkbox"/> Age </td> <td style="padding: 5px;"> <input type="checkbox"/> Race </td> </tr> <tr> <td style="padding: 5px;"> <input type="checkbox"/> Disability </td> <td style="padding: 5px;"> <input type="checkbox"/> Religion & belief </td> </tr> <tr> <td style="padding: 5px;"> <input type="checkbox"/> Gender </td> <td style="padding: 5px;"> <input type="checkbox"/> Transgender or Transsexual </td> </tr> <tr> <td style="padding: 5px;"> <input type="checkbox"/> Marriage & civil partnership </td> <td></td> </tr> </table>	<input checked="" type="checkbox"/> *Accessible for all groups	<input type="checkbox"/> Pregnancy & maternity	<input type="checkbox"/> Age	<input type="checkbox"/> Race	<input type="checkbox"/> Disability	<input type="checkbox"/> Religion & belief	<input type="checkbox"/> Gender	<input type="checkbox"/> Transgender or Transsexual	<input type="checkbox"/> Marriage & civil partnership	
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<input type="checkbox"/> Marriage & civil partnership											
1d	<p>Is it likely that there will be a negative impact on one or more of the equality groups, or is it clear at this stage that it will be equality neutral? (No negative impact on the groups) Please tick in the box equality neutral OR tick the box for the group(s) that will suffer a negative impact. If you have ticked the box 'equality neutral' please provide evidence.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;"> <input checked="" type="checkbox"/> Equality neutral </td> <td style="width: 50%; padding: 5px;"> <input type="checkbox"/> Pregnancy & maternity </td> </tr> <tr> <td style="padding: 5px;"> <input type="checkbox"/> Age </td> <td style="padding: 5px;"> <input type="checkbox"/> Race </td> </tr> <tr> <td style="padding: 5px;"> <input type="checkbox"/> Disability </td> <td style="padding: 5px;"> <input type="checkbox"/> Religion & belief </td> </tr> <tr> <td style="padding: 5px;"> <input type="checkbox"/> Gender </td> <td style="padding: 5px;"> <input type="checkbox"/> Transgender or Transsexual </td> </tr> <tr> <td style="padding: 5px;"> <input type="checkbox"/> Marriage & civil partnership </td> <td></td> </tr> </table> <p>If you consider that the impact is Equality Neutral then go to question 1h Otherwise go to question 1e</p>	<input checked="" type="checkbox"/> Equality neutral	<input type="checkbox"/> Pregnancy & maternity	<input type="checkbox"/> Age	<input type="checkbox"/> Race	<input type="checkbox"/> Disability	<input type="checkbox"/> Religion & belief	<input type="checkbox"/> Gender	<input type="checkbox"/> Transgender or Transsexual	<input type="checkbox"/> Marriage & civil partnership	
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1e	<p>What are the negative impacts associated with this function? Please list and give details then go to question 1f</p> <p>A Full EIA of the Community Toilet Scheme was carried out in 2015 .This EIA considered</p>										

	<p>that the proposal to close the remaining public toilets and extend CTS was equality neutral..However consideration was given to the impact on age, disability, religion and gender</p> <p>There are no negative impacts associated with the withdrawal of Central Library from the CTS are toilet facilities within the Central Library are still available to those with protected characteristics e.g disability, age pregnancy and maternity If they are unable to access the nearest alternative CTS</p>
1f	<p>Are there positive impacts associated with this function? If yes, please list and give details.</p> <p>The positive impacts associated with this function are as follows</p> <ul style="list-style-type: none"> • Disabled toilet facilities are available within the Central Library for use by several groups with equalities characteristics including Age, Disability, Pregnancy and Maternity • The nearest alternate Community Toilet is located at BHS only 387 foot away from the library taking approximately 2 minutes on foot • The greater number and provision of equivalent facilities within Central Bromley means there is more choice, therefore no equalities group should be disadvantaged • The facilities provided as part of the CTS offer extended opening hours, whereas access to Library toilets is restricted to within current opening hours
1g	<p>At this stage, what plans could be built in to address any negative impacts, and/or to add measures which promote a positive impact, or could you consider an alternative approach which may better achieve the promotion of equality?</p> <p>See action Plan</p>
1h	<p>The Council has a responsibility to promote positive attitudes to equal opportunities in public life. Has this responsibility been discharged in the application of this function? If yes give examples.</p> <p>Yes-The council has opened up a greater variety of conveniences enabling all groups access to good quality facilities in a range of convenient locations. Those using the Central Library facilities with a range of protected characteristics will be given access to the Library disabled toilet facility</p>
1i	<p>Are there any Human Rights Issues? If so what are they?</p> <p>There are no Human Rights issues related to this</p>
1j	<p>Is a full impact assessment required?</p> <p><input type="checkbox"/> YES – If you have established that there may not be equality of opportunity in 1c or assessed that there would be negative impact on an equality group in 1 d go to Stage 2</p> <p><input checked="" type="checkbox"/> NO - please sign off the process (stage 3) and fill in any actions identified, if any in the action plan.</p> <p><input type="checkbox"/> Don't know. i.e. not enough evidence. Please go to stage 2.</p>

Stage 2 – full impact assessment

2a	Does the function affect or impact on the public, whether directly or indirectly?		
	<input type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> Don't know
	Provide any relevant information here.		
2b	Have complaints or feedback been received about the function and its effect on different equality groups?		
	<input type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> Don't know

	Provide evidence by documenting all reliable up to date information.
2c	Outsourced services - if the function is provided by external organisations/agencies on behalf of the Council please detail any arrangements you have to ensure that the function promotes equality; this may include contract conditions.
	Provide evidence by documenting all reliable up to date information.
2d	Does the function have employment implications for Council staff
	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> Don't know
	Provide evidence by documenting all reliable up to date information.
2e	<p>If you have established that the function does have an adverse impact on one or more of the groups, then you must identify whether this is justifiable. If not, then the function must be changed. Please set out the adverse impact and the business justification for continuing with this situation.</p> <p>n/a</p>
2f	<p>Monitoring – give details of any monitoring being carried out on existing functions.</p> <p>n/a</p>
2f (i)	<p>If this is a new function, or not currently monitored, are you planning to monitor the impact of the function</p> <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> Don't know
	<p>If yes add details to action plan</p> <p>If no please explain why it is not considered appropriate to do so.</p>
2g	<p>Consultation – If you have not carried out consultation, or if you need to carry out further consultation who will you be consulting with and by what methods?</p> <p>Add details to action plan</p>
2h	<p>Evidence – what further evidence do you have about considerations with regard to equality issues that you have made concerning this function?</p> <p>e.g. audit reports, minutes from meetings or survey results</p>
2i	<p>Publishing – if the equality impact assessment forms part of an overall review then the results should be published as part of any report that goes forward to Elected Members. If not the findings of the impact assessment should be published on our Council's web site.</p> <p>Add details to action plan</p>
2j	<p>Training and development - please list any staff training issues that have arisen as a result of conducting the impact assessment</p> <p>Add details to action plan</p>

Stage 3 - EQUALITY IMPACT ASSESSMENT ACTION PLAN please list actions that you plan to take as a result of this assessment, continuing on a separate sheet if necessary. If appropriate these actions should be added to any business/service plan for the function.

Issue	Action to be undertaken	Desired outcome	Action owner	Target date
Communication	<p>Bromley Central Library to be removed from list of participants in CTS</p> <p>Posters displaying the nearest alternative Community toilets are displayed in the library foyer</p>	Public are aware that Central Library is no longer part of the CTS	Ian Cox-Facilities Manager	May 2015 (Action Completed)
Staff Communication	<p>Library Staff including Site Officers are updated as to the removal of Central Library from the CTS scheme and reminded to allow access to Disabled toilet facilities to those in the following equality groups</p> <ul style="list-style-type: none"> • Disability • Age • Pregnancy and maternity 	That all staff are aware that Central Library has been removed from the scheme but enable the identified groups to continue to have access to disabled toilet facilities	Tim Woolgar	May 2015 (Action Completed)

Signed: Paula Young
Date: October 2015