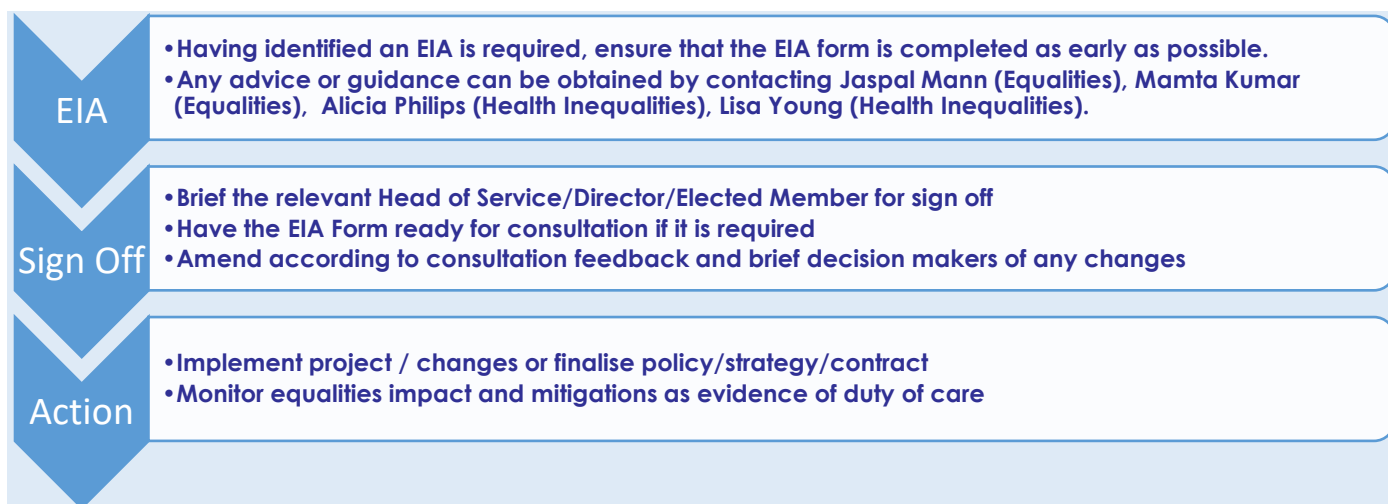


EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		Installation of Changing Places Toilets
EIA Author	Name	Mamta Kumar
	Position	Equality and Diversity Officer
	Date of completion	17th July 2023
Head of Service	Name	Valerie DeSouza
	Position	Consultant Public Health
Cabinet Member	Name	Councillor A S Khan
	Portfolio	Policing and Equalities



PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- ☐ New policy / strategy
- ☐ New service
- ☐ Review of policy / strategy
- ☐ Review of service
- ☐ Commissioning
- ☒ Other project (*please give details*)



1.2 In summary, what is the background to this EIA?

Coventry City Council successfully applied for £260,190 funding from the Department of Levelling up Housing and Communities to install 5 Changing Places Toilets in Coventry.

Changing Places Toilets are specialist toilets that meet the needs of disabled children and adults with complex care needs who need carer support, appropriate equipment and more space whereas Standard accessible toilets were designed to meet the needs of disabled people who can use the toilet independently.

Locations of 5 toilets are:

Tesco Arena Ricoh Arena - Arena Park Shopping Centre contains one of UK's largest Tesco Extra hypermarkets, 20 big name stores (Next, Marks and Spencer's etc) and 10 places to eat.

A few minutes walk is Coventry Building Society Arena which includes:

1. a 32,609-seater stadium, home to Championship club Coventry City F.C. and rugby club Wasps. The capacity rises to 40,000 when hosting music concerts.
2. exhibition hall
3. Double Tree Hilton Hotel with pitch side rooms and a second hotel to open soon
4. Casino.
5. The arena will also hold the rugby sevens, wrestling and judo events at the 2022 Commonwealth Games.

Due to the opening times of Tesco, the CPT's will be available for 18 hrs per day Monday to Saturday and Sunday for 6 hours making this the most popular choice which was proven by the results of survey of local people with disabilities that was conducted earlier in September.

Tesco Arena is located North side of Coventry less than 1 mile to the M6. On this side of the city there is currently no CPT's available and as explained this is the hub for live sports, entertainment and shopping combined which all people should feel encouraged to access if reassured about CP toilet provision.

Albany Theatre - High percentage of respondents confirmed they would like to see toilet installed with a theatre. Albany theatre is located next door to Premier Inn and is waking distance to the city centre.

Shop Mobility - Shop Mobility is a service that provides powered and un-powered wheelchairs and mobility scooters for people who have either permanent or temporary limited mobility; allowing them greater independence to use the pedestrianised shopping areas within Coventry city centre. The venue will have blue badge parking spaces and is a minute's walk to the city centre. They do not require funding for the modular building - only the equipment and installation. Shopmobility are planning to have the project completed by July 2023. Coventry is investing 450m to create a new residential, shopping and leisure destination. By installing changing places toilets in the city centre, we will be allowing the most vulnerable people the opportunity to enjoy these new facilities without having to limit their time to go back home to use the toilets.

War Memorial Park - War Memorial Park is a premier park, covering 50 ha of open space. Attracting over 400,000 visitors a year excluding festivals such as The Godiva Festival and BBC Big Weekend.

The park is divided into three main character areas:

- a formal memorial park centred around the War Memorial Cenotaph and a largesandy children's play area
- An extensive area of open space for sports grass root football, tennis, bowls,cricket, a footgolf coarse and includes
- Country park area for large-scale events and activities

The Council has collaborated with people with disabilities to make the park more accessible; building an accessible sensory garden, peace garden, rose garden and currently creating an accessible labyrinth. The council's enjoys excellent relationships with local special needs schools – who use the park on a regular basis for education and recreational visits.

EQUALITY IMPACT ASSESSMENT (EIA)



Some people cut short the time they spend in the park due to lack of facilities to meet their needs; a CPT will ensure the most vulnerable park users are able to enjoy the park without the experience impacting on their dignity.

Coombe Abbey Park – Surveys completed by the Department of Levelling Up and Coventry City Council, listed Parks and Open Spaces as the top location where respondents would like to see the installation of CPT'S.

Coombe Abbey Park and Hotel is fully accessible and has over 500 acres, attracting 460,000 visitors in 2021 to seal its mark as a destination park. The park is also designated as an historic landscape, a Site of Special Scientific Interest and a Local Wildlife Site. In 2022 the park gained the Green Flag Heritage Award status.

The Installation of a CPT will also allow people with physical disabilities to enjoy the park for as long as they wish, 7 days a week. The park holds:

- Sell out events from Easter trails, outdoor cinemas and Coombe's magical lightshow "Luminate Coombe".
- The Discovery Centre
- Woodturners classes to teach the public this traditional craft.
- Coventry Outdoors, a range of educational and curriculum programmes and much much more

1.3 Who are the main stakeholders involved? Who will be affected?

Coventry City disabled residents and carers
Tesco
Albany Theatre
Shopmobility
War Memorial Park
Coombe Abbey Park
Disabled Employee Network
DEAP
Grapevine
Coventry City Council – Public health Team, Procurement, transformation and Legal teams
Coventry Residents and surrounding areas

1.4 Who will be responsible for implementing the findings of this EIA?

Each of the 5 host venues
Coventry City Council's Public Health Team

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

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To ensure that we do not discriminate in the way our activities are designed, developed, and delivered, we must look at our duty to:

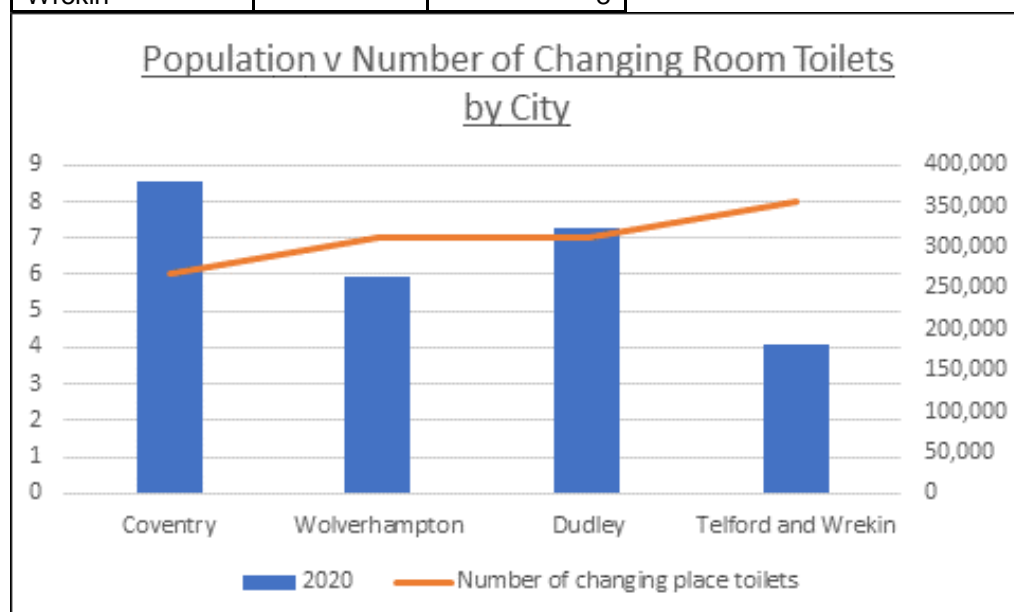
- Eliminate discrimination, harassment, victimisation, and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and drawing comparisons with local data where necessary (go to <https://www.coventry.gov.uk/factsaboutcoventry>)

Compared to other West Midland Cities Coventry City has lower provision of CPT's to its residents and visitors. Table 1, highlights Coventry has the highest population and the least number of CP toilets

	2020 Population	Number of changing place toilets
Coventry	379,387	6
Wolverhampton	264,407	7
Dudley	322,363	7
Telford and Wrekin	181,322	8



Changing Places toilets can be found at the following locations please note postcodes:

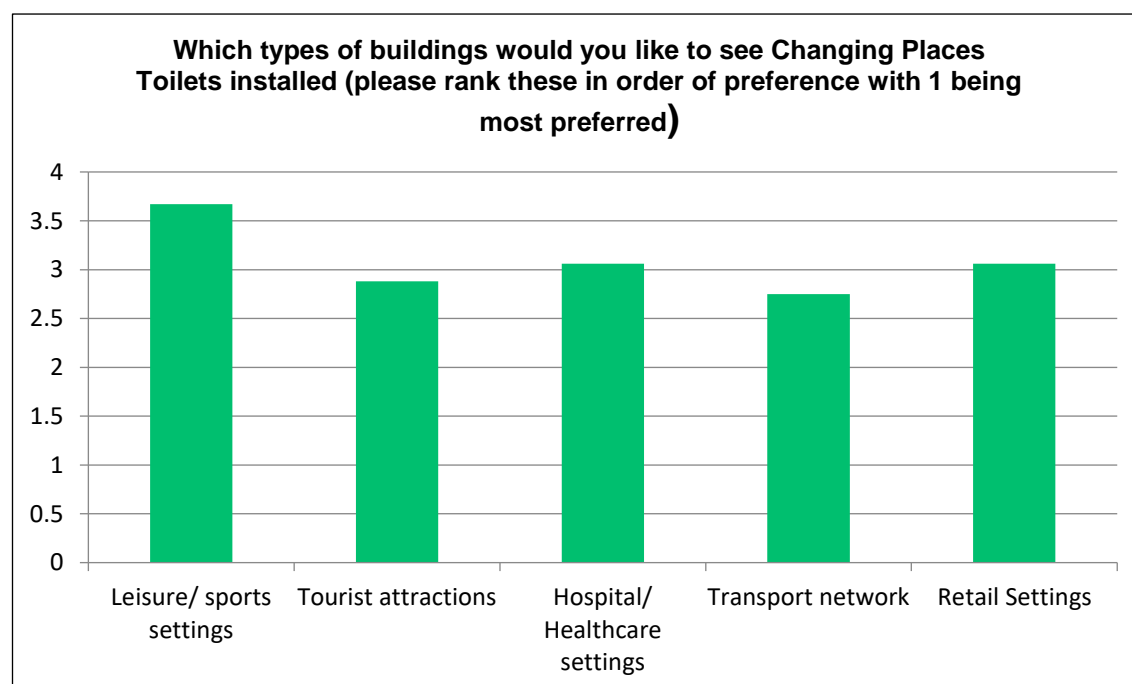
1. University of Warwick Sports and Wellness Hub 1st one **CV4**
2. University of Warwick Sports and Wellness Hub 2nd one **CV4**
3. Coventry Central Library **CV1**
4. Wilfred Spencer Resource Centre **CV5**
5. Asda Abbey Park **CV3**
6. Coventry Train Station **CV1**

During August 2021, Coventry City Council produced an 8 question survey which was shared with:

- Disabled Employee Network
- Disability Equality Action Partnership.
- Grapevine

35 respondents completed the survey and the results are as per below:

- 54% of the respondents were aware of changing places places toilets
- 29% of the respondents had used changing places toilets in the UK
- 19 of 20 respondents would use them in Coventry
- 14 out of 21 respondents stated location of Changing Places Toilets influence their decision when planning trips or activities



If people knew changing places toilets were available at all locations below are the activities, they would like to carry out

EQUALITY IMPACT ASSESSMENT (EIA)



1. Have days out
2. Go Shopping
3. Take part in/ enjoy sports and leisure activities
4. Go on Holiday
5. Attend Hospital
6. Other

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

Any impact on the Council workforce should be included under question 2.6 – **not below*

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	P	Any vulnerable person, regardless of age with relevant need will be able to access the changing place facilities and so this initiative will have a positive impact and outcome for both people with disabilities and carers
Age 19-64	P	Any vulnerable person, regardless of age with relevant need will be able to access the changing place facilities and so this initiative will have a positive impact and outcome for both people with disabilities and carers
Age 65+	P	Any vulnerable person, regardless of age with relevant need will be able to access the changing place facilities and so this initiative will have a positive impact and outcome for both people with disabilities and carers
Disability	P	The changing place facilities are provided for the most vulnerable members or visitors to our communities. Consequently, delivery of these facilities will have a positive impact and outcome for persons with this protected characteristic along with their family / carers.

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Gender reassignment	P	The changing place facilities irrespective of Gender are provided for the most vulnerable members or visitors to our communities. Consequently, delivery of these facilities will have a positive impact and outcome for persons with this protected characteristic along with their family / carers.
Marriage and Civil Partnership	P	The changing place facilities irrespective of marriage or civil partnership status are provided for the most vulnerable members or visitors to our communities. Consequently, delivery of these facilities will have a positive impact and outcome for persons with this protected characteristic along with their family / carers.
Pregnancy and maternity	P	The changing place facilities irrespective of pregnancy and maternity status are provided for the most vulnerable members or visitors to our communities. Consequently, delivery of these facilities will have a positive impact and outcome for persons with this protected characteristic along with their family / carers.
Race (Including: colour, nationality, citizenship ethnic or national origins)	P	The changing place facilities irrespective of race are provided for the most vulnerable members or visitors to our communities. Consequently, delivery of these facilities will have a positive impact and outcome for persons with this protected characteristic along with their family / carers.
Religion and belief	P	The changing place facilities irrespective of religion and belief status are provided for the most vulnerable members or visitors to our communities. Consequently, delivery of these facilities will have a positive impact and outcome for persons with this protected characteristic along with their family / carers.
Sex	P	The changing place facilities irrespective of sex are provided for the most vulnerable members or visitors to our communities. Consequently, delivery of these facilities will have a positive impact and outcome for persons with this protected characteristic along with their family / carers.
Sexual orientation	P	The changing place facilities irrespective of sexual orientation are provided for the most vulnerable members or visitors to our communities. Consequently, delivery of these facilities will have a positive impact and outcome for persons with this protected characteristic along with their family / carers.

HEALTH INEQUALITIES

2.3	Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These
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EQUALITY IMPACT ASSESSMENT (EIA)



	<p>conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p> <p>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Alicia Philips or Pooja Ahluwalia in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>
Question	Issues to consider
2.3a What HIs exist in relation to your work / plan / strategy	<ul style="list-style-type: none"> • Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) • Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation
	<p>Response:</p> <p>Over 250,000 people in the UK need personal assistance to use the toilet or change continence pads, including people with profound and multiple learning disabilities, spinal injuries and people living with stroke. Key findings from the Changing Places Toilets consultation highlighted the impact of not having access to these facilities that disabled people and their carers face, and the potential impact on their health and well being. By not having access to adequate safe changing places may mean that disabled people, their families, friends and carers may reduce the amount of time out of their home, risking social isolation and poor mental health.</p> <p>Changing Places Toilets are accessible in the City in a number of facilities/venues. The addition of 3 new Changing Place Toilets will enhance the availability of these facilities for people and provide equitable access to a wider range of leisure, sport, retail and health facilities services for people to access a wider range of activities, participate in days out with their families, friends and carers, and access changing and toilet facilities with dignity, improving healthy living conditions.</p>

<p>2.3b How might your work affect HI (positively or negatively).</p> <p>How might your work address the needs of different groups that share protected characteristics</p>	<p>Consider and answer below:</p> <ul style="list-style-type: none"> • Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income • Consider what the unintended consequences of your work might be
	<p>Response:</p> <p>a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>The location of the additional CPT's will impact health inequalities positively ensuring that all disabled people regardless of where they live will have equitable access to a wider range of activities i.e the theatre, Ricoh Arena shopping, sports and leisure facilities and health care at University Hospital Coventry and Warwickshire (UHCW) in the City, and are able to access safe toilet and changing facilities. .</p>
	<p>b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.</p> <p>The recent Governments Consultation on Changing Place Toilets consultation in 2018 highlighted the impact on disabled people not having access to safe hygienic appropriate toilet and changing facilities for example the risk of dehydration or infection by limiting liquid intake, sitting in soiled clothing and not having access to adequate changing facilities.</p> <p>The addition of the new CPT's will enhance the number of locations that CPT's are accessible and contribute to reducing health inequalities and poor health outcomes for the most vulnerable residents or visitors to our City.</p>

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

The Changing Place Toilets facilities will be built and funded through the investment received. The maintenance of these facilities will be managed and funded by the host businesses/ organisation. Action will be taken in line with the local authority's procedure on compliments and complaints received on negative and positive feedback received.

DIGITAL INCLUSION

2.5	<p>The Covid-19 pandemic accelerated the uptake of digital services nationally, whereby people who are digitally enabled have better financial opportunities, can access new information and are better connected to others (Lloyds Consumer Digital Index, 2021). However, for those who are digitally excluded, the digital divide has grown during the last two years, and without intervention people will be left behind with poorer outcomes across employment, health and wellbeing, education and service access. Some people are more likely to be excluded including: older people, people from lower income households, unemployed people, people living in social housing, disabled people, school leavers before 16 with fewer educational qualifications, those living in rural areas, homeless people, or people who's first language is not English (NHS Digital.)</p> <p>Some of the barriers to digital inclusion can include lack of:</p> <ul style="list-style-type: none"> • Access to a device and/or data • Digital skills • Motivation to get online • Trust of online safety <p>Digital exclusion is not a fixed entity and may look different to different people at different times.</p> <p>Example 1. Person A has access to a smartphone and monthly data and can access social media apps, however lacks the digital skills and confidence, and appropriate device to create a CV, apply for jobs and attend remote interviews, and/or access educational and skills resources.</p> <p>Example 2. Person B, is digitally confident and has their own laptop, however due a lower household income and other financial priorities, they cannot afford their monthly broadband subscription and can no longer get online to access the services they need to.</p> <p>Example 3. Person C has very little digital experience and has heard negative stories on the news regarding online scams. Despite having the financial resource, they see no benefit of being online and look for alternatives whenever possible. A new council service requires mandatory online registration, therefore they do not access it.</p> <p>It is important that we all consider how we can reduce digital inequalities across our services, and this may look very different depending on the nature of our work.</p>
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EQUALITY IMPACT ASSESSMENT (EIA)



<p>Please answer the questions below to help identify if the area of work will have any impact on digital inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Laura Waller (<i>Digital Services & Inclusion Lead, CCC</i>). More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>		
Question	Issues to consider	
2.5 What digital inequalities exist in relation to your work / plan / strategy?	<ul style="list-style-type: none"> • Does your work assume service users have digital access and skills? • Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access? • Consider what the unintended consequences of your work might be. 	
	<p>Response:</p> <p>n/a</p>	
2.5b How will you mitigate against digital inequalities?	<ul style="list-style-type: none"> • If any digital inequalities are identified how can you reduce these? For e.g. if a new service requires online registration you may work with partner organisations to improve digital skills and ensure equitable processes are available if someone is unable to access online. 	
	<p>Response:</p> <p>n/a</p>	

2.6 How will you monitor and evaluate the effect of this work?

The host venues will monitor the impact once the toilets are installed. Any impact will be picked up and shared with Equality team within the same working day

2.7 Will there be any potential impacts on Council staff from protected groups?

EQUALITY IMPACT ASSESSMENT (EIA)



No Impact

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: Nicole.Powell@coventry.gov.uk

Headcount:

Sex:

Female	
Male	

Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

No impact has been identified for one or more protected groups ☐

EQUALITY IMPACT ASSESSMENT (EIA)



- Positive impact has been identified for one or more protected groups ☒
- Negative impact has been identified for one or more protected groups ☐
- Both positive and negative impact has been identified for one or more protected groups ☐

4.0 Approval

Signed: Head of Service: Valerie De Souza	Date: 17.07.23
Name of Director: Allison Duggal	Date sent to Director: 17.07.23
Name of Lead Elected Member: Councillor A S Khan	Date sent to Councillor: 17.08.23

Email completed EIA to equality@coventry.gov.uk