



INTEGRATED IMPACT ASSESSMENT (IIA) TOOL

Proposal Details

Title of Policy / Proposal / Initiative	
Public Toilet Savings	
Service Area	Officer completing IIA
Economy and Regeneration	Russell Hughes-Pickering
Corporate Lead Officer	Strategic Director
Russell Hughes-Pickering	Barry Rees
Please give a brief description of the purpose of the proposal	
<p>It is proposed to reduce the overall cost of public toilet provision to the council by £100k during 2024/25. There is currently a deficit between cost of provision (£300k) and income from charging (£90k).</p> <p>This is to be achieved by an increase in fees from 30p to 40p, changes to operational costs by tailoring the level cleaning to usage of toilets and support or transfer from Town and Community Councils.</p> <p>The IIA for the Fees and Charges has already addressed the potential impacts of charging. These will be repeated here together with an input on the potential impact of changes to operational costs and working with Town and Community Councils.</p> <p>The changes will contribute to the Council delivering a balanced budget and is in line with the Council's Income Management and Service Cost Recovery Policy where services are expected to aim for full cost recovery wherever possible. The proposal relies on a combination of increasing income and reducing spend to reduce the current deficit, whilst maintaining provision. The changes though will not achieve full cost recovery on 2024/25.</p>	
Who will be directly affected by this proposal? HINT	
The changes will affect the general public at large to some at extent.	
Have those who will be affected by the proposal had the opportunity to comment on it?	
<p>The current Public Toilet Strategy was subject to consultation. This is currently being reviewed. The strategy seeks to maintain appropriate provision whilst introducing measures that achieve full cost recovery.</p> <p>Proposals have however been through the relevant Budget Scrutiny committees.</p>	

Version Control

The IIA should be used at the earliest stages of decision making, and then honed and refined throughout the decision-making process. It is important to keep a record of this process so that we can demonstrate how we have considered and included sustainable development, Welsh language and equality considerations wherever possible.

Version Number	Author	Decision making stage <u>HINT</u>	Date Considered	Description of any amendments made <u>HINT</u>
1.0	Russell Hughes-Pickering	Cabinet	29/02/2024	n/a

Council Corporate Well-being Objectives

Which of the Council's Corporate Well-being Objectives does this proposal address and how? Click here to read a summary of our [Corporate Strategy 2022-27](#)

Boosting the economy, supporting business, and enabling employment.	The proposals don't necessarily address specific Corporate Well-being Objectives, but the proposal does contribute to the Council being able to produce a balanced budget and therefore offer sustainable services going forward. In turn underpinning all the Council's objectives.
Creating caring and healthy communities	The proposals seek to provide sustainable approach to public convenience provision in Ceredigion that positively contributes to public health, well-being and the prosperity of the community.
Providing the best start in life and enabling learning at all ages	See above
Creating sustainable, greener, and well-connected communities	See above.

National Well-being Goal: A Prosperous Wales

An innovative, productive, and low carbon society where everyone has decent work and there is no poverty.

Click [here](#) for information about a prosperous Wales.

Does the proposal contribute to this goal? Describe the positive or negative impacts. (Click [here](#) for information)

The proposal allow the Council to maintain public toilet provision through an overall balanced budget. Without the cost recovery many of the services would be unsustainable with current resources and could potentially cease.

It is a fine balancing act between being able to provide the service with current resource constraints whilst not making the service too expensive as to make it unaffordable for residents or to reduce provision that would impact on access to facilities.

What evidence do you have to support this view?

In regard to resources available to the Council, current funding from Welsh Government through the annual Revenue Settlement Grant is not rising in line with the Council's own cost inflation, as illustrated by the need to increase Council Tax significantly. It is currently envisaged that the proposals will help maintain services and access to toilets, along side other provided within shops and services, throughout the County. Changes to fees and operational costs have been introduced during the last 5 years without a significant decrease in usage.

What action(s) can you take to mitigate any negative impacts or better contribute to this National Well-being Goal?

The proposals are in line with the Council's Income Management and Service Cost Recovery Policy. The breadth of the proposals seeks to balance some additional income with other changes that will be less noticeable operating costs or support from Town and Community Councils that keep toilets open.

We expect the impact to be minimal due to the small cash value of increases for individual visits. Discussions are also ongoing with a number of Community & Town Councils to transfer the running of the public conveniences to them as they may be able to operate them at a lower cost than Ceredigion County Council.

National Well-being Goal: A Resilient Wales

A society where biodiversity is maintained and enhanced and where ecosystems are healthy and functioning.

Click [here](#) for information about a resilient Wales.

Does the proposal contribute to this goal? Describe the positive or negative impacts. (Click [here](#) for information)

Public toilet provision has no direct impact on the biodiversity and ecosystems of Wales, although some investment when maintaining and servicing toilets can reduce carbon emissions where they reduce electric and water usage.

What evidence do you have to support this view?

The Council collects data on the overall costs of power and water usage in each toilet and has deployed technologies that assist with reducing costs.

What action(s) can you take to mitigate any negative impacts or better contribute to this National Well-being Goal?

Continued investment that will reduce energy or utility costs.

National Well-being Goal: A Healthier Wales

A society where people make healthy choices and enjoy good physical and mental health.

Click [here](#) for information about a healthier Wales.

Does the proposal contribute to this goal? Describe the positive or negative impacts. (Click [here](#) for information)

Positive

The proposals seek to provide sustainable approach to public convenience provision in Ceredigion that positively contributes to public health.

Negative

Increasing costs may deter people from using public toilets or visiting certain places in the County. The service does however provide low cost RADAR keys that provide access to more accessible toilets for extended periods of the day.

What evidence do you have to support this view?

The Council collects data on the usage levels of toilets through counters, fee income and water usage. Current data shows that usage has remained consistent as changes have been introduced.

What action(s) can you take to mitigate any negative impacts or better contribute to this National Well-being Goal?

The proposals seek to balance costs with maintaining provision through less noticeable operational changes e.g. aligning cleaning levels to actual usage during peak days or period of the year. In the past cleaning levels have increased between April and October that has been viewed as the summer season, the peaks are however known to be two weeks in May, and the two months of July and August.

The Council makes provision for RADAR keys for certain groups.

We expect the impact to be minimal due to the small cash value of increases for individual visits. Discussions are also ongoing with a number of Community & Town Councils to transfer the running of the public conveniences to them as they may be able to operate them at a lower cost than Ceredigion County Council.

National Well-being Goal: A More Equal Wales

A society where everyone has an equal chance whatever their background or circumstances.

This section is longer because you are asked to assess the impact of your proposal on each group that is protected by the **Equality Act 2010**.

Click [here](#) for information about equality in Wales.

Do you think this proposal will have a positive or a negative impact on people because of their age? (Click [here](#) for information)

Children and Young People up to 18	None / Negligible
People 18-50	None / Negligible
Older people 50+	None / Negligible

Describe the positive or negative impacts.

Changes to the Council's Fees and Charges would not disproportionately affect one age group over another.

The proposals will help maintain provision without losing access to toilets. There may be some impacts due to rising costs but this is balanced against keeping toilets open, keeping them in a good condition and responding to vandalism that does impact on provision.

What evidence do you have to support this?

The Council collects data on usage.

What action(s) can you take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

The proposals seek to balance costs with maintaining provision through less noticeable operational changes e.g. aligning cleaning levels to actual usage during peak days or period of the year. In the past cleaning levels have increased between April and October that has been viewed as the summer season, the peaks are however known to be two weeks in May, and the two months of July and August.

The Council makes provision for RADAR keys for certain groups.

We expect the impact to be minimal due to the small cash value of increases for individual visits. Discussions are also ongoing with a number of Community & Town Councils to transfer the running of the public conveniences to them as they may be able to operate them at a lower cost than Ceredigion County Council.

Do you think this proposal will have a positive or a negative impact on people because of their disability? (Click [here](#) for information)

Hearing Impairment	None / Negligible
Physical Impairment	None / Negligible
Visual Impairment	None / Negligible
Learning Disability	None / Negligible
Long Standing Illness	None / Negligible
Mental Health	None / Negligible
Other	None / Negligible

Describe the positive or negative impacts.

Public Conveniences

Radar keys, which are used to enable people who have additional needs to access public conveniences, are rising in price from £6.50 to £7.00. The rise in price is relatively small so we expect the impact to be minimal, but it has been considered to potentially have an impact on some individuals.

General public convenience usage fees are rising from 30p to 40p. Again, this may impact users with health issues who choose not to use the toilets or can't afford the increased price. There are alternatives in some locations though such as in supermarkets and café's.

During 2023/24 fees were increased from 20p to 30p and no drop in demand was experienced so it is expected the current proposed increase will have a minimal impact.

What evidence do you have to support this?

Experience of past demand changes from similar price increases.

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

We expect the impact to be minimal due to the small cash value of increases for individual visits. Discussions are also ongoing with a number of Community & Town Councils to transfer the running of the public conveniences to them as they may be able to operate them at a lower cost than Ceredigion County Council.

Do you think this proposal will have a positive or a negative impact on people who are transgender? (Click [here](#) for information)

Trans Women	None / Negligible
Trans Men	None / Negligible
Non-binary people	None / Negligible

Describe the positive or negative impacts

n/a

What evidence do you have to support this?

n/a

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

n/a

Do you think this proposal will have a positive or a negative impact on people with different sexual orientation? (Click [here](#) for information)

Bisexual	None / Negligible
Gay Men	None / Negligible
Gay Women/Lesbian	None / Negligible

Heterosexual/Straight	None / Negligible
Describe the positive or negative impacts	
n/a	
What evidence do you have to support this?	
n/a	
What action(s) can you to take to mitigate any negative impacts?	
Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?	
n/a	

Do you think this proposal will have a positive or a negative impact on people who are married or in a civil partnership? (Click here for information)	
People who are married	None / Negligible
People in a civil partnership	None / Negligible
Describe the positive or negative impacts	
n/a	
What evidence do you have to support this?	
n/a	
What action(s) can you to take to mitigate any negative impacts?	
Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?	
n/a	

Do you think this proposal will have a positive or a negative impact on people who are pregnant or on maternity leave? (Click here for information)	
Pregnancy	None / Negligible

Maternity	None / Negligible
Describe the positive or negative impacts	
n/a	
What evidence do you have to support this?	
n/a	
What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?	
n/a	

Do you think this proposal will have a positive or a negative impact on people because of their ethnic origin? (Click here for information)	
Asian / Asian British	None / Negligible
Black / African / Caribbean / Black British	None / Negligible
Mixed / Multiple Ethnic Groups	None / Negligible
White	None / Negligible
Other Ethnic Groups	None / Negligible
Describe the positive or negative impacts	
n/a	
What evidence do you have to support this?	
n/a	
What action(s) can you take to mitigate any negative impacts?	
Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?	
n/a	

Do you think this proposal will have a positive or a negative impact on people with different religions, beliefs, or non-beliefs? (Click [here](#) for information)

Buddhist	None / Negligible
Christian	None / Negligible
Hindu	None / Negligible
Humanist	None / Negligible
Jewish	None / Negligible
Muslim	None / Negligible
Sikh	None / Negligible
Non-belief	None / Negligible
Other	None / Negligible

Describe the positive or negative impacts

n/a

What evidence do you have to support this?

n/a

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?

n/a

Do you think this proposal will have a positive or a negative impact on men or women? (Click [here](#) for information)

Men	None / Negligible
Women	None / Negligible

Describe the positive or negative impacts

n/a

What evidence do you have to support this?

n/a

What action(s) can you to take to mitigate any negative impacts?

Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between men and women?

n/a

Do you think this proposal will have a positive or a negative impact on people from the Armed Forces Community? (Click [here](#) for information)

Members of the Armed Forces

None / Negligible

Veterans

None / Negligible

Spouses

None / Negligible

Children

None / Negligible

Describe the positive or negative impacts

n/a

What evidence do you have to support this?

n/a

What action(s) can you to take to mitigate any negative impacts?

n/a

Socio-economic Duty

Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, making it more difficult to access basic goods and services.

Family background or where a person is born still affects their life. For example, a child from a wealthy family often does better at school than a child from a poor family, even if the poorer child is more naturally academic. This is sometimes called socio-economic inequality.

Do you think this proposal will have a positive or a negative impact on people experiencing socio-economic disadvantage?	Negative
Describe the positive or negative impacts	
There are some Fees & Charges that will now have an increased cost that will make some services less accessible to people experiencing socio-economic disadvantage.	
Public Conveniences – The fees for public convenience visits are rising by 10p and the cost of Radar keys used by those with additional needs are rising by 50p. Due to the low cash value of these increases we don't expect a significant impact but they additional cost will be felt more by those with less disposable income.	
What evidence do you have to support this?	
In regard to public conveniences where similar prices rises have been made in the past there was no decline in usage was experienced.	
What action(s) can you to take to mitigate any negative impacts?	
Public conveniences - We expect the impact to be minimal due to the small cash value of increases for individual visits. Discussions are also ongoing with a number of Community & Town Councils to transfer the running of the public conveniences to them as they may be able to operate them at a lower cost than Ceredigion County Council.	
Is there an opportunity to use this proposal to eliminate unlawful discrimination, advance equality of opportunity or encourage good relations between people in this group and the rest of the population?	
N/A	

National Well-being Goal: A Wales of Cohesive Communities

A society with attractive, viable, safe, and well-connected communities.

Click [here](#) for information about cohesive communities.

Does the proposal contribute to this goal? Describe the positive or negative impacts. [HINT](#)

Changes to Fees & Charges shouldn't have a particular impact on cohesive communities

What evidence do you have to support this view?

n/a

What action(s) can you take to mitigate any negative impacts or better contribute to the goal?

n/a

National Well-being Goal: A Wales of Vibrant Culture and Thriving Welsh Language

A society that that promotes and protects culture, heritage, and the Welsh language and which encourages people to take part in the arts, sports, and recreation.

Click [here](#) for information about culture and the Welsh language

Does the proposal contribute to this goal? Describe the positive or negative impacts.

As already covered in previous sections the changes will contribute to the Council operating with a balanced budget and therefore continue to offer services that it provides that supports a vibrant culture. Without a balanced budget many of these services would be unsustainable and may cease altogether.

What evidence do you have to support this view?

The Councils funding settlement is evidence of restrictions to its funding. It is also logical that from a price elasticity point of view increasing prices could decrease the demand for a particular service, although the increases have been kept to as minimal as possible and the actual change to demand, if any, is difficult to predict.

What action(s) can you take to mitigate any negative impacts or better contribute to the goal?

We expect the impact to be minimal due to the small cash value of increases for individual visits. Discussions are also ongoing with a number of Community & Town Councils to transfer the running of the public conveniences to them as they may be able to operate them at a lower cost than Ceredigion County Council.

With reference to the following, do you think this proposal will have a positive or negative effect on the Welsh language?

Click [here](#) for information

Opportunities for people to use the Welsh language

None / Negligible

Treating the Welsh language, no less favourably than the English language

None / Negligible

What evidence do you have to support this view?

There is no distinction between the languages within this policy and nor does it have an impact on the use of the Welsh language.

What action(s) can you take to increase the positive impact or mitigate any negative impact on the Welsh language?

n/a

National Well-being Goal: A Globally Responsible Wales

A society that considers how our actions might impact on other countries and people around the world.

Click [here](#) for information about global responsibility.

Does the proposal contribute to this goal? Describe the positive or negative impacts. [HINT](#)

The proposed changes have no impact on a Globally Responsible Wales

What evidence do you have to support this view?

n/a

What action(s) can you take to mitigate any negative impacts or better contribute to the goal?

n/a

Strengthening the Proposal

If you have identified any negative impacts in the above sections, please provide details of any practical changes and actions that could help remove or reduce the negative impacts.

What will you do?	When?	Who is responsible?	Progress
<p>If no action is to be taken to remove or mitigate negative impacts, please justify why. <i>(If you have identified any unlawful discrimination then the proposal must be changed or revised.)</i></p>			
<p>Any negative impacts identified above are difficult to predict in their scale and are expected to be relatively small.</p> <p>Where mitigations around price increases are available they have been implemented or being sought. We expect the impact to be minimal due to the small cash value of increases for individual visits. Discussions are also ongoing with a number of Community & Town Councils to transfer the running of the public conveniences to them as they may be able to operate them at a lower cost than Ceredigion County Council.</p> <p>Without taking this approach the service offered may cease or significantly reduce in some areas. This would have a far greater negative impact to the Council's Corporate Well-being Objectives than these proposals.</p>			
<p>How will you monitor the impact and effectiveness of the proposal?</p>			
<p>The Council will continue to monitor usage.</p>			

Sustainable Development Principle: 5 Ways of Working

Describe below how you have implemented the five ways of working in accordance with the sustainable development principle of the Well-being of Future Generations (Wales) Act 2015

<p>Long term Balancing short-term needs with long-term need and planning for the future.</p> <p><u>HINT</u></p>	<p>The proposals seek to provide sustainable approach to public convenience provision in Ceredigion. Taking the approach in this proposal, the Council aims to maintain appropriate levels of provision instead of a significant reduction in facilities in the County.</p>
<p>Collaboration Working together with other partners to deliver.</p> <p><u>HINT</u></p>	<p>. Discussions are also ongoing with a number of Community & Town Councils to transfer the running of the public conveniences to them as they may be able to operate them at a lower cost than Ceredigion County Council</p> <p>There may be opportunities where the third sector such as charities, community groups and the private sector to assist or provide some of the services currently offered by the Council.</p>
<p>Involvement Involving those with an interest and seeking their views.</p> <p><u>HINT</u></p>	<p>The current Public Toilet Strategy has been subject to consultation. Usage and costs are monitored and this is helping inform the implementation of changes.</p> <p>The proposals have been through relevant Budget Scrutiny Committees.</p>
<p>Prevention Putting resources into preventing problems occurring or getting worse.</p> <p><u>HINT</u></p>	<p>The need to implement the changes to the Fees & Charges is fundamentally because of cost inflation combined with limited funding settlements from Welsh Government. The Council doesn't have many levers of control in this area except a reduction of service which is what is trying to be avoided through any fees increase.</p> <p>The proposal includes a range of measures to reduce the overall cost of the service and make them more sustainable to provide.</p>

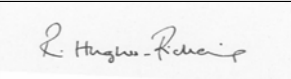

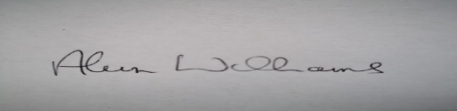
<p>Integration Considering the impact of your proposal on the four pillars of well-being (social, economic, cultural and environment) the objectives of other public bodies and across service areas in the Council.</p> <p><u>HINT</u></p>	<p>The Council is continually looking for improvement and partners where possible. An example of which is that the Council is in the process of agreeing in some instances that Town & Community Councils take over the running of public conveniences, grounds maintenance of public spaces and seasonal street cleaning. This can offer an alternative potentially more local and viable solution than that which the Council can afford.</p>
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Risk

Summarise the risk associated with the proposal.

	1	2	3	4	5
Impact Criteria	Very Low	Low	Medium	High	Very High
Likelihood Criteria	Unlikely to occur	Lower than average chance of occurring	Even chance of occurring	Higher than average chance of occurring	Expected to occur
Risk Description	Impact		Probability	Score (Impact x Likelihood)	
Increased Fees & Charges leads to significant fall in demand for services leading to income targets being missed	4		3	12	
Increased Fees & Charges leads to Services becoming unaffordable to service users	3		2	6	

Sign Off

Position	Name	Signature	Date
Corporate Lead Officer	Russell Hughes-Pickering		23/02/2024
Corporate Director	Barry Rees		23/02/2024
Portfolio Holder	Clive Davies		23/02/2024