



Equality Impact Assessment (EIA).

As part of the University's commitments in relation to the Equality Act 2010, we are legally bound to show "due regard" to the aims of the Public Sector Equality Duty (PSED) when making decisions and setting policies. This duty focuses on the need to pay due regard to:

- Eliminate discrimination, harassment and victimization
- Advance equality of opportunity between different groups, and
- Foster good relations between different groups.

It is therefore essential that consideration is given to the 9 protected characteristics identified in the Equality Act 2010 in regards to any change, with positive and negative impact identified. Change in this context refers to, but is not limited to the following: strategy development; projects and plans; initiatives, policy and procedure creation or amendment; restructure. Evidence of consideration should be logged accordingly, to be referred to in response to any potential legal challenge, whereby the university would be expected to justify their actions and decisions.

An Equality Impact Assessment (EIA) is a process designed to ensure that policies, practices and initiatives are fair, meet the needs of our staff and students and that they do not unlawfully discriminate against any protected characteristic.

An EIA should form part of any decision-making process and not be seen as an add-on at the final stage. Assessing impact early avoids wasted time and resource, as changes and mitigations can be applied at the outset of the journey, using reliable data and/or engagement with key groups to inform and guide the change. The Equality and Human Rights Commission (EHRC) are clear that engagement should be proportionate and relevant to the size of the organisation and the significance of decision.

It is imperative that the EIA is completed by the lead colleague responsible for the change in the university, to draw on their specialist knowledge and take ownership from the moment of conception, to the final decision and in regards to future monitoring. Further development will be required to record and measure original expectation, alongside possible further equality action.

The form on page 2 will enable you to reflect on the proposed change and assess the potential positive and negative impact from an equalities perspective on our university community.

Title of EIA:	Toilet Provision on Existing Estate
Lead colleague and contact details:	Lee McDermott

Step 1: Identify the proposed change e.g. strategy development; projects and plans; initiatives, policy and procedure creation or amendment; restructure

Barrow and Citadel developments included in-depth consultation that included a focus and decision of gender-neutral toilets as standard, alongside disabled toilets and changing spaces. To bring our existing estate into alignment and provide consistency across campuses in terms of clearly designated spaces and appropriate signage, the EDI Officer has worked with Estates to address this, in-keeping with our Inclusivity Statement, EDI Policy and Athena Swan action plan. Consultation, as outlined in Step 2, resulted in clear feedback that new signage and changes were welcomed by our community.

This has resulted in a decision for existing estates having clearly defined disabled toilets (with new signage), gender-neutral toilets (with new signage and learnings from Barrow/Citadel consultation) and gendered toilets. Gendered toilets will remain in place due to the limitations on our existing estate. As part of this change, estates are also taking the opportunity to ensure there are sanitary bins in all toilets, etiquette signage and add hooks/shelves in disabled toilet spaces, following previous requests from UCSU.

Step 2: Please reference sources of data/information, consultation, or individuals/groups you have identified to explore equalities impact

UoC Athena Swan action plan.
[Equality, Diversity & Inclusion - University of Cumbria](#) – University Inclusivity Statement and EDI Policy
[Equality, Diversity and Inclusion Data & Reports - University of Cumbria](#)

- [EDI Report 2021-22](#) (most recent HESA-approved data at time of writing)
- 1.7% of UoC students do not identify with the same gender they were assigned at birth (more than the sector at 0.9%)
- Staff data for identifying with the same gender assigned at birth was redacted due to low numbers
- Students declaring a disability is at 17.2%, higher than the sector which sits at 15.2% and is expected to grow
- Staff declaring a disability is at 10.5%, higher than the sector which sits at 6%

UCSU including Welfare Officer and Student Disability Network chair
 Unison reps
 UCU reps
 LGBTQ+ Staff Network
 DANN
 LGBTQ+ Network of Networks

Sector good practice

Stonewall - [The truth about trans \(stonewall.org.uk\)](https://www.stonewall.org.uk) 0.5% of the population (262,000 people in England and Wales) reported having a gender identity that is different from the one they were assigned at birth. Within this, the number of trans women and trans men is almost exactly the same – each accounting for 0.1% of the population (48,000 people in England and Wales), with a slightly smaller proportion identifying as non-binary at 0.06% (30,000 people in England and Wales). 18,000 people wrote in a different gender identity.

As London Campus space also includes ablution facilities, further and more tailored consultation and information was sought from:

Director of London Campus, Campus Manager London and Chaplain re London campus.

[religion-belief-discrimination-guide.pdf \(acas.org.uk\)](#)

[diversity-matters-20.pdf \(wudumate.com\)](#)

[How to create a multi-faith room in the workplace - VERCIDA](#)

[Religious Worship in the Workplace - Thrive Law](#)

[religion-or-belief-guide-to-the-law.pdf \(equalityhumanrights.com\)](#)

Phone conversation with ACAS representative 8/12/23.

Equality Act 2010.

Step 3: Assessing the change in relation to potential impact on the universities diverse community

	Acknowledge Potential Positive, Negative or Neutral Impact on Groups (please include relevant data if possible)	Action Plan: how will you mitigate or remove the potential negative impact and maximize the potential positive impact?			
		Action required	Person responsible	Target date	Progress to date
Age (consider older people, younger)	Potentially positive – Stonewall report				

<p>people, early-career researchers etc.)</p>	<p>that more young people are identifying as Trans and non-binary so intersectionally this will have a positive future impact</p>				
<p>Disability (including mental health and non-visible disability)</p>	<p>Potentially positive</p>	<p>Hooks/shelves to be added to the inside of toilet doors to support those with stoma bags and other requirements (as previously discussed with UCSU).</p> <p>Sanitary bins located so they do not block access to the toilet.</p> <p>Red cords not to be tied and checked that all are in working order.</p> <p>Etiquette signage in place to reinforce expectations and support an inclusive culture.</p> <p>New signage UoC-wide that includes a message about Hidden Disabilities in-keeping with our Hidden Disabilities Sunflower membership.</p>	<p>Estates Team</p>	<p>February 2024</p>	<p>Estates completed a review of existing facilities as part of this workstream.</p> <p>Previous comms have been released noting location of facilities.</p> <p>Disability Confident Leader level achieved.</p> <p>Joined Hidden Disabilities Sunflower scheme in October 2023.</p> <p>Consultation with staff networks, unions and UCSU.</p> <p>Embedding learnings from Barrow/Citadel consultation and approved EIAs.</p> <p>November 2023 staff and student global message was released advising users of toilets to be mindful of future users with the spraying of aerosols in toilets and the impact this can have.</p>

		<p>Preferred signage with a majority vote (8 votes to 4 from staff networks and UCSU) across all groups also included braille.</p> <p>Estates and domestic staff to receive clear messaging to not challenge toilet users based on appearance in relation to disability.</p> <p>Replacing existing signage that noted disabled toilets were also gender neutral (noted they are by default, but this could infer negative connotations).</p> <p>Etiquette signage includes details to support numerous disabilities such as asthma and the spraying of aerosols</p>			
<p>Gender reassignment (including Trans and non-binary people, gender identity and gender expression)</p>	<p>Potentially positive –</p>	<p>Replacing existing signage that noted disabled toilets were also gender neutral (noted they are by default but this could infer negative connotations) and updating gender neutral toilet signage. Older signage with man/woman image replaced (which reinforces the gender</p>	<p>Estates Team</p>	<p>February 2024</p>	<p>Previous and current consultation on signage</p>

		<p>binary) and also aware that some toilets had multiple signs on them, to now be replaced with a single agreed sign, focusing on what is behind the door and not who goes through it.</p> <p>Sanitary bins added to all toilets.</p> <p>Estates and domestic staff to receive clear messaging to not challenge toilet users based on appearance in relation to disability.</p>			
Marriage and civil partnership	Neutral – considered but no impact identified				
Pregnancy and maternity (including adoption)	Neutral – considered but no impact identified				
Race	Potentially positive – noted in relation to intersectional identities e.g. if a person of colour is also disabled and/or Trans or non-binary, they				

	would benefit from these changes				
Religion and belief (including those without religion or belief)	<p>Potentially positive – potential intersectional positive impact whereby international students joining from countries where there are cultural/legal differences will have spaces to use as per their gender identity.</p> <p>London is a small campus and includes ablution facilities in the toilet.</p>				<p>Previous Isoc consultation which led to signage on multi-faith space advising of ablution facilities and location for London.</p>
Sex	<p>Potentially positive – due to constraints of existing sites, there will be some gendered facilities, unlike Barrow/Citadels</p>	<p>Sanitary bins added to all toilets. This is to improve inclusive facilities for men, Trans and non-binary colleagues who may also use related products</p>	Estates Team	February 2024	<p>Estates completed a review of existing facilities as part of this workstream.</p> <p>Previous comms have been released noting location of facilities.</p> <p>Changes to systems so UoC staff can now log legal sex, if their gender is the same as assigned at birth and report</p>

					<p>their gender identity. Student systems already allowed to log gender identity.</p> <p>UCSU lead on providing free and accessible sanitary products.</p>
Sexual orientation	Potentially positive – intersectional positive impact for Trans and non-binary community				
Other International	Potentially positive – international students joining from countries where there are cultural/legal differences will have spaces to use as per their gender identity	Details to be added to campus maps so visitors/externals and those new to the sites can identify the location of facilities prior to visiting (not potentially having to indirectly out themselves by asking where the nearest gender neutral or disabled toilet is located)	Estates Team	February 2024	<p>Estates completed a review of existing facilities as part of this workstream.</p> <p>Signage is in place but requires an update.</p> <p>Previous comms have been released noting location of facilities.</p>

Step 4: Next steps. Please consider:

- Is further monitoring/engagement required?
- How will you measure mitigation in regards to potential negative impact?
- How will you measure maximizing potential positive impact?
- When will you review this EIA?

Estates team to update all signage across existing sites as per consultation outcomes, as provided by EDI Officer.

Etiquette signage to be added to these spaces at the time of change that is based on good practice and consultation (London-specific signage required due to the amount of available facilities).
 Estates team to ensure staff monitor the spaces in line with etiquette and expectations e.g. red cords not being tied up.
 UoC comms and awareness-raising of the changes made to signage.
 Estates to add details of facilities added to campus maps.
 EDI Officer to release staff comms in relation to data reporting update and addition of gender identity reporting now being available as part of wider reminder to staff to review/update diversity data, as other updates have also taken place.

Step 5: Final review. Please confirm the lead colleague has reviewed this EIA and is satisfied it can be considered for final consultation/sign-off.			
Name:	Lee McDermott	Date:	11/12/23

Step 6: Institutional approval confirming that this EIA is satisfactory in terms of analysis, consultation and mitigation, acknowledging that future monitoring and review will be undertaken to assess actual impact.	
Chair of Committee/Director of Institute/Head of Service:	EDIW Monitoring Group
Date:	12/12/23