



EQUALITY IMPACT ASSESSMENT (EqIA)

Summary results of the EqIA

Title of policy/ practice/ process/ service:

Shower room refurbishment.

Is the policy new (proposed), a revision to an existing policy or a review of current policy?

Revision - upgrade of current facilities.

Key findings from this assessment (or reason why an EqIA is not required):

That the provision of fully enclosed showering facilities, fitting of additional features for people with limited mobility and a separate accessible shower room will help to mitigate any negative impacts on the identified equality groups and will advance equality of opportunity for those most affected by this policy.

Summary of actions taken because of this assessment:

No further actions.

Lead person(s) for this assessment (job title and department only):

Facilities Manager, Corporate Services.
Senior Facilities Officer - Health & Safety.

Senior responsible owner agreement that the policy has been fully assessed against the needs of the general duty (job title only):

Director of Corporate Services and Accounts.

Publication date (for completion by Communications):

04/04/2022



Step 1 - Framing the planned change

Discussing step 1 and step 2 with the Corporate Policy Officer (Equalities) at an early stage will help identify appropriate evidence. This may include support from the wider Policy and Development team.

1.1 Briefly describe the aims, objectives and purpose of the policy/ practice/ process/ service. *You can use the information in your project specification, business case etc.*

Existing shower room refurbishment with the addition of a new disabled wet room.

1.2 Why is the change required? *Legislative, routine review etc.*

Building Improvement works. Our employees and tenants are office workers and do not require the provision of showers as part of their job roles.

1.3 Who is affected by this policy/ practice/ process/ service? *Be clear about who the 'customer' is.*

Scottish Legal Aid Board staff and tenants who rent office space.

1.4 Policy/ practice/ process/ service implementation date e.g. *project end date, date new legislation will take effect.*

02/03/2020

1.5 What other SLAB policies or projects may be linked to or affected by changes to this policy/ practice/ process/ service? The EqIA for related policies might help you understand potential impacts, and/ or your findings might be relevant to share. Refer to SLAB's business plan, our current equality outcomes, current project list etc.

None.

Step 2: Consider the available evidence and data relevant to your policy/ practice/ process/ service

The information you gather in this section will:

- help you to understand the importance of your policy/ practice/ process/ service for different equality groups,
- inform the depth of equality impact assessment you need to do (this should be proportional to the potential impact on equality groups), and
- provide justification and an audit trail behind your decisions, including where it is agreed an equality impact assessment is not required.

2.1 What information is available about the experience of each equality group in relation to this policy/ practice/ process/ service? Stay focused on the topic and scope of your policy/ practice/ process/ service. Does the policy/ practice/ process/ service relate to an area where there are already known inequalities? Refer to the EqIA guidance for sources of evidence.

Note: If you proceed to a full EqIA you should continue to add to this section as you develop the policy/ practice/ process/ service, come across new evidence and/ or **undertake a consultation**.

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
Age	N/A	There is no evidence that a shower refurbishment will affect this group. There is a correlation between increased age and acquiring a disability and/ or having issues with mobility. These will be considered with under Disability.
Disability	Equality Act	There is a duty on public authorities to make reasonable adjustments for people with disabilities, both in service provision and employment. This includes access to showering facilities by removing any barriers like steps and supporting access, for example space for wheelchair/mobility assistance users

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		to manoeuvre in and gain access to a shower, appropriate signage, and facilities within the room (seating, hand rails).
	Building standards www.gov.scot/publications/building-standards-2017-non-domestic/3-environment/312-sanitary-facilities/	These set out the appropriate dimensions for access for both shower facilities including the wet room for people with disabilities.
	Age care bathrooms	Some features that people with a disability might find useful - a seat in the shower or having somewhere to sit, hand rails, anti-slip material in the shower tray itself or other flooring.
	Other sources	Lockers at appropriate height for wheelchair users and people who can't bend down. Alarms in cubicles in case of an emergency. Locks on doors, lockers and showers controls are easy to use and can be used one handed. Free of tripping hazards and floor is an even surface.
Race	Culturally excluded guidance - sports partnership	Key barriers for 'culturally excluded women' include sufficient privacy in changing and showering areas. This also applies to men who may not want to undress in front of other men and showering in communal showering facilities.
Sex	Article - creating gender neutral facilities	Highlights the importance of privacy and security in shared changing facilities (for example, floor to ceiling showering spaces with no hidden corners). The article outlines the potential to create a barrier or risk in offering gender neutral spaces.

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
Gender Reassignment	EHRC Guidance for public authorities	Importance of offering gender neutral/private showering facilities for people to feel comfortable and included in a number of environments.
Sexual orientation	Stonewall Scotland Out in Sport NUS	There is no evidence that upgrading the shower facilities will have any impact on this group. Most relevant information was found under sport inclusion. No specific evidence in relation to separate or gender neutral changing facilities (there is with regards Trans - see Gender Reassignment). Any issues around bullying or harassment is covered by current employee policies.
Religion or Belief	ACAS Religion or Belief in the Workplace	Some religions or beliefs do not allow individuals to undress or shower in the company of others. If an organisation requires its staff, for H&S reasons, to change their clothing and/or shower, it is good employee relations practice to explore how such needs can be met. Insistence upon same-sex communal shower and changing facilities could constitute indirect discrimination (or harassment) as it may disadvantage or offend staff of a particular religion or belief whose requirements for modesty extend to changing their clothing in the presence of others, even of the same sex.
Pregnancy or maternity	N/A	There is no evidence that a shower refurbishment will affect this Equalities Characteristic, however limited mobility that can present with later stages of pregnancy will be considered under disability.
Marriage or civil partnership	N/A	There is no evidence that a shower refurbishment will affect this Equalities Characteristic.
Care Experienced (<i>corporate parenting duty</i>)	N/A	There is no evidence that a shower refurbishment will affect this equality group.

2.2 Using the information above and your knowledge of the policy/ practice/ process/ service, summarise your overall assessment of how important and relevant the policy/ practice/ process/ service is likely to be for equality groups.

The approach we take to refitting the shower facilities will have an impact on several equality groups as noted in the evidence table. We can see some differences in terms of people working in an environment where employees are required to use shower facilities because of their occupation, we are not in that position. Our employees and tenants are office workers and do not require the provision of showers as part of their job roles.

2.3 Outcome of step 2 and next steps. Complete the table below to inform the next stage of the EqIA process. Consult with the project group and/ or Corporate Policy Officer (Equalities) on completing this section.

Outcome of Step 2 following initial evidence gathering and relevance to equality characteristics	Yes/ No (Y or N)	Next steps
There is no relevance to equality or our corporate parenting duties.	N	Proceed to Step 5: agree with decision makers that no EqIA is required based on current evidence.
There is relevance to some or all of the equality groups and/ or our corporate parenting duties.	Y	Proceed to Step 3: complete full EqIA.
It is unclear if there is relevance to some or all of the equality groups and/or our corporate parenting duties.	N	Proceed to Step 3: complete full EqIA.



Step 3 - stakeholder involvement and consultation

This step will help you to address any gaps in evidence identified in Step 2. Speaking to people who will be affected by your policy/practice/process/service can help clarify the impact it will have on different equality groups.

Remember that sufficient evidence is required for you to show ‘due regard’ to the likely or actual impact of your policy/practice/process/service on equality groups. An inadequate analysis in an assessment may mean failure to meet the general duty.

The Policy and Development team can help to identify appropriate ways to engage with external groups or to undertake research to fill evidence gaps.

3.1 Do you/did you have any consultation or involvement planned for this policy/ practice/ process/ service?

Yes

3.2 List all the stakeholder groups that you will talk to about this policy/ practice/ process/ service.

Staff and tenants

Health and Safety Committee

3.3 What did you learn from the consultation/ involvement? Remember to record relevant actions in the assessment action log.

There was a need to upgrade the existing facilities and to increase the number of showering facilities available. We also took this opportunity to include a new accessible wet room.

Step 4 - Impact on equality groups and steps to address these

You must consider the three aims of the general duty for each protected characteristic. The following questions will help:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? How will this be mitigated?
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?

4.1 Does the policy/ practice/ process/ service have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics?

Age	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impact	Negative impact	No impact	
potential for discrimination			X	No changes to existing facilities which will impact on this characteristic. See section on disability to support people whose mobility may deteriorate with age.
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Sex	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	

potential for discrimination			X	
potential for developing good relations			X	
potential to advance equality of opportunity		X		Shower cubicles will be floor to ceiling and have space within them for individuals to get showered and changed in privacy. There are shared spaces for electrical items, mirrors and such, which is deemed reasonable given the close proximity of the showers to single sex bathrooms for people to use if preferable.

Disability	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination		X		An accessible shower tray has been installed in the single shower room and is accessible for wheelchair users.
potential for developing good relations			X	
potential to advance equality of opportunity	X			Additional features have been installed to assist people with limited mobility: pull down seats, pull cords for emergencies, handrails in each of the showers and lockers at different heights in the communal space.

Gender Reassignment	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination			X	
potential for developing good relations			X	
potential to advance equality of opportunity	X			With the introduction of gender neutral facilities, we believe this is a positive impact on this equality group.

Race	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X	X		Each shower cubicle is lockable and fully enclosed (floor to ceiling to allow for private undressing and dressing). This should help to mitigate any potential negative impact of the facilities becoming gender neutral. We consider this proportionate as there is no requirement for workers to shower for their job role.
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Religion or Belief	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X	X		Each shower cubicle is lockable and fully enclosed (floor to ceiling to allow for private undressing and dressing). This should help to mitigate any potential negative impact of the facilities becoming gender neutral. We consider this proportionate as there is no requirement for workers to shower for their job role.
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Sexual Orientation	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination			X	
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Pregnancy & Maternity	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination			X	
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Marriage & Civil Partnership	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination			X	
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Care experienced young people	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination			X	
potential for developing good relations			X	

potential to advance equality of opportunity			X	
--	--	--	---	--

4.2 Describe how the assessment so far might affect other areas of this policy/ practice/ process/ service and/ or project timeline?

N/A.

4.3 Having considered the potential or actual impacts of your policy/practice/process/service on equality groups, you should now record the outcome of this assessment below. Choose from one of the following (mark with an X or delete as appropriate):

Please select (X)	Implications for the policy/practice/process/service
X	<p>No major change Your assessment demonstrates that the policy/practice/process/service is robust. The evidence shows no potential for unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.</p>
	<p>Adjust the policy/practice/process/service You need to take steps to remove any barriers, to better advance equality of to foster good relations. You have set actions to address this and have clear ways of monitoring the impact of the policy/practice/process/service when implemented.</p>
	<p>Continue the policy/ practice/ process/ service with adverse impact The policy/ practice/ process/ service will continue despite the potential for adverse impact. You have justified this with this assessment and shown how this decision is compatible with our obligations under the public sector equality duty. When you believe any discrimination can be objectively justified you must record in this assessment what this is and how the decision was reached.</p>

	<p>Stop and remove the policy/practice/process/service</p>
--	---

	<p>The policy/practice/process/service will not be implemented due to adverse effects that are not justified and cannot be mitigated.</p>
--	---

Step 5 - Discuss and review the assessment with decision makers and governance structures

You **must** discuss the findings of this assessment with senior decision makers during the lifetime of the project/review and before you finalise the assessment. Relevant groups include, but are not limited to, a Project Board, Executive Team or Board members. EqIA should be on every project board agenda therefore only note dates where key decisions have been made (e.g. draft EqIA sign off, discussion about consultation response).

5.1 Record details of the groups you report to about this policy/ practice/ process/ service and impact assessment.

Include the **date you presented progress** to each group and an **extract from the minutes** to reflect the discussion.

Email to architect 19 December 2018 to examine the possibility of making the old, disused shower room DDA compliant.

Email acknowledged by the Director of Corporate Services and Accounts 20 December 2018.

Tender specification 4 March 2019 - states a walk in shower wet room option may be considered for the new shower area.

Email from the Director of Corporate Services and Accounts/ET on 18 November 2019 asking for an EqIA to be carried out for the refurbishment of the showers.

Emailed to the Director of Corporate Services and Accounts for review - 30 March 2020.

Sign off of works done was January 2021 and final invoice paid 29 January 2021.

Discussed with Director of Corporate Services and Chief Executive at a meeting on 12 January 2022.

Step 6 - Post-implementation actions and monitoring impact

There may be further actions or changes planned after the policy/practice/process/service is implemented and this assessment is signed off. It is important to continue to monitor the impact of your policy/practice/process/service on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

6.1 Record any ongoing actions below. This can be copied from the project action log or elsewhere in this assessment and should include timescales and person/team responsible. If there are no outstanding items please make this clear.

No further actions required.

6.2 Note here how you intend to monitor the impact of this policy/ practice/ process/ service on equality groups. In the table below you should:

- list the relevant measures
- Identify who or which team is responsible for implementing or monitoring any changes
- Where the measure will be reported to ensure any issues can be acted on as appropriate.

Measure	Lead department/ individual	Reporting (where/ frequency)
Shower usage and any issues reported to Facilities by employees and tenants.	Facilities	H&S Committee

6.3 EqlA review date. This EqlA should be reviewed as part of the wider post-implementation review of the policy/practice/process/service. The date should not exceed 3 years from the policy/practice/process/service implementation date.

05/12/2024



Step 7 - Assessment sign off

All equality impact assessments must be signed off by the Executive Team, even where an EqIA is not required. Note the relevant meeting date here:

12/01/2022

Approved: the Chief Executive's Office will pass the assessment to Communications for publication on our website. All assessments must be published on SLAB's website as early as possible after the decision is made to implement the policy/practice/process/service.

Not approved: