



## Equality Impact Assessment (EqIA) – Initial Screening and Full Assessment

### SECTION ONE: ESSENTIAL INFORMATION

<b>Directorate and Service :</b>	<b>Commercial and Tourism</b>		<b>Name of Lead Officer:</b>		Susan Loch	
			<b>Team:</b>		VOCS	
			<b>Tel:</b>			
			<b>Email:</b>			
<b>Proposal/Project:</b>	Site Visitor Toilets Refurbishment – Initial sites as per plan embedded.				<b>Reference No. (if applicable):</b>	
<b>What is the Proposal?</b>	<b>Budget &amp; Other significant Financial Decision</b>		<b>Corporate Policy/Plan (New or Change)</b>		<b>New or Changed HR Policy &amp; Practice</b>	
	No		No		No	
<b>Who Does the Proposal Affect?</b>	<b>Stakeholders</b>	<b>Partners</b>	<b>Members of the Public</b>	<b>Employees</b>	<b>Other, please specify:</b>	
	No	No	Yes	Yes		
<b>The main aims and projected outcome of this proposal</b>				<b>Projected Outcome of this Proposal</b>		
The VisitScotland (VS) Quality Assurance Scheme audit feedback has indicated that, without improvement to the toilet provision at some of our staffed sites, our gradings may reduce.				The objective is to improve our toilet provision at several of our staffed sites to provide appropriate and sufficient facilities for our visitors in line with expectations from the independent VS Quality Assurance Grading Scheme and which enhance our visitor experience on site. The project output will be that the sites will have improved toilet facilities and will maintain (or improve) their VS star grading, meeting our aspiration for improving access and visitor satisfaction.		

<p>Improvement to our visitor offer is included in the Commercial and Tourism Directorate Plan 2018/19 and is covered in the objectives below:</p> <ul style="list-style-type: none"> <li>• Invest in visitor facing facilities at our Properties in Care (PIC) based on clear prioritisation, research and audience participation</li> <li>• Improve access to our PICs and associated collections, and to their stories</li> <li>• Maximise commercial income from core HES activities and activities in the HESe Business Plan.</li> </ul>	<p>Initial sites for refurbishment are:</p> <ul style="list-style-type: none"> <li>Blackness</li> <li>Craignethan</li> <li>Dumbarton</li> <li>Jedburgh</li> <li>Linlithgow</li> <li>Newark</li> <li>Rothesay</li> </ul>
<p>The driver for this refurbishment is to maintain our standards and VS quality assurance. Some decisions were made to offer ‘unisex’ or ‘gender neutral facilities’ at some sites where the refurbishment identified that this could be an option. Additionally, it was considered that ‘unisex’ or ‘gender neutral facilities’ could positively impact on waiting times for women.</p>	<p>We know from research that public toilets or lack of particularly for women users results in queuing and as part of the refurbishment it was decided that moving to ‘unisex’ and ‘gender neutral’ provision could be a response to positively impacting on this.</p> <p>Installing more facilities would be one answer but this is not straightforward. It requires changes in architecture, which are costly or even plain impossible in many of our listed buildings.</p> <p>Although evidence on waiting times to use the toilet between women and men is limited a study<sup>1</sup> did theorise that waiting times could be reduced for women but that waiting times could increase for men.</p>

<sup>1</sup> <https://journals.sagepub.com/doi/abs/10.2466/PR0.105.3.789-790>

## SECTION TWO: ASSESSING THE IMPACT

**Equality Protected Characteristics:** What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010. Quantitative and qualitative information should be considered in determining any impact.

Our 2018 calendar year visitor figures for our staffed sites. 5,229,049 people visited our staffed sites in 2018 – up 5% from 2017. Edinburgh Castle came up top with 2,111,578 visitors, followed by 605,241 visitors to Stirling Castle and 518,195 visitors to Urquhart Castle. Sites featured in the TV show Outlander have continued to see record-breaking numbers, with Blackness Castle reaching 50,000 visitors for the first time – an increase of 36% from the previous year, while Doune Castle and Craigmillar Castle have also experienced an increase in footfall. Sites which featured the LEGO exhibition Brick Wonders also reported a dramatic increase in visitors – Aberdour Castle had a 42% increase; Glasgow Cathedral had a 24% increase and Arbroath Abbey had an 18% increase. A record number of memberships in 2018 which peaked at over 200,000 – up from 5% in 2017.<sup>2</sup>

Protected Characteristic	Neutral Impact	Positive Impact	Negative Impact	Please provide information on how the impact on this protected characteristic was identified and arrived at.
				The review has considered the needs of disabled visitors with the provision of separate accessible facility. Edinburgh Castle has provided a range of facilities based on the diversity of visitor which includes (toilet facilities which are familiar to South East Asian visitors); family provision; provision for disabled visitors (including a changing place toilet).
<b>Age</b>	X			<p>The Scottish Govt. equalities finder using a variety of source data states 94% of 16 to 24-year olds attended a cultural event compared to 63% of those aged 75 and over. Sixteen to 24-year olds also had higher cultural attendance than those aged 75 and over after excluding trips to the cinema (80 per cent and 61 per cent).<sup>3</sup></p> <p>Older visitors may be more confident about visiting due to the availability of disabled toilet provision and the availability of general toilet provision on site. It is suggested that older people should have access to the disabled toilet to mitigate any hidden health issues.</p> <p>Signage will need to be considered where ‘unisex’ or ‘gender neutral facilities’ are available in order to reduce any confusion for older people or for people with conditions e.g. dementia.</p> <p>Hygiene is an important factor in public toilet provision therefore well-ordered cleaning routines are essential.</p> <p>Having disabled toilet signage extended to hidden disabilities/conditions would be advantageous for people of any age.</p>

<sup>2</sup> <https://intranet.hes.scot/2019/05/28/our-visitor-strategy-how-well-improve-our-visitor-experience-and-keep-our-sites-accessible-and-protected/>

<sup>3</sup> <https://scotland.shinyapps.io/sg-equality-evidence-finder/>

			<p>We do acknowledge that we might receive some queries/comments about the introduction of unisex toilet facilities and staff are encouraged to record these and/or direct people to our website where comments can be sent in and will be responded to.</p> <p>Regarding safety of visitors, we have assessed these sites in our care as, to some extent, controlled environments where HES can operate some measure of control by virtue of control around entry, movement, and activity while visitors are on site.</p>
<b>Disability</b>		X	<p>The Scottish Govt. equalities finder using a variety of source data states cultural attendance was lowest among adults with a physical or mental health condition that caused long term major reduced daily capacity (60% compared to 89% attendance for those with no condition). For those whose condition caused minor reduced daily capacity, the attendance rate was 78%.<sup>4</sup></p> <p>Separate accessible provision for disabled visitors will be made available as part of the overall refurbishment plan. These facilities will have extended use for people with hidden disabilities or medical conditions. Appropriate signage will be in place.</p> <p>Hygiene is an important factor in public toilet provision with potential risks higher for wheelchair users therefore well-ordered cleaning routines are essential.</p> <p>Regarding safety of visitors, we have assessed these sites in our care as, to some extent, controlled environments where HES can operate some measure of control by virtue of control around entry, movement, and activity while visitors are on site.</p>
<b>Sex</b>			X <p>The Scottish Govt. equalities finder using a variety of source data states women have higher cultural attendance than men after excluding trips to the cinema, with the gap between men and women being 5% points (74:79).<sup>5</sup></p> <p>Some sites may be able to take the opportunity to provide 'gender neutral' or 'unisex' toilets where it is possible within that built environment. The plans attached indicate that this is being prepared for some of the sites in this round of refurbishment.</p> <p>The best practice examples are the options with fully enclosed cubicles including a washbasin (Linlithgow and Rothesay).</p> <p>The examples with shared washbasin space may present some users with concerns of privacy and safety (Blackness, Jedburgh, Dumbarton).</p>

<sup>4</sup> <https://scotland.shinyapps.io/sg-equality-evidence-finder/>

<sup>5</sup> <https://scotland.shinyapps.io/sg-equality-evidence-finder/>

				<p>Individual cubicles will be fully enclosed and lockable, and all facilities will provide appropriate sanitary bins.</p> <p>Women often have more reasons for using public toilets than men e.g. menstruation, menopause, pregnancy, incontinence and caring for children/elderly relatives and this inevitably results in women queuing to use facilities.</p> <p>Issues cited by women about use of unisex public toilets concern areas of maintenance; cleanliness; lack of toilet paper; and smelly. Cleaning arrangements will need to be sufficient to reduce such concerns.<sup>6</sup></p> <p>Some women’s organisations do not support ‘unisex’<sup>7</sup> or ‘gender neutral facilities’<sup>8</sup> and their views are publicly documented.</p> <p>We do acknowledge that we might receive some queries/comments about the introduction of unisex toilet facilities and staff are encouraged to record these and/or direct people to our website where comments can be sent in and will be responded to.</p> <p>Single fathers or male guardians of young children and elderly relatives may be more reassured using ‘unisex’ or ‘gender neutral facilities’ when visiting our sites as they will feel able to enter a non-segregated space where they are looking after children or older people of the opposite sex.</p> <p>Hygiene is an important factor in public toilet provision with potential risks therefore well-ordered cleaning routines are essential.</p> <p>Signage will need to be considered where ‘unisex’ or ‘gender neutral facilities’ are in place in order to reduce confusion.</p> <p><b>Refer to consultation findings later in this assessment.</b></p> <p>Regarding safety of visitors, we have assessed these sites in our care as, to some extent, controlled environments where HES can operate some measure of control by virtue of control around entry, movement, and activity while visitors are on site.</p>
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<b>Ethnicity</b>			X	The Scottish Govt. equalities finder using a variety of source data states cultural attendance is highest for people from the ‘White Other’ and the ‘Asian, Asian
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<sup>6</sup> <https://www.rsph.org.uk/about-us/news/taking-the-p-the-decline-of-the-great-british-public-toilet.html>

<sup>7</sup> <https://scottish-women.com/2018/12/16/councils-gender-neutral-school-toilets-ignore-children-young-peoples-commissioner-scotlands-call-for-a-human-rights-approach/>

<sup>8</sup> <https://womansplaceuk.org/gender-neutral-toilets-dont-work-for-women-2/>

				<p>Scottish or Asian British' ethnic group (88% and 87%), and lowest for people from the 'White Scottish' ethnic group (84%). For people from the 'Other' ethnic group, the attendance rate was 86% respectively. Our sites are attractive as tourist destinations and have significant numbers of international visitors. See visitor information above at reference 2.</p> <p>There is limited research on 'unisex' or 'gender neutral facilities' from within the minority ethnic community.</p> <p>However, we need to acknowledge that for some people the use of non-segregated facilities may be culturally and socially inappropriate.</p> <p>We do acknowledge that we might receive some queries/comments about the introduction of unisex toilet facilities and staff are encouraged to record these and/or direct people to our website where comments can be sent in and will be responded to.</p> <p>Hygiene is an important factor in public toilet provision with potential risks therefore well-ordered cleaning routines are essential.</p> <p>Signage will need to be considered where 'unisex' or 'gender neutral facilities' are in place in order to reduce confusion.</p> <p><b>Refer to consultation findings later in this assessment.</b></p> <p>Regarding safety of visitors, we have assessed these sites in our care as, to some extent, controlled environments where HES can operate some measure of control by virtue of control around entry, movement, and activity while visitors are on site.</p>
<b>Religion / Belief / non-Belief</b>	X			<p>The Scottish Govt. equalities finder using a variety of source data states cultural attendance was highest for those who said they had 'No Religion' (87%), and lowest for those who said, 'Church of Scotland' (79%). For those who said, 'Other Christian', 'Roman Catholic' and 'Another Religion', the attendance rate was 85%, 84% and 82% respectively.</p> <p>There is limited research on 'unisex' or 'gender neutral facilities' from religious organisations. However, we need to acknowledge that for some people the use of non-segregated facilities may be inappropriate on religious grounds.</p> <p>We do acknowledge that we might receive some queries/comments about the introduction of unisex toilet facilities and staff are encouraged to record these and/or direct people to our website where comments can be sent in and will be</p>

				<p>responded to.</p> <p>Signage will need to be considered where ‘unisex’ or ‘gender neutral facilities’ in order to reduce confusion.</p> <p><b>Refer to consultation findings later in this assessment.</b></p> <p>Regarding safety of visitors, we have assessed these sites in our care as, to some extent, controlled environments where HES can operate some measure of control by virtue of control around entry, movement, and activity while visitors are on site.</p>
<b>Sexual Orientation</b>		X		<p>While there is limited research on ‘unisex’ or ‘gender neutral facilities’ and the LGB community there have been instances where some lesbians have been challenged in women’s toilets and moves towards a more neutral space could alleviate concerns and individual stress.</p> <p>This EqIA has been shared with members of the HES LGBT+ Employee and Allies Network for comment.</p> <p>Signage will need to be considered where ‘unisex’ or ‘gender neutral facilities’ in order to reduce confusion.</p> <p><b>Refer to consultation findings later in this assessment.</b></p> <p>Regarding safety of visitors, we have assessed these sites in our care as, to some extent, controlled environments where HES can operate some measure of control by virtue of control around entry, movement, and activity while visitors are on site.</p>
<b>Gender Re-assignment</b>		X		<p>The visitor site toilet refurbishment initiative is expected to be received positively by the trans community (people transitioning from male to female or female to male .</p> <p><b>Refer to consultation findings later in this assessment.</b></p> <p>Regarding safety of visitors, we have assessed these sites in our care as, to some extent, controlled environments where HES can operate some measure of control by virtue of control around entry, movement, and activity while visitors are on site.</p>
<b>Pregnancy / Maternity</b>			X	<p>Although this protected characteristic is relevant within an employment context. It is worth recognising that a relatively constant percentage of visitors to our sites will be pregnant.</p> <p>We need to acknowledge that for some pregnant women the use of non-</p>

				<p>segregated facilities may be uncomfortable and undesirable. We do acknowledge that we might receive some queries/comments about the introduction of unisex toilet facilities and staff are encouraged to record these and/or direct people to our website where comments can be sent in and will be responded to.</p> <p><b>Refer to consultation findings later in this assessment.</b></p> <p>Regarding safety of visitors, we have assessed these sites in our care as, to some extent, controlled environments where HES can operate some measure of control by virtue of control around entry, movement, and activity while visitors are on site.</p>
<b>Marriage / Civil Partnership</b>				Not relevant

**Public Sector Equality Duty: Scottish Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance quality of opportunity and foster good relations.**

	<b>Please say how your proposal will contribute to the general equality duty</b>	<b>What is the potential impact of your proposal</b>
<b>Eliminate Unlawful Discrimination (harassment, victimisation and other prohibited conduct):</b>	<p>Refurbishment of toilet facilities at several of our sites following the VS audit is aimed to improve the available provision for our visitors.</p> <p>Where 'unisex' or 'gender neutral facilities' are provided this will meet the needs of people within the LGB and trans community.</p>	<p>Meet the requirements of the Equality Act 2010 in terms of facilities for disabled visitors</p> <p>Meet the requirements of the Equality Act 2010 in terms of gender reassignment and/or sexual orientation requirements.</p> <p>There are mixed views and responses from the consultation we have carried out and we will endeavour to mitigate where it is possible to do so at sites where the opportunity has been taken to provide 'unisex' or 'gender neutral' facilities.</p>
<b>Advance Equality of Opportunity (taking positive action through activity and policies which widen access; participation and opportunity to protected groups</b>	<p>Refurbishment of toilet facilities at a number of our sites following the VS audit will advance equality by ensuring that our facilities cater to the needs of our visitors.</p>	<p>Meet the requirements of the Equality Act 2010 in terms of facilities for disabled visitors</p> <p>Meet the requirements of the Equality Act 2010 in terms of gender reassignment and/or sexual orientation requirements.</p> <p>There are mixed views and responses from the consultation we have carried out and we will endeavour to mitigate where it is possible to do so at sites where the opportunity has been taken to provide 'unisex' or 'gender neutral' facilities.</p>

<b>Foster Good Relations (promoting understanding and reducing prejudice):</b>	The driver for this project is to provide quality facilities and to reduce the waiting times for women, in the main, who often find themselves in long queues waiting to use our toilet provision.	We recognise that our refurbishment has some limitations based on the nature of different sites resulting in a variety of refurbished models.
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JUDGED OVERALL LEVEL OF NEGATIVE /DIFFERENTIAL IMPACT:			
LEVEL		COMMENTS	
<b>MEDIUM</b>	<b>Yes / No</b>	<b>Where it is possible within the limitations of the various sites to mitigate any concerns identified as a result of this assessment, we have established actions set out further in this assessment.</b>	
<b>Evidence</b>		Research and insights from consultation	<b>Outcome: Full assessment required.</b>

**SECTION THREE: EVIDENCE** Please include any evidence or relevant information that has influenced the decisions contained in this EqIA. (This could include demographic profiles; social/household audits; research; national guidance or legislative requirements and how this relates to the protected characteristic groups)

**A - Quantitative Evidence:** This is evidence which is numerical and should include the number people who use the provision and the number of people from the protected characteristic groups who might be affected by changes to the service.

**Visitor Numbers Visitors at Staffed Sites**

2017/18 = 5.04 m

2020/21 estimated 5.4 m

2022/23 estimated 5.5 m

Future visitor-number forecasts will be determined by any new capacity issues and any changes to operational arrangements. Plans to be developed to count visits to an increasing number of unstaffed sites.

**Over 2.7M Overseas visitors came to Scotland UP 17% since 2011**

<https://www.historicenvironment.scot/about-us/news/record-breaking-visitor-figures-at-scotland-s-historic-sites/> (references top 10 sites visitor numbers)

The numbers of visitors are estimated to continue rising and this will undoubtedly continue to put pressure on providing the necessary and important services for visitors which make their experience an enjoyable and memorable one for all the right reasons.

**B - Qualitative Evidence:** This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

**Social** - case studies; personal /group feedback / consultation / research /other:

**Research:**

<https://journals.sagepub.com/doi/abs/10.2466/PRO.105.3.789-790>

<https://intranet.hes.scot/2019/05/28/our-visitor-strategy-how-well-improve-our-visitor-experience-and-keep-our-sites-accessible-and-protected/>

<sup>1</sup> <https://www.rsph.org.uk/about-us/news/taking-the-p-the-decline-of-the-great-british-public-toilet.html>

<sup>1</sup> <https://scottish-women.com/2018/12/16/councils-gender-neutral-school-toilets-ignore-children-young-peoples-commissioner-scotlands-call-for-a-human-rights-approach/>

<sup>1</sup> <https://womansplaceuk.org/gender-neutral-toilets-dont-work-for-women-2/>

Best Judgement:	
Has best judgement been used in place of data / research / evidence?	No
Who provided the best judgement and what was this based on?	
What gaps in data / information were identified?	
Is further research necessary?	No
If NO, please state why.	See references above

**SECTION FOUR: ENGAGEMENT/CONSULTATION**      **With individuals or organisations affected by the policy or proposal**

Has the proposal / policy / project been the subject of relevant engagement/consultation?	YES
If YES, please state who was engaged/consulted.	<p><b>Consultation:</b></p> <p>Scottish Tour Guide Association were asked for their members opinions with a total of 3 responses received; 2 responses expressing concern and offering suggestions (discussion with a group of American tourists):</p> <ul style="list-style-type: none"> <li>• stalls that are completely closed in and have their own wash basin and exit onto the corridor should it be ok to have for any and all people.</li> <li>• completely closed in toilet stalls that open into a communal hand washing area would be unacceptable to many women.</li> <li>• anything that feels like an invasion of privacy needs to be avoided</li> <li>• women don't particularly like going into a public toilet just vacated by a man</li> </ul> <p>Dundee International Women's Centre – discussed with a couple of their user groups who raised common issues of:</p> <ul style="list-style-type: none"> <li>• Queuing; cleanliness; preference for sinks to be in cubicles; could be put off visiting.</li> </ul> <p>Euan's Guide is a regular partner and contributor to advising on accessibility and we will be working with Euan's guide as the refurbishment progresses and where space allows to expand providing 'changing places' toilets.</p> <p>HES LGBT+ Steering group highlighted:</p> <ul style="list-style-type: none"> <li>• Welcomed the introduction of gender-neutral toilets at sites</li> <li>• Acknowledged the concerns raised by others</li> </ul>

- Safety concern expressed re the layout of Jedburgh:
- No sight line from the two lowest washbasin positions to the door
- Potential for people using the two lowest washbasins to feel trapped
- Lack of space for people to move past each other without feeling squeezed

West of Scotland Race Equality Council - staff and user discussion highlighted:

The main consensus was that if there were single non-binary toilets then this would not be an issue. And or if there were male/female toilets with additional facilities for non-binary/gender neutral then this would be ok too.

Where the pros were the cut in waiting times the cons at the moment included:

- Both sexes would feel uncomfortable using cubicles next to each other
- Concerns around hygiene (women on her menstrual cycles needing that additional privacy)
- Many women tend to spend a bit longer in toilets fixing hair, face – there would be an issue for people needing to fix headscarves etc as they could be exposed to men walking in without their headscarf on.
- One person mentioned that men tend to start getting 'ready' to use facilities as soon as going into toilets, not realising that that they are non-binary toilets could risk exposure of some kind.
- Many mothers/fathers wait outside when slightly older children go into use facilities. i.e. a father standing outside whilst his 8-year-old daughter goes into use facilities. There is a higher risk of indecency or exposure that may be prevented if there were still female only toilets available.

Scottish Women's Convention – no response.

Stonewall response:

We would also recommend mentioning non-binary identities here too. Gender neutral facilities will positively impact people who identify as non-binary (non-binary is an identity that comes under the trans umbrella term, so can be mentioned here). We would not recommend limiting the term trans to just trans men and trans women.

**If NO engagement/consultation has been conducted, please state why.**

How was the engagement/consultation carried out?		What were the results? Please highlight and embed any consultation report/s.
Focus Group	Yes	See above
Survey	No	
Display / Exhibitions	No	
User Panels	No	
Public Event	No	

<b>Other: please specify</b>	The draft equality impact assessment was sent out to different groups cited above who have connections with HES and were requested to provide feedback.
<b>Has the proposal / policy / project been reviewed / changed as a result of the engagement/consultation?</b>	Yes – Jedburgh plan amended
<b>Have the results been fed back?</b>	Yes
<b>Is further engagement/consultation recommended?</b>	Yes via staff at sites with visitors after refurbishment

## SECTION FIVE: PARTNERS / OTHER STAKEHOLDERS

<b>Which sectors are likely to have an interest in or be affected by the proposal / policy / project?</b>	<b>Describe the interest / affect.</b>	
<b>Business</b>	No	
<b>Local Councils/Community Planning Partners</b>	No	
<b>Wider Heritage/Conservation/Tourism Sectors</b>	Yes	To gauge the response to the refurbishment and to the introduction of ‘unisex’ and ‘gender-neutral’ toilets.  To gauge the response to extending the use of disabled toilets to include hidden disabilities and older people.
<b>Voluntary / Other Sectors</b>	Yes	There may be interest from women’s groups/organisations; LGBT+ groups; religious groups
<b>Other(s): please list and describe the nature of the relationship / impact.</b>		

## SECTION SIX: ASSESSMENT OUTCOME

Only one of following statements best matches your assessment of this proposal / policy / project. Please select one and provide your reasons.		
No major change required		
The proposal must be adjusted to reduce impact on protected characteristic groups		
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups	Yes	In our action plan below, we aim to address the concerns identified from our consultation. We will capture visitor comments following the refurbishment and we will use these to inform future refurbishments.
Stop the proposal as this is potentially in breach of equality legislation		

**SECTION SEVEN: ACTION PLANNING**

**Mitigating Actions:** As a result of performing this assessment, what actions are proposed to remove or reduce any risks of adverse outcomes identified for employees, customers; participants; service users or other people who share characteristics protected by the Equality Act.

Identified Impact	To Whom	Recommendation to address the issues raised	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Equality Outcomes
Waiting times	Women	Staff to record visitor comments on waiting times following the refurbishment and to relay through management reporting.	Regional/On site manager/s	tbc	Visitor Strategy
Clear signage	Disabled; Women/Men; LGBT+	To avoid confusion, it is important that the signage is clear and has a common HES brand across our sites	C&T in conjunction with VECL and Conservation Directorate	tbc	Visitor Strategy
Hygiene	All	Well-structured cleaning regime	Cleaning contractor – Engie where this applies. Staff.	tbc	Visitor Strategy
Visitor comments/concerns	All	Staff are encouraged to record queries/comments/concerns about the introduction of unisex or gender	Regional/On site manager/s	tbc	Visitor Strategy

		neutral toilet facilities and /or direct people to our website where comments can be sent in and will be responded to.			
Visitor safety	All	HES is to some extent a controlled environment where HES can operate some measure of control by virtue of control around entry, movement, activity while visitors are on site. Current protocols/procedures are in place.	Regional/On site manager/s	tbc	Visitor Strategy
Corporate messaging	Public	Have an agreed response to any social media/concerns received from visitors.	Complaints Communications	tbc	Visitor Strategy

<b>Are actions being reported to SMT? If yes when and how?</b>	N/A	<b>Date Reported to SMT:</b>	
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**Where No Mitigating Actions have been identified:**

**Where a negative impact on diverse communities has been identified what is the justification for continuing with the proposal / policy / project?**

**SECTION EIGHT: LEAD OFFICER SIGN OFF**

<b>Lead Officer: Susan Loch</b>			
<b>Signature:</b>	Susan Loch	<b>Date:</b>	August 2019

**SECTION NINE: HEAD OF SERVICE/DIRECTORATE SIGN OFF**

**Director / Head of Service/Directorate:** Alison Turnbull

**Signature:**



**Date:**

September 2019