

# Aberdeenshire Council

## Integrated Impact Assessment

### PC Strategy 2025-30

Assessment ID	IIA-003155
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Approved By	Allan Whyte
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# 1. Overview

This document has been generated from information entered into the Integrated Impact Assessment system.

PC Strategy 2025-30 covering operational running of public conveniences across Aberdeenshire.

During screening 5 of 12 questions indicated that detailed assessments were required, the screening questions and their answers are listed in the next section. This led to 4 out of 5 detailed impact assessments being completed. The assessments required are:

- Equalities and Fairer Scotland Duty
- Health Inequalities
- Sustainability and Climate Change
- Town Centres First

In total there are 3 positive impacts as part of this activity. There are 11 negative impacts, all impacts have been mitigated.

A detailed action plan with 2 points has been provided.

This assessment has been approved by [allan.whyte@aberdeenshire.gov.uk](mailto:allan.whyte@aberdeenshire.gov.uk).

The remainder of this document sets out the details of all completed impact assessments.

## 2. Screening

Could your activity / proposal / policy cause an impact in one (or more) of the identified town centres?	Yes
Would this activity / proposal / policy have consequences for the health and wellbeing of the population in the affected communities?	Yes
Does the activity / proposal / policy have the potential to affect greenhouse gas emissions (CO2e) in the Council or community and / or the procurement, use or disposal of physical resources?	Yes
Does the activity / proposal / policy have the potential to affect the resilience to extreme weather events and / or a changing climate of Aberdeenshire Council or community?	No
Does the activity / proposal / policy have the potential to affect the environment, wildlife or biodiversity?	No
Does the activity / proposal / policy have an impact on people and / or groups with protected characteristics?	Yes
Is this activity / proposal / policy of strategic importance for the council?	No
Does this activity / proposal / policy impact on inequality of outcome?	No
Does this activity / proposal / policy have an impact on children / young people's rights?	No
Does this activity / proposal / policy have an impact on children / young people's wellbeing?	No
Does the activity / proposal / policy relate to budget proposals?	Yes
Does this activity / proposal / policy impact on consumers of Council services?	No

## 3. Impact Assessments

Children's Rights and Wellbeing	Not Required
Climate Change and Sustainability	All Negative Impacts Can Be Mitigated
Equalities and Fairer Scotland Duty	Only Some Negative Impacts Can Be Mitigated
Health Inequalities	All Negative Impacts Can Be Mitigated
Town Centre's First	All Negative Impacts Can Be Mitigated

## 4. Equalities and Fairer Scotland Duty Impact Assessment

### 4.1. Protected Groups

Indicator	Positive	Neutral	Negative	Unknown
Age (Younger)		Yes	Yes	
Age (Older)		Yes	Yes	
Disability			Yes	
Race		Yes		
Religion or Belief		Yes		
Sex			Yes	
Pregnancy and Maternity		Yes	Yes	
Sexual Orientation		Yes		
Gender Reassignment		Yes		
Marriage or Civil Partnership		Yes		

### 4.2. Socio-economic Groups

Indicator	Positive	Neutral	Negative	Unknown
Low income			Yes	
Low wealth		Yes		
Material deprivation		Yes		
Area deprivation		Yes		
Socioeconomic background		Yes		

### 4.3. Negative Impacts and Mitigations

Impact Area	Details and Mitigation	
Age (Older)	Older people may need to use public conveniences with greater frequency. Can be mitigated Mitigation	Yes  Other facilities available in some areas already. Where there are no alternative facilities already available, Comfort Partnerships will be sought together with exploring other council facilities that could be used.
	Timescale	6 months

Impact Area	Details and Mitigation
<p><b>Age (Younger)</b></p>	<p>Younger children may need to use the public conveniences with greater frequency.</p> <p>Can be mitigated                      Yes</p> <p>Mitigation                      Other facilities available in some areas already. Where there are no alternative facilities already available, Comfort Partnerships will be sought together with exploring other council facilities that could be used (eg leisure facilities, corporate offices etc).</p> <p>Timescale                      6 months</p>
<p><b>Disability</b></p>	<p>Some public toilet facilities which may be closed have disabled toilet facilities which may be closed. It is not proposed to close any Changing Places facility.</p> <p>Can be mitigated                      Yes</p> <p>Mitigation                      As part of the overall assessment, alternative disabled toilet facilities within locations where there is a proposed closure will be explored via Comfort Partnerships and other council owned facilities. The Changing Places facilities will remain open.</p> <p>Timescale                      12 months</p>
<p><b>Pregnancy and Maternity</b></p>	<p>Those who are pregnant may need to use the public conveniences with greater frequency.</p> <p>Can be mitigated                      Yes</p> <p>Mitigation                      Other facilities available in some areas already. Where there are no alternative facilities already available, Comfort Partnerships will be sought together with exploring other council facilities that could be used.</p> <p>Timescale                      6 months</p>

Impact Area	Details and Mitigation
<p><b>Sex</b></p>	<p>The cleaning staff are predominantly female and should hours be reduced or facilities closed, they will be adversely impacted.</p> <p>Can be mitigated                      Yes</p> <p>Mitigation                      The cleaners will be redeployed wherever possible and where hours are being reduced, every effort will be made to consider other posts/hours that may be available. The cleaners will be supported through the consultation process and additional support to be made available through the Resourcing Team and Employability Service in addition to information relating to welfare rights.</p> <p>Timescale                      6 months</p>
<p><b>Low income</b></p>	<p>The cleaners will be impacted by these proposals through potential redundancy consultation, although efforts will be made to redeploy staff wherever possible.</p> <p>Can be mitigated                      Yes</p> <p>Mitigation                      The cleaners will be redeployed where possible and any hours lost we will consider other posts that may be available to replace these hours. The cleaners will be supported through the consultation process. Additional support to be made available which will include support through the Resourcing Team and Employability Service in addition to information relating to welfare rights.</p> <p>Timescale                      6 months</p>

#### 4.4. Evidence

Type	Source	It says?	It Means?
<p>External Data</p>	<p>Changing Places website</p>	<p>Over a 1/4 million people in the UK need Changing Places Toilets to enable them to get out and about and enjoy the day-to-day activities which many of us take for granted. To use a toilet in safety and comfort, these people need to be able to access a CPT, which has more space and the right equipment, including a height adjustable changing bench, a peninsular toilet and a ceiling hoist.</p>	<p>There is a requirement to ensure facilities which are well used by tourists and visitors have Changing Places facilities to allow people to get out and about.</p>

Type	Source	It says?	It Means?
Internal Data	iTrent	Affected cleaning staff identified	Consultation with those affected will be carried out in accordance with HR policy and procedure.
External Consultation	Public Convenience Survey June - July 2025	Overwhelming feedback from 3,149 respondents in total, that indicates closures of public toilets would have significant impact on individuals and communities.	Need to ensure any proposed closures are carefully considered and limited wherever possible.

#### 4.5. Engagement with affected groups

Public Convenience survey issued June 2025 and attracted 3,149 responses. This helped shape the current strategy proposals.

#### 4.6. Ensuring engagement with protected groups

Not specifically. Public Convenience survey issued June 2025 and attracted 3,149 responses. This helped shape the current strategy proposals.

#### 4.7. Evidence of engagement

All feedback from the Public Convenience Survey has been considered and used to feed into the strategy proposals.

#### 4.8. Overall Outcome

Only Some Negative Impacts Can Be Mitigated.

Consultation to take place with staff affected. Alternative facilities to be provided, perhaps with the exception of Inverbervie.

Strategy proposals will affect minimal users due to focus on reducing cleaning; much more significant impact would be seen if broader range of closures proposed.

#### 4.9. Improving Relations

Ensure clear and transparent communication at all stages, including providing feedback to the public on how the survey responses helped shape the strategy. Work with Area Teams who know their areas well and can help build relationships with local businesses and community groups to broaden the use of Comfort Partnership scheme and Community Run toilets.

#### 4.10. Opportunities of Equality

Limited opportunities to advance equality of opportunity.

## 5. Health Inequalities Impact Assessment

### 5.1. Health Behaviours

Indicator	Positive	Neutral	Negative	Unknown
Healthy eating		Yes		
Exercise and physical activity		Yes		
Substance use – tobacco		Yes		
Substance use – alcohol		Yes		
Substance use – drugs		Yes		
Mental health			Yes	

### 5.2. Negative Impacts and Mitigations

Impact Area	Details and Mitigation
Mental health	<p>Feedback from PC Survey indicated that individuals with specific health needs (eg Crohns, IBS etc) may feel apprehensive when visiting towns if there is a lack of facilities for them to utilise a toilet. This can impact on their mental wellbeing.</p> <p>Can be mitigated Yes</p> <p>Mitigation The PC Strategy seeks to minimise the closures across the public convenience estate and efforts will continue to replace any closed facilities with Comfort Partnerships and the availability of other council owned facilities (eg office accommodation where this is suitable for public access and leisure facilities).</p> <p>Timescale 12 months</p>

### 5.3. Evidence

Type	Source	It says?	It Means?
External Data	Feedback from PC Survey in June 2025	Comments received indicated a degree of apprehension from those with medical conditions around a potential decline in availability of public conveniences in Aberdeenshire.	Mental wellbeing can be impacted if those with medical conditions are out in towns across Aberdeenshire and do not have access to public conveniences.

### 5.4. Overall Outcome

All Negative Impacts Can Be Mitigated.

Limited public convenience closures proposed under this strategy and additional Comfort Partners and accessibility to other council owned premises should ensure there remains a good

degree of coverage in terms of available public conveniences.

## 6. Sustainability and Climate Change Impact Assessment

### 6.1. Emissions and Resources

Indicator	Positive	Neutral	Negative	Unknown
Consumption of energy	Yes		Yes	
Energy efficiency		Yes		
Energy source		Yes		
Low carbon transition		Yes		
Consumption of physical resources	Yes			
Waste and circularity		Yes		
Circular economy transition		Yes		
Economic and social transition		Yes		

### 6.2. Biodiversity and Resilience

Indicator	Positive	Neutral	Negative	Unknown
Quality of environment		Yes		
Quantity of environment		Yes		
Wildlife and biodiversity		Yes		
Infrastructure resilience		Yes		
Council resilience		Yes		
Community resilience		Yes		
Adaptation		Yes		

### 6.3. Positive Impacts

Impact Area	Impact
Consumption of energy	Closure of Public Conveniences will lead to a reduction in energy usage and emissions as the heating, lighting and water would all be turned off.
Consumption of physical resources	Closure of Public Conveniences will lead to a reduction in energy usage and emissions.

### 6.4. Negative Impacts and Mitigations

Impact Area	Details and Mitigation
Consumption of energy	<p>Closing public conveniences may result in people having to travel further to find alternative toilet provision.</p> <p>Can be mitigated Yes</p> <p>Mitigation Other alternative facilities to be provided, with perhaps the exception of Inverbervie.</p> <p>Timescale 6 months</p>

## 6.5. Evidence

Type	Source	It says?	It Means?
Internal Data	Utilities Bills	Closure of Public Conveniences will see a reduction in energy costs.	Reduction in energy usage and associated costs.

## 6.6. Overall Outcome

All Negative Impacts Can Be Mitigated.

Alternative locations available

## 7. Town Centre's First Impact Assessment

### 7.1. Local Factors

Indicator	Positive	Neutral	Negative	Unknown
Town centre assets		Yes		
Footfall			Yes	
Changes to road layouts		Yes		
Parking		Yes		
Infrastructure changes		Yes		
Aesthetics of the town centre		Yes		
Tourism			Yes	
Public safety		Yes		
Town centre business	Yes		Yes	
Cultural heritage and identity		Yes		
Social and cultural aspects		Yes		

### 7.2. Positive Impacts

Impact Area	Impact
Town centre business	The mitigation of creating additional Comfort Partnerships is positive albeit we have at present 10 across Aberdeenshire and work will be ongoing to actively promote more. Creating Comfort Partnerships will local businesses could increase footfall for them and potentially lead to an increase in sales. Payment is also made to local businesses who enter into the Comfort Partnership scheme. Improving the signage also forms part of the strategy.

### 7.3. Negative Impacts and Mitigations

Impact Area	Details and Mitigation
Footfall	<p>Potential closures of public conveniences may impact on footfall to the area and therefore have a negative impact on tourism.</p> <p>Can be mitigated Yes</p> <p>Mitigation Alternative facilities available and to be explored further (eg additional Comfort Partnerships and other council owned facilities)</p> <p>Timescale 6 months</p>

Impact Area	Details and Mitigation
Town centre business	<p>A decrease in tourism may have a negative impact on town centre businesses.</p> <p>Can be mitigated Yes</p> <p>Mitigation Alternative public conveniences available within areas. Further exploration of Comfort Partnerships within town centres providing opportunities for businesses with toilet facilities to become partners and potentially lead to increased footfall for their business.</p> <p>Timescale 6 months</p>
Tourism	<p>Potential closure of public conveniences may impact tourism, albeit that will be mitigated if alternative facilities are available.</p> <p>Can be mitigated Yes</p> <p>Mitigation Alternative facilities to be offered within each area.</p> <p>Timescale 6 months</p>

## 7.4. Evidence

Type	Source	It says?	It Means?
Internal Data	Customer Complaints / Feedback	When public conveniences are closed or unopened at the designated times, we receive feedback from customers complaining about this. This can be from residents, visitors, delivery drivers or others who rely on the public conveniences.	If alternative facilities are available then this should be mitigated and no noticeable upturn in complaints.

## 7.5. Overall Outcome

All Negative Impacts Can Be Mitigated.

By reviewing the Comfort Partnerships and looking at further expansion of those, together with other council owned facilities, we will continue to provide a comprehensive range of facilities.

## 8. Action Plan

Planned Action	Details	
<p>If these proposals are approved, consultation will need to be undertaken with the cleaning staff in conjunction with HR.</p>	<p><b>Lead Officer</b></p> <p><b>Repeating Activity</b></p> <p><b>Planned Start</b></p> <p><b>Planned Finish</b></p> <p><b>Expected Outcome</b></p> <p><b>Resource Implications</b></p>	<p>Emma Plunkett</p> <p>No</p> <p>Monday January 12, 2026</p> <p>Tuesday March 31, 2026</p> <p>Staff will either accept reduced working hours or will be made redundant. We will endeavour to avoid this as much as possible and look at all available redeployment options.</p> <p>P&amp;FM, HR, Legal</p>
<p>Communication to the public regarding any closures and to provide feedback to them on the Public Convenience survey they participated in. This will enable us to demonstrate their feedback has been listened to and how it has been acted on.</p>	<p><b>Lead Officer</b></p> <p><b>Repeating Activity</b></p> <p><b>Planned Start</b></p> <p><b>Planned Finish</b></p> <p><b>Expected Outcome</b></p> <p><b>Resource Implications</b></p>	<p>Emma Plunkett</p> <p>No</p> <p>Wednesday October 01, 2025</p> <p>Tuesday March 31, 2026</p> <p>Initial feedback needs to be provided by 5th October 2025 following the public toilet survey undertaken in June and July. This will provide a high level overview of how the feedback has been incorporated into the strategy. Beyond that, where there are closures the public will be informed of these and where alternative facilities are. We will continue to explore options with Community Groups potentially accessing vacant facilities.</p> <p>P&amp;FM, Area Teams</p>