Cambridge City Council Equality Impact Assessment (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the Public Sector Equality Duty to have due regard to the need to –

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Guidance on how to complete this tool can be found on the Cambridge City Council intranet. For specific questions on the tool please contact the Community Equity Team at equalities@cambridge.gov.uk.

Also, once you have drafted the EqIA please send this to equalities@cambridge.gov.uk for checking.

1. Title of strategy, policy, plan, project, contract or major change to your service
Cambridge City Council Position on the updated EHRC Code of Practice

2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)
Cabinet 16th November: Agenda for Cabinet on Monday, 16th November, 2026, 5.00 pm - Cambridge Council.

3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?
Cambridge City Council's proposed position on the updated Equality and Human Rights Commission (EHRC) Code of Practice meet its obligations under the Equality Act 2010, including the Public Sector Equality Duty, while ensuring that its services and facilities remain safe, accessible and inclusive for everyone. The Council's proposed position is informed by its 2020 cross-party *Trans Rights Are Human Rights* motion, which affirmed that "trans women are women, trans men are men and non-binary individuals are non-binary", alongside its commitments to end violence against all women and girls and its commitments provide safe and inclusive services for everyone. These commitments are rooted in the shared principle that everyone deserves to be safe and treated with respect. The Council also recognises that people's identities and experiences are shaped by more than one characteristic.

The majority of Council services are provided on a universal basis, (open to all) and are not delivered on a single-sex basis. For the Council, the code primarily relates to public toilets, changing facilities, and a small number of single-sex activities. The proposed position aims to maintain inclusive access while recognising and responding to the different needs of service users.

The Council's approach, as outlined the 16 November Cabinet Report, is to be as inclusive as possible by:

- Moving towards universal toilet and changing facilities, in addition to accessible facilities for disabled people.
- That self-identification should be sufficient in normal circumstances to access Council facilities and services.
- Continuing to provide single sex services and facilities where this is a proportionate means of achieving a legitimate aim. The Council will consider their need on a case-by-case basis and document its rationale.

When referring to universal toilet facilities, the Council is specifically referring to fully self-contained toilets. This is where a toilet, sink, sanitary bin and hand drying facility are in self-contained room, accessed directly off main foyers or corridors, with a floor to ceiling lockable door. Universal changing facilities refer to individual private cubicles with lockable doors where people change their clothes.

Background and purpose of the EqIA

The updated EHRC Code of Practice for Services, Public Functions and Associations came into force on 5 August 2026, following the Supreme Court's judgment in *For Women Scotland Ltd v Scottish Ministers* (2025). The Code provides guidance on existing equality law rather than creating new legal duties.

This EqIA considers how the Council's proposed position may affect people with different protected characteristics, including how the approach supports inclusion and addresses potential adverse impacts. It provides a strategic assessment; specific changes to services, policies or facilities will be considered in more detail within separate EqIAs.

The EqIA does not replace the need for proportionate assessments of specific changes to services, facilities or policies as the Council's position is implemented. Proportionality assessments will be undertaken if single-sex provision is being considered. The assessment will consider the reasons for providing a service or facility on a single-sex basis, the needs of different service users, the potential impacts of any restrictions and whether alternative

arrangements could meet those needs. It will document whether the proposed provision is a proportionate means of achieving a legitimate aim under the Equality Act 2010.

4. Responsible Team and Group
Resettlement and Community Equity Team; Communities Group (see section 7 for full list of responsible teams).

5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service? **(Please tick all that apply)**	☒ Residents ☒ Visitors ☒ Staff
Users of Council facilities and services, this may be residents, visitors and staff. The position is strategic and relevant to everyone using Council services, but its impacts will not necessarily be equal or identical for all groups. Specific impacts are considered in section 9.	

6. What type of strategy, policy, plan, project, contract or major change to your service is this?	☒ New ☐ Major change ☐ Minor change

7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)	☒ Yes ☐ No
Council teams involved in delivering this approach include Equity & Resettlement, Legal, Community Facilities, Recreation Development, Operations and Street Cleaning, Communications, Learning and Development and Customer Services. The Council will continue to work with community organisations and representatives of affected groups to help identify impacts on specific communities as the approach gets implemented.	

8. What research methods/ evidence have you used in order to identify equality impacts of your strategy, policy, plan, project, contract or major change to your service?
The assessment draws on the following evidence and sources. Relevant population figures cited within each protected-characteristic analysis in section 9.

• Council knowledge and engagement: existing Council equality commitments; consultation with the Inclusion and Equity Panel and Task and Finish group, feedback from both the panel and task and finish group are included in the Cabinet paper.

- Council policy and legal context: 'Cambridge City Council position on the updated EHRC Code of Practice (Cabinet report 16 November 2026)'; Equality Act 2010 (including sections 7 and 149); Supreme Court judgment in For Women Scotland Ltd v Scottish Ministers (2025); and the statutory EHRC Code of Practice for Services, Public Functions and Associations (effective 5 August 2026).

• National equality analysis: EHRC's accompanying Equality Impact Assessment of the Code and the published government equality impact assessment. These concern the Code nationally; their findings inform identification of potential impacts but do not determine the local impacts of Cambridge City Council's approach. EHRC source: Code of practice for services, public functions and associations equality impact assessment| EHRC government source: Equality impact assessment - GOV.UK

• Local demographic evidence: 2021 Census demographic data for Cambridge: Census gender identity estimates, particularly local-area categories, have substantial quality limitations; see ONS additional guidance published in March 2025:

• Operational intelligence and gaps: public information about Council toilets and accessible provision; available feedback and complaints where relevant.

• GP survey reveals health and healthcare inequalities of trans and non-binary adults | University of Cambridge (health inequalities experienced by trans people) and LGBT in Britain - Trans Report (2018) | Stonewall UK (socioeconomic inequalities experienced by trans people)

Evidence limitations: population statistics indicate the scale and diversity of potential users but do not in themselves establish the effects of this policy; no comprehensive site-level analysis is claimed.

Further evidence and proportionate site-specific equality assessments will be required when changes to facilities or services are proposed, and this EqIA will need to be updated where impacts are identified relating to the overall proposed position.

9. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

(a) Age - Please also consider any safeguarding issues for children and adults at risk

The Council's proposals to increase universal facilities, review service access arrangements and provide clear information and staff guidance are particularly relevant to people of different ages, including those who need assistance.

Universal facilities may make it easier for parents and carers to support children or older people regardless of sex or gender identity, helping to make services more inclusive. For example a father would be able to take their 3 year old daughter to use a gender neutral toilet, instead of taking their daughter to a male toilet.

When making changes to existing services or facilities, EqIAs will ensure the needs and impacts on those with the protected characteristic of age are considered.

(b) Disability

Context: The Council proposes moving to universal facilities in addition to accessible facilities. However, in limited circumstances some accessible facilities will be made available to all, where universal provision does not currently exist. There is a risk that this may reduce disabled people's access to toilet and changing facilities, but this risk is mitigated in part, as it is restricted to a small number of facilities and is primarily a short – medium term measure, pending refurbishment. The Council will monitor impacts on disabled people, especially by continuing to liaise with disability groups and organisations, to identify how to mitigate negative impacts relating to each facility. Council Communications on its approach aims to promote understanding, discourage assumptions or harassment.

Potential impacts: The Council's proposal to increase universal facilities in addition to existing accessible provision aims to improve choice and inclusion. Some disabled people who do not require specialist accessible facilities may benefit from having more options, including those who need assistance from someone, regardless of their sex or gender identity. Dedicated accessible facilities will continue to be provided, this includes Changing Places toilets. Changing Places toilets have a peninsular toilet with support rails and space for a wheelchair to either side. The room has plenty of space for carers and a height-adjustable changing bench and hoist.

In a small number of locations where accessible toilets may also be made available for universal use, there is a risk of increased demand and waiting times for disabled people who rely on these facilities. Limiting these arrangements to a small number of facilities helps

contain the potential impact, while the Council's commitment to monitoring and responding to any identified barriers will provide further mitigation.

The Council's communications will also explain the different facilities available and discourage assumptions or inappropriate challenges based on appearance, helping to reduce the risk of harassment or questioning of people with non-visible disabilities.

The Council will assess and monitor these arrangements to understand any impacts and look into how these can be mitigated. Further information about existing toilet usage will help inform decisions about provision and any necessary adjustments.

(c) Gender reassignment

Context:

In the 2021 Census trans and non-binary residents aged 16 and over were 0.52% of the Cambridge population (652 people), whilst nationally trans and non-binary people are 0.26% of population of England and Wales.

The Equality Act 2010, section 7 paragraph 1, sets out that the protected characteristic of gender reassignment applies to any trans person at any stage of transition.

Potential impacts: The EHRC and Government equality assessments identify potential negative impacts on trans people arising from the updated Code of Practice, particularly where they may be excluded from services or facilities they previously accessed on the basis of their gender identity. This could worsen existing health and socio-economic inequalities experienced by trans people.

The Council's proposed approach aims to mitigate these risks by increasing universal toilet and changing facilities that everyone can use, reducing uncertainty about access and providing more inclusive options for trans and non-binary people. The Council also proposes that self-identification will normally be sufficient for accessing its services and facilities, subject to lawful exceptions. This aims to support continued access and reduce the risk of exclusion or unwanted questions about someone's sex or gender identity.

The Council will continue to provide services open to everyone. Where single-sex provision is considered, it will assess whether this is a proportionate means of achieving a legitimate aim under the Equality Act 2010, taking account of the needs of trans people alongside those of other service users.

The updated Code may also increase the risk of trans people being challenged when accessing services or facilities. The Council's communications and staff guidance will aim to discourage assumptions, challenges and harassment. Communications will also make clear

that universal facilities are for everyone, not just trans people, to reduce the risk of people being identified or singled out when using them.

(d) Marriage and civil partnership

No specific impacts have been identified in relation to marriage or civil partnership.

(e) Pregnancy and maternity

The Council's proposed approach to increasing universal toilet and changing facilities may provide greater flexibility for parents and carers accompanying young children, regardless of gender identity or sex.

No specific additional benefits related to pregnancy and maternity have been identified from universal provision itself. However, frequent or urgent toilet access may be more likely during pregnancy, and any changes to existing facilities should take these into account.

The Council will consider these needs when reviewing individual facilities, including ensuring suitable toilet and baby-changing provision remains available.

(f) Race – Note that the protected characteristic 'race' refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

The Council's commitment to providing inclusive services, supported by clear information and signage, aims to ensure that people from all ethnic and national backgrounds can access services and facilities. Plain-English communications and translated information where needed will help reduce barriers for people with limited English proficiency.

Cultural practices or expectations relating to modesty may also affect whether some people feel able to access particular services or facilities. The Council's commitment to increasing fully enclosed universal toilets and changing facilities may align with cultural practices where modesty is important by providing individual spaces that can be used by anyone that are fully enclosed with no shared spaces. The Council will continue to provide single sex services and facilities where this is a proportionate means of achieving a legitimate aim. For

example, it may be identified as necessary and reasonable to protect privacy, dignity or safety, or where a combined service would not be as effective.

This will involve understanding where particular arrangements create barriers to accessing services, how individual facilities are designed and used, and whether existing provision or alternative arrangements could meet different people's needs.

The Council recognises that cultural practices vary and should not be assumed based on someone's ethnic or national background.

(g) Religion or belief

Context: The Council's proposed approach aims to ensure inclusive access to services and facilities for people of all religions and beliefs.

Cambridge has a diverse religious and belief profile. The 2021 Census found that 44.7% of residents reported having no religion, while 35.2% identified as Christian, 5.1% as Muslim, 2.3% as Hindu and 0.7% as Jewish. These figures illustrate the diversity of the local population, although religious affiliation does not necessarily indicate an individual's needs or views. People within the same religious community may have different beliefs and requirements, including in relation to single-sex provision.

Potential impacts:

Some people's religious beliefs or practices may affect whether they feel able to access particular services or facilities, particularly where modesty is important to them. This may mean that single sex services are more effective for them.

The Council's commitment to increasing fully enclosed universal toilets and changing facilities may help meet needs of religious communities where modesty is important by providing individual spaces that can be used by anyone that are fully enclosed with no shared spaces. The Council will continue to provide single sex services and facilities where this is a proportionate means of achieving a legitimate aim. For example, it may be identified as necessary and reasonable to protect privacy, dignity or safety, or where a combined service would not be as effective.

This will involve understanding where particular arrangements create barriers to accessing services, how individual facilities are designed and used, and whether existing provision or alternative arrangements could meet different people's needs. It will not assume that everyone within a particular religious community has the same requirements or views.

(h) Sex

Context: The Council's proposed position was informed by and reaffirms its commitment to ending violence against all women and girls, demonstrated through its White Ribbon accreditation, alongside its commitment to providing safe and inclusive services for everyone. These commitments are rooted in the shared principle that everyone deserves to be safe and treated with respect.

The 2021 Census recorded 49.9% of Cambridge residents as female and 50.1% as male.

Potential impacts:

The Council's position sets out that legal framework by which single sex provision needs to be applied and confirms that the Council will continue to provide this on a case-by-case basis, documenting rationale to ensure that such provision is a proportionate means of achieving a legitimate aim . Whether a single sex service needs to be provided or not will depend on what the service is for, who uses it, and the particular circumstances under the Equality Act relating to privacy, dignity or safety, or where a combined service would not be as effective.

The Council's proposed move towards fully enclosed universal toilet and changing facilities may improve inclusion and choice for women and men. Universal provision and the Council's position that self-identification should be sufficient in normal circumstances for using any of its facilities and services may also reduce the risk of women and men being challenged where their appearance or gender expression does not conform to traditional expectations or stereotypes about sex, as highlighted during discussions with the Inclusion and Equity Panel.

Following the Council's position, residents will see an increase in universal toilet and changing facilities as facilities are refurbished or redeveloped where funding is available. These will be gender neutral. For each decision related to single-sex services and facilities, a proportionality assessment and EqIA will be undertaken. The proportionality assessment would determine whether single-sex provision is lawful as a proportionate means of achieving a legitimate aim. This means that in some circumstances single sex provision will be provided in addition to universal provision. Feedback from the Task & Finish Group highlighted the importance of clearly explaining the continued availability of single-sex services and facilities and understanding the needs of women and girls when considering changes to existing provision. The EqIA will monitor the impact of changing provision for different equality groups.

(i) Sexual orientation

Some lesbian, gay, bisexual and queer people may face assumptions or challenges when accessing single-sex facilities because their appearance or gender expression does not conform to traditional expectations or stereotypes about sex or gender. This could increase the risk of discrimination or harassment.

The Council's approach to increasing universal provision, alongside clear communications and staff guidance discouraging assumptions and inappropriate challenges, aims to reduce these risks and support inclusive access for everyone.

(j) Other factors that may lead to inequality – in particular, please consider the impact of any changes on:

- **Low-income groups or those experiencing the impacts of poverty.**
- **People of any age with care experience – this refers to individuals who spent part of their childhood in the care system due to situations beyond their control, primarily arising from abuse and neglect within their families. The term "Care experience" is a description of a definition in law, it includes anyone that had the state as its corporate parent by virtue of a care order in accordance with the Children Act 1989 and amendments.**
- **Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage. (Here you are being asked to consider intersectionality, and for more information see: https://media.ed.ac.uk/media/1_l59kt25g).**

Low-income and poverty

The Council's proposed approach aims to make services and facilities more inclusive and accessible for everyone, including people experiencing poverty, homelessness or other forms of disadvantage. A more inclusive accessible approach may improve access for people who rely on public facilities and have limited alternatives available.

Clear information and staff guidance should also help ensure people are treated consistently and respectfully, regardless of their circumstances or background.

Care experience

No specific additional impacts relating solely to care experience have been identified.

Intersectionality

In developing its position, the Council has noted that "people are more than any single characteristic, and many people identify with more than one community or group. People's identities and life experiences are important parts of who they are and how they experience the world. Recognising and valuing this helps create a city where everyone feels included."

The Council's proposed approach recognises that people's needs may be shaped by more than one protected characteristic and aims to ensure that services remain inclusive and accessible to everyone. For example:

- Sex and religion or belief: Some people have religious or belief-based needs relating to modesty or single-sex provision. The Council will continue to provide single sex services and facilities where this is a proportionate means of achieving a legitimate aim. The Council will consider their need on a case-by-case basis and document its rationale. This may mean providing single sex provision in addition to universal provision. This aims to provide options that meet different needs.
- Disability and gender reassignment: Disabled trans people may already benefit from accessible toilets that can be used regardless of sex or gender identity. The Council's approach aims to maintain inclusive access while increasing universal provision. Where accessible toilets are also made available for wider use, the Council will assess and monitor any impact on their availability for disabled people and consider mitigations to address negative impacts where needed.
- Sex and gender reassignment: The Council recognises that trans people are protected from discrimination under the Equality Act 2010, including through the protected characteristic of gender reassignment, and the protected characteristic of sex relating to their sex assigned at birth and protected on the grounds of perception. The Council will consider needs through an intersectional lens ensuring that suitable services and facilities remain available to all residents.

These examples demonstrate how the Council's proposed approach aims to recognise different and overlapping needs. Further EqIA assessments of specific services and facilities will help identify where additional measures may be required to support inclusion.

10. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqIA accordingly.)

This action plan sets out the steps needed to implement and monitor the Council's proposed position, including measures identified through this EqIA and engagement with affected communities. Proposed leads and timescales will be confirmed with relevant services.

Action	Proposed lead	Timescale	Evidence of completion
1. Review Council policies and services. Identify policies, services and access arrangements affected by Council's approach. Prioritise areas requiring changes and record actions needed to support inclusive and lawful provision.	Relevant service leads, supported by Equity & Resettlement and Legal Services	Following approval, prioritised according to risk	List of affected policies and services, with agreed actions and responsibilities
2. Develop clear communications and signage. Develop plain-English information and clear signage to help people understand the Council's approach. Explain that universal facilities are for everyone, promote inclusion, recognise that disabilities and other personal characteristics are not always visible, and discourage assumptions or harassment.	Communications and Engagement working with Equity and Resettlement and relevant service leads	Before and during implementation	Communications materials and appropriate signage developed and implemented
3. Review staff training and guidance. Identify training needs for staff, particularly those managing single-sex facilities or services. Provide training and guidance to ensure all services users are treated with respect.	People (HR), relevant service leads and Equity & Resettlement with support from Legal Service	Before and during implementation	Updated guidance and training delivered where required
4. Establish a facilities review programme. Agree a timetable for reviewing existing toilet and changing facilities to move towards universal provision.	City Services, Community Facilities and Equity and Resettlement	Following approval, with timetable to be agreed	Agreed review timetable, findings and priorities for action
5. Assess equality impacts and single-sex provision. Undertake	Relevant service leads, supported by	Before material changes are	Completed EqIAs and

proportionate EqIAs when changes to services, policies or facilities are proposed. Where a single-sex exception is being considered, carry out and document an assessment to establish whether the arrangement is a proportionate means of achieving a legitimate aim.	Equity & Resettlement and Legal Services	implemented or single-sex exceptions applied	proportionality assessments, with documented decisions and mitigations
6. Engage with affected communities. Continue working with community organisations and service users, seeking feedback from people affected as the Council's position is implemented. Use findings to inform service and facilities reviews, and consider any additional measures needed.	Equity & Resettlement and relevant service leads	Ongoing	Engagement findings and resulting actions recorded

11. Do you have any additional comments?

12. Sign off
Lead officer: Gina Warren, Community Equity Officer Other assessment team members/people consulted: Helen Crowther, Equity and Community Power Manager, and Keryn Jalli, Strategic Resettlement and Community Equity Lead Date of EqIA sign-off: 4th November 2026 Date of next review: 4th November 2027 (or earlier as any additional impacts relating to the Council's overall position are identified) Date to be published on Council website: 6th November 2026

All EqIAs need to be sent to the Community Equity Team at equalities@cambridge.gov.uk