Integrated Impact Assessment – Summary Report

Each of the numbered sections below must be completed
Please state if the IIA is interim or final

Interim report		Final report	X

1. Title of proposal

City of Edinburgh Council Public Entertainment standard licence conditions – Sun Tan Centres only.

2. What will change as a result of this proposal?

The Council is a licensing authority under the Civic Government (Scotland) Act 1982 ('the 1982 Act'). Sun Tan Centres are included in the Council's Public Entertainment Resolution and must therefore hold a Public Entertainment Licence ('PEL') under the 1982 Act.

The Council's Regulatory Committee agreed the current PEL standard conditions in 1997 – these currently apply to all types of public entertainment. The Committee agreed to review the conditions framework in respect of Sun Tan Centres at its meeting on 29 September 2025. Committee agreed that public consultation would be carried out on the proposed set of conditions which if approved would be applied specifically to PELs for Sun Tan Centres. Where premises hold a PEL for the provision of Sun Tan Centre and any other activity licensable under the Public Entertainment Resolution, licence holders would be required to comply with both PEL conditions and the PEL conditions for Sun Tan Centres.

If the proposed policy is not approved, the Sun Tan Centres will continue to be required to comply with the existing standard conditions for Public Entertainment Licences.

3. Briefly describe public involvement in this proposal to date and planned

On 29 September 2025, the Regulatory Committee instructed officers to carry out a consultation exercise on the issues summarised in section two above.

A public consultation was carried out from 27 November 2025 to 19 February 2026, in order to gain a broader understanding of community and business views on the licensing requirements with regard to Public Entertainment and particularly in respect to Sun Tan Centres.

The consultation was advertised on the Council's website and X (formerly Twitter) accounts. Furthermore, key stakeholders including Public Entertainment licence holders and community councils were contacted directly to inform them of the policy review and related consultation. Advised of the consultation were Police Scotland who are a statutory consultee under the 1982 Act, as well as the Council's Public Safety, Licensing Enforcement and Environmental Health teams.

Following consideration of consultation responses, the proposed conditions were revised further where necessary and presented to Committee for approval.

4. Is the proposal considered strategic under the Fairer Scotland Duty?

No.

5. Date of IIA

21 April 2026

6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)

Name	Job Title	Date of IIA training
Anna Darocha **Lead Officer** **Report Writer** **Facilitator** **Note Taker**	**Regulatory Officer – Licensing**	**8 January 2025**
Christopher McKee	**Regulatory Team Leader (Licensing)**	**6 December 2023**
Isla Burton	**Trading Standards Officer**	**24 October 2023**
John McCluskey	**Senior Solicitor – Licensing**	**8 January 2025**

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on populations in need – where available use disaggregated data	Yes • Consultation Responses	Public entertainment licence applicants (including Sun Tan Centre operators) are required to provide limited information on their background, namely date and place of birth. The consultation responses gave data on gender, age and national identity of respondents.
Data on service uptake/access	Yes • Consultation Responses • Information gathered by the Council's Environmental Health, Licensing Service and Enforcement Team	As part of the policy review the Council has considered data on public entertainment licences (sun tan centre) and pending licence applications, and information gathered by the Council's enforcement and Environmental Health teams. Information on the service uptake/access to service provided by Sun Tan Centre operators, could be considered commercially sensitive and therefore the Council has not been able to access this information. However, the consultation process resulted in information being received from the following groups: Operators of licensed Sun Tan Centres Residents Businesses/ other premises affected by sun tan centres Community Councils Other organisations (NHS Lothian, Police Scotland)

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation	Yes • Consultation Responses	It was expected information received during the consultation process from Sun Tan Centre operators could suggest that by introducing a conditions framework which places any additional restrictions on operators would result in a loss of income. This would create a socio-economic disadvantage for this group and their dependents. However, no such suggestions were received as part of the consultation. The proposed conditions reflect current best practice and industry guidelines and are unlikely to result in any difficulty or cost to operators.
Data on equality outcomes	Yes • Melanoma Focus, May 2024 • Consultation Responses	Information was received from Police Scotland, NHS Lothian, trade members, businesses, community organisations and residents. If not properly managed, the operation of a Sun Tan Centre may have a negative impact on young persons in relation to health. Existing legislation prohibits allowing under-18s to use sunbeds. Some data suggests use of sun tan equipment is more common in persons aged 18-25 than in other age groups.
Research/literature evidence	Yes • Public Health etc.(Scotland) Act 2008 • Public Health etc.(Scotland)	In drafting the proposed conditions, officers have taken into consideration existing legislation and industry-specific guidance. Proposed conditions are not intended to duplicate existing

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	• Act 2008 (Sunbed) Regulations 2009 • Business Companion guidance on Sunbeds, Chartered Trading Standards Institute, October 2025 • Optical radiation – including ultraviolet radiation and lasers, Health and Safety Executive • Committee on Medical Aspects of Radiation in the Environment (COMARE) Report 2009 • Consultation Responses	legislation but aim to promote compliance and good practice within the industry. Information was received from statutory consultees, NHS Lothian, trade members, other businesses, community councils and residents.
Public/patient/client experience information	Yes • Consultation Responses	Information was received from Police Scotland, NHS Lothian, trade members, other businesses, community councils and residents.
Evidence of inclusive engagement of people who use the service and involvement findings	Yes • Consultation Responses	Information was received from Police Scotland, NHS Lothian, trade members, other businesses, community councils and residents. A round of public consultation was held, totalling 12 weeks, in order to provide a detailed and robust

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		evidence base from which to inform any decision making. All current public entertainment licence holders (including sun bed operators) were notified of the consultation and invited to feed back. To encourage participation, the public consultation was open to all interested parties to contribute.
Evidence of unmet need		The consultation process did not produce evidence of significant unmet demand for the provision of Sun Tan Centres.
Good practice guidelines	The Civic Government (Scotland) Act 1982 Public Health etc. (Scotland) Act 2008 Public Health etc. (Scotland) Act 2008 (Sunbed) Regulations 2009 Committee on Medical Aspects of Radiation in the Environment (COMARE) Report 2009	The policy and conditions framework continue to support public safety objectives, particularly in relation to health.
Carbon emissions generated/reduced data	No	
Environmental data	No	
Risk from cumulative impacts	No	

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Other (please specify)	N/A	
Additional evidence required	No	

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights and Children's Rights	Affected populations
Positive The purpose of licensing Sun Tan Centres as one of the activities listed in the Council's Public Entertainment Resolution is to prevent crime and to ensure public safety. In addition, every person who applies for a licence is assessed to determine whether they are 'fit and proper' to have a licence. In practical terms this means that a Police Scotland background check is carried out on the person applying for the licence. The Public Entertainment licensing scheme and associated policy provide a transparent decision-making process and improve the feeling of control over what happens in local communities. It also helps to improve public safety and promote good practice amongst licensed operators through standard licence conditions framework. Some residents may experience more pleasant accommodation if the operation of Sun Tan Centres is regulated and in particular if the proposed condition on control of noise is approved. Introducing a policy and a robust conditions framework may also lead to an increased sense of safety and wellbeing in customers of these establishments.	All groups
Negative	All groups

Equality, Health and Wellbeing and Human Rights and Children's Rights	Affected populations
Requirement to engage in the licensing process may be seen as a barrier to some people or groups. The public entertainment licensing scheme and policy could lead to a financial impact on Sun Tan Centre operators, their employees and suppliers of products used or sold on the premises. Approving a policy which places additional restrictions on operators may reduce opportunities for individuals to take up this activity or grow their existing business, although such an outcome is unlikely as the proposed conditions reflect current best practice and guidance within the industry. Some residents may experience less pleasant accommodation if the operation of Sun Tan Centres is less strictly regulated and in particular if the proposed condition on control of noise is not approved. If proposed conditions are not approved and current conditions continue to apply, this may result in a decreased sense of wellbeing amongst customers and neighbours of Sun Tan Centres. Again, any such effect would be limited as the proposed conditions reflect existing best practice and industry guidance.	

Environment and Sustainability including climate change emissions and impacts	Affected populations
Positive The Public Entertainment licensing policy with regard to Sun Tan Centres may have a positive impact on noise pollution as a result of the proposed licence conditions framework, in particular condition 20 on control of noise. The proposed policy changes are however unlikely to have significant positive overall effect as they reflect current industry guidance and best practice.	All groups
Negative	All groups

Environment and Sustainability including climate change emissions and impacts	**Affected populations**
If the proposed conditions are not approved and current conditions continue to apply to sun tan centres, this may have a negative effect on noise pollution. The Council has the power to control noise generated by businesses under the terms of separate legislation, however the proposed condition would put an additional responsibility on operators to remain good neighbours to occupiers of surrounding premises. Not approving the proposed policy changes is however unlikely to have significant negative effect, as these changes reflect current industry guidance and best practice.	

Economic	**Affected populations**
Positive The operation of a Public Entertainment licensing scheme and policy in relation to Sunbeds may give clients confidence that these activities are regulated to an appropriate standard and lead to increased visits to areas where these businesses operate. This may positively impact not only Sun Tan Centres but the income of other businesses. The prices of services could decrease if fewer restrictions placed by the licensing policy on operators due to a potential increase in competition. The proposed policy changes are however unlikely to have significant positive effect as they reflect current industry guidance and best practice.	All groups
Negative Adopting a policy which places further restrictions on Sun Tan Centre operators may affect their ability to generate income from the activity. It may also be seen as having a negative effect on the businesses in the areas by reducing the variety of products and services offered, therefore reducing the number of visitors in the affected areas. A policy which places restrictions on the operation	All groups

Economic	Affected populations
of Sun Tan centres may negatively affect consumers through a reduction in offering and competition potentially leading to an increase in prices of certain products or services. Not approving the proposed policy changes is however unlikely to have significant negative effect, as these changes reflect current industry guidance and best practice.	

9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children's rights, environmental and sustainability issues be addressed?

No

10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

The Licensing Service currently deals with customers from a range of backgrounds. This includes those affected by sensory impairment, speech impairment, low level literacy or numeracy, or English as a second language.

When the Regulatory Committee agrees the Sun Tan Centre conditions framework, the licensing service will communicate this in a number of ways. Firstly, all existing licence holders and applicants will be notified of the newly approved conditions. All respondents to the consultation will be written to in order to inform them of the decision along with information on the agreed conditions framework and any other appropriate information. Furthermore, the Committee's decision will be communicated using the Council's and Licensing Service's social media accounts in addition to updates being placed on the Council's website. The decision will also be communicated to Community Councils and other relevant organisations.

Where customers require further support to access information in respect of public entertainment licensing, the licensing service will make the necessary reasonable adjustments to cater for this. For example, translators can be provided for those customers whose primary language is not English and who have difficulty understanding this information.

11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.

No

12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

At this stage, it has not been established that any additional information of evidence will be required. Should the Regulatory Committee request further information, this will be provided.

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Include a copy of this IIA in the Regulatory Committee Report due to be considered on 11 May 2026	Anna Darocha, Regulatory Officer	1 May 2026	11 May 2026

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

No

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

It is proposed that the licensing policy in respect of Sun Tan Centres is reviewed as and when required. A review of the IIA and how the policy is affecting different groups, including those with protected characteristics, will form part of that work.

16. Sign off by Service Director

Name – Peter Watton

Date – 28 April 2026

17. Publication

Completed and signed IIAs should be sent to: integratedimpactassessments@edinburgh.gov.uk to be published on the Council website www.edinburgh.gov.uk/impactassessments

Edinburgh Integration Joint Board/Health and Social Care
sarah.bryson@edinburgh.gov.uk to be published at www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/