

National Assembly for Wales / Cynulliad Cenedlaethol Cymru
[Health and Social Care Committee / Y Pwyllgor Iechyd a Gofal Cymdeithasol](#)

[Public Health \(Wales\) Bill / Bil Iechyd y Cyhoedd \(Cymru\)](#)

Evidence from The British Toilet Association – PHB 53 / Tystiolaeth gan
Cymdeithas Toiledau Prydain – PHB 53

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The British Toilet Association Limited

Is a Not-for-Profit Members Organisation working to promote the highest standards of hygiene and provision in all “away from home” toilet facilities across the UK. The Association, as a whole, has a wealth of knowledge on toilet related issues and practices and every day handles a constant stream of enquiries from everyone who has a real desire to help improve the current provision as well as reduce the number of toilet closures. We support consumers and suppliers alike on the future development and installation of more hygienically clean publicly accessible toilets across the country. Our survey team carries out a number of consultations each year, which can include a wide variety of detailed reporting on: toilet facilities and their fixtures, hygiene, cleaning, design and innovation, specification and maintenance, current & future provision along with change of purpose, use and operation. As an independent body we are frequently invited to give an opinion, statement or judgement regarding legal issues and regulation revolving around publicly accessible toilets. Having access to a wealth of knowledge through our growing membership can allow us to be proactive in many instances. We are currently developing a Toilet Map project that will greatly enhance the public’s quest for finding a decent clean – open – facility as the map will contain/identify all recorded sites and then give a detailed profile of what each contains.

Written Evidence on the general principles of the Public Health (Wales) Bill.

Part 6 – Provision of Toilets

Question 1: What are your views on the proposal that each local authority in Wales will be under a duty to prepare and publish a local toilets strategy for its area?

The BTA fully supports – Option 3 of the proposal – to place every council in Wales under a duty to prepare a local strategy for the provision of public toilets.

However, very careful consideration must be given to the foundation of these strategies to make sure that authorities continue to control and administer the correct levels of provision. It would not be acceptable for councils to devise a strategy that pushes the total responsibility onto other providers – whether community or private – and thereby relinquishes all responsibility for the strategy. A combination of council and community toilets working in tandem/partnership is probably the most effective overall solution across the country – but especially in the less populated towns and villages. Individual strategies should not allow councils to completely opt-out of providing toilets.

Since the Public facilities Grant was withdrawn in 2014 and the monies transferred to the Revenue Support Grant in a move to increase flexibility of funding to local authorities, it is our understanding that only a very small proportion of this money was in fact used for the provision of toilets. We believe that the impetus has been lost and the department would need to revisit this funding structure and make sure that monies originally intended to improve public provision are ring-fenced for that purpose.

When any of us are travelling and away from home for an extended time, we will on one or more occasions require the use of a decent, clean toilet. There are also an increasing number of specialist user groups, whose lives are adversely affected by the poor state public toilets across the country. These include people with mental or physical disabilities and their carers; older persons and many focus groups; families with babies or young children, schoolchildren and residents and visitors of all ages who are coping with a range of medical conditions. This is a basic human function and we need to have a greater level of adequate provision for everyone and anyone who has a sudden urge to find relief when they are away from their normal residence. It's a problem faced by thousands of people every day, truck/lorry and van

drivers, car drivers and that includes taxi & private hire, coach drivers and passengers, emergency services and transient workers.

The failure to get to or use a toilet, when the need arises to, can very often lead to both embarrassing medical and social problems.

Question 2: Do you believe that preparing a local toilet strategy will ultimately lead to improved provision of public toilets?

Public toilets – owned or operated by local authorities – have historically fallen into a shared responsibility over a number of departments. This has made overall management and ultimate responsibility difficult to assign, and in many cases has led to neglect and the lowering of acceptable standards in many facilities across the country. The preparation of a toilet provision strategy can only have extremely beneficial outcomes in focussing attention onto this vital provision for so many independent users. With improved management and a clearer understanding of the needs of residents and visitors, must come higher standards of health and hygiene.

Question 3: Do you believe the provision in the Bill to ensure appropriate engagement with communities is sufficient to guarantee the views of local people are taken into account in the development of local toilet strategies?

The BTA believes it is absolutely vital to involve not only local communities and community groups but consideration should also be given to engagement with local support groups, shop owners and representatives from organisations who completely understand the needs and daily requirements for people living with medical and social conditions that require them to visit the toilet on a much more frequent basis. A wealth of knowledge can be gained through interaction with local community representatives.

Question 4: Do you have any views on whether the Welsh Ministers' ability to issue guidance on the development of strategies would lead to a more consistent approach across local authorities?

The provision and placement of public toilet facilities has a significant impact on the health and vitality of the local community and the surrounding area. Anyone suffering with any type of medical or social problem relating to toilet usage can find themselves isolated or unable to move around an area

when no provision is easily accessible. The range of health problems is often underestimated and we need to have a clearer understanding of the problems being faced by a growing number of individuals who need to plan their journeys and daily routines around the need to frequently visit a toilet facility. The BTA is delighted that the Health Minister has understood and had the foresight to question the current lack of any strategy to answer the needs of those with disabilities, older persons, families with young children, pregnant women, and all persons who are transient through their work. It is our firm belief that public toilet provision specifically addresses the following issues:

Health & Well-being, Equality, Social inclusion, Privacy & Public Decency

Question 5: What are your views on considering toilet facilities within settings in receipt of public funding when developing local strategies?

It has been our long-term belief that local authorities should be in receipt of direct funding from central government to provide these types of facilities. It has always been extremely difficult for councils to maintain a range of facilities and to attain acceptably high standards of hygiene and provision when government refuses to recognise its responsibilities to public health. The BTA has continuously worked with local authorities and the relevant departments in trying to maintain an acceptable standard of provision as expected by the general public and a considerable number of specialist user groups. The responsibility for these facilities has always been perceived to belong to the local authority. Considerable efforts have been made in recent years to involve shops, stores, and other local providers to enter into controlled community toilet schemes. This has had a significant effect on the amount of provision available, however, unless closely controlled there can still be a considerable number of variants and negative factors that can affect the overall provision. Opening times, bank holidays, closures, management and staff attitudes as well as high volume visitor numbers can lead to businesses withdrawing their support after only a short period. Careful consideration and management must be applied.

Question 6: Do you believe including changing facilities for babies and for disabled people within the term 'toilets' is sufficient to ensure that the needs of all groups are taken into account in the development of local toilet strategies?

In recent years we have seen a considerable positive shift in the provision of

toilets, where we now have child changing beds in both male and female and in a growing number of cases, a completely separate unisex baby-changing room. The growth of these types of units is to be applauded as we invite more families to visit and enjoy our towns and city centres, as well as our parks and beaches. In our work with Mencap, we have been heavily involved in the promotion and installation of Changing Places toilets that are designed for users with profound and multiple difficulties. We believe all toilets should be equally accessible for all persons whether able-bodied or struggling with a temporary or permanent disability; and this must include carers and parents who need to attend to a range of special needs. Normally a block of toilets will contain both male and female facilities along with a separate accessible unit. Many of these disabled units are poorly maintained and this has a detrimental effect on the health and well-being of many visitors.

Question 7: Do you believe the proposals leading to toilet provision in the Bill will contribute to improving public health in Wales?

The BTA believes this is a huge step forward in striving to improve the health and well-being of both residents and visitors to Wales. Without decent, clean public toilets, many citizens affected with bowel and urinary problems will find it almost impossible to move around and enjoy the normal freedoms the rest of us take for granted. A lack of decent, clean public facilities can be correlated directly to isolation, infection, dizziness, disorientation and a general distress at feeling unwell. We know from studies that more and more people are experiencing reluctance to leave their own homes, or in some cases temporarily altering their medication to allow them to stay away from home for longer than usual. Drivers and road users may become disorientated and unwell from the effects of not being able to relieve themselves for extended periods. This could in extreme cases result in a loss of control of a vehicle, or extremely poor judgement at major junctions. It is our belief that operating a vehicle and not being able to find a toilet when necessary could be a major factor in the number of accidents that occur on our roads each year.

Public toilets are a major health issue, which has gone unrecognised for many years. In extreme cases the inability to relieve oneself can lead to raised blood pressure, stroke or even heart attack. When one considers the cumulative effect of all the points and considerations above, it becomes

blatantly apparent that Wales has through this proposed bill taken a massive step in recognising the importance and trying to address the health and equality inadequacies that its people have faced since austerity first began to bite.

Finance Statement

What price can you put on public health? It was recognised in the 11th Century as part of the Magna Carta that the health and well-being of the populace, far outweighs that of the government and the crown. If your people are sick it has a massive effect on all aspects of life. Costs go through the roof for healthcare, welfare and social services. Whilst sick people are not fit to work, shop or go on holiday, the economic imbalance is very easily understood.

The figures as detailed in Part 2 of the Explanatory Memorandum seem perfectly fair and correct. Negated over a five year period, it appears to cost in and around £5000 per council, per year, to implement and administer the strategy around public toilets. The BTA like many other organisations is working with local authorities to reduce overall running costs, whilst maintaining the highest possible level of provision and hygiene. The installation of charging gates and doors, the introduction of franchising and commercial partnerships, along with the inception of the community toilet scheme are all current methods employed to reduce the pressure on capital and revenue budgets.

The BTA is the leading authority on the provision of public, private and commercial toilets, and is ready and willing to work with local authorities and government to formulate ideas and plans covering the implementation of any future strategy.

Assuring you of our best attention at all times.

I remain yours faithfully,

Raymond Martin
Managing Director
British Toilet Association