

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 Paediatric Continence Forum – PHB 55 / Tystiolaeth gan Y
Fforwm Ymataliaeth Pediatrig – PHB 55

Public Health (Wales) Bill
Written evidence from the Paediatric Continence Forum

Background to the Paediatric Continence Forum

1.1 The Paediatric Continence Forum (PCF) is an expert group of patient representatives and healthcare professionals which campaigns for improved services for children with continence problems (bladder and bowel dysfunction) in all settings across the UK. Established in 2003, it works closely with the national charities ERIC (Education and Resources for Improving Childhood Continence) and PromoCon (Promoting Continence through Product Awareness), with representation from the Royal College of Paediatrics and Child Health, the Royal College of Nursing and the Community Practitioners' and Health Visitors' Association.

1.2 One of the key goals of the PCF is for every area in the UK to have a proper community-based integrated paediatric continence treatment service, led by an expert paediatric continence professional, with a clear system of referral and care pathways across primary and secondary NHS care, education and social services. The PCF has recently published NICE-accredited guidance for the commissioning of paediatric continence services, which can be found at www.paediatriccontinenceforum.org/resources.

1.3 The PCF actively supports The Right to Go - a campaign organised and run by ERIC - which calls on schools and the Government to ensure that all educational settings have appropriate policies and procedures in place to support children with continence problems, and to provide school toilets which are safe, hygienic and well-maintained.

1.4 The PCF is chaired by Dr Penny Dobson MBE.

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?

2.1 The PCF welcomes the proposal by the Welsh Government to require each local authority in Wales to prepare and publish a local toilets strategy. UK-wide data suggests around one in 12 children has an ongoing continence problem, which can be distressing for them and their family/carers. Conditions like chronic constipation, incontinence and urinary infections can be caused or exacerbated by limited access to toilets. Open access to high quality toilet facilities is crucial to the health and welfare of children, enabling more effective self-manage their condition whilst away from their home.

2.2 However, the PCF has identified opportunities to improve the Bill, particularly regarding consultations and national guidance. These are outlined below.

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

3.1 Preparing a local toilet strategy will only lead to improved provision of public toilets if local authorities engage with patient groups interested in continence and toileting when developing their local strategy. These groups have a strong understanding of the needs of people with continence problems and can highlight areas to consider which local authorities may not be aware of, for example related to the specific facilities available or the design and layout of the facilities.

3.2 Local authorities must also be willing to fully fund any of the provisions within their toilet strategy. The strategy needs to contain deliverable outcomes which can be measured to assess the progress of the local authority in implementing their strategy.

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?

4.1 We are pleased that the Bill states that local authorities must consult with any person it considers is likely to be interested in the provision of toilets in its area. However, we would like to know how this will be defined. For example, local authorities should be required to engage with local patient groups, local community care services, elderly homes, schools and educational settings, and local businesses. There is currently no set criteria in the Bill; consideration should be given to naming specific groups.

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?

5.1 The PCF believes that by developing and issuing national guidance, Welsh ministers can help local authorities ensure a consistent approach towards toilet provision. In the summer of 2014, prior to the launch of the Paediatric Continence Commissioning Guide, the PCF conducted research on the provision of paediatric continence services in Wales and the rest of UK and discovered significant variation between service providers.

5.2 Should Welsh Ministers decide to issue guidance on the development of local strategies, this guidance should be developed in consultation with stakeholders with an understanding of what constitutes effective toilet provision. This should include organisations such as the PCF as well as patient groups like PromoCon and ERIC.

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

6.1 The PCF welcomes the fact that the local authority must have regard to the local toilet strategy when determining whether to provide toilets and the types of toilets to be provided.

6.2 Toilets which require payment to access can be problematic from a convenience/cost standpoint. Moreover, people may not be able to access toilets requiring payment as they do not have the appropriate level of change. This can result in people with continence problems being restricted in the management of their condition when out and about in public. Should local authorities mandate payment, we believe that contactless payment by card should be an option as this would help increase accessibility.

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?

7.1 The current definition does not cater for people with a medical condition that requires special toilet facilities, but do not consider themselves disabled. For example, some people with bladder and/or bowel dysfunction may otherwise be able bodied, but may require larger, more hygienic washing rooms (extra space and a basin) to carry out actions like catheterisation. To accommodate these people, we would suggest that the legislation states that 'toilets' also cover those with

specialised continence problems, and that local authorities give consideration to these special toilet facilities.

Do you believe the proposals relating to toilet provision in the Bill will contribute to improving public health in Wales?

8.1 This Bill will improve public health by enabling better provision of toilets to people who need them, especially children and young people with continence problems. Inadequate provision of public toilets for these children can contribute to stress, isolation, embarrassment, effects on bladder and bowel function, urinary tract infections and spread of infection. Moreover, the declining provision of public toilets is disproportionately affecting groups like children and young people with continence problems or other medical conditions that businesses or the public may not consider. Finally, inadequate provision can impact on the ability of children to leave their house without fear of wetting or soiling themselves due to a lack of appropriate toilets for them to use.