

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 Truckers Toilets UK – PHB 64 / Tystiolaeth gan Truckers Toilets UK – PHB 64

RESPONSE TO THE CONSULTATION QUESTIONS Relating to the Public Health (Wales) Bill

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Part 6: Provision of Toilets:

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?

1. Good in theory. However whilst Section 93 (1) allows LAs the option of providing public toilets it does not demand that they do so. Therefore the strategy could result in not establishing public toilet facilities (91,2,a).
2. As 100% of the population needs a toilet several times a day and Wales is a tourist hotspot, it would seem vital that areas such as Gwynedd, where toilets are under threat, should have toilet facilities available. Toilets encourage tourism and enable people with urgency problems and disabilities to leave their homes in the knowledge they can access a loo relatively easily. This in turn reduces mental health problems, especially in older people who are often scared to go out in case of an 'accident'.

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

3. Not necessarily. It could be read as a 'paper' exercise. Yes, it might give some LAs encouragement to consider toilet provision but for those who are looking for ways to reduce spending, toilet closures will continue to be considered an easy option to save money in the short term. Without the legal requirement to provide public toilets there will

be no pressure to make the necessary adjustments. Communities and tourists will continue to suffer in the meantime.

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. It's a step in the right direction but it is not a 'guarantee' that views will be taken into account. This has been proved in other areas of the UK. That said, there are some very active groups who have succeeded in keeping their public toilets open and others groups who have managed, by keeping up the pressure, to have toilets made available.
5. The term 'appropriate engagement' needs clear definition. There are some LAs who provide a tick box document and call it a 'consultation'. In some instances the questions have been directed to the outcome required with little or no opportunity for respondents to voice an opinion.
6. Consultations, if done properly, are a good way of learning opinions but few LAs have the time or experience to gather groups together to discuss the issues and summarise the results. Consultations should include a wide range of people / organisations / businesses and anyone likely to be affected.

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?

7. There may be a more consistent approach in developing the strategies but it is the outcome for the various communities which is the important issue. Guidance is always useful. Someone with knowledge of the subject of the strategy in question would be most appropriate.

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

8. Not clear what is being asked here. If it means considering toilet facilities in publicly funded areas eg council offices, museums, tourist information etc, then why not? Toilets are a necessity for everyone.
9. Many local authorities are closing public toilets because their funds are being squeezed and they have statutory obligations to provide certain services. Public toilets are not part of that provision so if there are no means to ensure public toilet availability, then having a toilet strategy will be a waste of public money and time for many LAs who don't appreciate the need for public toilet facilities.
10. In order to develop a useful toilet strategy LAs will need to understand the need for having public toilets available.

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?

11. Changing facilities for babies need to be available to men and women and should be in a separate area to general toilet facilities
12. There are many types of disability. Often forgotten are those with 'hidden' disabilities such as IBS, those with a stoma, people taking certain types of medication; those with bladder and/or bowel conditions etc who all require space and clean facilities – often with a shelf - in which to address their needs. Those in wheelchairs need to be offered suitably sized and well designed surroundings whilst those who have severe impairments should have access to Changing Places facilities where hoists and adjustable height equipment is available.
13. Women's needs are often forgotten: they need somewhere hygienic to change sanitary pads / tampons when they have their period and pregnant women need the loo more frequently;
14. British Standards BS6465 1-4 provides information on sanitary installations and BS6465-4 in particular relates to the Code of practice for the provision of public toilets.

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

15. Having a strategy is good but if that strategy is not implemented then it is time consuming in its construction and worthless
16. Access to a toilet is necessary for our health – and safety. Research has shown that 'urgency' and 'holding on' can affect concentration which is especially dangerous when driving. 'Holding on' can also cause serious health problems. Lack of toilets encourages many people, including drivers, to reduce their fluid intake to avoid the need for the toilet. This can result in dehydration.
17. Making toilets a legal requirement would contribute to the sustainability of local communities; support the growing 24 hour economy; encourage tourism; enable people to travel and take up work opportunities; reduce infections; encourage good hygienic practices; reduce incidents of fouling and improve public health in Wales

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Brief Biography

Gillian Kemp has been active in managing charities but began her career in education and law and has also worked in the media. She is the founder of Truckers' Toilets UK www.facebook.com/TTUKcampaign and joint founder of Public Toilets UK www.facebook.com/PTUKcampaign – both are campaigns which aim to improve toilet provision in the UK. She has been involved with the British Toilet Association [BTA] for a number of years and has given evidence on behalf of The IBS Network on the effects of public toilet closures to the Health & Social Care Committee at the Welsh Assembly. On behalf of the BTA Gillian chaired a joint venture with Hertfordshire Constabulary to

revise a booklet on reducing vandalism in publicly accessible toilets. She is currently in the throes of editing another booklet on public toilet facilities. Gillian is a Founder Director of an international medical equipment manufacturing company