

PHB 17

Bil Iechyd y Cyhoedd (Cymru)

Public Health (Wales) Bill

Ymateb gan: Un Llais Cymru

Response from: One Voice Wales

## Public Health (Wales) Bill – One Voice Wales Response

### General Principles

One Voice Wales is happy to endorse each of the principles of the Bill as presented. These are similar to those presented earlier this year during a previous incarnation of the Bill. One Voice Wales wishes to make more detailed points in respect of the section relating to public toilets, along the same lines as the points presented to the Welsh Government earlier this year.

### Duty to prepare and publish a local toilets strategy

The Bill contains a proposal that each local authority in Wales will be under a duty to prepare and publish a local toilets strategy for its area. One Voice Wales agrees with the need for local authorities to prepare such strategies. Each authority will have its own particular range of needs and priorities, although there would be questions over the continued relevance of such a local strategy if any future local government reorganisation exercise results in changed regions and boundaries. But, basically, the principle of requiring a well thought through strategy, towards which members of local communities have been encouraged to contribute, is a sound and positive philosophy.

### Improved provision of public toilets

One Voice Wales believes that preparing a local toilet strategy can ultimately lead to improved provision of public toilets, although much will depend upon the overall level of public funding resources that will be available in the future. “Improved provision” will depend upon “quality” as well as “quantity” in terms of toilet provision, and future public sector budgets will have an important part to play in this agenda. One Voice Wales questions the way in which the four basic options (paragraphs 832 to 898 in the Explanatory Memorandum) have been analysed and in particular the way in which the conclusion appears to favour option 3. Whilst the “do nothing” option is agreed to be unsatisfactory, there are nevertheless some merits to the other three options and One Voice Wales wonders whether the preferred option of requiring local strategies (only) will in itself provide sufficient momentum to generate the improvements desired. There was much

merit in the former Public Facilities Grant scheme, and One Voice Wales has called for its reintroduction in order to help tackle the lack of public conveniences in many areas of Wales. Furthermore, the option of imposing a duty on local authorities to carry out a full implementation of their new strategies would surely give members of the public more confidence that the public engagement exercises leading to the formation of these strategies were indeed meaningful. Therefore, One Voice Wales would ask the Welsh Government to think again about the preferred option (which is in general supported) as to whether there might be room for manoeuvre in terms of more strict guidelines over the availability of funding for partnership initiatives (in line with the former Public Facilities Grant scheme) and, again, in terms of giving local authorities a stronger message with regard to the need to put their strategies into full implementation.

### Appropriate engagement with communities

One Voice Wales calls on the Welsh Government to ensure that any such consultation exercise introduced in order to facilitate engagement with stakeholders would be robust and wide enough to provide confidence that all appropriate voices will be heard. The current thinking for the Bill seems to be that there should not be a prescribed format for the consultation process, but this aspect could well be strengthened via guidance, as mentioned in the next paragraph. It is considered absolutely essential that local community and town councils should need to be formally engaged as a part of this process, and that their voices should be heard as well as being encouraged to consider potential solutions in areas with critical needs. Many local councils have already taken on public toilet provisions that were traditionally within the domain of unitary authorities. The fact that the latter authorities are struggling financially (hence, leading to these transfers) should signal a cautionary note to the Welsh Government as it faces up to this particular agenda of ensuring adequate public toilet provision across Wales.

### A consistent approach across local authorities

The issuing of Welsh Ministers' guidance on the development of strategies could well prove useful in the drive for consistency across Wales in this matter. The guidance would need to take into account all reasonable aspects of the challenge, including how local authorities should have to liaise with community and town councils within their borders when considering the details of the strategy. Such guidance would also be potentially useful in driving a stronger implementation regime, as mentioned in the third paragraph above.

### Receipt of public funding

One Voice Wales would support any sensible funding arrangements for making public toilets available and these could include housing the facilities within different types of settings, such as public buildings, private enterprises and so on.

#### Disabled and baby changing facilities

One Voice Wales believes that including changing facilities for babies and for disabled people within the term 'toilets' would be sufficient to ensure that the needs of all groups are taken into account in the development of local toilet strategies, provided that all other equalities aspects are incorporated within the guidelines for the local strategies, such as any specific needs, use of bilingual signage and so on.

#### Improving public health in Wales

One Voice Wales believes that the proposals relating to toilet provision in the Bill will contribute to improving public health in Wales, which is consistent with the Welsh Government's own views as outlined in the Explanatory Memorandum.

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