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Dear Chair,

Thank you for the opportunity to contribute to your inquiry into the general principles of the Public Health (Wales) Bill¹. I am pleased to see the Bill return to the Assembly and hope to see a final version enacted that will address the major public health issues facing the people of Wales.

In my attached evidence, I have chosen to focus on three areas of the Bill in particular. The first two, public toilets and health impact assessments, are already present in the Bill and I welcome them in principle but have detailed improvements that could be made. The third area, loneliness and isolation, is not currently included in the Bill but as it is one of the major public health issues affecting older people and others across society, I believe that it merits inclusion in the legislation.

I hope you find these comments useful and take them into consideration when taking forward your inquiry. Please do not hesitate to contact me or my Communities, Local Government and Wellbeing Lead, Iwan Williams (████████████████████ / ████████████████████), should you wish to discuss these issues in further detail.

Kind regards,



Sarah Rochira
Older People's Commissioner for Wales

¹ <http://www.senedd.assembly.wales/mgConsultationDisplay.aspx?id=234&RPID=1007994869&cp=yes>

Health, Social Care and Sport Committee Consultation on the General Principles of the Public Health (Wales) Bill

Provision of Public Toilets

1. The proposal for Local Authorities to prepare and publish a local toilets strategy is welcomed. However, it does not go far enough and falls short of obligating Local Authorities to ensure that people have access to public toilets. Older people rarely call for strategies and instead require firm commitments and actions to ensure that they can continue with their daily lives and remain connected with their communities through the provision of public toilets and other essential non-statutory services. Older people in Wales have the right to expect access to open, clean and accessible public toilets. Whilst Local Authorities will have the ability to develop their own strategies, the Bill must ensure some degree of consistency so that there is a uniformed approach to public toilet provision across Wales.
2. As I have consistently emphasised and highlighted in my report on 'The Importance and Impact of Community Services within Wales'², public toilets and other community services are vital assets and are absolutely essential in maintaining the health, independence and wellbeing of older people. Public toilets also contribute towards the prevention agenda, keeping older people active and reducing the risk of accessing health and social care services.
3. Good public toilet provision is a public health necessity. Closing public toilets affects physical health (older people are more likely to suffer from bladder or bowel incontinence), mental health (the fear of being unable to access toilets can lead to isolation and depression), and environmental health (the risk of infection from street fouling increases with the closure of public toilet facilities). Closing down or reducing access to public toilets is damaging to public health and has a detrimental effect on the economy, with

² http://www.olderpeoplewales.com/en/news/news/14-02-25/The_Importance_and_Impact_of_Community_Services_within_Wales.aspx#.VbDAcmctAdU

older people, including local residents, visitors and tourists, less likely to visit places.

4. As the Explanatory Memorandum acknowledges, poor public toilet provision is known to have particular negative impacts on older people, and often disproportionate impacts. Many older people will not leave their homes without the assurance of being able to access a public toilet in their village, town or city when the need arises³. Almost 20% of public toilets managed by Local Authorities closed between 2004 and 2013, leading to older people becoming more susceptible to loneliness and social isolation, and requiring costly packages of health and social care⁴.
5. The proposal for public toilets to include changing facilities for babies and changing places for disabled persons is welcomed, but could go much further. Public toilets must be clean, safe and accessible places for older people and others, with handrails, wheelchair ramps and visual and hearing aids for those with mobility issues and sensory loss.
6. The requirement for Local Authorities to assess local need for public toilets must be supported by adequate resources. I am fully aware of the stark financial challenges facing Local Authorities and support all efforts to provide them with the resources required to provide public toilets. I am not convinced that the former Community Toilet Grant scheme, whereby the public are able to use toilets in local businesses, is a model that can adequately replace public toilet provision.
7. Older people have told me that they often feel uneasy or embarrassed about using Community Toilet Schemes, and instead require dependable and accessible public toilets. Furthermore, the Welsh Senate of Older People's 'P is for People' campaign found that 85% of respondents would be prepared to pay a small amount in order to use a public toilet⁵.

³ <http://www.assembly.wales/laid%20documents/pri-ld10224-em/pri-ld10224-em-e.pdf>

⁴ <http://www.itv.com/news/wales/2014-06-30/public-toilet-closures-in-wales-shortsighted/>

⁵ <http://www.welshsenateofolderpeople.com/Documents/P%20is%20for%20People%20Questionnaire.pdf>

8. As part of the Ageing Well in Wales Programme⁶, all Local Authorities have signed the Dublin Declaration, a commitment to establish age-friendly communities in their area. Adequate public toilet provision plays a key role in establishing such communities and the Bill must go further in ensuring that older people and others can access public toilets across Wales.

Health and Well-being Impact Assessments

9. One of the main changes between the revised Bill and its predecessor is the inclusion of Health Impact Assessments (Part 5)⁷. The requirement for public bodies to undertake health impact assessments (HIAs) in specified circumstances is welcomed, and helps to strengthen the Bill.
10. These assessments will help public bodies in maintaining and improving the health of their populations, but would provide a more consistent and complimentary approach if they were to also include well-being.
11. I hope that these assessments will be able to address some of the issues I previously highlighted about the absence of obesity and physical activity in the Bill but the Bill must also ensure that the Assessment takes account of individual's mental health, as well as physical.
12. The Health (and Well-being) Impact Assessments can help to maintain essential community assets, such as public toilets and park benches, to ensure that older people are able to get out and live active lives.
13. Impact Assessments must go beyond health and consider the well-being of individuals as well. The focus must be on outcomes for older people and others, ensuring that proposals and interventions by public bodies contribute to their health, independence and ability to participate and contribute in communities. Such assessments provide a more holistic approach to public service delivery, providing a more thorough and nuanced

⁶ <http://www.ageingwellinwales.com/en/home>

⁷ <http://www.assembly.wales/laid%20documents/pri-ld10796/pri-ld10796-e.pdf>

understanding of how schemes and services impact on people's confidence, happiness and ability to get about and take part. Taking forward health and well-being impact assessments complements my Quality of Life model for older people⁸, my well-being indicators for older people⁹ and also aligns with the national indicators under the Well-being of Future Generations (Wales) Act¹⁰ and the National Outcomes Framework that supports the Social Services and Well-being (Wales) Act¹¹.

Loneliness and Isolation

13. Loneliness and Isolation is a serious public health issue that is affecting an increasing number of older people across Wales, and exacerbated by the closure of 'lifeline' community services such as public buses, public toilets, libraries, day centres, meals on wheels and befriending schemes. Loneliness can have a serious impact on a person's physical and mental health and wellbeing, and has an effect on mortality that is similar to smoking 15 cigarettes a day.
14. It is estimated that more than 75% of women and a third of men over the age of 65 live alone. Without the means to leave their homes, or with fewer visits from community workers and service providers, an increasing number of older people will feel lonely and isolated, resulting in damaging effects to their mental health and increased exposure to alcohol misuse. These 'silent killers' need to be addressed as a matter of urgency, and for this reason Loneliness and Isolation is a priority theme within the Ageing Well in Wales Programme¹².
15. I have previously called for Loneliness and Isolation to be included in the Public Health (Wales) Bill as I believe it is one of the biggest public health issues facing our nation. I would like to see a duty placed on Public Services Boards, established by

⁸ http://www.olderpeoplewales.com/Libraries/Uploads/Framework_for_Action.sflb.ashx

⁹ http://www.olderpeoplewales.com/Libraries/Uploads/Wellbeing_Indicators.sflb.ashx

¹⁰ <http://gov.wales/topics/people-and-communities/people/future-generations-act/national-indicators/?lang=en>

¹¹ <http://gov.wales/topics/health/socialcare/well-being/?lang=en>

¹² <http://www.ageingwellinwales.com/en/home>

the Well-being of Future Generations (Wales) Act 2015, to ensure that they take account of loneliness and isolation in their local well-being plans, in a manner that reflects the potential assets that older people are, and aim to reduce the number of people feeling lonely and isolated in their communities. I also see a role for Public Health Wales, as the national public health agency that exists to protect and improve health and wellbeing, in addressing loneliness and isolation at the national level.

16. Loneliness and Isolation has a devastating impact on the health, independence and well-being of older people but also affects a number of other groups in society. Recent research commissioned by the British Red Cross and Co-Op identified a number of trigger points that can cause people to become lonely and isolated, including becoming a new mother, being diagnosed with a serious illness and disabilities, as well as retirement¹³.
17. Whilst I welcome the Welsh Government's commitment to producing a nationwide strategy to address Loneliness and Isolation in its Programme for Government¹⁴, I believe this is such an important issue, facing some of the most vulnerable people in society, that it should also be included within the Public Health (Wales) Bill.

Conclusion

18. As I have highlighted above, the duty around public toilets, although a step in the right direction, must go further in ensuring that older people have access to public toilets in their communities, including an element of consistency across Wales.
19. The inclusion of Health Impact Assessments into the second incarnation of the Bill will help to promote people's health but for them to be most effective and to join up with other priorities, I believe that they should include the wellbeing of their populations, as well as their health.

¹³ http://www.coop.co.uk/Corporate/PDFs/Coop_Trapped_in_a_bubble_report.pdf

¹⁴ <http://gov.wales/docs/strategies/160920-taking-wales-forward-en.pdf>

20. Whilst I do welcome these elements of the Bill, I feel that there is a significant missed opportunity by omitting loneliness and isolation, one of the biggest public health issues affecting older people and other across society. I would like to see a duty on Public Service Boards to take account of loneliness and isolation in their local well-being plans and aim to reduce the number of people feeling lonely and isolated in their communities.