

‘Still dying to spend a penny’ - A survey of public conveniences within the Royal Borough of Greenwich (RBG) in 2022



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Former 'public' toilet at New Eltham Library

'Still dying to spend a penny' is an updated version of the report originally published in 2019 and presented to the then Leader of the Council with additional copies to the London Assembly member for Lewisham and Greenwich and Caroline Russell, a fellow Assembly member who sat on the Health Committee. The independent, citizen-led piece of research mapped out the number, distribution and private and public providers of the toilet and baby-change facilities available to residents, workers, tourists and students across the Royal Borough of Greenwich **without having to ask permission or buy anything in exchange'**. This 'post-covid' version was updated throughout October 2021 to March 2022 and provides the latest network of facilities since the boundary changes, new legislation, policy and regulations that have since occurred.

During the intervening two years, the lack of and access to public toilet provision has fast moved up the nation's policy agenda and continues to gather momentum. It is still raised as an agenda item voiced in national, regional and local service-user's fora. A variety of factors has contributed to its prominent profile;

- ❖ The **closure of most of the borough's public toilets at the height of the pandemic**, concentrated the minds of a far wider and a younger public on the importance of accessible toilets. It brought home to them the problems faced on a daily basis by those living with chronic bowel and bladder conditions or older people with failing continence. As well as posing a potential health hazard, the unedifying sight of discarded soiled nappies, evidence of widespread defecation and urination in our parks and green space shocked many.
- ❖ In June 2018, London became a signatory to the **WHO's Global Network of Age-Friendly Cities and Communities** that highlights adequate and accessible public toilet facilities as one of the eight key domains to promote healthy and active ageing and featured in the London Assembly's subsequent 'Age-Friendly London' report. Their Health Committees report (see Appendix B) '**The Toilet Paper- Improving public toilet provision in London**' was published in November 2021 and lists thirteen key recommendations many of which echo our own ones outlined in our report back in 2019.
- ❖ **Academic studies** during Covid and its impact on vulnerable cohorts has continued to flag up the lack of readily- available community toilet facilities as a key factor in maintaining the independence, an active life and prolonging the years spent in 'good health' amongst the over-60s.
- ❖ The run up to the 2017 general election put paid to the second reading of the 2017 members bill, **Toilets (Provision and Accessibility) Bill** that aimed to redress the decline of public toilets and to make it mandatory for Changing Places Toilets to be installed in all new-build complexes. The long battle to offer a more dignified service and convenient toilet facilities for those living with complex physical disabilities waged by the Changing Places organisation finally paid off with new building legislation and regulations cushioned by ring-fenced government funding that came into effect on the 30th of June 2022. Whilst there is no retrospective mandate on organisations, all new buildings commonly used by the public or existing ones that have undergone major refurbishment or a material change of use must now include a Changing Places toilet (see page ?). This applies to new shopping centres, hospitals, health centres, malls and retail parks with a floor area of more than 30,000 square metres, leisure and sports centres measuring more than 5,000 square metres and retail properties with a gross floor area of 2,500 square metres.
- ❖ Transport for London (TFL) was already in the midst of a comprehensive review of its accessible toilet provision across its network long before the publication of the London Assemblies health committee's report and the four TFL recommendation (6,7,8, and 9). A coloured-coded map of its toilet provision across its network has now been published on its website for the travelling public to download.
- ❖ The cumulative effort and tireless work undertaken by a variety of user-led organisations pushing the envelope agenda for improvement such as **Age-UK London's 'Out and about Campaign**, the establishment of **TINKLE**, the Toilet Information Exchange based at the Helen Hamlyn Centre for Inclusive Design, '**Truckers Need Toilets**' and all the various charities representing chronic medical conditions Crohns Society, Bowel and Bladder Association, ERIC and Irritable Bowel syndrome.

Executive Summary

The impetus behind the decision to map the distribution of public and privately provided toilets available to Greenwich's residents, workers and students across the borough was prompted by a number of factors;

- a) The increasing level of concern voiced at national, regional and local disabled and older people's fora about the disappearance of available public toilets within the borough.
- b) The issue of adequate and accessible toilet provision as one of key domains in the London Assembly's 'Age-Friendly London' plan.
- c) An increasingly volume of clinical research demonstrating the importance of accessible community toilets in the maintenance of the health, wellbeing and independence of older people and those living with a disability.
- d) The failure of key Greenwich-based stakeholders responsible for the health and wellbeing of its residents to acknowledge inadequate community toilet provision as a major Public Health issue and to act upon it.

Whilst the closure of 13 RBG's public conveniences (fig.2) in addition to those formerly based in now permanently closed libraries, municipal buildings and hospitals had a significant impact on everyone, it had a disproportionate effect on specific cohorts, namely the heavily pregnant, mothers with young children, outdoor workers, the homeless, service-users living with chronic bowel and bladder conditions and the over-65s .The over-65s currently number 29,181, 10% of Greenwich's population and the percentage estimated to rise by 41% by 2030 (ONS 2011).

The original audit was a snapshot of available community-based toilets mapped out on a ward-by-ward basis by a team of eight volunteers throughout October 2019 - January 2020. This has now been updated by the author between December 2021 to March 2022 to incorporate new legislation and changes in provision that have taken place in the intervening years. All the toilets included had to meet stringent criteria, namely **'toilets to which the public have unimpeded access without having to seek permission or buy anything in exchange'** . The primary focus of the audit was not the standard of upkeep, cleanliness and state of repair but rather a log of basic pre-selected variables that included the number of banks of male, female and gender-neutral toilets, availability of disabled and baby-change facilities, opening times, charges levied, potential obstacles to entry, provider, ward location and if attended.

The current 91 'banks' of toilets across 72 locations (see Appendix D) **were provided by a variety of suppliers including** major retail outlets (19.4%), Southeastern Trains and TFL (15.3%), NHS (8%), entertainment hubs (8.3%) and those directly maintained by RBG or on premises leased out by them to private operators (66.7%). None were attended and few required an entry fee apart from the APCs (Automated Public conveniences) and those based in Greenwich Park managed by the Royal Parks. Most of the original volunteers were unaccompanied women and consequently reluctant to enter and record the number of cubicles and stalls within the men's toilets so no reliable conclusions could be drawn in respect to 'potty parity' and if Greenwich's toilet facilities matched the national ratio of 2:1 male to female toilets.

The distribution of toilets lacked any consistency, ranging from none in three wards to over thirteen in others. The majority of the 18 RBG managed toilets listed on the RBG website (appendix A) were judged 'not to fit for purpose' being 'out of order', awaiting repair or remained locked despite the advertised opening times or else so unpalatable that only the desperate or intrepid would willingly resort to their use. These tended to be either street toilets or those sited in parks and cemeteries that in the past might have been maintained and policed by attendants.

Strategies adopted by five neighbouring South-East London boroughs (see Appendix C) to remedy their own toilet shortfall such that include the Community Toilet schemes were studied to see if any low cost/no cost 'best practice' solutions were worth importing by RBG and tailored to suit local conditions.

As wished for, the 'Dying to spend a penny' report has generated considerable interest amongst user-groups and other authorities across London including Barnet, Tower Hamlets and Camden, organisation such as Age-UK London and KOVE and requests for the author to address user-groups interested in using it as a blueprint for action.

Context

Urinary continence tends to decline with age and further exacerbated by commonly prescribed diuretic medication. The fear of not finding a toilet 'in time' and resultant shame in the event of an 'accident' can lead to many older people or those living with chronic bladder and bowel conditions to become increasingly reluctant to venture out of the 'safety' of their home, the so-called, '**loo leash**' effect. In a recent survey, 1:5 (20%) of older people cited the fear of having 'an accident' as one of the prime reasons for not 'getting out as often as they wished'. If forced to leave the convenience of their home to attend appointments or shop, they would often resort to either not taking their 'water tablets' that particular day or else, even more worryingly, purposely restrict their fluid intake. Dehydration in older people at a time when their thirst reflex is on the wane can not only adversely affect certain health conditions like Diabetes but also lead to an increased incidence of urinary tract infections. Incontinence is now a protected characteristic under the Equalities Act 2010 and public bodies need to address the question of access to and adequate provision of community toilets under their **Public Sector Equality duties (PSED)**.

The '**loo leash**' effect runs counter to NHS's advice to all older people to get out of their house more, take exercise, interact socially with friends and actively participate in their community in order to maintain their independence, improve their health and wellbeing and overcome the pernicious effect of loneliness and isolation. Insufficient toilet amenities within the local neighbourhood disproportionately affects the freedom of specific groups who urgently require a toilet close at hand and by enforcing their social isolation and inactivity, we further 'disable' them limiting their ability to lead full, dignified, independent and self-reliant later lives. We also hasten their reliance on scarce and expensive **health and social care support services**.

Whose Responsibility?

There is currently no legal requirement, '**statutory obligation**', on English Local Authorities to provide a sufficient number of public conveniences to meet the size of its population, undertake a regular audit or publish an annual **local toilet strategy** unlike Wales (Public Health (Wales) Act 2017 Chapter 8). There is however an 'expectation' to provide a '**discretionary service**'.

Successive cuts in central government funding has forced local authorities to concentrate their limited resources in the delivery of statutory services often at the expense of discretionary ones such as public conveniences which are expensive to maintain, repair and police. closure nationwide, sale or leasing them out to private providers and sub-contractors. The London Assembly is now advocating (see recommendation 1) a similar move towards closer to the Welsh model and calling on Government to make it a statutory duty with local authorities expected to produce their own toilet strategy, undertake an annual audit and action plan..

Why undertake the mapping exercise?

Complaints about RBG's 'vanishing public toilets' are regularly voiced within local disability and older people's fora and the remit for this audit was firstly to collect tangible evidence to substantiate these allegations and if founded, offer some low-cost suggestions and practical solutions on how some might be fully or partially resolved within the current financial climate.

The basic aims of the toilet audit were:

- ❖ To undertake a comprehensive audit of all the disabled, gendered men's, women's and gender-neutral toilets that met the criteria '**unimpeded access without having**

to be a paying customer or ask permission' plotting each location on a ward-based map that could later reveal any significant gaps in provision.

- ❖ To raise awareness amongst key stakeholders within Greenwich's health and social care economy of the need for a coherent and integrated approach to the production of an integrated toilet strategy.
- ❖ To ensure that accessible public conveniences are classed as a vital civic amenity and integral part of any civilised urban area particularly when planning permission is sought from the council by private developers
- ❖ To provide accessible information of their whereabouts and the kind of facilities on offer not just exclusively on line but in a variety of formats to meet people's needs.
- ❖ To offer citizen volunteers an opportunity to participate in collaborative projects that aim to improve resources and assets within their neighbourhood.
- ❖ To offer a template for other citizen groups to pursue with their own local authorities.

Local Authority websites invariably refer enquirers onto a range of pre-existing free **'toilet finder' apps or else the Great British Public Toilet Map website** in spite of the fact that much of the information on these online apps is limited in one respect or another. The Great British Public Toilet Map website only lists basic information, lacks contemporariness and is dependent on individuals constantly adding and updating the information. Other apps such as 'Flush', Toilet4London or 'Toilet Finder' either can't be accessed on android devices or the listings limited to tourist hotspots or areas of high footfall. They all tend to omit key information essential to certain user-groups such as the cost, existence of baby-change facilities or potential obstacles barring access. Finally, and more importantly, key users, the homeless and over-70s, perhaps the heaviest consumers of health and social care resources, either lack sufficient IT fluency to access information online, able to afford the broadband connection or requisite equipment or unable to operate a smartphone due to failing eyesight or loss of fine and dextrous finger movement.

What was involved in the mapping process?

Our criteria for inclusion in the toilet Directory were fairly strict and limited to those **'to which the public have 'unimpeded access without having to be either a paying customer or ask permission'**. Certain age, faith and cultural groups often hesitate, even forbidden, to enter unfamiliar premises such as pubs or cafes or else too embarrassed to ask a total stranger, possibly of the opposite sex, permission to use their facilities. Consequently, the majority of cafes, pubs, petrol stations, GP surgeries or venues with a centrally-staffed reception area were excluded. A number of the larger café and restaurant chains, such as COSTA, McDonalds, Pret-a-Manger already restrict the use of their toilet facilities to only their paying customers with the introduction of a door release 'key' or entry code.

The **'state'** of the borough's toilets in terms of user-friendliness, standard of cleanliness, repair and evidence of ongoing maintenance was not the primary focus of the audit given difficulties in arriving at a unanimous definition of such subjective areas.

The volunteers took part on the proviso that the task would not take more than a three-hour commitment so data needed to be simple for ease of recording and limited to a few key areas (see box below).

Key Variables recorded on the 2019 and 2022 recording frame

- ❖ The number of actual 'banks' of female, male and gender-neutral public conveniences within each ward, their exact location and the number of cubicles and urinals within.
- ❖ The number of 'disabled' toilets and range of facilities within and if a radar key required.
- ❖ Any imposed entry charges.
- ❖ Any obstructions or barriers to their use i.e., steps, turnstiles.
- ❖ Provision of baby-change and nursing facilities.
- ❖ Hours and days of opening and closing.
- ❖ Attendant on-site.

Other areas of equal importance such as bins for the disposal of used sanitary wear, soiled nappies and incontinence pads available in both male and female toilets, supplies of soap, paper towels and toilet paper, contraceptive and sanitary wear dispensers and door hooks will need to be an integral feature of any future survey as adequate hand-washing facilities are an important component for many who need to observe hygiene rituals in keeping with their

faith or cultural practice.

The original 2019 team of 20 fieldwork volunteers were recruited in the main from two user-groups, the Greenwich Pensioners Forum and the South-East London branch of the U3A (University of the Third Age). All were concerned about the declining public toilet provision not only in respect to their own needs but its impact on their other responsibilities as grandparents, caregivers of older relatives and friends. They were predominately retirees, older women apart from three token men all prepared to devote a few hours to exploring a designated neighbourhood. They seemed to relish the opportunity to participate in a community-based project with a practical focus that might eventually improve their own stock of neighbourhood assets. Unfortunately, only eight from the original volunteer group actually undertook the audit as all the others gradually dropped out due to unforeseen health emergencies, hospital admissions, sudden family crises and inclement weather.

Each 'bank' of toilets within a venue was separately recorded even though it might only consist of a single gender-neutral facility or in the case of the O2, house eight or more cubicles within each 'bank'. Whilst the data on female and gender-neutral toilets was fairly reliable, detailed information on number of cubicles and urinals within men- only ones remained limited.

In the 2019 survey, detailed A-Z street maps covering each of Greenwich's then seventeen wards were allocated to a volunteer, matched wherever possible to their home area for convenience and local knowledge. Our frail and less mobile workers were handed less geographically-challenged areas whilst the 'denser' ones with concentrations of retail outlets, tourist hot spots and entertainment hubs were reserved for the fit. A record of the relevant details was entered for each 'bank' that met our inclusion criteria and its location plotted with a sticker on their map. The completed sheets were then sent off for collation and analysis in the SAE provided. The 2022 update proved to be a far easier task undertaken by just author over a three-month period working from the original list, updating and correcting as she went. Responsibility for the future annual audit of the Directory has now been passed onto the Live Well team who intend to recruit a team of community champions trained to undertake the task using a recently modified recording frame.

2022 Findings

Our Directory (see Appendix D) is merely a snapshot of toilets available for use across the borough between January and May 2022. Despite our best efforts to be as comprehensive and inclusive as possible, a number of closures and new arrivals will have inevitably escaped our notice or been overlooked.

The original 2019 audit identified 71 banks of toilets meeting our criteria whereas 91 banks across 72 locations were registered in the 2022 audit.

Fig. 1 Provision of Male, female and gender-neutral toilets by ward population – Red Star * indicates a Changing Places Toilet

New and redesignated wards (Boundary changes August 2021)	Projected Population	No. of different Locations	No of banks of toilets	No of Gendered M -F banks of toilets	No of gender-neutral toilets
Abbey Wood	12916	4	4	4	0
Blackheath and Westcombe	12195	4	6	3	3
Charlton and Hornfair	8579	0	0	0	0
Charlton Village and riverside	7516	6	6	5	1
East Greenwich	11374	4	4	3	1 *
Eltham Page	7176	1	1	1	0
Eltham Park and Progress	8451	3	3	2	1
Eltham Town and Avery Hill	11916	7	7	6	1
Greenwich Creekside	8194	2	2	1	1
Greenwich Park	8008	5	10	7	3 *
Greenwich Peninsula	11416	10	13	10	3
Kidbrooke Park	7704	0	0	0	0
Kidbrooke Village and Sutcliffe	7208	3	3	1	2
Middle Park and Horn Park	7044	0	0	0	0
Mottingham, Coldharbour and New Eltham	11191	3	3	1	2
Plumstead Common	11254	3	3	1	2
Plumstead and Glyndon	12901	1	2	0	2
Shooters Hill	8476	2	2	1	1
Thamesmead Moorings	8183	3	3	2	1

West Thamesmead	7847	0	0	0	0
Woolwich Arsenal	11362	7	10	9	1**
Woolwich Common	8213	2	6	5	1
Woolwich Dockyard	8584	2	3	2	1
Total		72	91	64	27

The distribution of public toilet facilities across the borough remains patchy and unrelated to the size of the ward's population even with adjustments made under the boundary changes. Three wards, Charlton Hornfair, Middle Park and Hornpark and Kidbrooke Park contained no public facilities at all whilst other wards with concentrated retail clusters were well-endowed such as Greenwich Peninsular and Woolwich Arsenal or Greenwich Park ward with its high tourist or visitor footfall.

The redrawn ward boundaries reflect the dramatic demographic changes that have occurred in areas benefitting from major housing and regeneration and schemes such as the Peninsula, Woolwich Riverside, Kidbrooke Village and Sutcliffe and the Royal Arsenal. The total **absence of any public community toilets built as an integral part of the regeneration itself is altogether surprising and in sharp contrast** to the provision of other vital 'community assets or benefits' such as state-of-the-art playgrounds, green spaces and seating, all presumably instrumental on securing planning permission under s.106 monies. There is not one single public convenience across the whole of the 109-hectare Kidbrooke Village site, a £1 billion scheme promising a new sustainable community with a projected 4,800 new homes and soon to be linked by the new housing scheme Kidbrooke Station Square (Notting Hill and Genesis) on the north side of the railway track delivering a further 619 dwellings. Parents of young children enjoying the new playground in Cator Park are currently forced to ask permission from the adjoining sheltered housing unit, Halton Court, to use their toilet facilities. It would appear that the partnership between RBG and private developers have chosen to disregard the recommendations of the seminal WHO's Global Age-Friendly Cities report (2007) Part five - Outdoor spaces and Buildings www.who.int/ageing/publications/Global_age_friendly_cities_Guide_English that classed adequate public conveniences as a vital public amenity and community asset in any civilised society. Readily available public toilets are a key amenity for numerous groups and an adequate supply of accessible toilets should be classed as an integral specification in any future planning proposal or application under consideration by RBG.

The lack of parity of **female to male toilet provision, often referred to as 'potty parity'**, used to be a contentious issue in many US states and Canadian provinces until legislation based on 'inequality of access' was passed. In the UK, the ratio of male to women's toilets stands at 2:1 and often results in the unedifying sight of long queues of women lining up to use a toilet at popular venues. The lack of parity is partly caused by the availability of space required. Women's cubicles generally take up twice the floor space of men's urinals. Women also occupy a toilet for a longer amount of time given their anatomical differences, menstruation, oversight of children and the removal of more items of clothing. Unfortunately, our survey could not provide a reliable comparison on the issue of potty parity as most of the original field work team were women reluctant or prevented from entering all male facilities to record the number of urinals or stalls within.

In spite of their more generous provision, it is overwhelmingly men who are found guilty of urinating in public spaces. Street urination is now such a persistent problem that many boroughs impose fixed penalty fines of between £80 (Richmond) and £100 (Lambeth) in an attempt to eradicate this unwholesome practice. It is not only unhygienic and poses a distinct health risk but is also offensive to the wider public forced to use foot tunnels and secluded pathways that reek of stale urine or worse.

Gender-neutral and all-inclusive male, female, baby-change and disabled toilets are becoming increasingly prevalent throughout the borough especially in recently-built premises, smaller stores and libraries where space is at a premium. This move is not without controversy however as many age groups, cultures or faiths frown upon mixed-sex public toilet facilities and object to the loss of a protected 'women-only' space. This is not so problematic in the case of an individual toilet but can be in unattended, enclosed banks of gender-neutral cubicles and baby-change facilities as found in the ground floor toilets at the newly-refurbished Plumstead Centre where a number of parents are reluctant to allow their younger children unless escorted to use the unattended library toilets for fear of uninvited approaches by potential sexual predators.

An **entry fee** to use a municipal public convenience can be a bit of a contentious issue for Council Tax payers who resent having to 'pay twice' for the privilege. Others are more sanguine, believing that a fee helps ensure the toilet's ongoing upkeep and maintenance and a financial deterrent to would-be vandals or substance abusers. Only two of the providers charged to 'spend a penny', the Royal Parks (20p) and 50p for each of the three APCs (Automated Public Conveniences) but free to owners of a RADAR key. Wall-mounted change machines in the Royal Parks overcome the problem of finding the right money unless you are a paid-up member of a cashless society and APCs automatically issue correct change. Whilst APCs are not always universally embraced by the general public on the grounds of their cost and fear of entrapment in the unlikely event of a mechanical failure, their 24-hour availability far outweighed any hesitancy on the part of night-shift workers or late-night revelers.

A '**disabled toilet**' is a somewhat misleading, 'catch all' term that encompasses a whole range of provision and equipment designed to cater for the needs of different levels of disability. Our survey was only able to record basic information on their numbers, location and if a radar key was required. According to the 'experts by experience', members of the disability user-group GAD (Greenwich Association for the Disabled), there are roughly three distinct types of toilets that correspond to different level of disablement.

- a) **Changing Places Toilets** - These specifically cater for residents living with severe and complex disabilities unable to independently use a toilet or wash themselves without the help of a carer or personal assistant. They are far more spacious than the average standard one (see below) with a privacy screen, tracking hoist, adult-sized changing bench and centrally placed toilet with sufficient room for carers or personal assistants to move around, Prior to their introduction, a service-user would be forced



to undergo the indignity of being laid on the floor to be changed or else wait until they returned home. The Changing Places Organisation that so successfully lobbied for changes in legislation and wider coverage of facilities has now published a downloadable list and app that plots the location of each Changing Places Toilet across the UK with details of the specialist equipment provided (see **Find a toilet [www. changing-places.org](http://www.changing-places.org)**). Greenwich has welcomed a further two since 2019, one based at the Maritime

Museum and another at the newly-opened Greenwich Works on the Royal Arsenal site. Regrettably, there are still none to found at the Queen Elizabeth Hospital, Memorial or the Eltham Community Hospital or any other NHS or Trust sites.

Following a lengthy period of public consultation, mandatory changes to the building regulations now state that a CPT (Changing Places Toilet) must be installed in any new building or one that has undergone major refurbishment, extended or undergone a material change of use. This applies to all buildings commonly used by the public of a certain size. Shopping malls or retail parks with a gross floor area of 30,500 square metres, retail properties with a gross floor space of 2,500 square metres leisure/sports 5,000 and take effect from 30.6.22. The Department of Housing, Communities and Local Government has encouraged all district and unitary local councils to apply for the new government funding available (see funding prospective) and take advantage of expert advice and training on offer to install them.

- b) Wheelchair-accessible toilets** – Often a gender-neutral, standalone facility with a wider doorframe and sufficient turning circle to accommodate a wheelchair-user and equipped with low-placed lever arch taps and flush, a fixed toilet frame and emergency call pull. The majority can only be accessed **with a RADAR key** (Royal Association for Disability and Rehabilitation - now the Disability Rights UK). The National Key Scheme (NKS) was introduced in 1981 in a bid to keep 'disabled' toilets free from misuse and in a functioning state for the exclusive use of the disabled community. Possession of their personal key would also save them the need to ask or be dependent on the provider for access. RADAR keys can be purchased online or obtained from the Disability Rights Organisation without the need for any 'proof' of registration but a number of local authorities will either sell or give you one. RBG's policy is to direct you to GAD (Greenwich Association for the Disabled) who keep a supply for sale at a cost of £4.
- c) Ambulant disabled** – A standard toilet equipped with additional features like a fixed toilet frame, low level flush and grab rails.

The '**Just can't wait**' card is a useful asset if you need a toilet urgently but reluctant to ask a provider's permission. Various charities produce their own version to top up their funds but



there is now a move towards the introduction of a universal card accompanied by a national campaign to raise awareness of the scheme. One Local Authority, Haringey, advertises the card and how to source it on their website, an example that RBG could easily follow by posting details on how to obtain a RADAR key and a card on the Live Well website or in the Community Directory.

The '**Not all disabilities are visible**' poster was widely displayed outside the disabled toilets encountered and this 'hidden' aspect is particularly relevant in the case of the 'older frail'. Late-onset chronic age-related health conditions such as heart problems, breathlessness, sensory impairments or restricted mobility can mean many are '**functionally disabled**'. Whilst some may not choose to define themselves as 'disabled', others see their health difficulties as just a natural part of 'growing old' and unaware that they now meet the criteria for services and certain benefits. This key group often remains 'hidden', unrecorded in official statistics and 'off the radar' of service-planners.

Most of the publicly accessible toilets listed offered some level, albeit basic, of **baby-change facilities** invariably of the wall-mounted, vertical or horizontal drop-down shelf variety. Some were based within cramped, dingy and insanitary toilets that most mothers wouldn't dare risk

exposing their young children to unless desperate. More often, they were incorporated into the marginally more palatable disabled toilets, shielded from the worst excesses of vandalism by being locked. The disadvantage was that parents were then forced to seek a RADAR key from either a shop assistant or ask the station ticket office, (if staffed) to unlock it for them (Abbey Wood). In our effort to keep recording to a minimum, we failed to log crucial details about the availability of soap and hand-washing facilities so vital in minimising any risk of faecal contamination or cross-infection when changing nappies and if bins for the disposal of soiled nappies, used incontinence and sanitary pads were available and appeared to be regularly emptied. Under the Environmental Protection Act 1990, their contents cannot be treated as 'general waste' and have legally to be disposed of by licenced operators.

The 'gold standard' **baby-change facilities** were found in major retail outlets such as IKEA and Sainsburys. In a nod to today's more enlightened attitudes to shared parental responsibilities, they were often available in both male and female-gendered toilets and some shops even offered a dedicated baby-change room equipped with sink, changing table and integrated toilet. In a few rare cases, a separate nursing mother's room replete with comfortable armchair was provided. It seems that savvy retailers are keen to attract this market segment of young, upwardly-mobile families and recognised the importance of investing in high-end facilities that promoted an image of a 'responsible and caring' organisation in tune with its customer's needs and values.

Few of the listed toilets presented **insurmountable obstacles to entry**. Legislation introduced in the 1960s to ban entry turnstiles that restricted entry to wheelchair-users or parents with buggies has long been repealed. Only two banks of toilets, both situated in Greenwich Park, still retained payment turnstiles. Whilst the majority of station platform-based toilets could be accessed by a lift, escalator or street-level side entrance, Woolwich Dockyard with its two flights of 20 steps each defied even the most determined wheelchair-user or traveller with impaired mobility or stiff joints.

None of our identified toilets benefitted from a **permanent on-site attendant** to service, oversee and police their use. As any visitor to one of the borough's street toilets will testify, the gradual disappearance of attendants due to their cost has contributed to the rising level of vandalism, damage and their alternative use of toilets over the past few years. As many of the older street and park conveniences were built in the late Edwardian era when 'toilet use' was a more discrete activity, they tend to be hidden away, 'out of sight', located in isolated positions or else screened by greenery. Their isolation coupled with the loss of attendants has contributed to the widespread reluctance of lone women with or without children and older people to use them for fear of encountering substance misusers, predatory offenders or muggers.

The chance of finding a **24-hour toilet** catering for Greenwich's homeward-bound, late-night revellers or night shift workers is fairly slim and limited to the three APCs, Greenwich North station, Queen Elizabeth Hospital and a handful of 24-hour superstores.

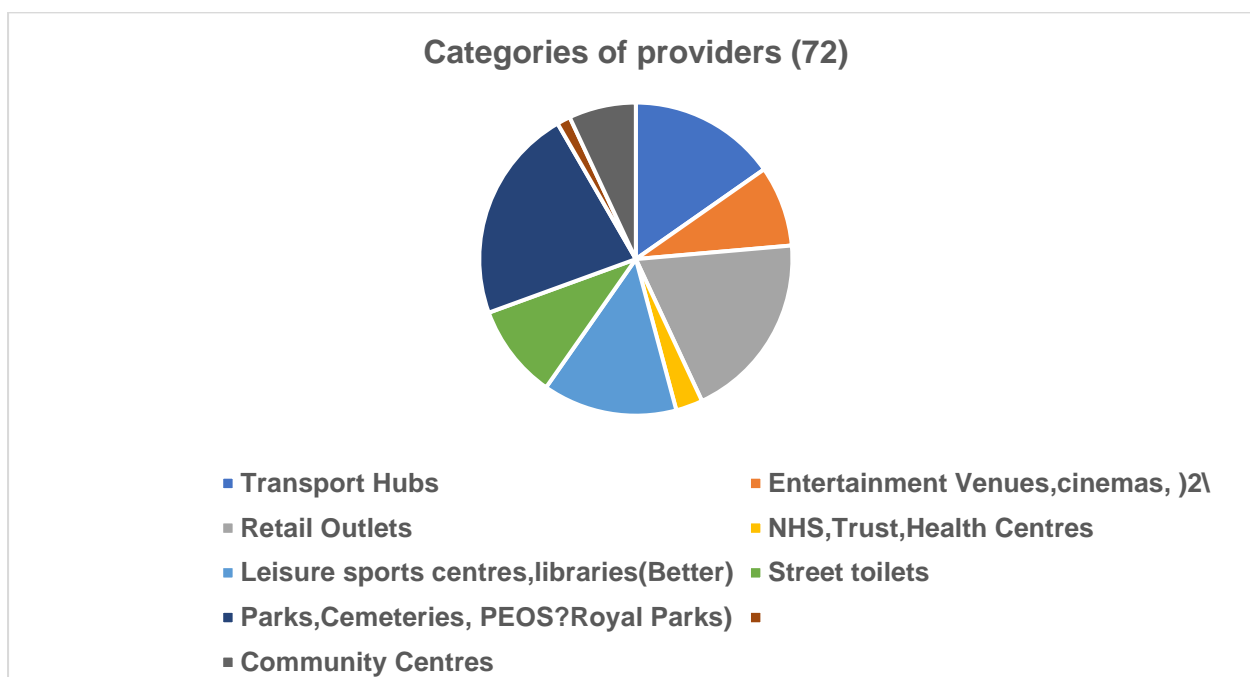
Toilet Providers and Operators.

Fig 2 tables the main **public and private suppliers of toilets** that meet our criteria. The majority (52%) were managed directly by RBG departments or situated on RBG-owned but contracted out premises. South-eastern train and TFL (19%) accounted for the second largest category closely followed by the larger retail and commercial sector (17%).

Fig.2 Providers of accessible banks of toilets within the borough

Category of each Provider Venue	Number of	
Retail outlets	14	19.4%
Entertainment venues- Cinemas, O2, Works, Museums	6	8.3%
Transport Hubs	11	15.3%
Leisure and Sports centres, (Better Ltd) and Libraries	10	13.9%
Parks and Cemeteries (PEOS) and Royal Parks	16	22.2%
NHS and Trust sites	2	2.7%
Street toilets and APCs	7	9.7%
Community Centres	5	6.9%
RBG Municipal Buildings	1	1.4%

Total - 72 Providers



(a) Royal Borough of Greenwich

IA comprehensive overview of public toilet provision across RBG was difficult to establish given the number of directorates with responsibilities for different groups of them in theory, ultimate responsibility appears to reside within one Directorate, **Communities and Environment** but the management of different banks of toilets is devolved across three or more departments. PEOS (Parks, Estates and Open Spaces) covers facilities in parks and cemeteries unless they have been leased out to private operators who undertake responsibility for their day-to-day management whilst 'Regeneration, Enterprise and Skills' still retains responsibility for their maintenance and repairs. Waste Street Services are responsible for 'standalone'

conveniences on the public highways and oversight of GS+, the contracted-out maintenance and cleaning service. Greenwich Leisure Ltd (Better) manage toilets based in leisure centres and libraries.

The uneven geographical coverage of the borough’s public toilets along with their less than acceptable ‘standards’ of cleanliness and upkeep must be blamed to some extent on the lack of a coherent toilet strategy and failure of the various departments to effectively communicate with each other. The appointment of a dedicated senior officer with sufficient authority to plan and impose a uniform strategy that encompasses all departments with involvement in toilet provision is key. Whilst it may not be a statutory duty as yet in the UK, public toilet provision is an essential community asset necessary for the health and wellbeing of its local population.

Over the past decade, RBG has closed over 12 of its ‘standalone’ street and park-based public conveniences (see fig.3) often in areas already poorly served by other private alternatives. The final decision to close a facility depends on a variety of factors, the lease on the land may have expired, the toilets are financially beyond refurbishment or repair, pose a risk to the general public or an unattractive proposition for a private operator to adopt.

Fig 3 Former RBG maintained public conveniences that have since closed

Batley Park (Building) Charlton Rd SE3 7EU
Eynsham Drive SE2
Bostall Gardens, McLeod Rd SE2 0TQ
Blackheath Common, Shooters Hill Road SE3 7BN
Eltham Park North SE9 1AR
Tarn. Court Road SE9 5AQ
The Slade, SE18 2NB
Rodmere St SE10 9EF
Marion Wilson Park SE7 8DH
Grovebury Rd SE2 9HA
Plumstead Gardens, Brookdene Rd SE18
King William Walk SE10 (2019)

Source - Schedule of RBG public conveniences 2018

Local residents would rely on toilets based in neighbourhood libraries and leisure centres when out but a number have permanently closed or now managed by not-for-profit enterprises such as Greenwich Leisure Ltd (Better) and no longer accessible unless you are a ‘paying member’ such as those tucked away behind ticket barriers at the Thamesmere Library, Horn Park and Waterfront Leisure Centres.

At first glance, the list of 18 RBG-maintained public conveniences (Appendix A), appears reasonably generous until visited in person. A number of the RBG stand-alone park toilets (not attached to cafes) were often found to be locked despite the advertised opening hours (7am-7pm) posted on their door. According to local passers-by and groundsmen, a peripatetic RBG operative is supposed to open and close

the Eltham Pleasance toilets on a daily basis but this only happens on a sporadic basis and in their view, there seems to be little official monitoring of the service.

The six street toilets listed often proved uninviting with some used as 'cottaging' venues although several such as Vincent Road and Market Place are likely to be replaced by new facilities under the Woolwich centre regeneration plan.

Many of the park and open spaces toilets situated within cafes are now leased out by RBG to private providers at Eltham South, Avery Hill, Charlton Park and Greenwich Pleasance. Under the terms of their lease, RBG still retains overall responsibility for any outstanding repairs and refurbishment but the tenants are required to undertake their day-to-day upkeep, locking and unlocking them and cleaning them on a regular basis and replenishing supplies. In 2022, the three toilets found to be 'out of order' in 2019 have since been repaired although the disabled one is permanently locked and key needs to be sought from the cafe staff. Some of the café employees confessed to not always bothering to open up if the weather was inclement or if they had a pressing appointment so causing considerable inconvenience to older visitors, mothers with young children, mobile workers and groundsmen who relied heavily on their facilities.

Our request for access to RBG's head lease was not forthcoming so we were unable to verify the terms laid down for lessees to adhere to or to establish if a monitoring system was in place to ensure compliance.

Public toilets located at each of the six Greenwich-maintained cemeteries remain open throughout the year, even Christmas Day, to cater for the needs of mourners. Apart from one exception, all were found to be dingy, neglected, in a dirty state and often in need of repair. In 2019, the women's toilet at the Well Hall cemetery was padlocked and the men toilet door broken open but on revisiting in 2022, the whole block is now boarded up even though still advertised as open for use. The sole exception turned out to be the Crematorium toilet which was brightly-lit, warm and clean.

Some of the PEOS toilets turned out to be only accessible on certain days of the week perhaps to cater for a football match or a meeting of the bowls club whilst others were limited to specific times of the year i.e., close to the paddling pools in the summer.

Whilst the audit purposely did not include any rating or judgement on the 'state' of the borough's toilets, the fieldworkers were often shocked by the conditions encountered in some of the RBG 'maintained' street, park and cemetery conveniences. They were universally described as uninviting with poor illumination, an air of neglect, often malodorous and damp with broken fittings and lacking supplies of soap, paper towels and toilet rolls. If bins were in evidence, they were often overflowing with soiled nappies, incontinence pads and used sanitary products.

The day-to-day management of RBG's 26 former community centres was transferred some years ago to local tenant and community service-user groups and now registered as charitable concerns and 'companies limited by guarantee'. Many have undergone further amalgamation to form even larger local clusters such as Glyndon Community Group and St Mary's Community. Their unpredictable opening hours and the need to seek permission from a reception area has meant that few feature in the toilet Directory apart from those hosting a walk-in, 'off the street' café onsite as is the case with the Clockhouse Centre. Whilst most centre staff were perfectly happy to

allow the general public access to their facilities if asked, others made it abundantly clear that their toilet facilities were reserved for the exclusive use of bona fide visitors attending courses or classes with large posters pointing out that the general public were not welcome (see photo above), St Marys Centre, West Greenwich Community Centre and the New Eltham library (see page 2).

Retail outlets

Almost a fifth (14), of all toilets meeting the inclusion criteria were based in retail outlets, some even open on a 24-hour basis at the larger superstores. Any store hosting an in-store café or food outlet that seats ten or more tables must provide toilet facilities for their customer's use.

The standard of instore toilets proved far superior in comparison with RBG's park and street facilities particularly in respect to good lighting, cleanliness, being better equipped and in a good state of repair. A visible standard of cleanliness and maintenance immediately makes for a favourable impression on customers and of a 'well-run company' that placed a premium on customer care. The initial expenditure on comprehensive facilities and generous funding on their ongoing upkeep and repair was seen as a wise investment that made good business sense in the longer term.

The more enlightened stores such as IKEA and Sainsburys, keen to attract the young professional market, offered well-equipped baby-change facilities, child-friendly features such as low-level sinks designed for help younger children and even provided dedicated rooms with armchairs for nursing mothers.

Transport Hubs

As they are evenly spread across the borough, Southeasters train stations at Eltham, Woolwich Arsenal, Woolwich Dockyard, New Eltham, Westcombe Hill, Maze Hill, Greenwich and Mottingham are a valuable source (10) of publicly-available toilets in areas that tend to poorly served. At smaller stations, the majority are now locked to prevent vandalism and 'alternative' use and some even permanently closed. Access is unusually achieved via a buzzer or camera linked to the ticket office staff who then release the locking mechanism remotely but if the ticket office is 'manned' only on a part-time basis generally during the morning rush hour they remain locked. Even the disabled toilets remain inaccessible as they are not on the National Key Scheme and can't be opened with a Radar Key. If South-eastern chooses to act on their proposal to close all ticket offices in favour of a move towards ticketing online, then none of these current 11 platform toilets will be available for use.

South-eastern toilets are supposed to be for the exclusive use of its 'travelling public' but the purchase of a 10p platform ticket or ownership of a valid freedom pass could arguably be proof of 'intended journey'. Toilets situated off open foyers of larger stations such as Greenwich are far easier for passers-by to access than others located behind ticket barriers at Eltham or Abbey Wood. At smaller stations, toilets are usually found on the 'up' platform so in the absence of a lift or side street level entrance, it proved virtually impossible for the wheelchair-bound or others with limited mobility (Woolwich Dockyard) to obtain access.

TFL's public toilets at North Greenwich tube station remain open throughout the night to serve passengers using the all-night bus service or 24-hour Jubilee Line. There are currently no toilet facilities across the whole DLR network but the platform-

toilet at the mainline Woolwich Arsenal station can be reached via an interlinking passageway.

(d) Entertainment Venues

Few of the borough's theatres and cinemas are featured in the Directory as their facilities are usually tucked away behind box offices or ticket barriers unless situated off an open public foyer as is the case with the Picturehouse Cinema or Royal Arsenal's 'Works'. The latter not only boasts a range of gendered and gender-neutral facilities but also ownership of one of Greenwich's four Changing Places Toilets.

The O2 Arena is not only one of the nation's foremost entertainment venues but also houses a high-end retail mall and a wide choice of restaurant outlets. Its four 'banks' of toilets each containing up to ten cubicles have been designed to accommodate the crowds of up to 20,000 spectators attending major events or concerts.

In addition to mounting temporary exhibitions and organising a regular programme of school visits, the Royal Naval College and Maritime Museum houses one of nation's permanent collections and consequently attracts a huge volume of UK and overseas visitors throughout the year whose needs are serviced by a generous supply of toilet facilities including the recent addition of a Changing Places Toilet.

(e) NHS premises

The Queen Elizabeth Hospital is now the only inpatient NHS facility since the closure of Greenwich's former stock of neighbourhood-based hospitals such as the Brook, Greenwich District, Royal Herbert, St Nicholas and the Miller over the past 50 years. Its four banks of toilets are spread over several floors and offer 24-hour open access to patients, visitors and the hospital's night shift staff.

It is surprising that not one of the Lewisham and Greenwich NHS Trust or Oxleas sites, the Queen Elizabeth Hospital, Memorial or the Eltham Community Hospital harbour a Changing Place's Toilet. A higher percentage of patients attending outpatient appointments, undergoing tests or treatment are more likely to be those living with complex disabilities or long-term chronic conditions in need of specialist toilet facilities. The author is not aware that either Trust lodged a bid for the £500,000 worth of ring-fenced funding offered by the Department of Health and Social Care for the installation of sixteen Changing Places toilets or applied for some of the current £1.5 million funding streams. This extra funding would also have helped increase the number of onsite baby-change facilities to supplement the only one currently available to visiting mothers at the Queen Elizabeth Hospital. The author understands that initial on-going discussions are underway between representatives from the Public Health and Wellbeing Directorate and Senior Trust Executives responsible for hospital sites..

None of Greenwich's 35 GP practices or Health Centres feature in the Directory given their onsite toilets tend to be strictly reserved for the exclusive use of their patients. As we move towards locality-based primary care networks (PCNs) and the further amalgamation of practices, new multipurpose one-stop health centres will gradually come on stream to house them and other health professionals such as dentists, pharmacists, community-based Physiotherapists and Occupational Therapists. Their toilet facilities will hopefully prove more accessible for the use and

benefit of the local community and under new building regulations, incorporate a Changing Places Toilet.

2019 Recommendations and current work undertaken in their delivery

The 2019 recommendations (see shaded below) aimed to present a range of practical low-cost/no cost solutions, some already road-tested (Appendix C) by neighbouring local authorities, to improve a cash-strapped RBG's toilet provision. Following the presentation of the report to the then Leader of the Council in February 2019, the Department of Public Health and Wellbeing acknowledged that toilet provision was indeed a public health issue worthy of involvement and sat within their own brief. Action plans were drawn up in March 2019 outlining the phased implementation of each recommendation only to soon stutter to a halt with the arrival of Covid in March 2020 and other priorities that took precedence including staff shortages and the resettlement of Afghan refugees. Work between the author and allocated officer has only recently resumed so many of the original recommendations are still outstanding but the publication of the London Assembly's Toilet report in November 2021 has added an extra sense of urgency and authority since many of their recommendations echo those contained in our original report. Postscripts have been added to each recommendation summarising the work undertaken since 2019 or in the process of being so.

*That an adequate supply of easily-accessed toilets is **a key Public Health issue** and needs to be owned as such by the Local Authority, NHS Greenwich and other stakeholders tasked with the health and wellbeing of Greenwich residents and **requires an integrated and inter-agency approach adopted**. This issue affects not just Greenwich's increasingly frail older population and those with chronic health conditions requiring instant access to toilet facilities but outside workers, visitors and mothers with young children. It is as equally important in any civilised community as waste collection, upkeep of roads and highways and streetlighting in the maintenance of a communities' health and should not be allowed to languish at the bottom of an agenda of priorities just because it lacks the status of a 'statutory duty'.

The Department of Public Health and Wellbeing was best placed to inherit the lead role in delivering the recommendations as it naturally fitted into their pre-existing area of interests, expertise and close contacts across RBG's departments and key stakeholders in the wider health and social care economy. The project has been allocated to one of their officers who co-produce the work in tandem with the report's author.

*That given the identified 91 banks of toilets (Appendix D) currently available across the borough's retail outlets, entertainment venues, various buildings and transport hubs across the borough, **there appears to be no need for RBG to launch its own Community Toilet Scheme** not that the Director of Regeneration, Skills and resources had any current plans to do so.

*That the time and resources that would have been required to set up a Community Toilet Scheme be better spent ensuring that **‘accessible’ information about existing provision is widely disseminated throughout the community particularly amongst under-served communities**. By accessible, written in plain English accompanied by pictograms for easy comprehension, in a variety of formats and not exclusively online. It is easy to forget that significant cohorts, often those in greatest need, are still dependent on printed, hard copy information and lack the necessary IT skills and equipment. Drawing on other borough’s practice, the project’s **ward-based Toilet Directory** with details on entry costs, potential obstacles, address, if a radar key required, opening hours and if baby-change and disabled facilities, could be presented and available on different platforms

- ❖ Posted on the RBG website or Community Directory to be downloaded by an individual at home or on their behalf at libraries, voluntary groups, health or social care practitioners. It could also include water refill stations at a later stage.
- ❖ A printed hard copy version of the directory similar to Lewisham’s designed for residents who lack the requisite IT skills to go online, download information or afford a broadband connection or printer. These portable reference leaflets could be readily available from community hubs, large retail outlets, GP surgeries and pharmacies and perhaps large commercial and retail organisations might also be persuaded to underwrite any printing costs involved.
- ❖ Interactive ward maps posted on both the CCG or RBG websites that plots the location of each listed toilet which if clicked reveals a drop-down menu of directory information. The individual ward maps could be grouped into larger areas coterminous with the six new PCNs (Primary Care Networks) of Blackheath and Charlton, Eltham Health, Unity, Greenwich West, Heritage and Riverview Health.
- ❖ Directions on the RBG or Community directory websites on how to obtain a radar key or a ‘just can’t wait’ card.

Despite the London Assembly’s endorsement of Community Toilet schemes (recommendation 2), many boroughs are abandoning their schemes due to the high costs of administering them, monitoring provision and payments made to the participating companies.

RBGs toilet provision is already well served in terms of raw number but they tend to be clustered in retail and tourist areas whilst certain wards have no facilities whatsoever so the Mayors of London’s advice (recommendation 3) to approach High Street retailers and businesses to open up their facilities to the public does not really apply. What we in Greenwich should be doing is targeting our approaches, should we decide to go down the route of adopting a Community Toilet scheme, to business within these areas. The online version of the toilet map is up and running on the Livewell site and the hard copy map at the design stage with possible key distribution points identified.

*That the task **of ongoing maintenance and annual updating of the toilet directory be outsourced**, possibly in return for a small grant, to one of the Greenwich-based organisations such as CACT, Live Well Greenwich or Healthwatch.

*That volunteers keen to actively participate in community projects **be recruited as ‘ward or community champions’ or ‘mystery shoppers’** to register the opening and closure of new toilets, monitor standards, log any outstanding repairs requiring attention and rate their user-friendliness feeding back to a central point for action and who would notify the local ward councillor concerned. In fact, **local councillors should regularly undertake ‘family**

friendly' checks of toilets within their ward to see if they would be prepared to recommend their use to their own children and partners.

Plans to recruit and train a taskforce of volunteers, Community Champions is underway whose role will be to assume all future responsibility for the annual toilet audit and upkeep of the Directory, monitoring standards in the guise of 'mystery shoppers' and report their concerns back to the appropriate department for action with copies forwarded to the ward councillor concerned.

Livewell have also recently uploaded the Toilet Directory onto their site and a 'hard copy', A3 fold-up reference map for those not on line currently at the design stage with a view to publication in late September. The map will feature all public and private toilets along with the location of water points and green spaces across the borough's 22 new wards. Supplies of the map will be available at community hubs, libraries, health centres and larger retail outlets. A short article announcing the launch of the map and the reasons for its commission will ideally appear in local newspapers such as the News Shopper and in the fortnightly Greenwich Information that reaches the majority of Greenwich residents either online or in a printed format. Other agencies such as Healthwatch, the Greenwich Carers Centre, Dementia Alliance and Bromley and Greenwich's Age-UK might also be willing to host the map on their own websites.

*That discrete sections of the existing Toilet Directory such as the borough's private and public disabled toilet provision be handed over to coalitions of disabled service-users to create a **more nuanced and disabled-specific survey** in the future and ensure that the borough's toilets would meet accessibility standards and if not, brought to the attention of the provider concerned. Similarly, groups of parents with young children may be interested in adding **'qualitative' information on baby-change facilities** and the directory distributed by Midwives and Health Visitors to new or expectant mothers.

As far as I am aware, the 2019 Toilet Directory and the usefulness of its information has not been shared as yet with either local groups representing the Greenwich's Disabled community or local branches of charities addressing chronic bowel and bladder conditions. As a closer alliance is highlighted in (recommendation12) the London Assembly's report perhaps a workshop could be staged with representatives of Metro Gav, BIG, the Dementia Alliance and DEPAC along with the Cabinet member for 'Health and Adult Social Care' and NHS health professionals working with service-users in primary and secondary health care settings.

The opportunity in areas undergoing major transformation to import new directional street signage that carries information on the nearest disabled toilets and baby-change facilities should be seized. I understand that the responsible officer in Public Health is investigating potential funding streams and liaising with the appropriate RBG department to see if it is feasible.

That the next iteration of the toilet directory, provided there is an appetite to repeat the mapping exercise every few years, should ideally include more detailed information in respect to levels of illumination, hooks on the backs of doors, dispensing machines for sanitary ware and contraception, if supplies of soap and toilet paper replenished and if bins used for dirty pads and nappies appear to be regularly emptied. Once an agreement is reached engage with about what constitutes 'minimal acceptable standards' of cleanliness and levels of hygiene perhaps a 'qualitative' traffic light scoring system could be introduced.

The recording frame has recently been updated to include prompts for toilet champions to log extra useful information i.e., hooks on doors, illumination levels, bins in men's toilets,

adequate supplies of toilet paper and soap so that the information can be forwarded onto the appropriate department to remedy.

*That the local authority perhaps to devise more creative and innovative funding initiatives to help defray maintenance, repairs and policing costs for its stock of toilet facilities. If core, ring-fenced funding fails to materialise from central government or City Hall then perhaps Greenwich-based commercial organisations or retailers could be persuaded to 'Adopt a loo' by inducements in the shape of partial relief on business rates, tax incentives or free advertising in borough publications. Alternatively, a tourist toilet tax could be levied or a toilet lottery scheme introduced.

Extra ring-fenced funding has been provided by the Department of Local Government and Communities to increase the number of Changing Places Toilets available. Recommendation 1 and 4 of the London Assembly's '**The Toilet Paper**' (November 2021) calls for both central government funding to Local authorities to fund the move towards an accessible and adequate supply of public toilets as a 'statutory duty' but also a move towards greater involvement with prospective commercial in borough partners to explore innovative ideas and practice. This issue will feature prominently on the agenda of the forthcoming stakeholder's event in October 2022 organised by the Public Health team. Once the 'Toilet Working Party' is established, one of its primary aims may be to engage more closely with Greenwich's local business and commercial community to test out their willingness to allow wider access to their own facilities or else 'adopt' responsibility for the maintenance of a local public toilet in return for free advertising or other inducements short of a fee.

*That **RBG produces an annual Toilet Strategy even though there is no statutory duty on it to do so** unlike as in Wales ('Public Health (Wales) Act' 2017 s.8). Incontinence is a protected characteristic under the Equalities Act 2010 and public bodies in the borough such as hospitals, the local authority and publicly-funded service providers have a duty, the Public Sector Equality Duty (PSED) to consider how their decisions and policies affect people with different protected characteristics which could include adequate access to community provision. Undertaking an annual toilet strategy would help in the formation of a clear overview and lead to a coherent policy and hopefully seamless service in conjunction with Public Health Greenwich and other key stakeholders within Greenwich's health and social care economy. The Welsh Statutory Guidance June 2018 refers to both municipal public conveniences and those in private ownership <https://gov.wales/sites/default/files/consultations/2018-02/180110guidanceen.pdf> and places a duty on each of their local authorities to collect details on;

Some elements of the information required has been already partly supplied by the toilet directory in terms of a comprehensive list of municipal and private toilet facilities mapped by location for easy identification of uneven spread of provision and gaps that need to be addressed and can consequently delivers a base for RBG to build upon

Welsh Statutory Guidance

- ❖ Identifying areas where there is limited provision.
- ❖ Stated plans on how and by what means the Local Authority intends to meet those gaps in provision.
- ❖ Review and publish the toilet strategy annually with updates and revisions.
- ❖ An annual statement of progress.

Our recommendation that adequate toilet provision becomes a statutory duty and that each authority is duty bound to develop both a toilet strategy and undertake an annual audit is echoed in the London Assembly's Health Committee report (recommendation 1).

The Public Health and Wellbeing team intend to hold a Toilet Event in October 2022 bringing together key

stakeholders to discuss the recommendations in the report and implication for their own department. Likely invitees will include representatives from Planning, PEOS, Regeneration, Environmental crime, Business and Town Centres Capital projects and Property Maintenance, Community Safety and corporate communication's team along with representatives from Lewisham and Greenwich NHS Trust and Oxleas.

A small working party, the **Toilet plan development group** will hopefully emerge after the event to devise a workable RBG toilet strategy and plan of action.

That the ultimate authority and responsibility for decision-making and scrutiny regarding toilet provision sits within one department of RBG. Although currently situated under the umbrella of the Directorate of Communities and Environment, responsibility is spread between three different departments, Waste Management, PEOS (Parks, Estates and Open Spaces), Greenwich Leisure (Better) making it nigh on impossible for an 'outsider' as well as RBG telephone receptionists and Customer Service Officers to find a spokesperson to refer to. The RBG website and community directory also lacks any information apart from a phone number to report a dirty toilet or its need for repair. To the uninitiated, it seems that the whole area of municipal toilet provision has been overlooked and relegated to the bottom of the list of financial pro priorities given its non-statutory status.

Rather than just providing a phone number on the website, a more authoritative and robust **'reporting problems' service** is required where screenshots of toilets requiring repair, cleaning and restocking can be uploaded along with broken pavements liable to pose a trip hazard and forwarded to the appropriate section for action and raised with ward councillor concerned. Details about the improved service will need to be advertised not exclusively posted on the RBG or Livewell website but also in the Greenwich Information paper distributed both online and in printed format.

That a named senior manager be appointed, responsible for the coordinating policy between different departments, establishing communication channels with fellow stakeholders within Greenwich's health and social care economy, reporting to the responsible cabinet member concerned, ensuring that the toilet database is maintained with the help of a voluntary agency and that a system for monitoring standards is in place and accessible information effectively disseminated throughout the community

A designated senior officer with the requisite authority to work across and implement policy within directorates is vital if we are serious about moving forward with the implementation of a borough-wide toilet strategy and seeding our recommendations.

That RBG insists on the inclusion of publicly-accessible toilet facilities as **an integral element in any Local Plan or planning application pertaining to a large-scale urban regeneration scheme**. Toilets are as vital a community benefit as children's play areas, green

spaces and seating specified within s.106 agreements and RBG as a key partner alongside private developers, might have been expected to be more forward-thinking and embraced the recommendations contained in the WHO's Global 'Age-Friendly Cities' report.

As stated earlier, profound changes to national building regulations in respect to mandatory provision of CPTs became operational at the end of June 2022 but I am unaware of any liaison with RBG's Planning Department since 2019 over the provision of accessible public toilet provision within any application for planning permission. The department, as one of the key stakeholders, will be represented at the Toilet Event in October and hopefully consider our recommendations for this essential amenity to be embedded in any future planning applications for large scale housing developments in the borough.

***That council leases or contracts relating to outsourced services or RBG premises** open to the public for social or recreational use must include clauses specifying both the provision of accessible toilets and existence of a monitoring system to ensure that the terms of the lease are being adhered to and agreed levels and standard of services delivered. The author was unable to gain sight of any internal documentation on the grounds of commercial confidentiality.

To my knowledge, no approach has yet been undertaken with RBG's legal section in respect to leases on RBG properties rented out to private operators and how the terms of the lease are monitored for compliance although any move towards a greater degree of transparency would be applauded by residents.

Just a few riders.

Occasionally, an 'outsider' with lived experience can offer a fresh perspective on issues of importance so hopefully this report, data and accompanying suggestions will serve as a useful starting point for a wider conversation about the borough's future toilet provision. In my opinion, the keys areas for action would be an annual community toilet strategy and the appointment of a dedicated senior manager responsible for driving change and working across not only the number of directorates involved but in partnership with our health and voluntary sector colleagues.

This project was not designed to be a sophisticated piece of research accompanied by impressive statistics but rather one written for a wider audience that includes service-users as well as NHS and RBG officers. It was undertaken at no cost apart from the time and effort donated by the author and volunteers for the 'greater community good'. Some observations may appear harsh but it is written in the spirit of a 'critical friend' and faithfully reflects widely-held views expressed at various national, regional and local user-group meetings.

Some items of information may already on publication prove inaccurate or out of date but each listed toilet has been personally visited and all other information harvested from official websites within the public domain. Requests in 2019 for a face-to-face meeting with a responsible RBG officer proved fruitless so detailed information about where responsibilities for the borough's toilet provision and upkeep lay within the RBG's organisational structure remains somewhat of a mystery.

Jane Hopkins – August 2022.

Jane Hopkins is a blind Greenwich resident in her mid-70s, a committed social activist and former Senior Psychiatric (Forensic) Social Worker with SLAM. Since retirement, she has sat on a number of NHS Pan-London, local CCG and RBG Directorate of Health and Care committees, Task and Finish groups and working parties. She also acts as a lay research

advisor to the Department of Primary Care and Population Health Research Unit at UCL PRIMENT and HSCWRU (Health and Social Care Workforce Research Unit) at Kings College and co-authored a number of published research articles. She is also a founder member of the Royal College of Art's Helen Hamlyn Centre for Inclusive Design, 'Age and Ability Lab'.

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- **The provision of public toilets in Wales - Local Toilet Strategy Guidance** June 2018 (Welsh Government document)
- **Changing Places Fund prospectus (July 2021)** Department of Housing, Communities and Local Government
- **The Toilet Paper-London Assembly Health Committees\ improving public toilet provision in London** Assembly November 2021.

Acknowledgements – With grateful thanks to all below for their time and dedication

- Our original (2019) team of fieldwork volunteers recruited from the Greenwich Pensioners Forum, U3A South-East London branch (University of the Third Age) and personal friends of the author.
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- Toby Green (Royal Society of Public Health)
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- Howard Lock, Interim Head of Property, Directorate of Regeneration, Enterprise and Skills (RBG) for his email and phone call

Appendices

Appendix A - Current list and information on directly-maintained RBG public conveniences (source: RBG website)

Avery Hill Park, Eltham SE9 2PQ	Daylight hours	None	Disabled out of Order awaiting RBG repairs	Café responsible for daily opening, clean under the terms of their lease. RBG responsible for refurbish and repair		
Batley Park, Charlton Road SE3 7LU	24 hours	50p (free with R/K)	Disabled access	APC (Automatic Public Convenience)		
Beresford Square, Woolwich SE18 6AY	7am to 7pm	No	Baby changing,			
	Daylight hours	No	Disabled access	No cover (opening and closing) outside of ranger's working hours		
Charlton Park Charlton Park Road SE7	Daylight hours	No	Café	Café responsible for daily opening, clean under the terms of their lease. RBG responsible for refurbish and repair		
Cutty Sark Gardens, Greenwich SE10 9HT	24 hours	50p	Disabled access (free with R/K)	APC (Automatic Public Convenience)		
East Greenwich Pleasance, Chevening Road SE10 0LB	Daylight hours	None	Café	Café responsible for daily opening, clean under the terms of their lease. RBG responsible for refurbish and repair		
Eltham Park south Glenesk Road SE9 1AN	Daylight hours*	None	Disabled toilet out of order awaiting repair	Café responsible for daily opening, clean under the terms of their lease. RBG responsible for refurbish and repair		
The Ferry, Woolwich SE18 6DL	7am to 7pm	None	Disabled access	Closed for refurbishment		
Herbert Road, Plumstead SE183TB	7am to 7pm	None	Disabled access			
Knee Hill, Abbey Wood SE2	7am to 7pm	None	Disabled access			
Southwood Road, New Eltham SE9 3QT	24 hours	50p free R/K	Disabled access (free)	APC (Automatic Public Convenience)		
Oxleas Woods Crown Woods Road SE18 4LX	Daylight hours	None	B/C disabled access,	Café owner's responsibility to open up toilets on a daily basis and keep them clean		

				under the terms of their lease but RBG responsibility to refurbish and repair Café - Only accessible when café owner decides to open.	
Rodmere Street (disabled only), Greenwich SE10 9EF	7am to 7pm	None	Disabled access		
Vincent Road, Woolwich SE18 6RF	7am to 7pm	None	B/C disabled access		
Well Hall Pleasance, Eltham SE9 6SZ	7am to 7pm	None	Disabled access	Male and Female toilets locked although supposed to be open from 7am-7pm (Disabled open with R/K)	
William Barefoot Drive, SE9 3AY	7am to 7pm	None	Disabled access		
The Board, Board Street, SE10				Leased out to tenant	

Appendix B

The Toilet Paper: The London Assembly Health Committee's three principles for improving public toilet provision in London - London Assembly Health Committee November 2021 - Seven Recommendations

Recommendation 1 - The government should make the provision of public toilets a statutory duty for local authorities, and the Mayor should be leading on this issue for London, lobbying with London Councils for the provision of ringfenced funding to enable this to be achieved.

Recommendation 2 - The Mayor and London Councils should provide an opportunity for local authorities to share best practice on their community toilet schemes, including how to run them successfully and how to ensure that information and directions about such schemes are clear, consistent and accessible.

Recommendation 3 - The Mayor should engage with large businesses and retail chains on the high street, to encourage them to open their toilets to the public and advertise that they are doing so.

Recommendation 4 - To make current public toilets more financially viable, and to stimulate provision of new public toilets, the Mayor should convene local authorities and prospective commercial partners to explore innovative practice with regards to advertising and broader commercial opportunities in public toilets.

Recommendation 5 - TfL should share, in a public forum, the results of their current review of toilet provision across the network and any actions that will be taken as a result of the findings.

Recommendation 6 - TfL should create an action plan for how they will enable the wider public, not just paying passengers, to access toilets situated behind the barrier in stations.

Recommendation 7 - The Mayor, local authorities and TfL should all improve the quantity and quality of information on how to find the types of publicly accessible toilets that Londoners require, with the information provided in a range of formats that suit the diverse needs of Londoners. The Toilet Paper: The London Assembly Health Committee's three principles for improving public toilet provision in London - London Assembly Health Committee November 2021

Recommendation 8 - TfL should add an easy-to-find toilet map on their TfL Go app, ensure it is available in accessible formats and contains accurate data on facilities and opening times.

Recommendation 9 - TfL should meet with disability charities including Crohn's and Colitis UK, and Changing Places, to review their provision for people with disabilities and people with long-term health conditions and join the "not every disability is visible" campaign.

Recommendation 10 - Each local authority should produce a toilet strategy based on population need and current provision.

Recommendation 11 - Using the principles of the Health Inequalities Strategy, the Mayor should review the health inequalities implications of current public toilet provision in London, and use that analysis to help drive improvements in provision with partner organisations.

Recommendation 12 - The Mayor and London Councils should work with local authorities to review the quality of accessible toilets to ensure they are genuinely accessible for Londoners with all disabilities..

Appendix C - Learning from neighbouring boroughs

There is never any justification for 'reinventing the wheel' so we investigated strategies adopted by five neighbouring South-East London boroughs (Bexley, Bromley, Southwark, Lambeth and Lewisham) to improve their access and range of toilet facilities and identify any low cost/no cost examples of 'best practice' that RBG could usefully import. The inner London ones shared a similar demographic profile in terms of diversity of faiths, ethnicity, cultures, gender and age as RBG with high levels of deprivation coexisting alongside areas of great affluence as well as high volumes of tourists and visitors but all laboured under the same financial constraints. Details of the Royal Borough of Richmond's Community Toilet Scheme was also included as it is often cited as the blueprint for all Community Toilet schemes.

Some boroughs already operated their own version of a Community Toilet Scheme or on the point of trailing one. Local businesses, shops or food outlets willing to allow open access to their toilet facilities were recruited and identified by a window sticker in return for free advertising on council's websites, publications or an annual financial inducement to cover any extra costs incurred in cleaning or public insurance liability. This size of the 'incentive' varied according to the range and sophistication of facilities provided but tended to be pegged between £500 to £1000 per annum and was designed to cover any extra cleaning, supplied and maintained and submitting themselves to a quarterly inspection sometimes on an ad hoc basis. However, some boroughs have since abandoned their community toilet schemes due to the cost of the annual 'inducement' coupled with the resources required to administer the schemes and regularly monitor the facilities.

A few of the more IT-literate volunteers undertook a 'mystery shopping' expedition to see how easily these council's websites could be navigated and information retrieved. All the information reviewed below is in the public domain and currently posted on council websites

although there is no way of telling if the information was incorrect or out-of-date. All the information was exclusively online with the exception of Lewisham and consequently inaccessible to significant sections of the population who lacked the requisite IT skills, could afford a broadband connection or a computer, tablet or smartphone or retained the physical ability and dexterity to operate the devices.

Southwark

Southwark's website was by far the most user-friendly and easiest to navigate when searching for information on toilet provision and included a 'listen' button, text to speech, to meet the needs of visually-impaired visitors.

It offered a comprehensive downloadable directory of all 33 public conveniences within the borough broken down by five areas (covering 23 wards). Each entry contained information on their location, cost, opening times and level of facilities identified by four icons denoting men's and women's toilets, changing places toilets, disabled and baby-change. The list included public toilets based in municipal premises such as cemeteries, libraries and leisure centres as well as NHS sites, mainline stations and larger branches of supermarket chains. An interactive google map was also available that pinpointed the position of each toilet with an icon which when clicked revealed an information menu.

Southwark's part-time dedicated toilet project officer based in the Highways division has undertaken a cross-borough public consultation involving representatives of key community groups and service-users both on line and in face-to-face meetings to capture feedback on the state of the borough's public toilet provision, how it could be improved and views about the introduction of a Community Toilet Scheme. As a result of the 466 responses, Southwark launched its own Community Toilet Scheme in 2020 targeting businesses and outlets in areas that had scant provision. Large organisations were not offered a financial 'inducement' as their involvement was deemed to be part of their own community outreach programme but smaller enterprises could be entitled to a small dividend to cover extra duties involved. Details regarding participation and advantages to be gained was circulated within the annual business rate letter. Participants initially signed up for a trial period but reserved the right to deny access to individuals likely to create a disturbance or damage to the premises or under the influence of drugs and alcohol. Services provided were to be regularly monitored and gaps in provision identified.

Lambeth

The Lambeth website lacked any comprehensive list of public conveniences available within its own council-run libraries, parks or cemeteries or even in other commercial premises such as local cinemas, entertainment venues, large supermarkets, NHS premises or stations. Even a search of individual premises such as libraries revealed little information and it appears that there is not toilet provision at all in any of Lambeth's cemeteries or crematoria. The website instead signposts those in need to search on the Great British Toilet Map which is fine if the person was online and not digitally-challenged. The 'Great British Public Toilet Map' and various other apps (FLUSH) are not always helpful as the information is often incomplete or limited, lacking details on key problematic areas such as steps.

Lambeth operates its own Community Toilet Scheme but the only information about the 17 participants, local businesses, food outlets and offices, was only to be found on an Excel database on the council website that listed their address, area and opening hours but no important information on the level of disabled provision, baby-change facilities, charge or barriers to access. An FOI request in March 2016 revealed that participants were paid up to £1000 annually (21 participants at the time) and subject to quarterly inspections and ad-hoc

visits. The service is advertised via a window sticker denoting the level of facilities on offer. According to the Excel spreadsheet the current recruits do not appear to be evenly spread throughout the borough and tend to cluster around areas of high footfall such as Brixton, Waterloo and Vauxhall.

Lewisham

Lewisham council has outsourced its administration of its Community Toilet Scheme to 'Lewisham Local', a not-for-profit enterprise that encourages individuals, local businesses, cafes and organisations within the borough to donate their time, skills and money towards local good causes. It hosts a user-friendly information page on Community Toilet Scheme on its own website.

Recruits to the scheme offer open access to the general public to use their toilet facilities and display one of four different stickers that corresponds most closely to the range of facilities on offer in a prominent position. In return, they are given a financial 'incentive', generally in the region of £500 depending on the level of facilities. As part of the contract, they must be covered by public liability insurance but retain the right to refuse entry to customers displaying anti-social or threatening behaviour although not permitted to discriminate. The standard of service provided is monitored on regular basis but also subject to 'mystery shopping expeditions' undertaken by volunteers from local user groups. Its website also refers viewers to the Flush Toilet app and Great British Public Toilet Map whose shortcomings have been discussed earlier.

The Lewisham scheme is the only one to offer a hard-copy version in the form of a leaflet listing fifty toilets broken down into 14 areas (18 wards) alphabetically. The list includes commercial enterprises and retail outlets participating in the Community Toilet Scheme along with other providers including council-run services such as libraries and parks, museums. The leaflet is cheap to print and freely available throughout the borough's libraries, GP surgeries, health and community centres.

Bexley

Bexley's website is far easier to navigate than two years ago. The website still features an interactive section inviting entry of a postcode or address to flag up areas needing council attention in terms of cleanliness, repairs, damage with text and or a photo. There is still only a single list of the nine municipal toilets based in parks, libraries and the borough four cemeteries and no mention of a Community Toilet Scheme in operation or plans to launch one. However, a very useful section has now been added giving an explanation and carrying a detailed picture of a Changing Places Toilet with a link to the organisation itself should anyone wish to hire a mobile CPT for an event. Detailed information on where to purchase a Radar Key was also included.

Bromley

Ten years ago, Bromley closed a number of its public conveniences often in the face of strong local opposition and accusations of the council depriving them of a 'valued community asset'. A few groups even explored the possibility of purchasing the redundant sites with view to managing them as a community project.

Bromley currently runs its own Community Toilet Scheme across its 22 wards recruiting local businesses, offices, food and retail outlets to allow unrestricted use by the general public of their facilities during opening hours. In return, they receive an annual 'incentive' of up to £1000 to cover the extra expenses incurred in terms of cleaning and maintenance. The participating enterprises are expected to maintain a high standard of cleanliness and hygiene,

provide clear signage as to where the toilet is located within the premises to avoid the need to ask for directions and ensure that non-customers are not challenged on entry. The venues display a distinctive sticker in their window advertising the service with street furniture carrying finger signs pointing in their direction.

Information on the 40 toilets in the Community Toilet Scheme and 18 toilets in council-run premises used to be displayed in two ways on their website;

- a) An A-Z list of toilets which if selected displays an interactive area map that pinpoints each toilet's position accompanied by details on its address, opening hours and facilities on offer (male, female, baby-change and disabled) but no warnings about potential obstacles to access, need for a Radar Key or charge.
- b) A purely alphabetical list accompanied by the same information.

However, it seems as if you can no longer view the toilet locator map unless you possess a 'My Bromley Account' number. Even the Better list of Bromley's libraries carried no information on regular or disabled toilet provision.

Royal Borough of Richmond

Richmond's website is very clear and informative. Their Community Toilet scheme includes 50 (2022) participating enterprises who receive a "payment graduated according to the facilities such as disabled access or baby-change provided and their opening hours with a minimum of £600 rising to a maximum of £1,200 (plus VAT) per annum paid in quarterly instalments". Only 50% of their Community Toilet participants offer wheelchair accessible toilets and 25% baby change facilities. This fee is meant to cover any additional costs incurred in return for enabling open access to their toilet facilities and displaying one of four different stickers in a prominent position and participants retain the right to refuse entry in exceptional circumstances. Street signage also indicates the name and direction of participating businesses.

Richmond's website enables you to browse the available toilets provided by local enterprises involved in the Community Toilet Scheme along with those in premises managed by the council by either;

- a) an interactive map for each of fourteen areas with an icon representing each toilet which if selected displays further key information i.e., full address, opening times, days and range of facilities.
- b) An alphabetical list to download for each of the fourteen areas (eighteen wards) with information that correspond to the map.

The website also hosts a further list of the eight borough libraries that all offer unrestricted access to their toilets along with details on their location, opening hours and level of facilities. Richmond also imposes an £80 fixed penalty for fouling or street urination.

Appendix D

Directory of public and private Toilet provision within the Royal Borough of Greenwich by ward (revised in 2022)



RK - Radar Key





APC - Automated Public Convenience







RBG - Royal Borough of Greenwich







PEOS -Parks, Estates and Open Spaces






GLL-Greenwich Leisure Ltd (Better)






RBG RES -Regeneration, Enterprise and Skills















Ward Area	Address	Facilities	Opening times	Cost	Additional Information
Abbey Wood	Abbey Wood Station, Wilton Road SE2 9RH	 M (N/K) F (x2) Radar Key required Key to baby change room from ticket office	6am -past midnight	Free	-P/T staffing Toilets beyond the ticket barrier so need a platform ticket or use of concessionary pass
	Bostall Heath Woods, Bostall Hill, SE2	 M (N/K) F x3 Radar Key required	Dictated by ranger's days of work -often closed on Fridays and Saturdays	Free	RBG (PEOS)
	Sainsburys superstore 1 st Floor. Harold Manor Way SE2 9NU	 M (N/K) Fx3 Separate baby change room	Mon-Sat-7-10pm Sun 11-5pm	Free	1 st Floor reached by lift, stairs or traveller
	Knee Hill		7am-7pm	Free	RBG Street Services






	Abbey Wood SE2 OYS				Cleaning to GS Plus Maintenance RES
Blackheath and West-combe	Batley Park Blackheath Standard SE3		24 hours	50p free to RK holders	Automatic Gender Neutral all in one
	Mycenae House, G/F Floor, 90 Mycenae Road SE3 7SE	 Fx1, Mx1 and 1x Disabled	Mon-Fri 9am-10pm Sat 9am-5pm	Free	Managed by Vanburgh Community Association under contract to RBG
	Mycenae House 1 st Floor 90 Mycenae Road SE3 7SE	 Fx2x, Mx 3 urinals and 2x cubicles	Mon-Fri 9am-10pm Sat 9am-5pm	Free	No lift – 22 Steps Managed by Vanbrugh Community Association under contract to RBG
	Mycenae House, Basement, 90 Mycenae Road SE3 7SE	 Fx3, M (N/K)	Mon-Fri 9am-10pm Sat 9am-5pm Closed Sundays	Free	No lift – 19 steps Managed by Vanburgh Community Association under contract to RBG
	Blackheath Library, Old Dover Road SE3 7BT	 1x Gender-neutral toilet	Mon 10-7pm Tues/W/F9-5.30 Thur 9-7pm Sat 9-5pm	Free	RBG Greenwich Leisure Ltd (Better)
	West-combe Park Station Plat 1	 Radar key required	6am-1pm	Free	Station only manned P/T basis.







	Station Crescent SE3 7EQ				Access to toilet via a buzzer linked into ticket of- fice.
Charlton Hornfair	None				
Charlton Village and River- side	Charlton House, Charlton Road SE7 8RE	 Mx1 (x2 and urinals) Fx1 (x4) Disabled x1	Mon- Sat 9-10pm Sun 9.30am- 7pm	Free	Royal Greenwich Heritage Trust
	Charlton Cemetery, Cemetery Lane SE7 DZ	 x1 Gender Neutral toilet	9am-4pm Winter. 9am-7pm Summer	Free	RBG (PEOS) Ramp up to toilet door
	Charlton Station,1 Charlton Church Lane SE7 7QG Plat- form 1	 M x1 F x1 Radar Key required	Station fully staffed 6am-8pm	Free	-No need to go through the barriers to get to toilet Lift to plat- form
	Charlton Park nr. Café, Charlton Park Road, SE7	 Mx1 Fx2 Baby change in Disabled toilet	Park clos- ing time	Free	RBG (PEOS) leased out
	Maryon Wilson Park Thorntree Road, SE7 8DH	 Mx1 (N/K) - Fx1 (x2) Separate Disabled - R/K required	Early-4pm winter Early-9pm in summer	Free	RBG (PEOS)
	Greenwich Carers Centre Café, The Stables, Hornfair Rd SE7 7BD	 1x disabled toilet 1x F (x3) 1x M (?)		Free	Carers Centre







East Greenwich	East Greenwich Pleasance, next to café, Chevening Road SE10	 2x unisex disabled toilets both with baby change facilities	8.30 to 5pm (dependent on daylight hours of park being open)	Free	RBG (PEOS) Leased to café owner
	East Greenwich Library, Ground Floor 1, 2 Lambarde Square SE10 9GB	 Mx1 (N/K) - Fx1 (x5). Disabled R/K required. Baby change Separate room with sink, changing table and chair	M-Tue 10-6pm Wed 10-8pm TH/Fri-10-6pm Sat 10-5pm Sun 12-4pm	Free	Managed by Better
	Greenwich Forum (formerly Christchurch forum), G/F Trafalgar Road SE10 9EQ	 Mx1 (x1) Fx1 (x2) Changing Places toilet R/K required	Mon 8-10pm T/W/T/F 8-9pm Sat 9-5pm Sun 9-6pm	Free	Registered charity
	Maze Hill Station Platform 1, Tom Smith Close, SE10 9XG	 x1		Free	Gender Neutral
Eltham Page	Well Hall Pleasance 59 Well Hall Road SE9 6SZ	 M1 (N/K)- Locked Fx1 (N/K) - Locked Disabled open with R/K	7am – 7pm Restricted access due to opening hours of Pleasance vary according to daylight hours	Free	RBG (PEOS) All toilets locked apart from Disabled (R/K) 10am on Saturday am. Workers complained but no toilet facilities working hours of







					park -4pm in winter).
Eltham Park and Progress	Eltham Cemetery Crown Woods Way SE9 2RF behind the Pavilion Cafe	 M x (N/K) Fx1 (x2)	9-4pm Winter 9-7pm Summer	Free	RBG (PEOS)
	Eltham Crematorium, Crown Woods Way SE9 2RF	 Mx1 (N/K)	9-4pm Winter 9-7pm Summer	Free	RBG (PEOS)
	Coldharbour Leisure Centre Chapel Farm Road Eltham SE9 3LX	 Separate unisex disabled toilet with baby change. 1x female (4x) 1x male (2x and 3x urinals)	7am-22pm M-F 9am-17.00 S-S	Free	Better
Eltham Town and Avery Hill	Eltham Park South Café, Glensk Road Eltham SE9 1AN	 1x F (x3) 1x M (N/K). 1x Disabled locked and apply for key from café owner (not R/K)	Only opened by café owner 8-4pm but sometimes café not opened up when weather bad	Free	RBG (PEOS) -Café and toilet leased out by RBG -
	Eltham Train Station – Well Hall Road SE9 6SL	 Mx1(N/K) F x1 (x2) Disabled toilet out of order	6am-1am	Free	Toilets beyond ticket barriers (open from 10am onwards). Otherwise 10p platform ticket required-







	Café. Avery Hill Park, Bexley Road SE9	  1x gender neutral 1x Disabled gender neutral	8m- 4pm	Free	RBG (PEOS)
	Sainsburys 1a Philpot path, SE9 5DL	  Mx1 (N/K) Fx1 (2)	M-Sat 7- 10pm Sun 10- 4pm	Free	Baby change in disabled toilet
	Eltham Community Hospital, G/F 30 Passy Place SE9 5DQ	  Mx1(N/K) Fx1(x3)		Free	2x separate rooms for baby- change and moth- ers feeding room with armchair and sink
	Marks and Spencer 115 Eltham High Street SE9 1TQ	  M 1 (N/K) Fx1(x4)	M-F 8- 6.30pm Sat 8am- 6pm Sun 10am- 4pm	Free	Toilets on 1 st Floor accessible by lift or es- calator
	Eltham Centre (Foyer) 2, Archery Road SE9 1HA	  Mx1(x3 urinals) Fx1 (x6)	M/Th 9- 19.00 Tu/W/F 9- 5.30 Sat 9- 17.00 Sun 10-4pm	Free	RBG GLL (Better)
Green- wich Creekside	Old Royal Naval Col- lege Visi- tors Cen- tre, Foun- dation House, 2 Cutty Sark Gardens, SE10 9NN.	  Mx1 (N/K) Fx1 (x10) 1xDisabled toilet contains baby-change. No R/K re- quired	10am-5pm	Free	Managed by ORNC trust
	Cutty Sark Gardens SE10 9HT	 	24 hours	50p Free to RK	APC







				holders	
Greenwich Park	Greenwich Park (Front gates) Charlton Way SE10 8QY		Times of park closure varies throughout the year	20p	Managed by the Royal parks turnstile(payment) entrance with change machine and Water Fountain
	Greenwich Park (Behind Observatory) SE10 8QY		closure hours of the park vary throughout the year	20p	Toilets managed by the Royal parks.
	Greenwich Station (ticket hall) Greenwich High Road SE10 8JQ	 Mx1(N/K) Fx1 (1) combined with disabled toilet	6am to 20.00pm	Free	Southeastern-A disabled male would need to use the combined female/disabled toilet
	Greenwich Park – Children’s Play Area (Maze Hill entrance) SE10 8QY		Playground gates locked (open 10am) times of park closure varies throughout the year	Free	Managed by the Royal Parks
	Picture-house, Mezzanine, 180 Greenwich High Rd, SE10 8NN	 Mx1 (N/K) F x1 (x6)	9am-11pm	Free	Managed by Picture-house 20x steps down to GF 20x steps to 1 st floor







	Picture-house, 1 st Fr, 180 Greenwich High Rd, SE10 8NN	 1x Gender Neutral R/K required	9am-11pm	Free	Managed by Picture-house
	Maritime Museum-G/F by Romney Road SE0 9NF	Changing places toilet Bring your own sling	10am-5pm	Free	
	Maritime Museum-G/F by cafe Romney Road SE0 9NF	 Mx1 (x4) Fx1 (x7) Disabled Baby-change	10am-5pm	Free	
	Maritime Museum - First Floor Romney Road SE10 9NF	 Mx1 (N/K) Fx1 (x3) Disabled. Baby-change in F	10am -5pm	Free	1 st floor with lift
	Greenwich West Library, Greenwich High Rd SE10 8NN	 1x Gender Neutral	Mon2-7pm/Tue 9-5.30pm/W/Sun Closed/Thu 9-7pm Fri 2-5.30pm/Sat 9-5pm	Free	RBG Greenwich Leisure Ltd (Better)
Greenwich Peninsula	Odeon Cinema Foyer Bugsby Way SE10 0J	 Mx1 (N/K) Fx1 (x10) Baby change pad in F Disabled separate No R/K		Free	Toilets off open foyer
	Greenwich North Station 5 Millennium Way, SE10 0PA	 Mx1 (x4) Fx1 (x5) Disabled R/K required	24 hours	Free	TFL









		Baby-change room Key required from ticket office			
	O2 (1 st Floor Icon), Peninsula Square SE10 0DX	 Mx1 (N/K) Fx1 (x8) Separate male and female baby changing rooms .Disabled no R/K required	9am to 3am (depending on the end of the main event)	Free	
	O2- by Cineworld, Peninsula Square SE10 0DX	 Mx1 (x5) Fx1 (x6)	9am to 3am (depending on the end of the main event)	Free	
	NEXT (1 st Floor)- Unit C, Brocklebank Retail Park, Bugsby Way, Charlton SE7 7SE	 1x M (N/K) 1x F (x3) and 1x Disabled with baby change	9am-8pm M-S 11am-5pm Sun	Free	Lift, escalator and stairs to 1 st Floor
	PRIMARK *1 st Floor by café) Brocklebank Retail Park, Bugsby Way, Charlton SE7 7SE	 x2 Gender neutral and 1x separate Baby changing room	9am-8pm M-S 11am-5pm Sun	Free	Lift, escalator and stairs to 1 st Floor
	IKEA 55-57 Busby Way SE10 0QJ (G/F by Bistro cafe)	 2x separate gender-neutral toilets that incorporate disabled facilities	M-F 10-10pm Sat 9-10pm Sun 11-5pm	Free	
	IKEA 55-57 Bugsby Way SE10 0QJ (1 st Floor by restaurant	 Mx1 (N/K) Fx1 (x6) Disabled -No R/K required	M-F 10-10pm Sat 9-10pm Sun 11-5pm	Free	






		Baby change separate room with armchair for nursing mothers			
	IKEA G/F 55-57 Bugsby Way SE10 QJ	 Mx1 (N/K) Fx1 (x11) Disabled x2 No R/K required. Baby change separate room	M-F 10- 10pm Sat 9-10pm Sun 11- 5pm	Free	
	Sainsburys First Floor, 7-11 Gal- lions Road SE7 7SA	 Mx1 (N/K) Fx1 (x4) Disabled-No R/K required Baby change separate room with sink, changing bench and toilet	M-Sat 7- 12am Sun	Free	On First floor reached by lift or stairs
	Marks & Spencer 1 st Floor 1-5 Gallions Road SE7 7SA	 Mx1 (N/K) - Fx1 (x7) Disabled toilet No R/K re- quired Baby-change x2 based in both male and female toi- lets with changing table and sink.	M-Sat 9- 9pm Sun 11.30- 5.30pm	Free	On First floor but accessible via lift, stairs and escalator
	Aldi 2 Pen- insula Park Rd SE7 7FR	 x Gender Neutral all-in- one 1	M-Sat 8m- 10pm Sun 11am-5pm	Free	
	Asda Su- perstore, Bugsby Way SE7 7ST	 Mx1 (N/K) -Fx1 (x4)Disa- bled toilet requires R/K, Baby-change in Disabled toilet	24-hours Sun 11- 5pm	Free	
Kid- brooke with Hornfair	None				
Kid- brooke	Kidbrooke Station		8-22.00 but only if	Free	Southern Region





Village and Sutcliffe	Pegler Square	1x gender neutral disabled toilet	ticket office 'manned'		
	Sutcliffe Park Sports Centre. Eltham Road SE9 5LW	 Mx1 (N/K) Fx1(x2) 1x Disabled	M-F 9- 7pm Sat-Sun 9-5pm	Free	RBG Greenwich Leisure Ltd (Better) Unimpeded access via café.
	Aldi superstore 241 Kidbrooke Park Road SE3 9PP	 x 1 Gender -neutral, all in one.	Mon-Sat8-10pm Sun 10am-4pm	Free	
Middle Park and Hornpark	None				
Mottingham Coldharbour and New Eltham	New Eltham Station (Plat1 Footscray Rd SE9 2AB		6am	Free	Only open if station manned buzz you in. Need travel pass to access platform
	William Barefoot Drive, SE9 3AY	 Mx N/K F(x2) Radar key required	7am-7pm No opening hours displayed	Free	RBG Street Services Cleaning to GS Plus. Maintenance to RES
	Southwood Road by Library SE9 3QT	 1x gender neutral	24-hours	50p free R/K holder	APC
Plumstead common	Slade Café 342 Plumstead Common Rd SE18 2SB	 1x gender neutral disabled with baby change	Closed M-Tue. W-Sun 8.30-3pm	Free	RBG leased out to private operators

	Slade Li- brary Erin- dale SE18 2QQ	 x1Uni- sex	M/Thu 2-7 pm. Tue/F9- 5.30pm/Sat 9-5pmx W/Sun closed	Free	RBG Greenwich Leisure Ltd (Better)
	Woolwich Cemetery Kings High- way SE18 2DS	 Mx1(N/K) Fx1 (x1)	9am-4pm Oct-March 9am-7pm April-Sept	Free	RBG (PEOS)
Plum- stead and Glyndon	Plumstead Centre (1 st F) 232 Plumstead High St.SE18 1JL	 Gender neutral disabled toilet	M-F 6.30- 22 S-S 9-17.00	Free	RBG Greenwich Leisure Ltd (Better) Lift to 1 st floor
	Plumstead Centre (G/F) 232 Plumstead High St.SE18 1JL G/F	 1x Gender neutral (6x) with babychange in one of them	M-F 6.30- 22 S-S 9-17.00	Free	RBG Greenwich Leisure Ltd (Better)
Shooters Hill	Shrews- bury House, Community Centre, Bushmoor Crescent SE18 2AE	 1x Disabled toilet on G/F	9am-10pm	Free	Managed by Shrews- bury House community association
	Oxleas Wood Café, Crown Woods Lane SE18 3JA			Free	RBG (PEOS)
Thames- mead moorings	Aldi Central Way SE28 8DT	 x1	M-Sat 8- 10pm Sun 10- 4pm	Free	Gender Neutral all purpose

	Morrisons 2 Twin Trumps Way SE28 8RD	 Mx1 (N/K) -Fx1 (x3) 1x Disabled (R/K re- quired) 1x Baby-change/Nursing room	M-Sat 7- 11pm Sun 10- 4pm	Free	
	Joyce Dawson Way SE28 8RA	 Mx1 (N/K) -Fx1 (x5) Disabled toilet requires R/K	7am-7pm	Free	RBG main- tained
Woolwich Arsenal	Woolwich Arsenal Station Platform 1, Woolwich New Road SE18 6EU	 Mx1(N/K) F Disabled R/K required Baby Change Separate room but locked (ticket of- fice)		Free	flight of about 20xsteps Step-free access to Toilets on platform I via carpark in Vincent Street also lift down to platform
	Tesco 1st floor by café,, Grand de- pot Road, SE18 6HQ	 1x gender neutral disabled toilet Separate baby change room	24 hours	Free	Access to First Floor by lift, stairs or escalator
	Tesco 1st floor, Grand de- pot Road, SE18 6HQ	 Mx1 (N/K) -Fx1(x4) Disabled 1x No R/K re- quired 1x Baby change/ nursing mothers' room	24 hours	Free	Access to First Floor by lift, stairs or escalator
	Woolwich Library 35 Wellington Street SE18 6HQ	 Mx1 (N/K) - Fx1 (x6) 1xDisabled R/K required	M/Thu 9- 7pm Tue/W 9- .30pm Sat	Free	RBG Greenwich Leisure Ltd (Better)

			Sun 12-4pm		
	Beresford Square SE18 6AY	 Mx1 (x N/K) -Fx1 (x5)	7am-7pm	Free	RBG Street Services. Cleaning to GS Plus. Maintenance to RES
	Woolwich Works, Firework Factory, No 1 Street SE18 6HD G/F by cafe	 1 separate changing places toilet 2x Gender neutral toilets		Free	
	Woolwich Works, Firework Factory, No 1 Street SE18 6HD G/F left of entrance	 x 19 Female X? males  8x Gender neutral	10am onwards,	Free	
	Woolwich Works, Firework Factory, No 1 Street SE18 6HD 1 st Floor via lift	 1x disabled plus shower 		Free	
	Vincent Street SE18 6RL	 Mx1 (N/K) Fx1 (x5) Disabled No R/K required	7am-7pm	Free	RBG Street Services Cleaning to GS Plus Maintenance to RES
	Woolwich Centre 35 Wellington	 Mx1 (x N/K) -Fx1 (x6)	M-F 8.30-5.30pm	Free	

	Street SE18 6HQ	Changing Places Toilet R/K required			
Woolwich Common	Queen Elizabeth Hospital Stadium Road SE18 4QH Lower Corridor	 Mx1(N/K) -Fx1 (X2) 1x Baby change /Nursing room	24 hours	Free	3x separate toilets
	Queen Elizabeth Hospital Stadium Road SE18 4QH Urgent Care Centre	 x1 Gender Neutral all in one	24 hours	Free	
	Queen Elizabeth Hospital Stadium Road SE18 4QH Main concourse	 Mx1 - Fx1 Disabled x 2 (F and gender 1x neutral)	24 hours	Free	4x separate toilets
	Queen Elizabeth Hospital Stadium Road SE18 4QH 1 st Floor next to lifts and Renal Centre	 Mx1 - Fx1 Maxi Disabled x2	24 hours	Free	4x separate toilets
	Queen Elizabeth Hospital Stadium Road SE18 4QH (By restaurant)	 Mx1 (x N/K) -Fx1 (x2)	24 hours	Free	

	Herbert Road SE18 3TB	 Mx1 (N/K) - Fx1 (x3) Disabled requires R/K	7am-7pm	Free	RBG Street Services Cleaning to GS Plus. Maintenance to RES
Woolwich Dockyard	Woolwich Dockyard Station Plat1Belson Road SE18 5JY	 Mx1 (N/K) F (N/K)	6.40-1.20pm not on Sat or Sun.	Free	Access only via ticket office (P/T) door release system. 23x steps to platform no lift
	Clock-house Community Centre LGF, Defiance Walk, SE18 5QL	 Mx1 (N/K) Fx1 (x2) Disabled -requires R?K	M-W 9-6.30pm T-F 9-10.15pm Sat 9-11pm	aFree	Independent charitable company core funding from RBG
	Clock-house (1 st Floor) Community Centre LGF, Defiance Walk, SE18 5QL	 Mx1 (N/K) Fx1 Disabled -requires R/K	M-W 9-6.30pm T-F 9-10.15pm Sat 9-11pm	Free	Independent charitable company core funding from RBG

31.8.22