



**Consultation response**  
**Statutory Guidance for Local Authorities: Local Toilets Strategies**  
**Welsh Government**  
**April 2018**

Age Cymru is the leading national charity working to improve the lives of all older people in Wales. We believe that older people should be able to lead healthy and fulfilled lives, have adequate income, access to high quality services and the opportunity to shape their own future. We seek to provide a strong voice for all older people in Wales and to raise awareness of the issues of importance to them.

**Introduction**

We are pleased to respond to the Welsh Government's consultation about local toilets strategies in Wales. Public toilets and toilets for public use are essential to making communities age friendly and a lack of them can have a debilitating effect on older people, preventing people from accessing key services and increasing loneliness and isolation. Adequate public toilet provision is vital to enable older people to maintain their dignity and participate in community life. The Welsh Senate of Older People's 'P is for People' campaign has raised awareness of the lack of public toilet provision in Wales.<sup>1</sup>

Poor toilet provision and access disproportionately affects some groups including older people and disabled people.<sup>2</sup> As people grow older they are more likely to develop continence issues; in the UK, 1 in 3 women and 1 in 7 men over 65 experience incontinence.<sup>3</sup> Despite the importance of these facilities, public toilets are disappearing from our communities at an alarming rate and we believe that assertive action is needed to halt this decline.

Loneliness and isolation are a daily reality for many older people – 75,000 older people in Wales have reported 'always or often' feeling lonely.<sup>4</sup> Feeling lonely has many detrimental effects on older people, and there is increasing evidence of the

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<sup>1</sup> Welsh Senate of Older People (2012). P is for People. Public toilet provision research.

<sup>2</sup> Welsh Government (2014) Welsh Government White Paper. Listening to you: Your health matters. Consultation on proposal for a Public Health Bill. Number WG20703.

<sup>3</sup> Martin *et al.*, (2006) Systematic Review and Evaluation of Methods of Assessing Urinary Incontinence, Health Technology Assessment.

<sup>4</sup> Age Cymru (2017) No one should have no one: tackling loneliness and isolation in Wales.

[https://www.ageuk.org.uk/global/Age-Cymru/Policy\\_and\\_Campaigns/A4%20WG%20Manifesto%20singleA4%20english.pdf?epslanguage=en-GB-CY?dtrk=true](https://www.ageuk.org.uk/global/Age-Cymru/Policy_and_Campaigns/A4%20WG%20Manifesto%20singleA4%20english.pdf?epslanguage=en-GB-CY?dtrk=true)

negative impacts on physical and mental health. Poor public toilet provision impacts upon many older people as it reduces their ability to remain active and restricts how often, and for how long, they are able to leave their homes. Providing enough clean and accessible public toilets and toilets for public use will increase opportunities for older people to pursue an interest and participate in their communities.

**Question 1: Is the process for consulting, preparing, publishing and reviewing a local toilets strategy clear?**

With reference to the consultation and preparation stages of the development of local toilet strategies, we would emphasise the importance of conducting meaningful engagement with older people in the community at the outset regarding the provision of local toilets, including meeting with groups of older people who will be able to assist in the identification of gaps in provision.

Regarding the publishing and review of local toilets strategies, it is essential that older people can easily access information about the provision of toilet facilities in the community. We believe that such information should be accessible in various formats; many older people are not able to use, or do not have access to the internet, and therefore may not be able to access such information if it is provided online only. Services provided online need to be high quality and easy to use, whilst offline services should be of equal quality and fully accessible. Service providers must ensure that the provision of online information is not to the detriment of the provision of information in other formats.

With reference to the table 'Dataset to be collected for each identified toilet location' we suggest that the full address of the premises is given in addition to the postcode to assist the public in locating the toilet site. We would also emphasise the importance of signage to toilets in the community, including walking distance to the facilities, and we suggest an additional data field in the table with reference to the provision of signage.

Regarding the review process in relation to local toilet strategies, we believe it is important to monitor the effectiveness of the strategy, and provide a mechanism that enables members of the public to provide feedback on the provision of toilet facilities.

**Question 2: Is there enough guidance on longer term thinking to shift the focus towards finding sustainable solutions?**

The number of older people in Wales is growing and we are, on average, expected to live longer. 2014-based National Population Projections for Wales indicate that the number people aged 65 and over is projected to increase by 292,000 (44 per cent) between 2014 and 2039.<sup>5</sup> This provides us with opportunities for the future, but also challenges and it will require changes to the way in which we plan and deliver public

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<sup>5</sup> Welsh Government (2015) 2014-based National Population Projections for Wales. A report, produced by the Office for National Statistics, on trend-based population projections by age and sex. 29 October 2015. <http://gov.wales/statistics-and-research/national-population-projections/?lang=en>

services. The fact that older people make up an increasing section of the population makes it ever more vital that future planning of services reflects their needs.

We believe that planning for, and responding to, demographic change should be a key consideration in the development of local toilet strategies, and that the planning of the provision of toilet facilities should take into account how it will affect people across different stages of the life course of future generations.

We note on page 14 of the consultation document that ‘community toilet schemes previously provided under the former Welsh Government Public Facilities Grant Scheme funding have declined since the funding was transferred to LAs via the Revenue Support Grant’.

We understand that funding for the community toilet scheme when it was transferred to LAs was no longer ring-fenced; it was for each local authority to decide how funding is utilised to deliver the range of services it is responsible for in order to meet the needs and priorities of its communities.<sup>6,7</sup> To help ensure the sustainability of the community toilet scheme, we believe that funding for the scheme should be ring-fenced, and that levels of public funding allocated to community toilet schemes must be closely monitored by the Welsh Government to ensure stability of provision and maintenance of these important services.

Research by the Welsh Senate of Older People in 2014<sup>8</sup> reported a distinct variation in the involvement, promotion and uptake of the community toilet scheme across Wales. We believe that the community toilet scheme, together with the provision of toilet facilities for public use within public buildings, must be better publicised and promoted. We believe that there must be clear and visible branding and signage (including notices in windows of premises taking part in the scheme), if they are to form part of a co-ordinated sustainable solution to toilet provision alongside public toilets provided by the local authority.

### **Question 3: Is there enough guidance on integration to enable the mainstreaming of toilets for public use within wider local policies?**

We welcome proposals regarding the mainstreaming of toilets for public use within wider local policies such as health, wellbeing plans, planning, urban design, transportation and active travel.

### **Question 5: Is there enough guidance on collaboration to enable partnership working and encourage shared solutions?**

We welcome proposals that LAs should produce their strategies by engaging with a number of organisations and representative groups including Age Cymru. We suggest that LAs should also engage with their local older people’s forum.

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<sup>6</sup> British Toilet Association (2015) Public Health Wales Bill. June 12, 2015.

<sup>7</sup> Welsh Government (2014) Welsh Government White Paper. Listening to you: Your health matters. Consultation on proposal for a Public Health Bill. Number WG20703

<sup>8</sup> Welsh Senate of Older People (2014) P is for People. Campaigning for better public toilets in Wales. Report on findings of Campaign Working Group of the Welsh Senate of Older People. Spring 2014.

**Question 6: Is there enough guidance on prevention to focus local toilet strategies to prevent problems from occurring or getting worse?**

The checklist on page 12 of the consultation document highlights some important considerations in the development of the strategies. We would re-emphasise our points made above, notably conducting meaningful engagement with members of the public at the outset regarding the development of local strategies.

**Question 8: Is the design of the National Toilet Logo fit for purpose?**

We note on page 41 of the consultation document that ‘the use of the toilet logo is not mandated in the Act. However, it would be helpful if LAs voluntarily incorporate the logo as part of their awareness raising of toilets for public use’ and that ‘LAs are not expected to replace existing street signage to toilet facilities’.

We would reiterate our points made in Question 2 (above) regarding the importance of publicity and signage for toilets in communities. Research by the Welsh Senate of Older People in 2014<sup>9</sup> reported a distinct variation in the involvement, promotion and uptake of the community toilet scheme across Wales. We believe that the community toilet scheme, together with the provision of toilet facilities for public use within public buildings, must be better publicised and promoted. We believe that there must be clear and visible branding and signage (including notices in windows of premises taking part in the scheme), if they are to form part of a co-ordinated sustainable solution to toilet provision alongside public toilets provided by the local authority.

We hope these comments are useful and would be happy to provide further information if required.

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<sup>9</sup> Welsh Senate of Older People (2014) P is for People. Campaigning for better public toilets in Wales. Report on findings of Campaign Working Group of the Welsh Senate of Older People. Spring 2014.