

Cardiff Council
Local Toilets Strategy
December 2019



**In Response to Part 8 Of The
Public Health Wales Bill**



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Executive Summary

Public conveniences are of significant importance to the whole community. Anyone who may require toileting facilities “away from home” obviously needs a public convenience. However, public conveniences can be even more important to certain groups within society, including disabled and older people, people with specific medical conditions or long-term illnesses, women, children and young people as well as their families. As such, many groups can be disproportionately affected by inadequate, infrequent and generally poor provision. In particular negatively affecting disabled and older people, resulting in isolation and feelings of loneliness created from a reluctance to leave their homes for fear of inadequate “away from home” public conveniences. In turn consequently increasing social isolation and inactivity, as well as affecting people’s ability to maintain independence and dignity; as well as access society and generally participate in day-to-day activities.

Part 8 of the Public Health (Wales) Act 2017: Provision of Toilets came into force on 31 May 2018 and places a duty on each local authority in Wales to prepare and publish a local toilets strategy for its area. Local authorities in Wales now have the responsibility to:

- assess the need for toilet provision for their communities;
- plan to meet those needs;
- produce a local toilets strategy; and
- review the strategy, update and publicise revisions.

As such, Cardiff Council must prepare and publish a strategy. The duty to prepare a local toilets strategy does not require local authorities to provide and maintain public toilets directly. The Local Authority must take a strategic view on how facilities can be provided and accessed by their local population. Upon review of this strategy, Cardiff Council is required to publish a statement of progress. This strategy contributes toward achieving accessible and clean toilets wherever people live, work or visit.

The provision of local toilets for public use is not a statutory requirement of Local Authorities in Wales. Therefore, due to unprecedented financial cutbacks within Local Government, Cardiff Council, like many other local authorities, may need to close some toilets. This strategy aims to mitigate potential impacts by making toilets in more Council facilities available for public use and to work with the private sector to help promote their facilities.

Locations of toilets will be promoted via the Welsh Government ‘Lle’ portal, which will hold the data for all of Wales. Participating premises will also display a sticker in a prominent place, indicating that toilets are available for the public. The sticker will display the logo stipulated by Welsh Government. Mapping is an important part of

our strategy so that people who need to visit a toilet can easily access information about the location, opening times, accessibility and type of facilities available.

This strategy incorporates feedback following a public consultation exercise undertaken from 21st January 2019 to 4th March 2019. The consultation was designed to assess the needs of residents, and people visiting or working within the city. A total of 1,038 responses were received. The analysis of which is detailed in the Cardiff Council's Local Toilets Strategy consultation report and this was used to inform the content of the draft strategy.

This strategy sets out options that may be considered over the next two years in order to increase the provision of local toilets. To do so Cardiff Council will:

1. Explore all options available including working with the private sector, local businesses, voluntary services and Community Councils to make more local toilets available in places where they are most needed.
2. Promote equal opportunities to provide appropriate, accessible and effective services and facilities to all sections of the community without prejudice or bias.
3. Ensure that the toilet logo sticker will be displayed at entrances at all appropriate Council buildings and private businesses that have agreed to being mapped.
4. Work with Cardiff & Vale University Health Board and health care providers; to encourage them to make the facilities available to the public, participate in the mapping scheme and to display the toilet logo sticker, in appropriate premises.
5. Improve awareness and information available on toilet provision in the city by updating information on the Cardiff Council website and will regularly update the 'Lle' open access data repository with Welsh Government.
6. Provide online information maps, physical maps and information sheets, and downloadable information accessed via mobile phone technology.
7. Ensure all council developed changing places are registered on changing places.org.uk to enable planning for those with additional and complex needs.
8. Work with partners to improve provision in close proximity to key night-time gathering points such as taxi ranks, car parks, railway/bus stations and stops.
9. Review cleansing operations and standards on a periodic basis to ensure the most efficient and effective provision within allocated resources.
10. Continue to work with the Police and residents, community groups and others to ensure that facilities are as safe as possible.
11. Not charge residents to use toilet facilities in Council buildings where there is provision.
12. Explore options for providing facilities for the homeless/rough sleepers.

Introduction

Wherever people go, outside of their own homes, they depend on toilet facilities for the enjoyment of their visit. Visitors to the county, who may be some distance from their homes, also depend on provision of accessible toilets. Toilets can make a significant impact upon the comfort of individuals and families who visit public spaces and their perception of the area as a desirable place to visit.

Provision of, and access to toilets is an issue that affects public health. Accessible, clean toilets that are well located in places such as town centres, parks, cycle trails and walking routes can help encourage people to socialise take exercise and stay more physically active. This has clear health and economic benefits. Conversely, a lack of adequate toilet facilities can impact on a person's physical and mental health, as well as affecting the wider environmental health of the population.

Therefore the provision of toilets has implications for public and individual health, transportation, crime prevention, urban design, economic and cultural development and social equity and accessibility. It is an important factor in delivering a 'people friendly' environment for everyone who goes to shopping centres, leisure and entertainment venues, sports facilities, parks and green spaces as well as everyone who moves about on foot, or bicycle, private or public transport, whether for work or pleasure.

Toilets for public use matter to everybody who goes "away from home" for some reason and remain a high-profile issue. They are, however, even more important to certain groups within society, including older people, people with disabilities, people with particular needs (including certain medical problems), women, children and young people and their families. These groups can be disproportionately affected by poor provision. Poor provision is understood to have particular negative impacts on a number of groups of people. For example older people may be less likely to leave their homes without having confidence that adequate facilities will be available to them. People with physical difficulties not having access to changing places, and subsequently having to use a toilet floor to be changed by their carer. This can contribute to increased social isolation and inactivity, as well as affecting people's ability to maintain independence and dignity throughout their life.

Background

In July 2017, the Public Health (Wales) Act 2017 received Royal Assent, bringing together a range of practical actions for improving and protecting health. Part 8 of the Act includes Provision of Toilets and introduces new responsibilities for Local Authorities to provide local toilet strategies.

To deliver a strategic approach to the provision of toilets across Wales, the Public Health (Wales) Act 2017 requires Local Authorities including Cardiff Council to assess local needs and facilities, and to publish a local toilets strategy for its area.

Local authorities in Wales now have the responsibility to:

- assess the need for toilet provision for their communities;
- plan to meet those needs;
- produce a local toilets strategy; and
- review the strategy, update and publicise revisions

Importantly although the Welsh Government, Public Health (Wales) Act 2017, Part 8 focuses on 'Provision of Toilets', the provision and maintenance of toilets in public places is a discretionary function of Local Authorities who have the power under section 87 of the Public Health Act 1936 to provide public conveniences. There is no duty for Local Authorities to provide public toilets directly.

However, Local Authorities must action a strategic view on how facilities can be provided and accessed; addressing such things as location, accessibility, facilities, frequency of use and quality of existing sites, as well as determining whether additional or fewer sites are required by their local population.

Furthermore, the Public Health (Wales) Act 2017 as published by Welsh Government has no funding opportunities for local authorities to utilise or additional provisions attached to it.

Cardiff Council holds the provision and value by which public conveniences are provided in critical importance. Having undertaken three separate reviews of toilet provision across the city and a partner in the 2018 scoping activity to assess changing place provision across the region over the last 10 years; making this new strategy now under the dedicated legislation of the Public Health (Wales) Act 2017, the third and most comprehensive, far reaching strategy to be developed and adopted by the Authority.

These historic reviews have highlighted a number of key considerations, including the cost effectiveness of public conveniences in comparison to tax payer value, impact of antisocial behaviour on sustainability of provision and factors relating to quality and accessibility. In some cases this has resulted in the removal of expensive

non-inclusive / inaccessible public conveniences including automatic public conveniences (APCS).

To support the requirements of the Act, Cardiff Council are adopting an integrated community centred approach to the provision of public conveniences. Actively supporting communities through providing access to high quality provision via existing toilets in Council buildings as well as developing targeted relevant provision within community Hubs, libraries sports/ leisure services, enabling people to have confidence in using publicly available and supported locations.

This strategy establishes a 2-year implementation action plan and encompasses future consideration and opportunities whilst assessing the evolving needs of local communities. The delivery of improvements focuses on the provision of improving the abundant high quality public conveniences within Cardiff.

Why Do We Need A Strategy For Providing Toilet Facilities?

Under the Public Health (Wales) Act 2017, Part 8 Provision of Toilets, Local Authorities in Wales now have the responsibility to develop a strategy towards achieving accessible and clean toilets wherever people live, work or visit. The strategy will support the availability of high quality and accessible facilities across Cardiff and throughout Wales, as this is a joint initiative supported by all Local Authorities within Wales.

Cardiff has a population of 361,500 and is one of the fastest growing major Cities in the United Kingdom. It is at the heart of the Cardiff Capital Region of 1.5 million people and makes up nearly a quarter (24%) of the population of Wales.

Cardiff's regional population has grown considerably in recent years, with growth expected to continue in line with Welsh Assembly Government's projection of a potential 26% increase in Cardiff's population during 2010-2026. This will include a significant increase in the proportion of elderly people and disabled people, by 2026.

As a capital city, Cardiff also has a pivotal role to play in connecting Wales to the world. Cardiff has risen to international prominence through the talent and ideas of its people and the experience of coming here to be part of major sporting and cultural events. This increased international profile has helped to put Wales, as well as Cardiff, as a destination for visitors across the World.

As such the provision of public conveniences in partnership within the city is of pivotal importance on a number of fronts.

Furthermore, in addition to the Welsh Government, Public Health (Wales) Act 2017, Cardiff Council have considered our duties under 2 additional Acts. Firstly the Well-being of Future Generations (Wales) Act 2015; and secondly the Equalities Act 2010. This will now be broadly explained below.

Well-being of Future Generations (Wales) Act 2015,

Well-being of Future Generations (Wales) Act 2015, sets out a 'sustainable development principle' which tells public bodies how to go about meeting their duty under that Act. This represents within Cardiff the opportunity to support the creation of partnership solutions towards the provision of public conveniences within our planning process, so that any such decisions are taken within the overall context of meeting the communities identified needs in a strategic approach, mitigating any negative impacts of changes to provision in order to create a more sustainable Wales.

The Wellbeing of Future Generations (Wales) Act 2015 requires public bodies to work towards seven Well-being Goals:



This placing a duty on the Public Sectors to consider the long term impact of the decisions they make. The Act places a sustainable development principle which tells public bodies how to meet their duty under the Act. The principle is made up of five ways of working to guide how public services should work to deliver for people:

Long term: the importance of balancing short-term needs with the need to safeguard the ability to also meet long term needs.

Prevention: how acting to prevent problems occurring or getting worse may help public bodies meet their objectives.

Integration: considering how public bodies' wellbeing objectives may impact upon each of the wellbeing goals, on their other objectives, or on the objectives of other public bodies.

Collaboration: acting in collaboration with any other person (or different parts of the body itself) that could help the body meet its wellbeing objectives.

Involvement: the importance of involving people with an interest in achieving the wellbeing goals, and ensuring that those people reflect the diversity of the area which the body serves.

Due regard has been made to the above five ways of working when preparing, reviewing, consulting on and publishing this strategy.

In adhering to the duties as required by the Well-being of Future Generations (Wales) Act 2015, Cardiff Council is committed to ensuring that long term aims do not compromise the ability of future generations to meet their own needs; taking an integrated approach; working with others in a collaborative way to find shared

sustainable solutions; involving a diversity of the population in the decisions affecting them; and acting to prevent problems from occurring or getting worse.

Due regard has been made to the above five ways of working when preparing, reviewing, consulting on and publishing this strategy and is included in the integrated impact assessment.

Equalities Act 2010:

Cardiff Council as a public sector body must abide by the requirements of the Equality Duty (PSED) paying due regard to the elimination of discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities.

Therefore, Cardiff Council must make decisions of a strategic nature about how to exercise its functions. Importantly paying due regard to the manner in which they are exercised and designed to reduce the inequalities of outcome which result from socio-economic disadvantage.

In fulfilling this duty; Cardiff Council has taken account, paying due regard to guidance issued and related stakeholder engagement. This is documented through the accompanying Equality Impact Assessment, supporting the implementation of the Local Toilets Strategy and addressing the provision of public conveniences across the city, which although a requirement under the Public Health (Wales) Act 2017, Part 8 Provision of Toilets, is also an ethical and moral priority for the authority.

How has this strategy been developed?

A multi-disciplinary group was established so that the strategy could be developed with input from a cross section of Local Authority services. This approach was considered vital in order to capture all available baseline line data and to maximise opportunities to improve toilet provision in the city.

Engagement with other public bodies, community groups, private enterprise and the public was undertaken to understand what is currently on offer and how any gaps in this contribution can be mitigated.

A public consultation was undertaken between January and March 2019 to assess the needs of residents, and people visiting or working within the city. Key engagement mechanisms included:

- Online including the Council Website and social media (including Facebook and Twitter) and on partner organisations' websites
- E-mail alerts and correspondence
- Promotional posters were displayed across the city-wide 19 Hubs and Libraries
- Face to face – discussions at the Cardiff Council Access Focus Group and the 50+ forum
- Paper Questionnaires – requested by groups and residents.

A total of 1,038 responses were received and have been included in this analysis; the results of which are detailed in the Local Toilets Consultation Strategy Report (Appendix 2) and have been used to influence the content of this strategy. A list of organisations separately consulted is detailed in the report.

Cardiff Council are working with Cardiff and Vale University Health Board and health care providers to encourage them to make their facilities available to the public and to be mapped and signposted for public use.

How does this strategy fit in with other Council strategies and plans?

Cardiff holds a commitment that every citizen, regardless of their race, gender, abilities, or inherited wealth should have the chance to fulfil their potential and play a full part in the life of our city.

In order to satisfy this ambition and succeed; our local toilets strategy needs to integrate with and compliment other existing strategies and plans including the Council's Corporate Plan 2019 – 22 and the Cardiff Council Local Well-being Plan 2018 – 2023.

- Delivering Capital Ambition Cardiff Council Corporate Plan 2019-22

<https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Corporate-Plan/Pages/Corporate-Plan.aspx>

- Cardiff's Corporate Plan 2019-22 (document)

<https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Corporate-Plan/Documents/Corporate%20Plan%202019-22%20FINAL%20ENG.pdf>

- Cardiff Local Well-being Plan 2018 - 2023,

<https://www.cardiffpartnership.co.uk/well-being-plan/>

<https://www.cardiffpartnership.co.uk/wp-content/uploads/Well-being-Plan-2018-23-Eng.pdf>

The integration of the Cardiff Council Local Toilets Strategy supports the Council's strategic direction at a local as well as the Bills aspirations at a national level. Specifically within Cardiff relating to health and wellbeing and reinforcing the Councils cross cutting and parallel objectives of the Cardiff's Well-being strategy. (Objectives 1 - A Capital City that Works for Wales 2 - Cardiff grows in a resilient way 3 - Safe, Confident and Empowered Communities 4 - Cardiff is a great place to grow up 5 - Supporting people out of poverty 6 - Cardiff is a great place to grow older 7 - Modernising and Integrating Our Public Services).

The Council has also considered the impact and effect of other plans and strategies such as the, Cardiff Council Local Development Plan 2006 -26, in the formulation of the Cardiff Council Public Continence Strategy; including:-

- Cardiff Council Local Development Plan 2006-26

<https://www.cardiff.gov.uk/ENG/resident/Planning/Local-Development-Plan/Documents/Urban%20Capacity%20Study.pdf>

- The City of Cardiff Council's Strategic Equality Plan 2016 – 20

<https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Equality-diversity-and-cohesion/Strategic-Equality-Plan-and-Policies/Documents/strategic%20equality%20plan/Final%20Strategic%20Equality%20Plan.pdf>

Who Provides Public Toilets?

Historically public conveniences have been provided has been through the erection of standalone dedicated toilet facilities. Therefore, there are obvious benefits in creating partnerships and co-locating provision in existing buildings. This often reduces issues such as anti-social behaviour, vandalism and higher operating costs; in turn improving quality, cleanliness and security.

The increase in socialising and the 24hour economy has generated extended opening hours and improved convenience through commercial and retail centres, entertainment and visitor attractions. This all satisfies the needs of their customers and the public as a whole, which also promotes the need for the improved availability and frequency of publicly accessible toilets, delivered through an ever increasing range of community buildings and partnership arrangements.

Importantly although the Welsh Government, Public Health (Wales) Act 2017, Part 8 focuses on 'Provision of Toilets', the provision and maintenance of toilets in public places is a discretionary function of local authorities who have the power under section 87 of the Public Health Act 1936 to provide public conveniences. The provision of local toilets for public use is not a statutory requirement of local authorities in Wales.

Due to the rationalisation of services Cardiff Council, similarly to all local authorities in Wales, has been forced to close some traditional toilet facilities. This strategy is designed to mitigate potential impacts of the loss of this important provision; partly by making toilets within Council properties available for public use and through instilling a mentality of coproduction and partnership with the private sector.

Cardiff Council has maintained the current provision of public toilet facilities across the city, in recent years investing in our core and leisure buildings to augment provision and at the same time ensuring that public conveniences are free for all to use.

Over the last 5 years Cardiff Council has continued to invest in its services and Council owned properties to further mitigate against the rationalisation of public conveniences. This has been achieved through major investment in superior facilities within our community hubs and core Council buildings. Works have included creating accessible toilets and changing places facilities in many of our community buildings, as well as ensuring that facilities can be accessed by mixed carer couples/support. This in addition to generally improving standards and specifications through utilising superior fixtures and furnishings (automatic soap, water and hand dryer fittings), ensuring vandal proof, aesthetically pleasing, accessible and hygienic away from home provision. This investment demonstrates Cardiff Council's commitment to investing in the future of communities.

Council owned - Includes stand alone, purpose built buildings providing separate areas for Ladies, Gents, and wherever possible, accessible unit for disabled people

and baby changing facilities. The Council is responsible for the maintenance, management and cleaning of these facilities.

Changing places

Changing Places also needs to be considered within the strategy, as people with limited mobility may need equipment or support from 1 or 2 carers to use the facilities. It is worth noting that many standard accessible toilets do not provide changing benches or hoists and most are too small to accommodate more than one person, with changing places required to be 8m², with sufficient space for a carer on either side of the toilet. Those with illnesses that can't be seen are also considered, with approximately 10,000 people in Wales living with a stoma, signage to reflect their need to access changing places is key to providing access to all that need the facilities. The provision of Changing Places across the city would enable more citizens to go out with the same dignity afforded to them as those able to use standard toilets. The work that has already been carried out to ensure changing places provision across the city should be noted, with changing places provided within a number of Community Hubs and Libraries across the city. There are also noticeable improvements in the provision of changing places across tourist sites, retail partners and mobile facilities for events. Examples of these can be seen at St Fagan's Museum, Cardiff Museum as well as in St David's shopping centre, the Senedd and the Wales Millennium Centre.

A map of the current public conveniences within Cardiff, including Council and Partners Facilities can be found at the below link.

<http://lle.gov.wales/home>

A map of the current registered Changing places can be found at the below link. This is updated nationally through a registration process that enables users to plan visits and check opening times of facilities.

<http://www.changing-places.org/>

Within Council facilities, offices and green spaces - Toilet facilities may be made available to the general public where the individual location, access and circumstances allow, such as libraries, sports centres and some Council offices. There are also toilets located at some parks and countryside settings. This is part of a wider need to ensure that all services offered are accessible by all members of the community.

Please refer to Appendix 1 for a list of the current provision of Council and partner owned facilities.

It is important to highlight that Local Authorities are not the only providers of toilet facilities and other providers and options are available. In this way a strategic combination and partnership forms part broad strategy and underpins the positive

actions to help achieve the requirements of the Public Health Wales Bill and deliver the aims and objectives of the Cardiff Council Local Toilets Strategy.

Commercial/Retail Sector Provision - Many toilet facilities provided by commercial and retail businesses have historically been primarily or solely for use by customers, but this is changing with a renewed understanding that the benefits of passing trade outlay restrictions. Shop managers understand that people come in to use the toilets and recognise that this may lead to people purchasing whilst inside. Most visitor and tourist attractions and entertainment venues such as cinemas provide toilet facilities. Members of the public depend on such facilities. A positive example of this is the recent development of changing places in retail areas locally such as Ikea, and nationally Tesco stores Ltd committing to develop additional changing places within their stores across the UK

Available locations and Mapping

A vital part of the strategy is to ensure that people are aware of which locations are participating in the partnership; and effectively where they can use a toilet facility. As such it has been important to gain information about the location, its opening times, accessibility and type of facilities available so that people are well informed and information is simple to access.

In order to insure that partnerships are clearly recognised and passers-by can recognise a participating location, participating premises will display a sticker in a prominent place, indicating that toilets are available for the public. The sticker will display the logo stipulated by Welsh Government, as below.



In line with research conducted by The British Toilet Association it is recommended that bilingual signs are fitted on the outside of facilities with information like opening hours, contact information for reporting problems and the facilities available, such as baby changing facilities, or accessible provision.

Once participating partners are confirmed a comprehensive audit of their facilities will be conducted, establishing the availability and range of their facilities. These locations and facilities will be listed and compiled into a database and publicised for the use of the general public as the Welsh Government 'Lle' map. Cardiff Council will ensure this list is provided to a national community resource; jointly contributed to by the other local authorities to produce the national dataset for the "Lle" map. "Lle" is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment. "Lle" will generate all Wales maps based on the datasets provided by local authorities that can be configured to focus on the national picture, or on local areas. The data included in the "Lle" map will be available as an open data service accessible to everyone. The link to the "Lle" portal is: <http://lle.gov.wales/home>

The Council will periodically review and update the Welsh Government "Lle" data repository to allow access to accurate information by guide and map publishers,

residents and visitors, as well as the changing places website <http://www.changing-places.org/>

Reasons For Not Developing A Dedicated App

Welsh Government has not developed an app, as many people are unable to use a smartphone for a number of reasons. It is more appropriate to focus on ensuring the information is available online through a wide range of websites and via traditional offline methods.

For data to be classed as open data it must be made available under an open licence. Within the Public Sector this can be achieved by publishing data under the Open Government Licence (OGL).

As the data provided by Local Authorities is to be made available as open data, it will be available for reuse by third parties, either directly from the local authority's own website, or via the joined dataset behind the "Lle" map. This might include other online map services, app developers or commercial interests, as well as being available for reuse by other public sector organisations.

The dataset will be available in Welsh and English. The public will be able to see and search the data as it appears on the "Lle" website, to see the whole of Wales or to look at particular areas. Cardiff Council will direct people from their website to the 'Lle' Portal on the Welsh Government Website.

Changing places can be accessed via an app on a smart phone or online through the national website www.changingplaces.org.uk

What We Learned From The 'Assessment Of Need' Public Consultation

Between Monday 21st January and Monday 4th March 2019, a six week long Assessment of Need public consultation was conducted across Cardiff. Entitled 'Local Toilets Strategy; Consultation On A Local Toilets Strategy for Cardiff Council'.

Accompanied by a review of existing toilet facilities to identify any gaps in current provision, this consultation involved engaging with communities and a wide range of interested parties to consider the requirements of the general population and specific user groups.

Engagement was conducted via a range of approaches including feedback from the public, on street poster advertising in social media, online content, emails, surveys and questionnaires as well as a range of community venues. Specifically this engagement acquired the input of the Cardiff Council Access Focus Group and 50 plus forums. Both identified as groups having relevant and specific interest in the topic of away from home public conveniences, as a result of identified historic need and general interest.

Respondents were asked a wide variety of questions relating to areas most visited within the city boundary's, broken down into civic centres, times of visiting, details of toilet and changing facility provision, attractions and parks most visited, followed by a series of statements relating to facilities which respondents were asked to agree or disagree with. This questioning mirroring the needs assessments of other local authorities in Wales to ensure a unified and comparative approach.

Methodology

- The electronic online and conventional questionnaire / survey booklet was available to complete from Monday 21st January to Monday 4th March 2019.
- All questionnaires and related information were provided bilingually.
- All questionnaires and related information were available in a range of formats including alternative languages upon request.
- Comments regarding the survey or requests for the survey in another language/format could be made by contacting public_conveniences@cardiff.gov.uk.
- Versions suitable for screen readers used by those with visual impairments were also provided.
- Bilingual paper questionnaire booklets and related information was available in retail locations / hubs etc. as well as distributed via engagement activities Cardiff Council Access Focus Group and 50+ forum etc.
- Links to the survey were available via Cardiff Council's dedicated web pages www.cardiff.gov.uk/haveyoursay.

- The survey was advertised via a repeating banner on the Council's website homepage which had 92,171 visits during the 6 week consultation period.
- The survey was promoted as a 'Quick Link' on the Council's Intranet pages.
- An email was sent out Via 'Staff Information' which goes to 8,182 email addresses across the Council.
- All staff engagement groups including the Carers network and Disability network emailed the questionnaire and invited to comment.
- A communication campaign was conducted via social media. Cardiff Council's Twitter and Facebook accounts have a combined audience of 89,000 followers (78k Twitter, 11k Facebook).
- Promotional Posters were displayed across the Council's 19 city-wide Hubs and Libraries.
- Posters were also displayed at shops in local shopping areas/districts across the city to further enhance visibility of the survey.
- A Cardiff Council Access Forum Group (CCAFG) meeting took place in County Hall on 08/02/19 to discuss the topic. The CCAFG is built up of a range over 400 organisations and individuals representing all strands of equalities including LGBT, Disability, Faith, and Age (both young and old) this meeting was also attend by members of the 50+ forum.
- Questionnaires were distributed via the secretary of the Hackney Carriage Alliance.
- All consultation literature and questionnaires were produced by Cardiff Research Centre.

Findings

There were 1,038 valid responses to the questionnaire; received over the 6 week consultation period, from across the city.

Additional comments came via email. One from 'FOR' Cardiff (a business-led, not for profit organisation voted for by the city's businesses tasked to work with and support plans to transform Cardiff city centre. The other from a local Councillor, who underlines the needs for public toilets and their importance.

Addressing The Feedback

- Cardiff Council endeavours to provide for the population and visitors alike and has used the needs assessment and questionnaire to underline that our civic centres continue to prove to be a constant and popular destination; in spite of competing pressures on our high streets. Therefore, provision will be focused in the most visited areas. Supported by future developments that support the need for 'away from home' public conveniences.
- Practical high quality and accessible facilities: Cardiff Council actively support equal opportunities to provide appropriate, accessible and effective facilities to all sections of the community without prejudice or bias. Enhancing social inclusion and removing barriers for all.
- Cardiff Council will where reasonably practicable support, with partners, the provision of facilities primarily for the use of local residents. In instances where dedicated facilities may not be located within a desirable distance; partnership opportunities will be utilised. Working in coproduction with local retailers and other service provider's in order to bridge the identified gaps. However, this anticipated constraint has not been generated by the needs assessment but is rather a proactive approach.
- Cardiff Council will improve awareness and information available on toilet provision in the area by ensuring that comparative information is available via a range of methods; including adding to and ensuring that the Council's website is up to date and regularly update the "Lle" open access data repository within Welsh Government.
- Cardiff Council will support the duties of the Public Health (Wales) Act 2017 by displaying relevant and approved toilet logo sticker at entrances to publicly accessible Council buildings and any private businesses that agree.
- We will work with health partners to encourage them to take up the voluntary duties of the Public Health (Wales) Act 2017. Encouraging them to promote the availability of their facilities and display the toilet logo sticker.

- The increasing numbers of tourists and people from outside the area visiting Cardiff as a capital city and an events destination places additional demands for toilet facilities. The size of facilities should be adequate for the number of people expected to use the toilets, without overcrowding or undue waiting times. A standard of provision based on Pedestrian flow count footfall figures could be considered where it is practicable to do so. This could inform considerations if additional toilet facilities are required at specific times.
- Cardiff Council is committed to minimising the effects of decisions made in relation to restricting the opening times or closing public conveniences due to anti-social behaviour and drug related misuse, vandalism and graffiti damage. Therefore in partnership, the effects of such restrictions will be minimised as much as possible, utilising where appropriate radar keys and other limited restrictions so as not to hamper or create inconvenience for the general public.
- Cardiff Council endeavours to support the development of a quality night time economy, maintaining and supporting changes in the city to support leisure and entertainment hubs. The growth of the night time economy can if not maintained and managed lead to an increase in drug and alcohol related anti-social behaviour. It is recognised that publicly accessible facilities should be in close proximity to key night time gathering areas, such as taxi ranks, car parks, railway stations, and bus stations / stops. The provision of temporary facilities will be assessed and considered during major events and at particularly busy times.
- In instances where Cardiff Council maintain and clean the public toilet facilities, they will be cleaned regularly and to a high standard. Ensuring standards of cleanliness, safety and appropriate maintenance standards.
- Cardiff Council will continue to adopt a 'free to use' policy, and will not charge the public to use toilet facilities in buildings where there is provision. This approach will be promoted to all partners.
- If considered appropriate private business providers are entitled to charge. Although will be advised that this is not desirable to the strategy or in line with the principles of Public Health Wales Bill and or other relevant legislation.
- Cardiff Council will open our public conveniences to the general public in all instances, security and facility permitting.
- The Council will work with local businesses, NHS, and voluntary sector to promote the use of their toilet facilities and explore options to increase local toilet provision through other means including partnership working.
- Adequate toilet facilities for people attending one-off outdoor events need to be considered, through temporary installations or through the use of existing

facilities at or near the event location. As such the promoters / organisers at one-off events will be required to provide adequate toilet facilities in agreement with the Council. The Events Management team provides guidance on all elements of events including temporary toilet facilities provided by event organisers to ensure compliance with relevant regulations. Furthermore, the broad and specific need of the community will be considered to ensure accessible facilities are available.

Objectives To Assist The Implementation Of The Local Toilets Strategy

The following two objectives have been employed to develop and support actions:

1. Work in partnership to enhance and maximise the use of existing facilities.

- Promote equal opportunities to provide appropriate, accessible and effective facilities to all sections of the community.
- Displaying the Welsh Government toilet logo sticker at the entrances of appropriate publicly accessible Council buildings and private businesses that agree to participate.
- Work with Cardiff and Vale University Health Board and health care providers to seek opportunities where feasible to support them in making their facilities available to the public; participate in the mapping scheme and to display the toilet logo sticker as may be required.
- Ensure that Council facilities and buildings continue to allow members of the public free access to toilet facilities in all building where reasonably applicable.
- Improve awareness and information available on toilet provision across the city by ensuring that information is updated on the Cardiff Council Website
- Ensure that the “Lle” open access data repository with Welsh Government is as up to date as possible in respect of facilities within Cardiff.
- Ensure that a periodic review of cleansing operations and standards are maintained within Council and all participating partner's facilities; within reasonable resources.
- Work with the Police, members of the public, community groups and other interested parties, to ensure that facilities are as safe as possible.
- Work with broad stakeholders to dynamically grow the availability and range of ‘away from home’ public conveniences.

2. Promote additional, appropriate and accessible facilities;

- Explore all available options, including working with the private sector, community and voluntary groups, to make more local toilets and changing facilities available where they are most needed and identified through public demand / request.
- Work with partners to improve toilet provision close to key night time gathering points, including taxi ranks, car parks, railway stations, bus stations and stops.
- Ensure that the Cardiff Council Events Team continues to provide advice and guidance on appropriate and accessible temporary toilet facilities to be provided at organised events to meet the diverse needs of the community.

Dismissed Options

- During the development stages a range of ideas and concepts were explored in order to forcibly promote organisations to open their public conveniences. These are explained below and their reasons for not being pressured to date.
- The Council has considered options to introduce a clause in leasing agreements which would mean that any locations let by the Council to a suitable business, for example, a café or shop, the leasing agreement would require the business to include public access to any toilet facilities within. However, as participation with the Public Health Wales Bill is unenforceable, this proposal was deemed unnecessary and unenforceable as well as potentially preventing prospective tenants from progressing with the lease; effectively resulting in disused locations and reduced employment opportunities. Therefore, all tenants will be encouraged where reasonable to support the duties of the Public Health Wales Bill as well as other relevant legislative requirements.
- Cardiff Council could explore the options and powers to introduce a charge for premises that have a late alcohol licence. However, in April 2017 a House of Commons review was conducted of the levy and led to the suggestion that it should be scrapped. Only 8 Local Authorities in England and Wales have introduced a levy since 2013 and one has since removed it. Currently there are no levies in place in Wales. The levy did not generate the amount of income expected even when introduced in areas with a large night time economy.
- Cardiff as a growing capital city is growing at an unprecedented rate. It is considered that larger commercial developments which will include cafes, bars, shops, entertainment, etc. could possibly be required, as a Planning condition, to allow general public access to any toilet facilities that are being built in the premises.
- Many toilet facilities within Commercial / Retail sector provided by commercial and retail businesses have been primarily or solely for use by customers. A growing number of shop managers recognise that people come in to use the toilets, which may lead to people purchasing whilst inside. Most visitor and tourist attractions and entertainment venues such as cinemas already provide toilet facilities and members of the public depend on them
- A survey was undertaken on an all Wales basis with larger national retailers to seek an agreement in principle that their toilet facilities could be used by the general public. Those that responded declined such an agreement.

Reviewing the Strategy

This strategy will undergo a periodic review, with the Council publishing an interim progress report setting out the steps taken in accordance with this strategy every 2 years commencing from when the Council last published or 2 years from the date of the last post-election review of this strategy. Publication of the review is required within 6 months.

Consequently an interim progress report against this strategy will be required in December 2021.

Appendix 1

A list of the current public conveniences within Cardiff (including Council and Partners Facilities) can be found at the below link.

Please note that this list is searchable via Welsh Government data repository; the link to the “Lle” portal is: <http://lle.gov.wales/home>

Name of Location	Postcode	Male Only	Female Only	Unisex Toilet	Baby change (in M toilet)	Baby change (in F toilet)	Baby change (in unisex toilet)	Baby change (in separate room)	Baby change (in disabled toilet)	Disabled - open access M	Disabled - open access F	Disabled - open access (unisex)	Disabled - RADAR M	Disabled - RADAR F	Disabled - RADAR (unisex)	Changing place
Wales Millennium Centre	CF10 5AL	1	1	0	0	1	1	1	1	0	0	1	0	0	0	1
CIWW Rafting Centre	CF11 0SY	1	1	0	0	0	0	0	1	0	0	1	0	0	0	0
Butetown Hub	CF10 5HW	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Barrage - Cardiff Bay A)	CF10 4LY	1	1	0	0	0	0	0	0	0	0	1	0	0	1	0
Barrage - Cardiff Bay B)	CF10 4LY	1	1	0	0	0	0	0	0	0	0	1	0	0	1	0
Senedd	CF10 4PZ	1	1	0	0	1	0	0	0	0	0	1	0	0	0	1
Pierhead	CF10 4PZ	1	1	0	0	0	0	0	1	0	0	1	0	0	0	0
Ty Hywel - The National Assembly for Wales	CF99 1NA	1	1	0	0	0	0	0	1	0	0	1	0	0	0	0
Canton Library	CF5 1QD	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Cathays Library	CF24 4PW	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
National Museum and Gallery of Wales	CF10 3NP	1	1	0	0	0	0	0	1	0	0	1	0	0	0	0
Queen's Arcade Toilet (Ladies)	CF10 2BY	1	1	0	0	0	1	1	0	0	0	1	0	0	0	0
Queen's Arcade Toilet (Men)	CF10 2BY	1	1	0	0	0	1	1	0	0	0	1	0	0	0	0
St David's	CF10 2EF	1	1	0	0	0	0	1	1	0	0	1	0	0	0	1
St David's Hall	CF10 1AH	1	1	0	0	0	0	0	1	0	0	1	0	0	0	0
Cardiff Central Library	CF10 1FL	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Central Market	CF10 2AU	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
The Hayes Island Public Conveniences	CF10 1AH	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
Rhydpennau Library	CF23 6EG	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Western Cemetery	CF5 5TG	1	1	0	0	0	0	0	1	0	0	1	0	0	0	0
Fairwater Hub	CF5 3HU	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Grangetown Hub	CF11 6PA	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
University Hospital of Wales.	CF14 4XW	1	1	0	0	0	0	0	1	0	0	1	0	0	0	0
Llandaff North and Gabalfa Hub	CF14 2HU	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Llanrumney Hub	CF3 5NQ	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Roath Park Lake	CF23 5PH	1	1	0	0	0	0	0	1	0	0	1	0	0	0	0
Penylan Library and Community Centre	CF23 5HW	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
St Mellons Hub	CF3 0EF	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Radyr Library	CF15 8DF	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Pantmawr Cemetery	CF14 7TD	1	1	0	0	0	0	0	1	0	0	1	0	0	0	0
Rhiwbina Library	CF14 6EH	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
St David's Hospital	CF11 9XB	1	1	0	0	0	0	0	1	0	0	1	0	0	0	0
Sophia Gardens	CF11 9XR	1	1	0	0	0	1	1	0	0	0	0	0	0	0	0
Rumney Partnership Hub	CF3 3JA	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Star Hub - Tremorfa	CF24 2SJ	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Whitchurch Library	CF14 7XA	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Ely And Caerau Hub	CF5 5BQ	1	1	0	0	0	0	0	1	0	0	1	0	0	0	1
Cardiff Castle	CF10 3RB	1	1	0	0	0	1	0	1	0	0	1	0	0	0	0

