

Meeting Name:	Cabinet
Date:	15 October 2024
Report title:	Response to Health and Social Care Scrutiny Commission: Access to Toilets
Cabinet Member:	Councillor Evelyn Akoto, Health and Wellbeing
Ward(s) or groups affected:	All
Classification:	Open
Reason for lateness (if applicable):	N/a

FOREWORD - COUNCILLOR EVELYN AKOTO, CABINET MEMBER FOR HEALTH AND WELLBEING

I am grateful to the Loos for Southwark group who have been campaigning on this issue and the Health Scrutiny Committee for undertaking this important work.

Public toilets matter to everybody but it is recognised that for some members of our community such as our older community, people with children and people with medical conditions, the need for available accessible toilets is a matter of independence to enjoy our public spaces. Some residents have told me that they become anxious about travelling far from their home or they have to restrict their journey to a few familiar routes if they cannot guarantee access to a toilet. Public toilets are integral to making the borough accessible and inclusive.

We are lucky to have a good provision across our parks, libraries, and estates. There are on-going plans to increase this number through new developments such as the provision of new public toilets as part of Peckham Rye Station's new square. However, there is also a need to work with our partners such as businesses to further widen this provision in order to address areas of the borough with limited public toilet provision.

We also need to ensure that we not only provide accessible toilets but that we tell people where they are. People need to be able to find public toilets and use them with confidence and trust that they are in good working order, clean and suitable for their needs.

I will work with the relevant departments and stakeholders to use the tools at their disposal to improve the provision.

RECOMMENDATION

Recommendation for the Cabinet

1. That Cabinet approves the response on the Health and Social Care Scrutiny Commission's recommendations on access to toilets, as set out in paragraphs 8 to 44.
2. That cabinet note the intention of officers to report on progress of the development and implementation of an Accessible Toilet Plan back to the Health and Social Care Scrutiny Commission within twelve months.

REASONS FOR RECOMMENDATIONS

3. This report sets out responses to the recommendations set out in the Report of the Health and Social Care Scrutiny Commission on Access to Toilets.
4. The commission's recommendations impact on various departments across the council. All relevant service areas have contributed to the response set out in this report.

ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

5. None - The council's constitution requires that a response to scrutiny recommendations is made to cabinet within two months.

POST DECISION IMPLEMENTATION

6. A draft Accessible Toilet Plan will be developed by Q1 2025/26. Officers will report on progress of the development and implementation of an Accessible Toilet Plan back to the Health and Social Care Scrutiny Commission within twelve months.

Key Activity	Target completion date
Accessible Public Toilet Plan	Q1 2025/26

BACKGROUND INFORMATION

7. The Health and Social Care Scrutiny Commission report on Access to Toilets was received by cabinet on 22 July 2024. Nine recommendations were made. This report sets out a response to each recommendation.

KEY ISSUES FOR CONSIDERATION

Recommendation 1 – Toilets are an Equality and Public Health Issue

8. The report of the Commission recognises that a lack of adequate toilet provision disproportionately impacts on people with a Protected

Characteristic, including older and disabled people, in particular. Poor provision is a Public Health issue and negatively impacts on the health and wellbeing of residents.

9. The Commission recommends that a Toilet Strategy ought to conduct an Equality Impact Assessment, and this ought to include:
 - a. Ensuring adequate provision for people who require a toilet more frequently,
 - b. Ensuring that all cubicles are large enough to accommodate walking aids,
 - c. Ensuring that different sex needs are catered for including ensuring provision recognises that:
 - i. Women take longer and require more toilets than men, and pregnant women often have a more urgent need,
 - ii. Men with prostate cancer require sanitary bins.

Response to Recommendation 1

Recommendation Partially Accepted.

10. An Accessible Toilet Plan will be developed as part of the council's approach to ensuring fair and reasonable access toilet facilities across the borough. This is as agreed at cabinet in July 2024 following a deputation from the Age UK London Loos Campaign.
11. Key elements of the council's Accessible Toilet Plan will include:
 - a. Ensuring adequate and appropriate access to toilets across the council's estate, including council offices, libraries and leisure centres.
 - b. Ensuring up to date information and sign posting on the location and availability of accessible toilet facilities across the borough. This includes publicising the Great British Toilet Map on the council's website.
 - c. Working with the borough's business community to encourage them to make their toilets available to shoppers and users of the high street, aligned to the council's Thriving High Streets programme.
 - d. In addition to businesses, working as appropriate across a range of partners, including anchor partners and key networks to promote toilet access.
12. As part of this work, a consideration of equalities impacts will be required. An Equalities Impact Assessment will be considered as part of the development of the Accessible Toilet Plan for Southwark.
13. A report on progress of implementation of the Commission's recommendations through the Accessible Toilet Plan will be made to the Health and Social Care Scrutiny Commission within twelve months.

Recommendation 2 – Environmental Health

14. The Commission recommends that the council ought to work with partners to ensure, as far as possible, that there is adequate provision to meet the needs

of the whole population of Southwark, including homeless people.

Response to Recommendation 2

Recommendation Accepted.

15. The council will work closely with relevant key stakeholders as part of the delivery of Southwark's Accessible Toilet Plan. Key partners will include Age UK, anchor partners, community groups, local businesses, and key council departments including Environment, Leisure and Local Economy.

Recommendation 3 – Toilet cold spots

16. The Commission recommends improved toilet provision in Peckham Rye Station and the new Town Square by prioritising this in the Toilet Strategy and Town Centre plans. Together the council and Network Rail ought to provide more transparency on the plan, and options for toilets at Peckham Rye Station and new Town Square, and consult with local residents and stakeholders to bring clarity by 2025. In addition the council ought to improve Camberwell Green toilet provision by a) ensuring the library toilet is cleaned frequently enough b) engage nearby supermarkets and fast food places through a Community Toilet Scheme.

Response to Recommendation 3

Recommendation Accepted.

17. As part of the creation of a new square at the front of Peckham Rye Station, new public toilets will be provided. The programme is for a start on site in 2025 with completion in late 2026.
18. Toilet cleansing in libraries (and across other parts of the Council's estate) is the responsibility of the councils Corporate Facilities Management team. An increase in the frequency of cleaning library toilets can be considered but this comes with resources implications that would need to be taken into account.
19. Southwark based businesses are already invited to promote access to their toilets by members of the public, particularly those in our town centres and high streets. It is recognised that greater accessibility of toilet provision can increase footfall and access to our high streets by our more vulnerable communities. Promotional activity will continue to take place with particular focus on key areas including Peckham and Camberwell. This will link to the broader work of the development of town centre action plans and support for local business networks. Local forums such as the Peckham Business Forum and SE5 Forum in Camberwell will be involved in this campaign. The scheme will also be promoted via well-established tools such as the Southwark Business e-newsletter which goes out to over 12,000 business contacts in the borough.
20. In addition to the above, it is proposed to undertake a gap analysis in toilet provision to get greater clarity on toilet cold spots across the borough and inform a more targeted approach to improving toilet provision across our communities.

Recommendation 4 – Community Toilets

21. The Commission recommends that the council invest in a refreshed Community Toilet scheme using London boroughs, such as Richmond upon Thames and Lewisham, as examples.
22. It is further recommended to prioritise Peckham Rye, Camberwell and other toilet cold spots, in the revived Community Toilet scheme.

Response to Recommendation 4

Recommendation Partially Accepted.

23. Information in relation to public toilets overseen by Southwark Council has been consolidated and can be found on the [Great British Toilet Map website](#) and linked to the [council's public toilets website](#).
24. As above, a strategy for engaging businesses on access to toilets has been developed and will be integrated into town centre action plans. Town centre leads will engage businesses directly, working alongside local forums and networks such as the Peckham Business Forum and SE5 Forum.
25. There is currently no budget to support the adoption of a more formalised Community Toilet scheme. Dedicated officer support and funding for marketing and incentives is required for a Community Toilet scheme to be implemented effectively.
26. Benchmarking of other schemes has demonstrated the need for more rigorous monitoring of toilets that are made available through this structured approach, ensuring appropriate accessibility for people with disabilities and wheelchair users, regular cleaning, and other health and safety considerations. An agreement is usually entered into with the host business, and the council pays each business a stipend to assist with the costs of making their toilets accessible to the public. By way of example, Lewisham Council pays each business up to £1000 per annum for participation in their Community Toilet scheme.

Recommendation 5 – Anti Social Behaviour

27. The Commission recognises that toilets have a high value to the community and as such the cost of mitigating ASB is not a good reason to deny provision. ASB can be addressed through engagement with partners to improve location and design and make the most of local capacity to prevent and deter ASB. This ought to include understanding the types of possible ASB and working with the police (including the Designing Out Crime unit), TfL, council enforcement and community organisations to mitigate and prevent ASB. Consideration ought to be given to keeping toilets clean and well maintained, and the use of attendants where possible.

Response to Recommendation 5

Recommendation Accepted.

28. The council has a statutory duty under section 17 of the Crime & Disorder 1998 to consider the implications of crime and disorder in all their activities and functions. They are also required to do all they can to reduce these issues. In Southwark ASB is addressed through a range of people and place based interventions across the borough which is driven by a data and intelligence led approach. When appropriate the use of Design Out Crime Advisors within the Metropolitan Police Services are commissioned to support local situational problem solving of hotspot areas. When the council considers new toilet provision due regard will need to be considered in line with this legislation.
29. Community Wardens are tasked following reports of Crime and ASB, (which can involve public conveniences) to assist with community reassurance and to assess the nature and level of the issue. This activity may form part of local interventions and work with police, wider partner organisations and local residents and businesses. It should be noted that Design Out Crime Surveys previously carried out in the borough on occasions have recommended either the removal or re-siting of public conveniences as a proportionate response due to the prevalence of ASB in those areas. These survey and the recommendations within can and do have financial implications which will also need to be considered.

Recommendation 6 – Southwark Borough Toilets

30. The Commission welcomes the accommodation review of the council's estate and the potential this offers to open up more toilets to the public. In addition the Commission recommends that the council works with wider stakeholders such as local GPs, the wider NHS, TfL and developers to maximise toilet provision in the existing estate and in future buildings.
31. The work on the accommodation strategy and engagement with wider stakeholders, to open up both the existing estate and expand provision, ought to be incorporated into a Toilet Strategy.

Response to Recommendation 6

Recommendation Accepted.

32. When the council undertakes works to existing buildings, or develops any new building, consideration will be given to widening public access to toilet provision. Information on existing provision can be found on the AccessAble website and the Great British Toilet Map, which is designed to help residents and visitors access relevant facilities, including toilets, when travelling around the borough.
33. Existing toilet provision in libraries consists of public toilets (including accessible toilets) in 11 of the 12 libraries as follows: Canada Water, Blue Anchor, John Harvard, Walworth, Camberwell, Grove Vale, Nunhead, Peckham, Dulwich, Una Marson and Kingswood Estate.

34. Across the boroughs larger parks there are 56 toilets in total within 13 toilet blocks of which 14 are accessible with 13 baby-changing facilities. This does not include provision of toilets in the parks cafes, these are managed directly by the café operators.

Park	Toilet units	Toilet blocks	Accessible toilets	Baby-changing facility
Southwark Park	12	1	1	2
Burgess Park	17	4	4	3
Peckham Rye Park	6	2	2	2
Dulwich Park	18	4	4	4
Geraldine Mary Harmsworth Park	1	1	1	0
Belair Park	2	1	1	2
Total	56	13	13	13

Recommendation 7 – Information and Sign Posting

35. The Commission supports the continued use of AccessAble, which is a well used resource.
36. In addition the Commission recommends that:
- a. The website is kept updated in the short term, and over the longer term more work is done as part of a Toilet Strategy to provide accurate information to residents and visitors.
 - b. The Great British Public Toilet Map www.toiletmap.org.uk is updated, as this is an excellent resource.
 - c. A map forms part of a revised Toilet Strategy / Community Toilet scheme and this would consist of a hard copy as well as digital offer. Lewisham have an excellent printed map that it would be useful to replicate in Southwark.

Response to Recommendation 7

Recommendation Accepted.

37. The council recognises the value of AccessAble and will publicise this resource on the council website as part of its Accessible Toilets Plan.
38. As stated above, information in relation to public toilets that are overseen by Southwark Council has been consolidated and can be found on the [Great British Toilet Map website](#) and the [council's public toilets website](#). This information will be subject to regular (annual) review.
39. We will explore the viability of hard copy map provision of toilet facilities, taking into consideration the need to keep such information regularly updated.

Recommendation 8 – Toilet Strategy

40. The Commission recommends that the council develops a Toilet Strategy through engagement with a range of stakeholders, local people, mapping needs and gaps, co-creating solutions and provision of an action plan that interfaces with planning and regeneration.

Response to Recommendation 8

Recommendation Partially Accepted.

41. As already stated, an Accessible Toilet Plan will be developed as part of the council's approach to ensuring fair and reasonable access toilet facilities across the borough. Key elements of the council's Accessible Toilet Plan will include:
- a. Ensuring adequate and appropriate access to toilets across the council's estate, including council offices, libraries and leisure centres.
 - b. Ensuring up to date information and sign posting on the location and availability of toilet facilities. This includes publicising the Great British Toilet Map via the council's website.
 - c. Working with the borough's business community to encourage businesses to make their toilets available to shoppers and users of the high street, aligned to the council's broader Thriving High Streets programme.
 - d. In addition to businesses, working as appropriate across a range of partners and key networks to promote toilet access.

Recommendation 9 – Leadership

Recommendation Accepted.

42. The Commission recommends that the Toilet Strategy is led by:
- a. The cabinet member for Public Health or a cabinet member with the Environmental Health and / or Streets for People brief in their portfolio,
 - b. A senior officer.
43. It is envisaged that both the cabinet member and senior officers would have a role working across different departments, and with external stakeholders, in order to champion a cross council and borough strategy.

Response to Recommendation 9

44. The Cabinet Member for Health & Wellbeing and the Strategic Director for Environment, Sustainability & Leisure will take interim lead responsibility for ensuring a whole council approach to delivery of the Accessible Toilet Plan.

Policy framework implications

45. Our vision for 2030 is that together we will build a fair, green and safe Soutwark where everyone can live a good life as part of a strong community. The recommendations to promote accessible toilet facilities for more

vulnerable members of our community are consistent with this vision.

Community, equalities (including socio-economic) and health impacts

Community impact statement

46. The actions set out in this report are anticipated to deliver positive impact through increased social and economic inclusion across Southwark's communities, with a particular focus on people with a Protected Characteristics, including older and disabled people, in particular.
47. The report of the Health and Social Care Scrutiny Commission recognises that a lack of adequate toilet provision disproportionately impacts on people with a Protected Characteristic, including older and disabled people, in particular. Poor provision is a Public Health issue and negatively impacts on the health and wellbeing of residents.

Equalities (including socio-economic) impact statement

48. The Commission recommends consideration of equalities impacts with a particular focus on:
 - a. Ensuring adequate provision for people who require a toilet more frequently,
 - b. Ensuring that all cubicles are large enough to accommodate walking aids,
 - c. Ensuring that different sex needs are catered for including ensuring provision recognises that:
 - d. Women take longer and require more toilets than men, and pregnant women often have a more urgent need,
 - e. Men with prostate cancer require sanitary bins.

Health impact statement

49. The recommendations set out in this report are consistent with the staying well theme of Southwark 2030.

Climate change implications

50. None applicable.

Resource implications

51. There are no immediate resource implications arising from this report.

Financial Implications

52. All existing activities set out in the report are currently funded and there are no additional cost implications to the council arising from this report.
53. Should the implementation of any activities or recommendations outlined in this report require additional funds in future these will be subject to further

decision reports setting out the cost and funding mechanisms.

Consultation

54. The Health and Social Care Scrutiny Commission consulted Loos for Southwark and Age UK as part of their review.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive, Governance and Assurance REF: [GOV/NC202409139]

55. This report asks the cabinet to note and consider the recommendations from the Report of the Health and Social Care Scrutiny Commission on Access to Toilets, in accordance with the Overview & Scrutiny Procedure Rules (15.3).
56. The Assistant Chief Executive notes the reference to the duty under section 17 of the Crime & Disorder 1998 to consider the implications of crime and disorder in all their activities and functions.
57. The cabinet's attention is drawn to the Public Sector Equality Duty (PSED General Duty) under the Equality Act 2010, which requires public bodies to have regard, when making decisions, to the need to eliminate discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and those who do not share it. This is particularly relevant in the provision of toilets.

Strategic Director, Resources (FC24/015)

58. The report requests cabinet to approve the response on the Health and Social Care Scrutiny Commission's recommendations on access to toilets, as set out in paragraphs 7 to 42.
59. The strategic director of resources notes that there are no additional cost implications to the council arising from this report and notes that if additional funds will be required in future due to the implementation of any recommendations, these will be subject to further decision reports setting out the cost and funding mechanisms.
60. Staffing and any other costs associated with this recommendation are to be contained within existing departmental revenue budgets.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Report of the Health and Social Care Scrutiny Commission: Access to Toilets	Southwark Council Website	Amit Alva Amit.alva@southwark.gov.uk
Access to toilets scrutiny review report.pdf (southwark.gov.uk)		

APPENDICES

No.	Title
None	

AUDIT TRAIL

Cabinet Member	Councillor Evelyn Akoto, Health and Wellbeing	
Lead Officer	Toni Ainge, Strategic Director of Environment, Sustainability and Leisure	
Report Author	Danny Edwards, Head of Economy	
Version	Final	
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Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Assistant Chief Executive, Governance and Assurance	Yes	Yes
Strategic Director, Resources	Yes	Yes
Cabinet Member	Yes	Yes
Date final report sent to Constitutional Team	3 October 2024	