

BABERGH DISTRICT COUNCIL

COMMITTEE: Cabinet	REPORT NUMBER: BCa/18/09
FROM: Cllr Margaret Maybury, Cabinet Member for Communities	DATE OF MEETING: 12 JULY 2018
OFFICERS: Peter Garrett – Corporate Manager, Countryside and Public Realm	KEY DECISION REF NO: CAB43

PUBLIC CONVENIENCES

1. PURPOSE OF REPORT

- 1.1 This report presents the findings of the joint Public Realm Member Advisory Task & Finish Group specifically in relation to public conveniences. It proposes a new Public Convenience Policy (attached at **Appendix One**), which contains a set of principles to guide the Council's decisions about existing and future provision.
- 1.2 The recommendations in this report will ensure: that the main town centres, key tourism locations and large parks have appropriate public convenience provision in place to meet the needs of all; that capacity will be extended by working in partnership with local businesses to establish a Community Toilet Scheme that will add to existing council-funded provision; that local control will be increased by offering town and parish councils the opportunity to manage public convenience provision directly, where they wish to do so; that, where appropriate, the provision or refurbishment of public conveniences will be integrated into other wider development and regeneration plans; and, where needed, basic repairs and improvements will be made to council-run public conveniences in this financial year.

2. OPTIONS CONSIDERED

2.1 The following options were considered:

- (a) To maintain the current situation whereby most public conveniences are managed by the District Council.
- (b) To offer the management of public conveniences to town and parish councils, or other community groups that wish to take them on.
- (c) To close all public conveniences run by Babergh District Council.
- (d) To increase the provision of public conveniences by developing a Community Toilet Scheme.

Option 2.1 (a) is recommended in the event that town or parish councils or other community groups do not wish to manage public convenience provision.

Option 2.1 (b) is recommended because it provides the opportunity for facilities to be managed at the most local level and as part of wider area provision.

Option 2.1 (c) is not recommended because it may lead to inadequate provision of public conveniences, which could impact disproportionately on certain groups, including older people, families with young children, people with disabilities or those with particular health issues.

Option 2.1 (d) is recommended because it will increase the provision of public conveniences.

<p>3. RECOMMENDATIONS</p> <p>3.1 To note the findings of the Public Realm Member Advisory Task & Finish Group in respect of public conveniences.</p> <p>3.2 To agree the Public Conveniences Policy (attached at Appendix One) to guide the Council's decisions about existing and future provision.</p> <p>3.3 To agree to establish a Community Toilet Scheme.</p> <p>3.4 To note the expenditure of £13,000 from the Public Realm budget to carry out basic repairs and improvements to existing public convenience provision.</p> <p>3.5 To ask the Corporate Manager for Public Realm to further engage town and parish councils, or other community groups, with a view to devolving public conveniences to those who wish to take them on.</p>
<p>REASON FOR DECISION</p> <p>To put in place a policy to guide decisions about the future of existing provision of public conveniences in Babergh.</p>

4. KEY INFORMATION

The Member Advisory Task & Finish Group

- 4.1 In March 2018, Mid Suffolk and Babergh Cabinets agreed to establish a joint cross-party Member Advisory Task and Finish Group to:
- (i) Develop a policy on public conveniences;
 - (ii) Develop standards and performance measures for Public Realm Services;
 - (iii) Establish a policy for the adoption of open spaces and other public realm assets; and
 - (iv) Review and extend the policy on trees.
- 4.2 The Task and Finish Group meetings are chaired alternately by Cllr Margaret Maybury, Cabinet Member for Communities and Cllr David Burn, Cabinet Member for Environment in Mid Suffolk.
- 4.3 The Task & Finish Group has now completed its work on public conveniences and its findings and recommendations in relation to this area of work are the focus of this report to Cabinet today. The Group continues its work on the other three areas referenced at paragraph 4.1, which will be reported to Cabinet in October 2018.

Scope and Process for the Review of Public Conveniences

- 4.4 Both Babergh and Mid Suffolk District Councils acknowledge the importance of public conveniences and their implications, not only for public health, personal health and well-being, and accessibility, but for tourism and the local economy too. In recognition of these factors, and the need to focus resources on locations with higher footfall, the review focussed on the provision of public conveniences in main town centres, key tourist hotspots and the largest parks and open spaces.
- 4.5 The Terms of Reference for the joint Member Advisory Task & Finish Group in relation to public conveniences are as follows:
- (i) To assess current provision;
 - (ii) To understand the costs of the provision;
 - (iii) To understand current management arrangements for public conveniences;
 - (iv) To look at what other councils are doing; and
 - (v) To propose a set of principles to guide the councils' existing and future provision of public conveniences in the two districts.
- 4.6 The Task & Finish Group considered public convenience provision in detail on two occasions. In advance of those meetings, officers from Public Realm carried out site visits to all existing public conveniences where the Council either directly runs the provision or contributes to it financially. During these site visits an assessment was made of current condition, standards and accessibility. Alongside this, a full analysis of the annual expenditure for each facility was provided to the group and included costs of utilities, business rates, supplies, cleaning, grounds maintenance and other running costs. Officers from Property Services also assessed the cost of basic repairs and redecoration for public conveniences owned by the Council, except where these were already part of wider development projects.

Background

- 4.7 The provision of public conveniences has implications for public health, tourism, the local economy, transportation, crime prevention, urban design, social equity and accessibility.
- 4.8 Public conveniences matter to everybody. They are, however, even more important to certain groups, including: older people; families with young children; people with disabilities or with particular health issues such as bladder, bowel or prostate related conditions; as well as visitors to the area.
- 4.9 The potential impact of the lack of public conveniences on health and wellbeing can result in some people feeling anxious about going out. This can have a negative impact on, for example, older people or those with health conditions, as they do not readily leave their homes without the reassurance that they will have access to public convenience provision. This can add to the impact of isolation for older people and those with health conditions, and affect physical, social and mental wellbeing. Indeed, the Help the Aged paper, 'Nowhere to Go', evidenced that lack of public convenience provision is significant with respect to isolation in older people.
- 4.10 People with disabilities and their carers also lack the freedom to leave their homes without the reassurance of adequate public conveniences being available. The Changing Places Consortium explains that absence of suitable provision prevents

those with disabilities being able to confidently leave their homes, travel and spend money in the local economy.

The Findings of the Review

4.11 **Overview**

Babergh District Council recognises that it needs to consider existing and future provision of public conveniences in the light of housing and population growth, regeneration opportunities and an aging population.

4.12 **Number, Location and Management Arrangements for Public Conveniences**

In Babergh there are currently nine public conveniences where the District Council either runs the facility directly or contributes financially. These are located in the main towns, at key tourism sites and larger parks. They are listed below at **Table One**, along with details of their management arrangements. All the buildings are owned by Babergh District Council.

Table One – Location and management arrangements for public conveniences in Babergh that are funded in full or in part by the Council

Location of public convenience	Management Arrangements
Pin Mill, Chelmondiston	Managed by BDC through ID Verde contractor
Magdalen Road, Hadleigh	Managed by BDC through ID Verde contractor
Belle Vue Park, Sudbury	Managed by BDC through ID Verde contractor
Gaol Lane, Sudbury	Managed by Sudbury Town Council
Burkitt's Lane, Sudbury	Facilities closed and building empty of sanitary ware
Hamilton Road (Bus Station), Sudbury	Managed by BDC through ID Verde contractor
Church Street, Lavenham	Managed by Lavenham Parish Council
Prentice Street, Lavenham	Managed by Lavenham Parish Council
The Green, Long Melford	Owned by Long Melford Parish Council, was leased by BDC, now managed by Long Melford Parish Council

4.13 In addition, Babergh District Council leases the public conveniences and adjacent car park at Flatford Mill, East Bergholt, to the National Trust.

4.14 The management of public conveniences at Cordell Place, Long Melford, is being transferred to the parish council. The Council has been working closely with Long Melford on this transfer and it is expected that this will be ratified at their next parish council meeting on 5th July 2018. The public conveniences have been closed for over 10 years and it is planned to re-open this provision along with office space for the parish council.

4.15 Public conveniences at Bristol Hill, Shotley are now owned and managed by the parish council, having been transferred more than 10 years ago.

4.16 **Costs**

The total annual revenue budget for public conveniences is £110,492. This includes an annual revenue sum for repairs, a contingency for variable costs of utilities and payment of £34,000 to the external contractor, ID Verde, to manage and maintain the

council-managed public conveniences and the grounds around them. The largest revenue costs relate to the contractor charge and business rates. The detailed revenue costs are summarised in **Table Two** below.

Table Two – Details of annual revenue costs for public conveniences

Location of public convenience provision	Business Rates	Water Rates	Electricity	Legionella Testing	Misc.	Total annual revenue cost
Magdalen Road, Hadleigh	£1,165	£403	£710	£164	£0	£2,442
Belle Vue Park, Sudbury	£0	£1,364	£865		£0	£2,229
Hamilton Road (Bus Station), Sudbury	£1,118	£1,986	£621	£164	£0	£3,889
Gaol Lane, Sudbury	£1,304	£1,008	£464	£164	£20,000*	£22,940
Burkitt's Lane, Sudbury	£1,796	£0	£0	£0	£0	£1,796
Pin Mill, Chelmondiston	£1,421	£2,727	£527	£54	£0	£4,729
Church Street, Lavenham	£9,441 (includes the business rates on the car park as they were assessed together)	£0	£0	£164	£0	£9,605
Prentice Street, Lavenham	£1,488	£0	£0	£164	£0	£1,652
The Green, Long Melford	£1,957	£0	£502	£164	£0	£2,623
Flatford Mill, East Bergholt	£0	£0	£0	£164	£0	£164
Total	£19,690	£7,488	£3,689	£1,202	£20,000	£52,069

*The payment of £20k per annum covers Sudbury Town Council's costs with respect to the running of the public conveniences. Staff are employed to clean and complete minor repairs at Gaol Lane and Hamilton Road. Gaol Lane used to be an attended service but over the last year the staff have been completing street cleansing duties in the town when not on cleaning duty in the two public conveniences.

In addition, Babergh District Council spent £3,900 on repairs to public conveniences in 2016/17 and £1,500 in 2017/18, with expenditure focussed on the three public conveniences in Sudbury located at Gaol Lane, Hamilton Road and Belle Vue Park.

The Council receives an annual income of £4,200 from leasing the public conveniences and the adjacent car park to the National Trust at Flatford Mill in East Bergholt. The contract expires in 2021.

4.17 **Business Rates**

Public conveniences are liable for business rates in the same way as other non-domestic premises. Both the Member Task & Finish Group, and local councils who may be interested in taking on the running of public conveniences from the District, were concerned that the financial burden of paying business rates was a prohibitive factor in local town and parish councils assuming responsibility for this provision. This was explored as part of the Group's work.

4.18 Local Authorities' discretionary powers are set out in the Local Government Act 1988. Section 47 gives billing authorities the power to grant discretionary relief against business rates liability. However, a Local Authority cannot grant discretionary relief to properties that it owns or occupies itself or to other precepting authorities such as town and parish councils.

4.19 There has, however, been significant lobbying of Government nationally to encourage the removal of business rates on public conveniences due to concern that this additional financial demand was contributing to the closure of some facilities. In response to that, the new Local Government Finance Bill, if enacted, will provide principal councils (county, unitary, district and borough) with the discretion to grant full business rate relief on all public conveniences that are all or part-owned by themselves or town or parish councils.

4.20 Local Authorities already have powers to provide business rate relief to private companies or charities that run public conveniences that are available for public use without any obligation to make a purchase.

4.21 **Accessibility**

All the existing public conveniences in Babergh have disabled facilities, but few have baby changing facilities.

4.22 The majority of the disabled toilets in the district are accessed using a RADAR key. The RADAR key is part of a National Key Scheme giving people with disabilities and health conditions independent access to locked public conveniences around the country. The RADAR scheme enables disabled toilets to be locked to prevent vandalism and misuse. It also ensures that they are more readily available to those who need them 24 hours a day, rather than being restricted to more traditional opening times. RADAR keys can be purchased from many different retailers of disability products or from organisations such as Age UK or Disability Rights UK. They cost approximately £5.

4.23 **Condition of current public conveniences**

Generally public convenience provision in Babergh is of the older traditional style. While provision varies in terms of aesthetics and the degree of wear and tear, all locations are functional.

4.24 As part of this review, officers from the Council's Property Services have recently assessed individual public conveniences and recommended a schedule of basic repairs and improvements, which can be carried out within existing budgets.

4.25 **What do other councils do?**

Nationally there is a mixed picture with regard to provision of public conveniences. Some councils have closed all their public conveniences and invested in Community Toilet Schemes, others have retained the direct ownership and management of all their provision, while many have devolved the running of public conveniences to town or parish councils on a variety of different terms and conditions. It is recognised that there is no single solution that fits all and that the right outcome will need to be guided by local circumstances.

4.26 **Community Toilet Schemes**

These schemes are now widely used across the country either instead of council-provided public convenience provision or in addition to it. Councils invite local businesses, including public houses, restaurants, cafés, shops and other outlets to register their interest in allowing the general public to use their toilets during their usual opening hours, without the need to make a purchase. Businesses taking part would be asked to display a sticker in their windows to promote the scheme and location signage would ensure the same.

4.27 In return councils usually offer businesses, for example, a standard annual payment of a few hundred pounds, a reduction in their commercial waste rates or discretionary relief of business rates. Businesses also benefit from increased publicity and advertising through the Council's marketing of the Community Toilet Scheme through, for example, signage in the town, listing and links on social media and on council and other websites. In turn, businesses will benefit from the potential to generate increased business from residents and visitors using their facilities.

4.28 Councils usually set an approximate number of businesses that they are seeking for a Community Toilet Scheme and can also indicate the areas of a town or tourist location where they require more provision. Participating businesses need to be able to meet standards of accessibility and to uphold good basic cleanliness and quality of provision. The wider use of facilities meeting the full Changing Places standards can also be encouraged through this scheme.

4.29 The Member Task & Finish Group was keen for Babergh District Council to pursue the introduction of this scheme locally, seeing it as mutually beneficial for both the public and businesses and a means of not only maintaining but expanding local provision.

Proposed principles to guide the Council's existing and future provision of public conveniences in the district.

4.30 The key role of the Public Realm Task & Finish Group in respect of public conveniences was to develop and propose a set of principles to guide the Council's existing and future provision in the district. After considerable deliberation the Group proposed the following principles:

- a. Public convenience provision will be prioritised in town centres, tourism destinations and key parks and open spaces.

- b. Public conveniences will be located in accessible locations that maximise visibility from the street/public space and will be near to central community facilities.
 - c. Provision of public conveniences in tourist locations will take into account the need to accommodate increased visitor numbers in line with seasonal adjustments.
 - d. All public conveniences will be clean, of a good standard and accessible to all users.
 - e. The Councils aim to include baby changing facilities and achieve Disability Discrimination Act compliance in all public conveniences managed directly or as part of any agreement to transfer the provision.
 - f. New, replacement or significantly refurbished public conveniences will contain features that promote environmental sustainability, where possible.
 - g. They will be sited and designed to meet safety and crime prevention standards.
 - h. Provision of new public conveniences or significant refurbishment of existing ones, will be secured through the planning process where this is needed and feasible.
 - i. Provision of public conveniences will be considered as part of all major regeneration programmes in town centres, open spaces and tourist destinations.
 - j. Adequate public convenience provision will be achieved by working in partnership with local town and parish councils, communities, businesses and other providers.
 - k. The ownership and management of public conveniences will be transferred to town and parish councils and other appropriate community organisations where there is local interest in taking these on.
 - l. The Councils will instigate, promote and, where relevant, support the use of Community Toilet Schemes as a means of increasing the supply of public convenience provision in local areas; standardised signage will be adopted for Community Toilet Schemes across both Babergh and Mid Suffolk districts so that these businesses are readily identifiable.
 - m. Public conveniences will be clearly signposted and directional signage will be provided where required to improve access.
 - n. Signage for public conveniences will show opening hours and contact details for maintenance.
 - o. Public conveniences will be well publicised, including on the Councils' website and through social media.
 - p. Where the Councils provide public conveniences directly or transfer provision, that facility will continue to be free for residents and visitors to use.
- 4.31 These principles form the basis of the proposed policy on public conveniences for Babergh and Mid Suffolk councils, which is attached as **Appendix One** of this report.
- 4.32 Subject to Cabinet's agreement, these will be the principles used to determine decisions about existing and future provision of public conveniences.

5. LINKS TO JOINT STRATEGIC PLAN

- 5.1 The continued provision of public conveniences and the principles within the policy support all three of the main priority areas within the Joint Strategic Plan, namely, the economy and the environment, housing growth and strong and healthy communities.

6. FINANCIAL IMPLICATIONS

- 6.1 Details of existing annual revenue costs of public conveniences are set out at paragraph 4.16 of this report, along with details of actual capital asset maintenance costs for 2016/17 and 2017/18.
- 6.2 With regard to any potential new future financial implications, these arise from any contribution that Babergh District Council would make to businesses joining a Community Toilet Scheme, estimated as no more than £300 per business per year.
- 6.3 During this financial year a schedule of basic repairs and improvements will be carried out to local public conveniences, owned by Babergh District Council. This is at a cost of approximately £13,000 and this money is included in the Public Realm budget for 2018/19.

7. LEGAL IMPLICATIONS

- 7.1 The provision of public conveniences is not a legal requirement for local authorities, rather it is a discretionary service for which councils may charge if they so choose.
- 7.2 This report proposes that Babergh District Council should offer town and parish councils the opportunity to manage public conveniences, if they wish to. This transfer of responsibilities can be managed under S.123 of the Local Government Act 1972 (disposal of land by principal councils) and would require a legal agreement under S.1 of the Local Authorities (Goods and Services) Act 1970 (supply of goods and services by local authorities).
- 7.3 Currently it is not possible for district councils to award discretionary business rate relief to town or parish councils running public conveniences. This is likely to change if the new Local Government Finance Bill is enacted.

8. RISK MANAGEMENT

- 8.1 This report is most closely linked with the Council's Corporate / Significant Business Risk No.s 1(d); 2(b); 3 (a); and 4(c). These, along with mitigation, as they relate specifically to public conveniences are set out in **Table Four** below.

Table Four – Impact of public conveniences on corporate risks

Risk Description	Likelihood	Impact	Mitigation Measures
1(d) If we do not secure investment in infrastructure, then development	2 (unlikely)	2 (noticeable)	Provision of public conveniences will be secured through the

will be stifled and/or unsustainable.			planning process where this is required and included in the supporting policies underpinning the Local Plan.
2 (b) If we do not engage the communities of Sudbury to develop a vision supported by a programme of projects, activities and initiatives (including regeneration) which will deliver the vision, we may not maximise the economic potential of the largest market towns.	1 (highly unlikely)	2 (noticeable)	Future provision of public conveniences in Sudbury will be integrated into the 'Vision for Sudbury', which was agreed at Cabinet in June 2017, and into the proposed developments at Hamilton Road and Belle Vue.
3 (a) If we do not effectively engage communities about future needs, then we will not be able to help them become more sustainable.	1 (highly unlikely)	2 (noticeable)	Engagement has already begun with town and parish councils and will continue; the management of public conveniences will be offered to all towns, parishes or other community groups that wish to take them on.
4 (c) If the Council does not manage its asset portfolio effectively, it may result in lost opportunities, loss of capital value, increased revenue costs and loss of public confidence.	2 (unlikely)	2 (noticeable)	Property Services have carried out an appraisal of existing public convenience assets and recommended improvement works, which are

			being considered as part of this report.
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9. CONSULTATIONS

- 9.1 Consultation has taken place with elected Members through the Member Advisory Task & Finish Group that has developed the new proposed principles for future provision of public conveniences.
- 9.2 There has been consultation with internal teams within Babergh and Mid Suffolk councils, namely Property Services, Assets, Communities, Planning, Economic Development, Finance and Law and Governance.
- 9.3 Cllr Margaret Maybury has lobbied James Cartlidge the Member of Parliament for South Suffolk regarding business rate removal from public convenience provision and reduced utility costs.
- 9.4 There has been no formal consultation with communities regarding the provision of public conveniences at this stage. A range of voluntary discussions have, however, taken place with representatives from town and parish councils and these are on-going.
- 9.5 Where there are potential significant changes to, or relocation of, public conveniences as a result of wider development plans (for example, in the case of Sudbury), communities will be consulted as part of the Planning process and through other engagement events.

10. EQUALITY IMPACT ANALYSIS

- 10.1 An Equality Impact Assessment screening has been completed to determine whether the proposals within this report are likely to have a negative impact on one or more of the nine protected characteristics, as defined by the Equality Act 2010, and require mitigation. These characteristics are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief (including lack of belief); sex; and sexual orientation.
- 10.2 No impacts have been identified. All existing public conveniences have accessible provision. There is no proposed change to the current number of public conveniences and the principles proposed by the Advisory Member Task & Finish Group enhance rather than reduce the quality and accessibility of provision. There is therefore no requirement to complete a full Equality Impact Assessment.

11. ENVIRONMENTAL IMPLICATIONS

The policy on public conveniences states that new, replacement or refurbished public conveniences will contain features that promote environmental sustainability, where possible, and will be sited and designed to meet safety and crime prevention standards.

12. APPENDICES

Title	Location
Appendix One - Public Convenience Policy	Attached

13. BACKGROUND DOCUMENTS

13.1 Equality Impact Screening

Babergh and Mid Suffolk Councils Joint Public Convenience Policy

Purpose of the Policy

To establish a set of principles to guide Babergh and Mid Suffolk Councils in decision-making about existing and future provision of public conveniences.

Why are Public Conveniences Important?

The provision of public conveniences has implications for public health, tourism, the local economy, transportation, crime prevention, urban design, social equity and accessibility. These are all areas of key importance for the two councils where the Joint Strategic Plan defines the primary strategic priorities as economy and the environment, housing growth and strong and healthy communities.

This Public Conveniences Policy therefore also has key linkages and interdependencies with the following other policies and strategies in Babergh and Mid Suffolk:

- The Health and Well-Being Strategy;
- The Joint Local Plan;
- The Open for Business Strategy;
- The Communities Strategy; and
- The Environment Strategy.

Who will the Policy Affect?

Public conveniences matter to everybody. They are, however, even more important to certain groups, including: older people; families with young children; people with disabilities or with particular health issues such as bladder, bowel or prostate related conditions; and visitors to the area.

The potential impact of the lack of public conveniences on health and wellbeing can have a negative impact on, for example, older people or those with disabilities or health conditions, as they do not readily leave their homes without the reassurance that they will have access to adequate public convenience provision. This can add to the impact of isolation for these groups and affect physical, social and mental wellbeing. It also means that they will not spend money in the local economy.

These considerations are particularly relevant to Babergh where there are nearly 6,500 people with limited day-to-day mobility and over 4,200 0-4 year olds resident in the district. The Office of National Statistics estimated in 2016 that 11.3% of the population in Babergh is 75 years or above, which is higher than the national average of 8.1%; this equates to about 10,200 residents.

The Role of District Councils in the Provision of Public Conveniences

There is no statutory duty for councils to provide public conveniences, it is a discretionary service.

Councils can, however, require any business classed as a place of entertainment, or selling food and drink to the public for consumption on the premises, to ensure that public conveniences are provided and maintained for public use. This includes both permanent provision and short-term events.

Councils can also place requirements on developers to provide or refurbish public conveniences as part of Section 106 Agreements or to resource this through the Community Infrastructure Levy.

Principles to guide the councils' existing and future provision of public conveniences in the districts

- a. Public convenience provision will be prioritised in town centres, tourism destinations and key parks and open spaces.
- b. Public conveniences will be located in accessible locations that maximise visibility from the street/public space and will be near to central community facilities.
- c. Provision of public conveniences in tourist locations will take into account the need to accommodate increased visitor numbers in line with seasonal adjustments.
- d. All public conveniences will be clean, of a good standard and accessible to all users.
- e. The Councils aim to include baby changing facilities and achieve Disability Discrimination Act compliance in all public conveniences managed directly or as part of any agreement to transfer the provision.
- f. New, replacement or significantly refurbished public conveniences will contain features that promote environmental sustainability, where possible.
- g. They will be sited and designed to meet safety and crime prevention standards.
- h. Provision of new public conveniences or significant refurbishment of existing ones, will be secured through the planning process where this is needed and feasible.
- i. Provision of public conveniences will be considered as part of all major regeneration programmes in town centres, open spaces and tourist destinations.
- j. Adequate public convenience provision will be achieved by working in partnership with local town and parish councils, communities, businesses and other providers.
- k. The ownership and management of public conveniences will be transferred to town and parish councils and other appropriate community organisations where there is local interest in taking these on.
- l. The Councils will instigate, promote and, where relevant, support the use of Community Toilet Schemes as a means of increasing the supply of public convenience provision in local areas; standardised signage will be adopted for Community Toilet Schemes across both Babergh and Mid Suffolk districts so that these businesses are readily identifiable.
- m. Public conveniences will be clearly signposted and directional signage will be provided where required to improve access.
- n. Signage for public conveniences will show opening hours and contact details for maintenance.
- o. Public conveniences will be well publicised, including on the Councils' website and through social media.
- p. Where the Councils provide public conveniences directly or transfer provision, that facility will continue to be free for residents and visitors to use.

Equalities' Impacts of this Policy

An Equality Impact Assessment screening has been completed to determine whether this policy is likely to have a negative impact on one or more of the nine protected characteristics, as defined by the Equality Act 2010, and requires mitigation. These characteristics are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief (including lack of belief); sex; and sexual orientation.

No negative impacts have been identified. The principles that form the basis of this policy will enhance rather than reduce the quality and accessibility of provision.

DATE: JUNE 2018

REVIEW DATE: JUNE 2020