

PUBLIC CONVENIENCES REMOBLISATION

1. EXECUTIVE SUMMARY

- 1.1 Following the national lockdown announcement at the end of March 2020, all Council operated public conveniences across the area were closed. Working with other local authorities, SCOTS, COSLA and the Scottish Government, national guidance was developed and published on 27 June and the Council agreed, following consultation with all area committees, a phased re-opening plan on 2 July.
- 1.2 The Leadership Group asked for a report to be brought back to the Business Continuity Committee in August to further consider the approach to the remobilisation of public conveniences from 1 September.
- 1.3 Of the 59 public conveniences, 3 were opened on 3 July, 11 were opened on 6 July and a further 21 were opened on 15 July. Calgary Bay public convenience in Mull has now been transferred over to Mull and Iona Community Trust and this leaves 23 that are closed. Further information is attached in Appendix 1.
- 1.4 The additional expenditure for the remobilisation agreed up until 30 August is estimated to be £25,518. The ongoing cost to keep the existing arrangements in place is estimated to be £10,398 per month. It should be noted there will continue to be a reduction in other services such as street cleansing and grounds maintenance as some staff are being used from these services areas to support the enhanced cleaning.
- 1.5 Officers have given consideration to 3 options for the provision of public conveniences for the remainder of this financial year and it is recommended that Members agree to Option 2 that is to continue to keep the current 35 public conveniences open until the end of October and then revert to only a core set that remain open that can be managed within the normal budget. Although this has a further additional cost of £20,796 it would ensure that there is a provision up until the end of the main tourism season.

PUBLIC CONVENIENCES REMOBILISATION

2. INTRODUCTION

- 2.1 Following the national lockdown announcement at the end of March 2020, all Council operated public conveniences across the area were closed. Working with other local authorities, SCOTS, COSLA and the Scottish Government, national guidance was developed and published on 27 June and the Council agreed, following consultation with all area committees, a phased re-opening plan (see Appendix 1) on 2 July.
- 2.2 The Leadership Group asked for a report to be brought back to the Business Continuity Committee in August to further consider the approach to the remobilisation of public conveniences from 1 September.

3. RECOMMENDATION

- 3.1 The Business Continuity Committee are asked to:
- a) Agree to Option 2, that is to continue to keep the current 35 public conveniences open until the end of October at an additional cost estimated to be £20,796 and then revert to only a core set that remain open that can be managed within the normal budget. The additional cost will be included within the in-year budget gap that will be considered by the information working group.
 - b) Note that the future provision of public conveniences will be part of the amenity services themed review and will be brought forward as part of the budget proposals.

4. DETAIL**4.1 BACKGROUND**

- 4.1.1 Public conveniences were closed across Scotland in March 2020 as the result of COVID-19. The Health Protection (Coronavirus) (Restrictions) (Scotland) Regulations 2020 (the Regulations) introduced strict requirements for opening public conveniences and about protecting public health, with the result that local authorities across the country moved to close their public conveniences.
- 4.1.2 There is no statutory requirement for Local Authorities to provide public conveniences and therefore no grant aided expenditure allocation has been made by the Scottish Government to support this service. The lack of a statute defining the service leads to a wide and varied service provision across the country.

- 4.1.3 A result of this wide and varied provision is that there is no national network for public conveniences across Scotland to facilitate national discussion about this service area. This means consistency of approach was difficult to achieve.
- 4.1.4 The Council did work with other professional networks as well as other local authorities and the National Park and reports were fed into COSLA and then used by the Scottish Government to help formulate national guidance which was published on 27 June. A copy of the guidance is attached at Appendix 2.
- 4.1.5 The guidance is clear and helpful in its terms particularly where:
- There is a clear definition as to what constitutes enhanced cleaning, but it is not prescriptive, recognising that the requirements at each location will vary depending on a number of factors, including footfall, infrastructure and physical distancing arrangements.
 - It is made clear that it is reasonable for providers to ensure physical distancing passively by way of signage etc. as opposed to having to staff facilities.
- 4.1.6 The guidance did not provide any timescales, which was in this context helpful as providers should be given the flexibility to make decisions about reopening based on their own specific circumstances.
- 4.1.7 We understand that most local authorities are availing themselves of that flexibility and any reopening of PCs is being done in a phased way depending on local needs and resource commitments.

4.2 PRE-COVID19 SERVICE

- 4.2.1 Pre COVID19 the Council provided public conveniences via a mixed model of a small percentage having dedicated members of staff, often locally based, who would work one-hour per day to maintain their facility; with the majority of facilities being attended to by mobile, multi-functional teams on a range of frequencies depending on use, with busier facilities being attended to more often than remote rural ones which in some cases would only receive 2-3 cleans per week.
- 4.2.2 It is also worth noting that the previous specification, as well as providing for a lesser frequency than the new arrangements, also provided a different type of cleaning e.g. one which was focused on seen rather than unseen issues, but with COVID-19 it is extremely important that all contact surfaces are cleaned.
- 4.2.3 Amenity Services have been the subject to a number of budget cuts over the last 10 years and resources are now so closely matched to service delivery specifications that there is little if any resilience within the service to accommodate, in this case, a requirement for additional cleaning.

4.3 REMOBILISATION

- 4.3.1 Officers gave careful consideration to remobilisation of public conveniences, conducting a review of all facilities and staffing levels, taking into consideration the national guidance.
- 4.3.2 Following engagement with Area Committees, a phased reopening was agreed at the Leadership Team meeting on 2 July. The phased reopening was agreed initially until 30 August and a report was requested to be brought back to the Business Continuity Committee in August to further consider the approach to the remobilisation of public conveniences from 1 September.
- 4.3.3 Of the 59 public conveniences, 3 were opened on 3 July, 11 were opened on 6 July and a further 21 were opened on 15 July. Calgary Bay public convenience in Mull has now been transferred over to Mull and Iona Community Trust and this leaves 23 that are closed. Further information is attached in Appendix 1. Information on the infrastructure adaptations are also included within Appendix 1, eg, taping off of some toilets, signage, provision of hand sanitiser.

4.4 RESOURCE IMPACT

- 4.4.1 In terms of increasing the specification, and given the lack of resilience within the service and the age-profile of many of the dedicated PC staff meaning they fall into the shielding category, the inevitable consequence of re-opening PCs in compliance with the national guidance is a reduction in other services such as street cleansing and grounds maintenance and cost pressures in staffing, transport and consumables.
- 4.4.2 During the month of July the cost pressure for staffing and associated travel costs was higher than is anticipated going forward due to a number of staff being in the shielding category. Now that shielding has been lifted by the Scottish Government existing staff should be available to carry out their pre-COVID19 duties, however, there will still be an ongoing cost pressure due to the enhanced cleaning requirements.
- 4.4.3 The table below provides detail on the estimated additional expenditure for the period of the initial remobilisation up to the end of August 2020 and the estimated full year/monthly cost going forward based on keep the existing arrangements in place, i.e. 35 out of the 58 public conveniences operated by the Council open.

Type of Cost	Additional Estimated Cost Up to 30 August £	Additional Estimated Cost Full Year £
Payroll	13,312	62,724
Fuel	2,926	12,348
Cleaning Products	4,908	39,264
Hand Sanitiser	1,920	0

Dispensers (one-off cost)		
Hand Sanitiser	2,452	10,440
Total	25,518	124,776
Monthly recurring cost		10,398

4.4.4 The additional expenditure for the remobilisation agreed up until 30 August is estimated to be £25,518. The ongoing cost to keep the existing arrangements in place is estimated to be £10,398 per month. It should be noted there will continue to be a reduction in other services such as street cleansing and grounds maintenance as some staff are being used from these service areas to support the enhanced cleaning.

4.5 OPTIONS FOR THE REMAINDER OF THE FINANCIAL YEAR

4.5.1 Officers have given consideration to 3 options for the provision of public conveniences for the remainder of this financial year and it has been assumed that social distancing and enhanced cleaning will still be in place. Should the national guidance be updated to give a clear end date to enhanced cleaning the projections can be updated but at present the assumption is they will remain in place for the remainder of the financial year. As part of the budget planning process for 2021-22 there is a themed review for amenity services that includes public conveniences and proposals for the future provision will be considered as part of that review.

4.5.2

Option	Additional Cost for July/August £	Additional Cost From 1 Sept £	Total Additional Cost 2020-21 £	Comment
Option 1: Continue with 35 PCs open until the end of the financial year.	25,518	72,786	98,304	The Council currently has a budget gap in 2020-21 due to COVID19 additional expenditure and this would add further to this gap.
Option 2: Continue to keep the 35 PCs open until end of October to take in the main bulk of the tourism season and then revert to only a core set remaining open that can be managed within the normal budget.	25,518	20,796	46,314	It is likely that from 1 November at least 10-15 PCs currently open would have to close. Officers would engage with Area Committees well in advance to define the core set of PCs that would remain open.
Option 3: From 1 September, only	25,518	0	25,518	There would be a reduced provision in some of the

keep a core set of PCs open that can be managed within the normal budget				medium footfall conveniences during the tourist season. It is likely that at least 10-15 PCs currently open would have to close. Officers would engage with Area Committees on the PCs that would remain open.
--	--	--	--	--

4.5.3 Officers did not consider the option to re-open all public conveniences on the basis that the cost would increase further and it is unknown whether all the enhanced cleaning required could be resourced. It should be noted that the toilets that remain closed are consider to be those where there is generally low footfall.

4.5.4 It is recommended that Members agree to Option 2 that is to continue to keep the current 35 public conveniences open until the end of October and then revert to only a core set that remain open that can be managed within the normal budget. Although this has a further additional cost of £20,796 it would ensure that there is a provision up until the end of the main tourism season.

5. CONCLUSION

5.1 The Council remobilised public conveniences on a phased basis in early July following Scottish Government guidance. Complying with the guidance and reducing the number of public conveniences that the Council area has open results in additional expenditure.

5.2 The Leadership Group asked for a report to be brought to the Business Continuity Committee in August to consider the approach to the remobilisation of public conveniences from 1 September. Officers have considered 3 options for the provision of public conveniences this financial year and recommend Option 2 that is to continue to keep the current 35 public conveniences open until the end of October and then revert to only a core set that remain open that can be managed within the normal budget.

6. IMPLICATIONS

6.1 Policy – Summarises agreed changes to the provision of public conveniences up to 30 August and provides a recommendation on the provision from 1 September.

6.2 Financial – There is currently no identified budget to meet any additional costs and therefore this will increase the in-year budget gap that will be considered by an informal working group that is being established.

6.3 Legal – The Council has no statutory requirement to provide public conveniences.

6.4 HR – Some staff were shielding up until 31 July and then it is assumed that staff will be available.

6.5 Fairer Scotland Duty: An Equalities and Socio Economic Impact Assessment is currently being carried out.

- 6.5.1 Equalities – TBC
- 6.5.2 Socio-Economic Duty – TBC
- 6.5.3 Islands Duty – TBC
- 6.6 Risk – There is no practical way to completely eliminate the risk of the COVID19 spread in PCs however reasonable mitigation measures are in place in line with national guidance.
- 6.7 Customer Service – The remobilisation of PCs provides a service for customers and is partly in response to customer demand.

Appendix 1 – 2 July Remobilisation Plan
Appendix 2 – National Guidance

Interim Executive Director Kirsty Flanagan
Head of Roads and Infrastructure Jim Smith
Policy Lead for Roads and Infrastructure Councillor Robin Currie
30/07/2020

For further information contact: Tom Murphy Operations Manager or Mark Calder Project Manager.

**Appendix 1:
PC remobilisation plan agreed at the Leadership Team meeting 2 July**

Open/close		No.	Comments			
Open 3 rd		3	Where evidence/feedback suggests a compelling need			
Open 6 th		9	High use (near key infrastructure like parks, piers and esplanades)			
Open 6 th with cost pressure		2	High use (near key infrastructure like parks, piers and esplanades). Location and local circumstances require extra hours			
Open 15 th		14	Medium level use			
Open 15 th with cost pressures		7	Location and local circumstances require extra hours			
Closed		24	Generally lower use			
TOTAL		59				
AREA	FACILITY	PRE-COVID SCHEDULE	POSSIBLE TO INCREASE?	NEW SCHEDULE	OPENING DATE	IMPLICATIONS
Mid Argyll	Inveraray	As required	Y	4 per day and as required	3 rd	None. Staffed facility
	Lochgilphead	1 per day	Y	2 per day	15 th	Reduced street cleansing
	Ardrishaig	1 per day	Y	2 per day	15 th	Reduced street cleansing
	Tayvallich	1 per week	N		CLOSED	Low use
	Kilmartin	1 per week	N		CLOSED	Low use
	Tarbert	1 per day	Y	2 per day	15 th	Reduced street cleansing
	Crinan	1 per week	N		CLOSED	Low use
Kintyre	Machrihanish	1 per day	N		CLOSED	Low use
	Southend	1 per day	N		CLOSED	Low use
	Bolgam Street	1 per day	Y	2 per day	15 th	Reduced street cleansing
	Pensioner's Row	1 per day	Y	2 per day	15 th	Reduced street cleansing
	Gigha	1 per day	N		CLOSED	Low use
	Carradale	1 per day	N		CLOSED	Low use
	Ctown Old Quay	1 per day	Y	2 per day	6 th	None. Cover from Marine.
Islay	Bowmore	1 per day	Y	2 per day	3 rd	Reduced street cleansing
	Bridgend	1 per day	N		CLOSED	Low use
	Port Ellen	1 per day	Y	2 per day	15 th	Reduced street

						cleansing
	Port Askaig	1 per day	Y	2 per day	6 th	Cost pressure additional hours inc. travel
	Feolin	Ad hoc	Y	3 per week	6 th	Cost pressure additional hours inc. travel
	Craighouse	Ad hoc	Y	3 per week	15 th	Cost pressure additional hours inc travel
	Bruichladdich	1 per day	N		CLOSED	Low use
	Portnahaven	1 per day	N		CLOSED	Low use
Lorn	Ganavan	1 per day	Y	2 per day	6 th	Reduced street cleansing
	North Pier [inc. Harbour Building]	As required	Y	4 per day and as required	3 rd	None. Staffed facility
	Ellenabeich	1 per day	Y	2 per day	15 th	Cost pressure additional hours inc. travel
	Port Appin	1 per day	Y	2 per day	15 th	Cost pressure additional hours inc. travel
	Cuan Ferry	1 per day	Y	2 per day	15 th	Cost pressure additional hours inc. travel
	North Lismore	1 per day	Y	2 per day	15 th	Cost pressure additional hours inc. travel
	South Lismore	1 per day	Y	2 per day	15 th	Cost pressure additional hours inc. travel
	Taynuilt	1 per day	N		CLOSED	Low use
	Pulpit Hill	1 per day	N		CLOSED	Low use
Mull	Craignure	1 per day	Y	2 per day	6 th	Reduced street cleansing
	Bunessan	1 per day	N		CLOSED	Low use
	Calgary NOW TRANSFERRED TO MULL AND	1 per day	N		CLOSED	Low use

	IONA COMMUNITY TRUST					
	Fionnphort	1 per day	Y	2 per day	15 th	Reduced street cleansing
	Iona	1 per day	Y	2 per day	15 th	Reduced street cleansing
	Salen	3 per week	N		CLOSED	Low use
	Ulva	3 per week	N		CLOSED	Low use
Tiree	Scaranish	1 a day	Y	2 per day	15 th	Reduced street cleansing and grounds maintenance
Coll	Middle Pier	1 a day	Y	2 per day	15 th	Reduced street cleansing and grounds maintenance
Bute	Rothesay Pier (terminal)	As required	Y	4 per day and as required	6 th	None. Cover from Marine.
	Port Bannatyne	1 per day	Y	2 per day	6 th	Reduced street cleansing
	High Street	1 per day	Y	2 per day	15 th	Reduced street cleansing
	Chapel Hill	1 per day	Y	2 per day	15 th	Reduced street cleansing
	Kilchattan Bay	1 per day	N		CLOSED	Low use
Cowal	Glenmorag	1 per day	Y	2 per day	6 th	Reduced street cleansing
	Kames	1 per day	N		CLOSED	Low use
	Tighnabruaich	1 per day	n/a		CLOSED	Asbestos issues (pre-COVID)
	Sandy Beach	1 per day	Y	2 per day	6 th	Reduced street cleansing
	Colintraive	1 per day	Y	2 per day	15 th	Cost pressure additional hours inc. travel
	Sandbank	1 per day	Y	2 per day	15 th	Reduced street cleansing

	Lochgoilhead	1 per day	N		CLOSED	Low use
	Riverside	2 per day (inc. Live Argyll)	N		CLOSED	Live Argyll staff on furlough
	Carrick	1 per day	N		CLOSED	Low use
	Lochgoilhead	1 per day	N		CLOSED	Low use
	Dunoon Ferry Terminal	As required	Y	4 per day and as required	6 th	None. Cover from Marine.
Lomond	Helensburgh Pier	2 per day	Y	3 per day	6 th	Reduced street cleansing
	Rhu	1 per day	Y	2 per day	15 th	Reduced street cleansing
	Kilcreggan Pier	1 per day	N		CLOSED	Reduced ferry sailings

Infrastructure Adaptations

CHANGE AGREED	COMMENTS
Taping off	In larger facilities tape off every other cubicle e.g. central one of row of three; in smaller facilities leave just one each in ladies and gents. Same with sinks. Block off all urinals.
Signage on hand washing	Laminated
Signage on physical distancing	Laminated Signs to include CSC number 6 asks of the public – 3 things we will do
Removal of ornaments etc.	As per guidance
Hand sanitiser and units	To be affixed to walls
CHANGE REJECTED	COMMENTS
Spray painting etc. footway	Agreed not necessary. Distancing guidance could change. Abortive costs.
Thumb locks	Guidance on propping open doors to reduce hard/contact surfaces to touch
Cleaning dispenser units for baby changing	Cost implications. Parents likely to bring their own items if they are using baby changing facilities.

Appendix 2 – Scottish Government guidance published 27 June

The opening of public toilets carries with it a risk of transmission of Covid 19 given the low levels of natural light, lack of ventilation, many surfaces to touch and the purpose of a toilet. Therefore, there is a need for careful consideration of how this can be done as safely as possible.

This may vary according to specific sectors and should align to the guidance provided by those sectors in terms of restart. Inherent in the restart process is that adequate sanitary facilities can be assured where appropriate.

Public Toilets are any toilets accessible to the public. The opening of toilets should be accompanied by local risk assessment and control measures should be proactively monitored by operators. Most premises should have a norovirus policy which can be adapted to cleaning facilities if an individual with Covid symptoms has used the facilities.

Risk assessment should specifically include:

- remote/unmanned facilities for which there may be increased demand as travel restrictions are eased and people start travelling for exercise; and
- janitorial staff for whom operators should already have procedures/PPE in place.

Any modifications or changes must take existing regulation into account.

In considering opening of toilets, operators should:

Prior to opening:

- Conduct routine checks and take all measures appropriate to reopening after a prolonged closure e.g. consideration of requirements for legionella risk management due to stagnant water in plumbing systems;
- Adjustments must be made such as signage, taping off areas and floor markings to ensure physical distancing and facilitate good hand and other hygiene;
- Review all toilet and sanitary facilities (including disabled and baby change areas) to determine whether the fixtures and fittings are in good working order and replace or repair if not; and
- Consider the need for additional waste management arrangements.

Hygiene measures

Enhanced cleaning

- It should not be assumed that hygiene measures in place pre Covid19 will be sufficient. Enhanced cleaning is likely to be required and should take into account:
 - **Frequency** – should be increased beyond what has been the case before Covid 19 and should be based on a risk assessment.
 - **Products used** – should be a disinfectant not detergent based product.
 - **Areas of particular concern** – it is important that attention is paid to frequently touched areas including toilet flush, toilet seat, toilet locks and handles, taps, paper towel and soap dispensers and door handles on access/entry.
- Enhanced monitoring of facilities is likely to be required to ensure hygiene.
- Have a clearly displayed enhanced cleaning rota and ensure it is adhered to i.e. a documented record that the checks have been carried out for the public to see.
- The cleaning rota should be supplemented with a cleaning schedule or similar procedure to detail the manner and frequency of cleaning of the various surfaces.
- Removal of any unnecessary or communal items within the facility (e.g. ornaments or cosmetic items) to facilitate cleaning.
- Ensure that if a staff key fob or key is required to access the facilities this is cleaned between uses.
- PPE should be provided in line with non-healthcare settings guidance. https://hpspubsrepo.blob.core.windows.net/hps-website/nss/2973/documents/1_covid-19-guidance-for-non-healthcare-settings.pdf
- Staff should be trained in appropriate cleaning methods for sanitary areas and the use of the equipment and products for cleaning and disinfection.
- Special care should be taken for the cleaning of portable toilets.

Equipment

- Removal of reusable equipment and replacement with disposable (e.g. fabric towels, baby changing mats).
- Ensure that there are adequate hands free waste disposal units.
- Provision of cleaning materials for surfaces (e.g. antibacterial wipes for baby change areas).

Communication

- Use signs and posters to build awareness of good handwashing technique, the need to increase handwashing frequency, avoid touching your face and the need to cough or sneeze into a tissue which is binned safely, or into your arm if a tissue is not available.
- Consider providing a contact number for the public should they have any concerns regarding cleanliness (e.g. if the facility has been heavily soiled between cleans). Signage to tell the public what to do if someone falls ill with suspected COVID within a toilet facility.

- COVID-19 can present with diarrhoea and or vomiting therefore it is important to have a mechanism to ensure the facility can be closed and adhoc cleaning can be arranged should the need arise.

Hand hygiene

- Provide liquid soap and ensure there is adequate stock at all times.
- Consider the provision of sanitiser. With adequate hand washing, the contamination of contact surfaces on leaving the facilities should be minimised. However, we know that many people do not wash their hands properly.
- Consider providing sanitiser dispensing units in portable toilets.
- Consider adjusting the time that push/sensor taps are on to encourage 20 seconds of hand washing
- Provide hand drying facilities – either paper towels with appropriate and frequent waste disposed or electric hand driers.
- Reduce contact points i.e. where possible reduce the requirement for surfaces to be touched once hands have been washed on the way out of the facilities eg prop open entry door.
- Consider providing hand gel at the entry and exit from the facility.

Physical distancing

- Operators should consider how to limit the number of people within facilities with multiple stalls/urinals, for example, with signage on the door instructing users to wait outside if they find that the facilities are occupied.
- Physical distancing should be maintained by way of signage or, in respect of staffed toilets, proactively encouraged by staff .
- Use signage and floor markings to ensure that physical distancing is maintained.
- Consider how this applies both within and outwith facilities e.g. marking waiting spots outside and route to and from toilets.
- Consider whether additional measures such as physical barriers are required eg.cubicles provide barriers but wash basins and urinals (trough urinals, in particular) will require greater consideration.
- Consider whether distances between equipment e.g. hand basins are sufficient and consistent with physical distancing policy.
- Consider the route to and from toilets and consider how to maintain physical distancing and cleaning of possible touchpoints.
- Use one way systems where this is possible.

Sanitary facilities provision

- Where toilets are being provided for a specific event consider whether the standard guidance on toilet to person ratios needs to be revised to allow for physical distancing and enhanced cleaning routines.
- Note that more toilet facilities may be needed for the same number of people due to the physical distancing and hygiene measures.
- Note that there may be greater numbers of people needing to use public toilets than usual as behaviours are influenced by current guidance (e.g. more people meeting in parks).

- Special care should be taken for cleaning of portable toilets.

Following opening there should be regular and proactive inspection of facilities to detect any issues promptly.