A GUIDE TO
PUBLIC TOILET RISK ASSESSMENT

Cornwall Association of Local Councils

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June 2020
LOCAL COUNCIL RUN PUBLIC TOILETS
MANAGING THE COVID-19 RISKS

Introduction

On March 23rd, 2020 the Government imposed a number of restrictions on public movement including the statutory closure of a number of public areas and open spaces, the restriction of movement outside of the home and information on minimising the risk of infection. Whilst some toilets remained open, most local councils chose to close the toilets as it became impractical for them to be managed safely.

As Government has gradually eased the restrictions and encouraged public exercise outside of the home, there is now a need to consider how to reopen public toilets safely. The CALC has been working with Cornwall Council and Public Health England to pull together all of the available guidance on the management of risk when reopening public toilets. The processes outlined in this guide should enable your council to identify what is needed to reopen the toilets and whether this can be achieved safely.

Any decision to open or close public toilets must be made against 3 Covid-19 criteria

- Can you open the toilets and meet the social distancing requirements in place at the time?
- Can you provide appropriate materials for hand washing and personal hygiene?
- Can you maintain a regime of cleaning which provides clean hard surfaces including knobs, handles and taps?

The Principles

Covid-19 creates additional risks; the council and its contractors must now consider how these can be managed to ensure that the toilets can be opened and that the users, cleaners and providers of the service have confidence in using them.

There is no single template for the assessment of public toilets. Local councils will already have in place a risk assessment for each set of toilets which it provides. They will also hold risk assessments prepared by any cleaning contractor for their risks during cleaning.

The Action Plan

Develop an action plan for re-opening toilets safely, such as scheduling for:
• Any necessary safety/site inspections and adjustments/maintenance.
• Consider how you are managing risks – carry out Covid-19 risk assessments (RA) for staff and public [see HSE link below and examples of RA provided,
• In light of the RA, develop a safe system of working and checklist for cleaning staff, this should cover: being properly equipped before leaving a work depot, revised cleaning and restocking methods and how to deal with hazards.
• Implementing new measures for social distancing and good hygiene, to prevent the spread of infection, you may want to consider the following:
  o Creating designated queuing areas (away from the entry point) with line markers for statutory social distancing
  o Close some or alternate cubicles.
  o Replace hand dryers (contact points) with paper towels, this may mean the provision of additional bins.
  o Provision of hand sanitiser dispensers outside toilets.
  o Enhanced cleaning, especially for busy areas and contact points.
• Agree operational changes – such as new measures or new hours for opening and closing facilities and staff attendance.
• Staffing – additional staff requirements and staff rotas.
• PPE and other equipment requirements for staff.
• Develop clear and appropriate signage.
• Establish re-opening date based on above timescales.
• Communications and building public confidence: - let the public know what steps you have taken to manage risks and ensure public safety (i.e. enhanced cleaning, opening/closing hours etc.)
• Publish guidance for users.

This is not a definitive guide – there are no minimum standards or criteria except that you must meet the 3 Covid-19 tests on social distancing, personal hygiene and the cleanliness of hard surfaces. Risks change, guidance changes and so your risk assessment must be kept under review and rechecked against government guidance.
Acknowledgements and thanks: Thanks to London Boroughs of Bexley and Hackney, Westminster City Council and Queen Elizabeth Olympic Park for help with preparing this guidance.

**Steps to Risk Assessment**

**Regular operations**

Remember that all regular compliance requirements still need to be in place i.e. electrical testing, legionella etc. It is important to ensure that these are up-to-date and available. The Covid-19 risk assessment is looking at a specific set of additional health risks related to public health which are in addition to your normal measures.

**Step 1: The key factors**

Before starting your risk assessment, take time to consider the individual circumstances of each set of toilets:

- **Usage**: what is the likely demand on each set of toilets? The footfall in the block may have an impact on the number of cleans required, availability of hygiene materials, management of social distancing outside including queue management. Will the footfall vary between weekdays and weekends – if so then the cleaning regime may need to reflect this.
- **Where**: where are the toilets in relation to usage points – car parks, open space, beaches, shops, main roads
- **Other providers**: are your toilets the only facilities available, who else provides toilets in the same area
- **Overall provision**: do you need to open all of your toilets or is there an option to identify the best ones to reopen. Do you need to open the whole block or is it appropriate to partially reopen toilets?

**Step 2: What are the Risks?**

**Maintaining social distancing**

- What mitigation works for your setting
- Signage
- Queuing system
- One in one out

**Internal** – Maintaining current social distancing requirements internally may require consideration of reducing the number of cubicles or only operating disabled facilities where a “one in one out” approach can be adopted. Strong emphasis should be place on guidance signage, making sure this is as clear and visible as possible – promotion on wider social media would also be recommended.
External – remember that consideration needs to be given to the exterior of facility. In low use areas it may be suitable to rely on simple signage. However, where it is foreseeable that people will be forced to queue, it is important to consider what form this is likely to take, how will it impact on other facilities/buildings nearby and how can this be best managed and guided.

Cleaning protocols and frequency

- Need for increased frequency of cleaning
- Cleanliness of touch points including door handles, knobs and taps
- PPE and cleaning protocols for staff and contractors

New cleaning protocols should be put in place to limit coronavirus transmission in public places, this may include increased frequency of cleaning and enhanced cleaning for some areas.

- The toilets must be cleaned and disinfected (with an appropriate solution) frequently. This cleansing regime may need to be increased in response to levels of use i.e. in busy areas Cornwall Council is choosing to increase the frequency of cleaning to three times per day. However, this may not be necessary in every case.
- Consider using disposable paper towels instead of air dryers
- Carry out enhanced cleaning for busy sites and for touch points in and near toilets.
- Close the facilities during cleaning. If this is not possible, provide staff with barriers to close off areas of the facility being cleaned.

Government has provided some guidance in Covid-10 Decontamination in non-healthcare settings

The Centre for Disease control and Prevention sets out good cleaning standards for all situations on its page for Cleaning and Disinfecting Your Facility

Staff safety and care

Whether using internal staff or a contractor, all staff should be fully briefed and understand new safe systems of working.

Staff should be fully equipped before leaving a work depot and issued with appropriate and properly fitting PPE, equipment (including a fully charged radio) and materials etc. Use of a checklist is advisable.

Step 3 : Carry out a risk assessment for each toilet block
The CALC has published a Guide to Risk Assessment which is available to download from our website [www.cornwallalc.org.uk](http://www.cornwallalc.org.uk). Working with Cornwall Council and Public Health England, we have now compiled a template which is the start of your risk assessment of each set of public toilets run by your council.

The template is only a guide and you must consider the local circumstances and needs.

The template is split into two parts:

i) Risks to users
ii) Risks to cleaners

1) Complete the header – it is important to know where the building is, when it was assessed, who assessed and when the assessment will be reviewed. This document is a key part of your audit trail and should be retained.

2) Identify the nature of the hazards and the existing control measures you can put in place to manage these risks. Be honest – it is important that these are practical and achievable measures based on what you can do.

3) Score the likelihood of something happening and the severity of the impact if it did, using the matrix provided on the template. The template requires you to identify a value for each criteria (the chance of something happening and the severity of the impact if it did) to give a risk rating.

4) Having established the likelihood and the severity, you will be able to multiply the two numbers to get a Risk Rating for users and cleaners.

5) The total score is the Risk Value for that set of toilets which will allow you to decide whether you have sufficient measures in place for your toilets to reopen them.

**Step 4 : Managing and monitoring**

Once you have established the Risk Rating for your toilets, compare against the chart below to establish whether you are able to reopen each block of toilets. You may find it helpful to reflect on those basic facts established at step 1 as these may help you prioritise a single set, a better way of cleaning or joint working with another provider to ensure some toilet provision in the parish.

<table>
<thead>
<tr>
<th>Risk Rating (combined users/cleaner score)</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>15 – 25 Very High</td>
<td>The toilets should not be opened without significantly reducing the risk</td>
</tr>
<tr>
<td>10 – 12 High</td>
<td>As above</td>
</tr>
</tbody>
</table>
Step 5 : Publicising your decision

Once you have reached a decision on the future opening of the toilets it is important that this is publicised as widely as possible. If toilets remain closed or partially closed it is vital that you let everyone know why and when this decision will be reviewed.

If you are able to reopen some or all of the toilets, then it is important that everyone knows which toilets are open and your ‘ask’ for keeping everyone safe. It is helpful to have notices outside the toilets visible for those waiting so that they have time to understand your message.

COVID-19 – USING PUBLIC TOILETS (guidance / signage) [add opening/closing times]

1. Please avoid using the public toilet where possible.
2. Use at your own risk.
3. These facilities are cleaned/inspected [X] times a day. It is still essential that you follow the guidance given to keep yourself and others safe.
4. The toilets will be closed during cleaning.
5. You must maintain a safe distance of [2 metres] from others when entering, waiting or leaving public toilets.
6. If on entry you are unable to maintain social distancing, please wait in the designated queuing area, keeping 2 metres apart from others and avoid blocking the entrance.
7. Some cubicles may be closed for your safety – do not use if closed
8. Avoid touching surfaces where possible and do not touch your face.
9. Before leaving the facility WASH YOUR HANDS with soap and water for at least 20 seconds and dry thoroughly.
10. Please use and leave the facility as quickly as possible.
11. Wash your hands again when you get home.
12. Please respect our staff.
Thank you for helping us keep everyone safe.

**Top Tips for maintaining hygiene, through handwashing, sanitisation facilities and toilets**

There is no statutory guide in place for the management of public toilets. However, this is a wide variety of information available for different public areas, especially in the work place. Working Safely in the Workplace does contain some information around hygiene and toilets at work and in retail and may be helpful in assessing how to open your toilets safely.

To help everyone maintain good hygiene, consideration should be given to:

- Using signs and posters to build awareness of good handwashing technique, the need to increase handwashing frequency, avoid touching your face and to cough or sneeze into your arm. Consider how to ensure safety messages reach those with hearing or vision impairments
- Providing regular reminders and signage to maintain hygiene standards
- Providing hand sanitiser in multiple locations in addition to washrooms
- Setting clear use and cleaning guidance for toilets to ensure they are kept clean and social distancing is achieved
- Enhancing cleaning for busy areas
- Providing more waste facilities and more frequent rubbish collection
- Using disposable paper towels in handwashing facilities where possible
- Minimising use of portable toilets
- Provision of automated hand sanitising dispensers in public places
- Ensuring that takeaway catering facilities can be used in a safe way that maintains social distancing and hygiene