



WPUK submission of evidence to the Ministry of Housing, Communities & Local Government's Call for Evidence regarding public toilet provision.

1. [Woman's Place UK](#) (WPUK) was established in September 2017 to enable the voices of ordinary women to be heard in the debate about reform of the Gender Recognition Act 2004. We are a grassroots campaign group, founded by women in the labour and trade union movement. We believe in the right of everyone to live their lives free from discrimination and harassment.
2. Since then, our campaign has broadened out to uphold and extend women's sex-based rights more generally. In January 2019, we published five [new year resolutions](#) and in July 2019 we published a [manifesto](#) with demands across a range of policy areas that we would like to see taken up widely.
3. We welcome the opportunity to submit evidence to the Ministry of Housing, Communities & Local Government (the Ministry) regarding public toilet provision. We note that the Ministry [acknowledges](#) that *"Women often have to face excessive queues for toilets or don't have access to appropriate facilities that meet their needs when out"* and that this limits women's freedom and social participation. Further, the Ministry's [recognition](#) that the move towards provision of 'gender neutral' toilets *"places women at a significant disadvantage"* because *"Women are also likely to feel less comfortable using mixed sex facilities, and require more space"* is welcomed. Major public organisations/institutions have effectively reduced provision for women by turning female and male toilets into 'gender neutral' toilets, even when the latter has urinals, for examples The Barbican, Old Vic and [Charleston House](#).
4. WPUK [agrees](#) that *"there needs to be proper provision of gender-specific toilets for both men and women, with a clear steer in building standards guidance"*. The erosion of the existing inadequate sanitary provision for women needs to be reversed. We recommend that the Ministry, in clarifying the building standards guidance, also investigates how the proliferation of 'gender-neutral' toilets has come about. We note that British Standards (BS 6465, parts 1-4) and "The Provision of Toilets in Wales: Local Toilets Strategies, Statutory Guidance June 2018" stress the point that women require double the provision of men. Women are the majority of the British population (almost one million more women than men). Girls and women, due to our female anatomy, deal with intimate physical issues every month (menstruation) for much of our lives and may need to deal with "accidents" due to the greater likelihood of incontinence amongst the female population as a result of pregnancy and childbirth, as well as the aging process. For these reasons, we need readily available access to single-sex toilet spaces with plenty of basins and preferably a supply of hot water. Women are increasingly using more environmentally friendly menstrual care, such as moon cups, which require rinsing. Women and girls do much more than simply wash their hands after using a public toilet. [Women](#) have greater caring responsibilities than men and often need to use public toilets not only for themselves but also when accompanied by children and/or elderly or those whose social limitations may not require them to use the disabled toilet facility. This means that the total space required for women and girls to access the public arena on an equal basis to men needs to be at least double that afforded to male toilets. We do not think that 'gender neutral' toilet facilities for disabled people/wheelchair users should be included in this space allocation and agree that such provision needs to be calculated separately.

5. Sex is a protected characteristic; and refers to a female or male of any age. Not only are women/girls legally entitled to be provided with same-sex toilets, but the opportunity also exists for us to show a case for sex discrimination if we are not given the same equality of access to women's facilities, as men are to male-only facilities. It is clearly stated in the Equality Act 2010 that sex does not include gender reassignment or sexual orientation. The building standards guidance needs to make explicit that any Public Sector Equality Duty Equality Impact Assessment should regard the protected characteristic of 'sex' to be the 'main affected group'. Any 'gender neutral' facilities deemed necessary should be additional to, rather than, instead of, sex-specific provision. Any gender-neutral provision should be entirely enclosed and include washing facilities.
6. Regarding signage, WPUK recommends the universal use of Male and Female to denote the sex-specific toilet provision and 'Mixed' for gender-neutral facilities. We request that all future designs for signage should be checked to ensure that the design/text is as clear as possible to all users.
7. The physiological differences between male and female must be considered as well as the social and cultural requirements of safety and dignity within our diverse society.
8. Woman's Place UK recommends that the Ministry refers to the technical detail in [this article](#) as a statement of our views and also to this very [engaging presentation](#) Professor Clara Greed made at one of our meetings in November 2018. Further, much relevant information is available at <http://www.publicinconveniences.org.uk/>.

Woman's Place UK
January 2021