### TAVISTOCK TOWN COUNCIL

# BUDGET AND POLICY COMMITTEE TUESDAY 19<sup>TH</sup> FEBRUARY, 2019

### **PUBLIC TOILETS IN TAVISTOCK**

### 1. PURPOSE OF REPORT

To afford the opportunity for this Committee and Council to formally consider proposals from the Borough Council (WDBC) to either convey public toilets currently in its ownership to the Town Council, or to close them.

More specifically to begin to ascertain, in principle, the answers to two questions posed by the Borough as part of the offer, namely which (if any), of the WDBC public conveniences in Tavistock to take on and, if so, whether or not to endorse the introduction of charging.

### 2. CORPORATE POLICY CONSIDERATIONS

The proposal potentially relates to priorities such as D1 (Representation), D3 (Consultation), C1 (Working Together), C5 (Community Assets), EN1 (Environment).

### **3. LEGAL AND RISK MANAGEMENT ISSUES**

This Committee and Council will be aware of the issues which can arise from the transfer/acquisition of assets, associated matters/costs and encumbrances. It has in place arrangements in respect of surveys, valuations, consultation etc within its policy framework.

The Council therefore needs to ensure that there is an appropriate level of assurance in key areas – not least ability to meet revenue and capital costs, liabilities etc to ensure that associated risks are mitigated and managed as best they can.

### **4. RESOURCE ISSUES**

The resource issues arising from this report include, but are not limited to, capital commitment, revenue commitment, staffing/capacity and contract management. Costs currently incurred by the Borough Council are set out in more detail within the report and its appendices.

By way of short hand a £6,000 increase in cost to the Town Council roughly approximates to a 1% increase in Council Tax.

### 5. COMMUNICATIONS ISSUES

Discussions have taken place with Officers of the Borough Council regarding the basis upon which public conveniences are to be treated, the options available to the Town Council and contents of this report. A survey has been distributed to households in the Town to help inform both the community, and the determination by Council of next steps in due course. Preliminary discussions have taken place with the Surveyors to the Council.

### 6. RECOMMENDATIONS

The Budget and Policy Committee review the contents of the report and comment, as appropriate thereon indicating either how it wishes the Council to proceed, in principle, and the information necessary to inform such a choice. A further report being brought back to Council on the close of the survey period incorporating the views of this Committee and seeking a formal indication of which (if any) premises the Council might be interested in taking on and whether it supports the principle of charging.

### 1.BACKGROUND

- 1.1 As part of its response to public sector austerity West Devon Borough Council has, with reluctance, decided that it will need to dispose of those public conveniences currently in its ownership and operation. The disposal is taking place over two tranches 2019/20 (for the majority of public conveniences) and 2020/21 (for those in Tavistock).
- 1.2 There are three facilities within Tavistock which fall into this category those public conveniences at the Guildhall Car Park, Bedford Car Park and the Bus Station.

### 2. CURRENT SITUATION

2.1 West Devon Borough Council has indicated that, for Tavistock, if the Town Council wishes to take on some or all public conveniences in the Town commencing in the 2020/21 financial year, then it will keep those premises open during 2019/20

pending transfer. However, any premises which the Town Council indicates it does not wish to take on will be closed either on 31<sup>st</sup> March, 2019 or as soon as practicable thereafter. The Borough Council is offering public conveniences to Town Councils principally on one of two bases<sup>1</sup>:-

- a. Acquiring the Freehold of the asset (subject to any relevant covenants or conditions); or
- b. Entering into a four year contribution agreement with the Borough Council. Under this the Town or Parish Council would meet the costs of the Borough Council for the provision of the service during the contract term<sup>2</sup>.
- c. Additionally for any toilets in the town which the Town Council indicates it would wish to take on the Borough has offered, at its own expense, to introduce 'pay as you go' arrangements<sup>3</sup>.
- 2.2 A copy schedule indicating the costs to the Borough Council of providing public conveniences in Tavistock is enclosed (Appendix 1 refers). It should however be noted that the cleaning costs shown should be treated as indicative. This is because the Borough Council has recently re-negotiated its contractual arrangements and notification of the new costs is awaited. It is however anticipated to be likely that the new contract costs will not exceed those of the existing contract.
- 2.3 Members will also be aware that the Government is proposing to remove the business rate liability applicable to public conveniences which would, in due course, affect that charge line. It can be seen that, in broad terms (and after adjusting for business rates), the cost to the Borough Council for delivering public convenience in Tavistock is approximately £100,000 per annum. This does not include any significant costs associated with sinking funds/capital repair works.

<sup>2</sup> Note one difference in cost terms is that under the latter arrangement the town/parish would continue to meet those costs classified on the schedule as WDBC costs.

<sup>&</sup>lt;sup>1</sup> But see below regarding possible leasehold

<sup>&</sup>lt;sup>3</sup> Note the assessment of such a proposal should appropriately include the relationship between toilets currently open to the public in the Pannier Market (and to users of the Town Hall) and associated footfall. In addition an assessment would need to be made of the associated cost/benefits – both financial (eg service/maintenance costs) and other (eg accessibility). There is also the prospective opening of the Guildhall Gateway Centre (which will have toilet facilities) to be mindful of.

- 2.4 The significance of this is that, for the Bedford Car Park toilets in particular:-
  - The building itself is listed and in a state of repair which may be likely to require work (some emergency repairs to the roof having been undertaken by the Borough Council recently);
  - There is a long lease holder occupying the first floor (and part ground floor) of the premises to whom the landowner will owe various obligations.
- 2.5 Consequently, if the Town Council were to consider taking the freehold of one or more of the public conveniences it would be appropriate, in addition to any routine running/maintenance costs, to make provision for a capital repair sinking fund. The condition of, and obligations attaching to, the Bedford Car Park toilets mean that it would not be appropriate for your officers to recommend acquisition of the freehold of the building. However, steps toward a possible solution appear to have been made in discussions with the Borough Council (see below).
- The Borough Council has indicated that in view of the 2.6 complexities previously identified with regard to the Bedford Car Park public conveniences there is a potential option whereby the Town Council could take a lease of the toilets at a pepper corn rent if it were prepared to take on the costs of delivering the public conveniences. However, in addition to being responsible for the internal areas it would occupy, the Borough is also seeking coverage for full repairing liability of 50% all repair costs associated with the structure/fabric of the premises. This is not something your officers could recommend as it would entail the Town Council taking on a liability not only for the area it would occupy, but also part of the area already under demise to another party<sup>4</sup>. Additionally Council would wish to consider if a full repairing lease is an appropriate arrangement in the context of providing a public service at additional cost to it.
- 2.7 Assuming that the liability could be adjusted solely to relate to the demise to the Town Council vis the Bedford Car Park premises it is still strongly recommended that it undertake a full

<sup>&</sup>lt;sup>4</sup> See footnote 8

structural survey<sup>5</sup> to better appreciate the potential liabilities of that listed building in view of the apparent poor condition of the premises. Council would also want to take legal advice upon the suitability of entering into such an agreement subject to the terms of the lease (eg duration, contracted out/in, covenants, restrictions etc).

- 2.8 For the two other premises, if considered for acquisition, it is suggested that a general survey be undertaken to better understand potential future liabilities associated with the structure and fabric of the buildings. More generally the Borough has responded to some of the points raised by the Town Council in discussions as follows:
  - i. There are no capital works identified or scheduled to any of the toilets in the next 10-15 years<sup>6</sup>;
  - ii. WDBC holds no condition surveys for any of the premises;
  - iii. Asbestos surveys whilst believed to have been undertaken WDBC holds no record, these would be undertaken by them prior to any transfer;
  - iv. There was a problem in the past with drain/sewer runs for the bus station. WDBC commissioned a survey and identified a 'flat' section. The drains were altered and they have
    - 'to a large extent, overcome the blockage problems that we have quite often had to resolve. There still remains the occasional blockage caused by inappropriate items being flushed in the "family" toilet<sup>7</sup>;
  - v. Lease (Bedford Car Park refers), terms would be likely to include:
    - a. Demise ground floor pc's and service void to the rear of the ladies<sup>8</sup>;

<sup>&</sup>lt;sup>5</sup> And requests an accompanying schedule of condition to be attached to the lease to avoid future disputes over liability.

<sup>&</sup>lt;sup>6</sup> This could be somewhat verified by survey but it is noted WDBC does not have a repair history available.

<sup>&</sup>lt;sup>7</sup> It might be appropriate to make enquiries as to associated frequency/cost etc

<sup>&</sup>lt;sup>8</sup> Note the apparent difficulty being that TTC is being asked to meet 50% of the fabric maintenance costs whilst being offered occupation of less than 50% of the premises (see floor plan (Appendix 4)). Subsequent clarification from WDBC is that the obligation on the other tenant is 50% (but their demise is greater than 50% of the premises). So to avoid any liability falling to WDBC for the maintenance of the fabric of the listed building the Town Council should meet the costs for the portion occupied by the other tenant (but not reflected in their repairing obligations). Putting aside the matter of fairness, because of the status of the other tenant the Town Council is precluded by s8 LGA 1894 from making grants for works to a church building. Consequently

- b. Term coterminous with the other lease, approximately 23 years;
- c. Rent nil:
- d. Outgoings TTC to be liable for all costs of occupation:
- e. Repairs TTC to be liable for all internal repairs and maintenance. In addition TTC to pay<sup>9</sup> a 50% contribution to the landlords reasonably incurred costs of maintaining the structure of the whole building, including external walls, roof, floors service media and drainage system;
- f. Use restricted to public conveniences only;
- g. Costs each party to bear their own with the exception that WDBC to make a contribution of up to £1,000 + disbursements toward TTC legal costs;
- h. No transfer of undertakings (TUPE) obligations are engaged.

### 3. CONCLUSION

- The outcome of the recent community survey undertaken by the 3.1 Town Council to assess the views of the public will be reported in full to the next Council Meeting. An interim update will be made orally at the Budget and Policy Committee.
- 3.2 Consequently it would be premature for your officers to make a recommendation to this Committee as to which, if any, of the facilities should either be taken on (or not as the case may be).
- 3.3 However, the Council will, inter alia, be mindful of:
  - a. The levels of importance attached by the Community to accessibility of/to public conveniences following consultation:
  - b. The benefits associated with public convenience provision both to residents and visitors to the Town;
  - c. The drawbacks associated with the significant ongoing revenue costs of public conveniences in relation to a relatively modest (£600,000 per annum) precept base;

it would be outside the lawful powers of the Council to enter a commitment to a de facto grant to cover such costs for a church building. <sup>9</sup> Ibid

- d. The potential for the significant (in the case of Bedford Car Park public conveniences potentially substantial) long term costs of maintaining buildings;
- e. The relationship between public conveniences in the Guildhall Car Park and Pannier Market. Also the Guildhall THI Public Realm proposals and Guildhall Gateway Centre in view of their proximity;
- f. If services were to be taken on, whether the Town Council would look to deliver them by virtue of contract, direct service delivery or other;
- g. The merits/drawbacks of pay as you go vis a vis increased taxation.
- 3.4 To provide additional information a copy of the current contract cleaning schedule and risk assessment are appended to this report (Appendices 2-3) and an indication of the (recent) contract cleaning costs has been requested from the Borough Council.
- 3.5 Taking 2017/18 as a cost base and stripping out both business rates and WDBC staff and vehicle costs the cost to the Borough Council of delivering all three public conveniences in Tavistock is in the order of £70,429. This equates to a potential increase in the Tavistock Town Council precept of in the order of 11%.
- 3.6 However, it is recognised that there would necessarily be other increased costs for the Town Council in taking on a new service in terms of overheads, support etc. Therefore this appropriately represents a minimum figure which also disregards any additional provision necessary to meet capital costs of maintenance. At this stage a prudent estimate of the provision the Town Council should make (in the event it were to look to all 3 facilities) remains iro £100,000<sup>10</sup>pa.

### **4. NEXT STEPS**

- 4.1 In coming to a view the Town Council will wish to have regard, inter alia, to:
  - a. Which facilities it would wish to retain/not and the basis for same;
  - b. Whether or not to introduce charging.

<sup>&</sup>lt;sup>10</sup> Or in practice, after adjustment for the current TTC contribution to WDBC (iro £6,000pa), £94,000.

# CARL HEARN TOWN CLERK

APPEN DIX 1

Appendix A
Public toilet cost allocation for 2017/ 18

Facility	% of costs (other than cleaning)	WDBC staff & vehicle costs	Cleaning costs	Repairs/ maintena nce/ vandalis m costs	Electricity	Business rates	Water charges	Grounds maint	Miscellan eous costs	Rent	Internal recharge s	Capital charges	Parish contributi ons	Pay on entry scheme	Total
Bedford Bridge	4.10	£3,580	£3,360	£1,648	£329	£2,544	£1,459	£31	121		£223	£476			E13,650
Brentor	0.77	£672	£633	£309	£62	£792	£274	£6	2.0		£42	£89			£2,880
Chagford	6.40	Pf san	\$5,244	\$2,572	£514	Σ600	\$2,27	£48	\$1	£470	£348	4743	-01.772		\$16,634
Hatherleigh	2,09	£1.825	£1.245	£840	£168	£684	£744	£16	60		£114	£243	-01.105		£4,773
Lydford	1,76	£1,537	£1,443	£707	£141	£720	£624	£13	0.3		196	£204			£5,489
Okehampton - Fairplace	13.98	£12:209	£11,450	£5,619	£1,123	£1,200	£4,974	£104	£2		1761	£1,623	-£3,649		£35,415
Okehampton - Market Street	9,99	€8.724	£8.178	£4,015	€802	£2,256	£3,554	£74	£1		£544	£1,160	-£2.10tl		€26,702
Princetown	13,98	£12,209	£11.450	£5,019	£1,123	£2, 728	£4,974	£104	£2		£761	£1,62	-£3/457	(E30)000	£34,305
Tavistock - Bus Station	5.99	£5.231	£4.907	£2,408	£481	£1,776	£2,131	£45	٤1		£326	£695	-£925		£17.073
Tavistock - Bedford	15,98	£13,955	£13,086	£6,423	£1,283	£2,736	£5,685	£119	£2		£870	£1,855	-£2,475		£43,539
Tavistock - Guildhall Square	19,97	£17.440	£16,357	£8,027	£1,604	£2,496	£7,105	£149	£3		£1,087	£2,319	+£3,094		£53,491
Yelverton - roundabout	4,99	£4.358	£4.089	£2,006	£401	£3,233	£1,775	£37	٤1		£272	£579	-£2,932		£13,818
	100,00	£87,329	£81,442	£40,193	£8,031	£15,624	£35,576	£745	£14	£470	£5,443	£11,610	-£22.020	-£3,030	£267,768

Facility cleaned by Pari

Facility	% of costs (other than cleaning)	WDBC staff & vehicle costs	Cleaning costs	Repairs/ maintena nce/ vandalis m costs	Electricity	Business rates	Water charges	Grounds maint	Miscellan eous costs	Rent	Internal recharge s	Capital charges	total
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Chagford	6.40	£5,589	£5,244	£2,572	£514	£600	£2,277	£48	£1	£470	£348	£743	£18,406
Hatherleigh	2.09	£1,825	£1,245	£840	£168	£684	£744	£16	£0		£114	£243	£5,878
Lydford	1.76	£1,537	£1,443	£707	£141	£720	£626	£13	03		£96	£204	£5,489
Okehampton - Fairplace	13.98	£12,209	£11,450	£5,619	£1,123	£1,200	£4,974	£104	53		£761	£1,623	£39,064
Okehampton - Market Street	9,99	£8,724	£8,178	£4,015	£802	£2,256	£3,554	£74	£1		£544	£1,160	£29,310
Princetown	13.98	£12,209	£11.450	£5,619	£1,123	£2,928	£4,974	£104	£2		£761	£1,623	£40,792
Tavistock - Bus Station	5,99	£5,231	£4,907	£2,408	£481	£1,776	£2,131	245	£1		£326	£695	£18,001
Tavistock - Bedford	15.98	£13,955	£13,086	£6,423	£1,283	£2,736	£5,685	£119	£2		£870	£1,855	£46,014
Tavistock - Guildhall Square	19.97	£17,440	£16,357	£8,027	£1,604	£2,496	£7,105	£149	£3		£1,087	£2,319	£56,584
Yelverton - roundabout	4.99	£4,358	£4,089	£2,006	£401	£3,233	£1,775	£37	£1		£272	£579	£16,750
Total	100.00	£87,329	£81,442	£40,193	£8,031	£15,624	£35,576	£745	£14	£470	£5.443	£11.610	£292.818

Facility	Parish contributi ons	Pay on entry scheme
Bedford Bridge		

Affendex 2

### 2.0 OPENING/ CLOSING TIMES

2.1 All toilets must be opened to the public on each day that they are required to be opened no later than 09:00; and closed no earlier than 18:00 as a minimum requirement (but before 19:00).

# 4.12 Daily tasks (upon each programmed visit)

### **First Clean**

- (a) Empty waste bins, where provided, remove all refuse from the site and dispose of at proper disposal site.
- (b) Clean all hand basins, taps, mirrors, sanitary fittings, door handles and tiles, and dry. Clean Wallgate units, hand dryers and top up soap dispensers.
- (c) Clean and sanitise all urinals, sparge pipes, lavatory pans, toilet seats, leaving the latter dry.
- (d) Clean and sanitise as necessary all baby changing areas where present, toilet areas of walls, doors, ceilings or other finishes and remove graffiti.
- (e) Thoroughly sweep all floors, placing all arisings into refuse sacks which shall be disposed of in a clean and hygienic manner as agreed with the Supervising Officer. Clean floors thoroughly, including floor edges and corners.
- (f) Soap, paper towels and toilet paper are to be supplied and replenished by the Contractor as necessary at each toilet.
- (g) Clear accumulated rubbish from external paths and areas immediately adjoining and up to 5 metres from the building and, where necessary, sweep so as to leave the area in a tidy condition.
- (h) Check building for damage or structural defects including water services (to prevent wastage). Effect minor repairs and immediately report to Supervising Officer any defect of a more substantial nature. Reporting of defects shall take place on the day of discovery.
- (i) Removal of litter and detritus from open external gullies.
- (m) Wash all ledges, sills, door fittings.
- (n) Remove cobwebs at all levels.
- (o) Paint over any graffiti or offensive markings not capable of removal by other means.

### All subsequent cleans

- (p) If required empty waste bins, where provided remove all refuse from the site and dispose of at proper disposal site.
- (q) Clean and sanitise all showers, urinals, lavatory pans, toilets seats, leaving the latter dry
- (r) Soap, paper towels and toilet paper to be replenished as necessary at each toilet
- (s) If required clean floors of any litter
- (t) Report any damage or defects to Supervising Officer

## 4.13 Results of daily cleaning

- (a) Floor to be left clean, dry and free from Litter, dust, dirt, stains and soilage.
- (b) All lavatories and urinals should be free from all dust, dirt, stains, smearing and soilage.
- (c) There should be sufficient soap, paper towels and toilet paper.
- (d) All fixtures and fittings should be free from all dust, dirt, stains, smearing and soilage.
- (e) All surfaces to be dry and safe and free from all dust, dirt, stains, soilage and drip marks.

### 4.14 Weekly tasks

- (a) Clean, inside and outside, all windows and frames, light fittings, door frames and handles, partitions, shelves, waste bins and signs.
- (b) Polish stainless steel fittings etc.
- (c) Eliminate all blacking/ engrained dirt.
- (d) Clean utility areas, including walls, floors, ceilings, shelving and concealed plumbing, including cisterns. Ensure all areas, including cisterns, are free from Litter.
- (e) Clear gutters as necessary of all leaves and other debris.

### 4.15 Deep cleaning

The Contractor shall submit a programme for deep cleaning to the Supervising Officer, stating the dates and times that these will be carried out. An initial deep clean needs to take place within 2 Months of the Services Commencement Date and then at least every Month between March and October for all toilets. For those

toilets which are open all year round, deep cleaning should continue from November to February every second Month. Those toilets which are closed for the winter period should be deep cleaned prior to being re-opened in spring.

- (a) Lavatory bowls de-scale, clean and remove all deposits from internal and external parts of the fitment, to include flushing rim, seat, hinges, S and P traps and clean exterior of flushing tank.
- (b) Urinals de-scale, clean and remove all deposits from the whole of the face, to include outlet traps, immediate pipe work, domical grating, sparge pipes and exterior of flushing tank.
- (c) Re-filleting of any open joints revealed by the removal of deposits from urinal stalls.
- (d) Wallgate units, wash basins and sinks de-scale, clean and remove all deposits from the entire areas, to include the underneath. Remove sludge and deposits from waste outlet, trap, pillar cocks and waste pipe. Re-filleting of any open joints when necessary.
- (e) Miscellaneous units gullies, open channels, baths, drinking fountains, soap dispensers, troughs etc. to be treated in the same manner as other units, to result in complete restoration. Any defects are to be reported to the Supervising Officer within 24 hours.
- (f) All signs, both internal and external, to be cleaned.
- (g) External walls to be pressure washed.
- (h) Guildhall Square all leaves to be removed from roof and skylights to be cleaned.
- (i) Bedford Bridge moss and leaves to be removed from roof.

# RISK ASSESSMENT

Commercial Services Assessor signature: HAZARD	SHDC staff, public, contractors  Name: E Widdicombe	_						
Assessor signature:	Name: E Widdicombe		Public	: Convenience	Public Convenience maintained by SHDC			
HAZARD			Revie	Review date:	Other assessments required:	OTHER		
HAZARD	Date: 11/05/2016 updated 30.04.18		ANNC	ANNUALLY		<u></u>		
	RISK	RISK	K RATING		ADDITIONAL CONTROL MEASURES REQUIRED TO REDUCE THE RISK	RESIDUA L RISK	SK A	
		LK	LIKELIHOOD	00	(If none required or possible please explain)	RATING	S S	
						SEVERIT Y X	* KIT	
							5	
		S	_	RR		တ	_	RR
PC Cleaning All risk	All risks arising from normal duties	က	က	6	All cleaning staff to be trained	2	2	4
PC Cleaning Injury	Injury from use/misuse of cleaning substances	က	4	12	MSDS and COSHH sheets for each cleaning substance to be held by cleaner at all times.	2	2	4
				•	Cleaner to wear suitable PPE as described by COSHH sheets			
PC Cleaning Electr	Electrocution from water/cleaning substance coming into	2	4		Cleaners to follow training	_	4	4
contac	contact with electric			•	Electric units not to be cleaned with running water			
PC Cleaning Injury	Injury from using incorrect/mixing cleaning substances	က	2	9	All cleaners to be trained in correct use of cleaning substances	-	2	7
				•	Only council issued cleaning substances to be used.			
PC Cleaning Verba	Verbal/physical abuse from members of the public	က	2	6 • All	All staffed training in dealing with confrontational situations	ო	_	က
				•	Report incidents to supervisor immediately			
Using steps to Injury reach areas	Injury caused by falling from height	2	2	4 . U.	Use long handled equipment to reach from floor	-	<b>—</b>	-
Lone Working Lone work	Lone worker injured and unable to obtain immediate assistance	2	4	• • • <u>M</u>	Follow Council's lone working procedure Mobile phone located to each round	2	2	4
				*	Weekend emergency contact phone number			
PC Cleaning Hygie	Hygiene and potential contact with biohazards	က	က	M •	Wear suitable PPE at all times whilst cleaning	က	_	က
Manual Handling Injury	Injury from poor manual handling techniques	က	က	9 Al	All staff to be fully trained in manual handling	2	2	4
PC Cleaning Injury	Injury caused by slips, trips and falls due to toilets being	က	2	• St	Staff trained in cleaning procedure	2	2	4

	cleaned, left in unsuitable condition, no lighting				<ul> <li>Warning signs to inform public of cleaning in progress</li> <li>Steps highlighted where no lighting applicable</li> <li>Seasonal closure of some toilets effected with no lights</li> </ul>			
Inspecting toilets for defects prior to cleaning	Injury due to unsafe facilities/buildings	2	4	ω	Toilets to be closed and supervisor informed immediately	-	4	4
Flooding due to blocked facilities	Slips, trips or falls due to slippery surfaces. Potential contact with biohazards	2	2	4	Toilets/area to be closed and supervisor informed immediately	-	2	2
Use of Vehicle	Injury caused by unroadworthy vehicle	ო	4	12	<ul> <li>Vehicle checks to be carried out daily</li> <li>Defects reported to supervisor immediately</li> </ul>	-	4	4
Fire	Injury or death caused by fire	2	4	ω	<ul> <li>Leave area and contact emergency services. Do not attempt to fight fire.</li> <li>Keep others away from the area</li> </ul>	~	4	4
Needles and other hazards	Contact with unexpected hazards within the toilets	4	0	ω		4	~	4
Drug or Alcohol user present when working on site	Drug or Alcohol user present when working on site	4	_	4	<ul> <li>Staff to leave site if any situation begins to develop this must be reported to appropriate team leader immediately</li> <li>Report to police if necessary</li> </ul>	4	2	∞
No Lighting in toilets	Slips, trips or falls	4	2	ω	<ul> <li>Minimum number of tollets this applies to</li> <li>Seasonal closures on some tollets</li> <li>Steps highlighted in white paint</li> </ul>	က	7	9
Use of Bleach	Risk of contact with skin and eyes, requires good ventilation	m	2	9	<ul> <li>Wear gloves, eye shields when handling concentrate</li> <li>Do not mix with other cleaning products</li> <li>Only provided to charge hand only and used on controlled way</li> </ul>	8	_	2

APPENDIX 4

