

November 28, 2024

To: Community and Protectives Services Committee and City of London Staff,

I would like to thank you for putting forward the report on **Publicly Accessible Washrooms in Parks and Recreation Facilities**. The provision of washrooms in public spaces is an important human right and is part of how we ensure people can regularly use and benefit from parks and recreation spaces. It is helpful to have a report like this to inform the review of outdoor washroom services as part of the upcoming Parks and Recreation Master Plan update. It will hopefully lead to an increase in availability and better access to good, quality public washrooms that meet the needs of everyone.

I am an instructor at King's University College and a PhD Candidate in the HEALab at Western in Geography and Environment. My area of research is specifically about public toilets in parks and recreations spaces across Canada. I am not sure if you are aware, but the United Nations provides a framework of criteria to assess the provision of toilets in public spaces. These criteria include availability; accessibility; affordability; quality and safety; privacy, dignity and acceptability. Cities should aim to use these standards to assess the provision of toilets in public spaces and more importantly ensure they are meeting them. While this report is a beginning there is more that London could be doing to ensure you are meeting the human right on access to toilets in public spaces.


That said, part of considering accessibility in the provision of public toilets is ensuring people know when washrooms are open or closed and when they can access them. Therefore, I want to acknowledge the City's commitment outlined in this report to provide signage that indicates a washroom's hours and months of operation, along with information to provide feedback on washrooms availability and conditions. This type of signage is important in ensuring people know if they can count on washroom to be available when they need it and to provide feedback when it doesn't meet standards. One addition I'd suggest is to also provide information on the next closest available public washroom that would be open should this one be closed. This ensures people can make timely use of a washroom when it is needed, particularly if it is an urgent situation. It is important that opening and closing times are accurately reflected in signage and that washrooms are open when they say will be and aren't closed unnecessarily.

The additional funding to increase staffing levels for the maintenance and operation of outdoor washroom facilities as part of the Mayor's Annual Budget Update is also a welcome move that will hopefully lead to better maintained washroom facilities and allow more washrooms to be open seasonally. Availability of washrooms is a key requirement of access. Research indicates that if people know there isn't a public washroom they can use, or if they can't count on it being open and clean, people will alter where they visit and their travel patterns (1, 2). People use parks and public spaces more regularly when and where washrooms are available all year round, regardless of cold weather and winter. Here in London, we can see this in the use of Springbank and Victoria Park. Both have all-season washroom availability.

Therefore, I'd like to propose the city do a pilot project to keep the washroom in Gibbons Park open 12 months a year. This will encourage more people to use our city's green spaces in the

winter and better meet the needs of families, caregivers and older people. Currently only three outdoor washrooms remain open in the winter, severely limiting people's use of parks and recreation spaces during this time. With the funding for additional washroom attendant cleaning, this is an ideal time to this initiative and will help move London closer to meeting the UN criteria on access to sanitation.

I have included the definitions of the 5 UN criteria below for your reference and I would be pleased to answer any questions or discuss this further with you or staff. Thank you for your time and consideration.



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1. Hartigan, Siobhan M., Kemberlee Bonnet, Leah. Chisholm, Casey. Kowalik, Roger R. Dmochowski, David Schlundt, and W. Stuart Reynolds. 2020. "Why Do Women Not Use the Bathroom? Women's Attitudes and Beliefs on Using Public Restrooms." *International Journal of Environmental Research and Public Health* 17 (6). <https://doi.org/10.3390/ijerph17062053>.
2. Reynolds, W. Stuart, Casey Kowalik, Melissa R. Kaufman, Roger R. Dmochowski, and Jay H. Fowke. 2020. "Women's Perceptions of Public Restrooms and the Relationships with Toileting Behaviors and Bladder Symptoms: A Cross-Sectional Study." *Journal of Urology* 204 (2): 310–15. <https://doi.org/10.1097/JU.0000000000000812>.

United Nation Definitions on Access to Sanitation in Public Spaces (Human Rights Council, 2019)

Availability – what location the public toilets are in, how that location is used, how many people use the space and the demographic make-up of those people. In addition, the number of toilets, sinks, amenities, and menstrual hygiene facilities available to ensure people are not waiting and have what they need.

Accessibility – the structure of the building and public toilet facilities so that they are accessible physically for "for all people at all times" of different abilities. Open during times people use those spaces in terms of both hours and seasonality. Facilities must be available to all genders, inclusive of signage, where people are easily able to access facilities that matches their gender.

Affordability – facilities at no cost or low cost to ensure adequate provision for all. It can also be understood to be the lack of public options setting up the need to pay for access through private facilities.

Quality and Safety – facilities that are clean, hygienic, and properly maintained to be safe for all users. Located and designed in ways that ensure users are safe from violence and that graffiti and damage is discouraged.

Acceptability, Privacy and Dignity – facilities must be designed, constructed, and maintained in ways that adhere to the personal and cultural needs of users.