

Gwynedd Council

Local Toilet Strategy

May 2019



1. Background

The Welsh Government agreed the adoption of the Public Health (Wales) Bill in May 2017. This Act brings together a range of practical actions for improving and protecting health. Part 8 of the Act introduces provision of toilets and specifically local toilet strategies. In terms of public conveniences the overall aim of the legislation is to ensure that all local authorities assess the needs of its community in relation to the provision of public conveniences and that it takes a strategic and transparent approach to best meet that need.

The intended effect of Part 8 is not to prevent local authorities from taking decisions which they need to take during the course of their activities, which may include decisions to close a traditional public toilet or building when appropriate to do so. Instead, the intended effect is to improve the planning of provision so that any such decisions are taken within the overall context of meeting their communities' identified needs. A strategic approach will also help to mitigate any negative impacts of changes to provision.

Local authorities in Wales now have the responsibility to:

- Assess the need for toilet provision for their communities;
- Plan to meet those needs;
- Produce a local toilets strategy; and
- Review the strategy, update and publicise revisions.

Gwynedd Council as such in line with these recommendations will set out to address the needs of the community and improving the standards of public conveniences under the local authority's control.

2. Introduction

Our objective in this strategy is to ensure that we continue to meet the needs of the people of Gwynedd despite the fact that the Council's resources are becoming scarcer. The emphasis in this strategy will be to ensure that Gwynedd has adequate provision for the future and we are able to work closely with our stakeholders to provide alternative delivery models in order to achieve this.

This strategy is also being prepared in a period of financial hardship therefore, that context has to be considered. The provision of public conveniences provides infrastructure necessary to facilitate the enjoyment of areas within Gwynedd by residents and visitors. They can make a significant impact upon the comfort of individuals and families who visit public spaces within the area and their perception of Gwynedd as a desirable place to visit.

Access to toilet facilities is important to all part of our population and not just older people. Lack of public toilets is commonly given as a reason that older people become socially isolated and loneliness can set it. However, many people (including younger people, families and people of all ages with a disability or health condition) require access to toilet facilities and a lack of provision can often lead to them also limiting their social contact with others.

Although the Public Health (Wales) Bill focuses on the 'Provision of Toilets', currently a local authority provision of public conveniences is not a statutory duty.

Increasingly the Council faces challenges to maintain standards of toilet provision, maintenance and cleaning due to limited funding and pressure on resources and yet Gwynedd still has the second highest number of council maintained toilets in Wales.

3. The aims of this strategy

The aim of this strategy is to meet the needs of the residents and visitors to Gwynedd by providing:-

- Provision of clean, safe, appropriately maintained facilities;
- > Maximise availability of toilets through Council partnership and other provision;
- Publicise and promote toilet provision information through webpages and other media;
- Ensuring public awareness of toilet location, through good direction signage and individual facility information signs;
- Assess the availability and distribution of facilities based upon demand;
- Sustainable provision within the budget available;

4. How has this strategy been developed?

This strategy incorporates feedback following a public consultation exercise undertaken during November and December 2018. The consultation was designed to assess the needs of residents and people visiting or working within Gwynedd. The responses received have been used to inform the content of the draft strategy.

This strategy also fits into other Council priorities and services and contributes to our vision as a Council to support all the people of Gwynedd to thrive and live full lives in their community, in a county which is one of the best counties to live in.

In developing this strategy the Council must fully consider the Well-being of Future Generations (Wales) Act 2015. The aim of the Act is about improving the social, economic, environmental and cultural well-being of Wales. It makes local authorities think more about the long term, work better with people and communities and each other, look to prevent problems and take a more joined-up approach. The Act also puts in place a 'sustainable development principle' which tells organisations how to go about meeting their duty under the Act, this means that Gwynedd Council have to act in a more sustainable way.

The Local Toilet Strategy incorporates the five ways of working which Gwynedd Council must follow in order to ensure we develop a sustainable strategy:

- Consider the importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs;
- Taking an integrated approach;
- Working with others in order to find sustainable solutions;
- Involving people in decisions that will affect them; and
- > Acting to prevent problems occurring or getting worse.

5. Reviewing the Strategy

Gwynedd Council will prepare an interim progress report setting out the steps taken in line with their strategy every two years commencing from the date of the last published strategy. An interim progress report will be published within six months of the end date of the two year period. Therefore, following publication in May 2019, the review will take place before the end of May 2021 and published before the end of November 2021.

6. Gwynedd Council Provision

Gwynedd has a mixture of toilet provision. We currently provide 63 traditional public toilets operated by the Council, as well as 35 community toilet facilities. A large part of the county is also part of the Snowdonia National Park which also provides toilet facilities.

Attached in Appendix 1 is a list of current provision within Gwynedd.

7. What is Gwynedd currently doing?

The Town and Community Council Partnership Scheme

Following the Gwynedd Challenge Engagement Exercise in 2016, the Cabinet revised its decision to achieve the £244,000 service cuts by agreeing to implement a proposed Partnership Scheme with Town and Community Councils in order to keep the majority of the County's existing toilets open for the future.

This scheme was developed as an alternative to the decision taken to close up to 50 toilets as part of the regime of cuts. We consulted with all the Town and Community Councils within Gwynedd to ascertain whether or not there would be sufficient interest in working in partnership in order to keep the toilets open. The Partnership Scheme works by the Town and Community Councils contributing towards the running costs of the toilets on an annual or seasonal basis.

Up to 63 toilets have now been kept open with the assistance of the local Town and Community Councils and others.

Working with Others

Where it has not been possible for the Town and Community Councils to contribute financially in order to keep the facilities open within their areas, the Council has sought to work with others, i.e. third sector partners, private businesses and local community groups in order to keep the provision open within their local areas.

For example in Fairbourne a local community group has been established and work is ongoing but other communities have also declared an interest in developing this way of working further.

Fairbourne Case Study

The coastal village of Fairbourne faced losing their toilet provision. The Council took every opportunity to speak to residents and the community council with regard to the financial challenge faced in order to keep the provision open. Public meetings were held to listen to the communities concerns and seek their views.

As a result, a group of residents came together and formed the Fairbourne Amenities Trust. By working with the Trust we had the opportunity to find a long term solution to ensure the future toilet provision for the village. A pilot scheme was developed which meant that the Trust has taken responsibility for the toilets. To ensure that we can support the group to succeed in this venture, it was decided that the Council would keep responsibility for the building in the short term. This was to ensure that we could support the group so that they have the resilience to provide the service.

It has been a positive experience for the Council in terms of working with others in order to have a sustainable outcome. In terms of planning for the long term, the Council have agreed to transfer the assets on a lease to the Trust from February 2019, with a continuous system for review in place.

Community toilet grant scheme

The Public Toilets Grant Scheme is funded and managed by Gwynedd Council. This Scheme allows members of the general public to use toilet facilities in a range of approved local establishments during their opening hours. The facilities are made available free of charge and without any expectation that users will purchase goods or services whilst on the premises. Participating premises will be required to keep their toilets safe, clean, accessible and well-stocked. The maximum grant is £500 per location per year. We have currently 35 premises across Gwynedd participating in the scheme and a current waiting list.

The service provider must display at least one sign provided by Gwynedd Council on their window(s) or door(s) to show that there are members of the scheme in order to inform the public of their right to use the their toilets. We have received some feedback that in general the public are not aware of the scheme.

Improving Facilities through Grant Funding

To date we have been successful in attracting up to £300,000 in grant funding to carry out improvement work on some public conveniences. Funding from the Tourism Amenity Investment Support Grant will pay for improvement work at three public toilets in Bethesda, Y Bala and Beddgelert.

Furthermore, funding has also been secured from the Rural Community Development Fund to upgrade the facilities and improve energy efficiency at the toilets at Penllyn, Caernarfon; Marian y De, Pwllheli; Queen's, Harlech; the Quay, Barmouth and Ganllwyd. This work will be carried out during 2019/20.

We will aim to seek ways of attracting further grants and work with others to attract grant funding in order to improve the standard and sustainability of the facilities.

Changing Places

Standard accessible toilets do not meet the needs of all people with a disability. People with profound and multiple learning disabilities, as well people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis often need extra equipment and space to allow them to use the toilets safely and comfortably. These needs are met by Changing Places toilets. Here in Gwynedd the first changing place facility has recently opened in the newly refurbished Ffestiniog and Welsh Highland Railway Station in Caernarfon.

Mapping Locations

This is an important part of our strategy so that people who need to visit a toilet can easily access information about the location, opening times, accessibility and type of facilities available.



The Welsh Government have developed this logo so that residents and visitors will readily recognise it wherever they are in Wales and have recommended that local authorities incorporate the logo as part of their awareness raising of toilets for public use.

One of the other requirements of this strategy is to prepare a dataset to a given specification and make it available as open data on our website. Once we have identified the toilets that will be publicised as available for use by the general public, the dataset will be consumed by the Welsh Government system and joined to other local authority datasets to produce a national toilets dataset for the Lle map. Lle is a geo-portal that serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment. Lle will generate all-Wales maps based on the datasets provided that can be configured to focus on either the national picture, or on more local areas. The data will be available in Welsh and English and available as an open data service accessible to everyone. The link to the Lle portal:

http://lle.gov.wales/home

The Council will annually review and update the Welsh Government "Lle" data to allow access to up to date information for residents and visitors.

8. What did we learn from conducting the Assessment of Need?

Gwynedd Council conducted an assessment of need to ensure that as many people as possible could engage in the process. This was achieved by coordinating quantitative information that already exists and we consulted with as many organisations and stakeholders as possible that we knew with an interest in the toilet provision.

Gwynedd Council has conducted an assessment of needs via:

- Public Toilets Questionnaire:
- Consultation 'Which services are important to you?'
- Equality Characteristics Groups
- Feedback from Town and Community Councils
- Gwynedd Profile
- Equality Assessment

Gwynedd Profile

Population Needs

According to the ONS Population estimates, the population of Gwynedd is 123,742. 23,410 of the population are under 18 years old and 27,971 are 65 or older. 61,335 of the population were men and 62,407 were women.

The ONS also provides population projections. These projections estimate an increase of around 10,000 people in Gwynedd over the next 20 years. However, we do not expect this increase to be consistent across age groups. We expect to see an increase in the population aged 0-15 of 5.6%, a reduction of 7.4% in the population aged 40-64 and an increase of 59.3% in the population aged 80 and over. This indicates a huge increase in the most vulnerable groups in our society - young people and older people.

Health Needs

The life expectancy of males in Gwynedd is 78.8 years, whilst female life expectancy in 83.1 years.

According to the Welsh Government Daffodil figures, 17,171 Gwynedd residents aged 18 years old and over have a limiting long-term illness. Over 4,500 Gwynedd residents have bladder problems.

According to the Crohn's & Colitis UK charity at least 300,000 people in the UK have Crohn's Disease or Ulcerative Colitis, known as Inflammatory Bowel Disease (IBD).

According to the response of Crohn's & Colitis UK to the Public Health Act (Wales), 96% of those who responded to their own survey stated that every local authority in Wales should have a duty to produce and publish a local toilets strategy. 40% stated that they supported this due to their urgent and regular need to use a toilet.

Public Toilets Questionnaire

The Public Toilets Questionnaire was launched by the Council in order to ascertain information to help us draw a picture of community needs and to assist with preparing a Local Toilets Strategy.

There was an opportunity for residents and organisations to participate:

- On-line by visiting the website at www.gwynedd.llyw.cymru/consultations
- A paper questionnaire available through Siop Gwynedd, the Council's libraries and leisure centres
- Send a letter or e-mail with feedback or comments

A wide range of methods were used to promote and raise awareness of the opportunities to participate in the survey, including:

- press releases used as a basis for articles in the local and regional newspapers (Daily Post, Herald, Bangor Mail, Cambrian News, Y Cyfnod, Chronicle, and a number of the county's Papurau Bro);
- a proactive campaign on social media that included a regular series of messages promoted through the Council's Twitter, Facebook accounts and via several partners;
- publishing an article in the newsletter 'Rhaeadr' for Gwynedd Council elected members
- circulating details of the consultation to a number of bodies, characteristic groups and difficult to reach groups, to share with their members, including members of:
 - Gwynedd Third Sector Liaison Group;

- Town and Community Councils;
- Gwynedd and Anglesey Public Services Board;
- Young Farmers;
- Bangor University Students Union;
- Yr Urdd:
- Age Cymru Gwynedd and Anglesey;
- arts organisations;
- environmental organisation
- Gwynedd Equality Core Group
- Young people including LGBT+ young people (GISDA),
- Disabled people, Menter Fachwen
- Gwynedd Older People's Council
- Gwynedd business sector representatives e.g. <u>http://www.gwyneddbusnes.net/html/singleton/228/cy-GB</u>

See the full responses to the questionnaire in Appendix 2

Who completed the Public Toilets Questionnaire?

1,202 responses were received. The majority of the responders were Gwynedd residents (67.3%) and visitors to Gwynedd (19.5%).



The majority of the responders (47.7%) were in the 45-64 age group. Less than 4% of responses were from the under 25 age group. This is low in comparison with the 21.6% of population in Gwynedd that are under 25 years old.

| Gender | Number | Percentage |
|---------------------|--------|------------|
| Female | 755 | 62.8% |
| Male | 380 | 31.6% |
| I prefer not to say | 34 | 2.8% |
| Not answered | 23 | 1.9% |
| Other | 10 | 0.8% |
| Total | 1202 | 100.0% |

Of the individuals who completed the questionnaire there were:

The following table shows the number and percentage of respondents who noted that they considered themselves as having a disability under Section 6 (1) of the Equality Act 2010. 100 individuals chose not to answer the question or chose the 'prefer not to say' option. Although it is not possible to make a direct comparison, according to the 2011 Census 9.7% of the Gwynedd residents declared that they had a condition that "severely limits their day to day activities" that compares with 9% of the questionnaire respondents who noted that they considered themselves disabled.

| Do you consider yourself a disabled person? | Number | Percentage |
|---|--------|------------|
| No | 994 | 82.7% |
| Yes | 108 | 9.0% |
| I prefer not to say | 82 | 6.8% |
| Not answered | 18 | 1.5% |
| Total | 1202 | 100.0% |

Main Messages

How often are public toilets used?

For the questionnaire, 'public toilets' are defined as public toilets and toilets that are part of the community toilets grant scheme e.g. in cafes or shops. It is obvious from the questionnaire that the provision is important to responders in general, with 54.4% stating that they use them daily or weekly. However, 8.9% of those under 25 stated that they 'Never' use public toilets compared with 2.3% in general. In addition, 13.3% of those under 25 stated that they that they used the toilets 'Daily' compared with 17.3% in general.

Are the opening hours suitable?

70.6% stated that the opening hours of the provision were suitable, however, there were clear messages in the comments that seasonal provision was unpopular especially in rural locations. Many of the observations referred to the need to extend opening hours, and noted that many close too early in the evening or do not open early enough in the morning.

38% of those who stated that they had a disability under section 6 (1) of the Equality Act 2010, noted that public toilets opening hours were not suitable for them, compared with 26% in general.

Are the facilities suitable for baby/children changing?

73.6% noted that the facilities were not suitable for baby/children changing. Many of the comments noted that there were insufficient changing units available and those that exist need to be modernised.

Are the facilities accessible?

16.7% of those who stated they had a disability under section 6 (1) of the Equality Act 2010, said that the facilities are not accessible to them, compared with 6.7% in general.

Was there any equality characteristic that specifically had an impact on the suitability of the toilets?

It can be seen from the table that the three equality characteristics that have an impact on the suitability of the toilets are Disability, Age and Gender.

| | Number of responses | % |
|-----------------------|---------------------|-------|
| Disability | 124 | 10.3% |
| Age | 119 | 9.9% |
| Gender | 77 | 6.4% |
| Pregnancy / Maternity | 22 | 1.8% |
| Sexual Orientation | 9 | 0.7% |
| Transgender | 8 | 0.7% |
| Religion | 7 | 0.6% |
| Race | 3 | 0.2% |

*They could choose more than one response.

Comments were received stating that the facilities were unsuitable for residents with disabilities and a specific medical condition e.g. bowel/bladder condition.

What are the standard of the facilities that are available?

Generally, 44.6% noted a score of 3 for the standard of the facilities. 29.4% gave a score of 4 or 5, namely Poor/Very Poor.



From your experience, what is the standard of the facilities that are available?

What is good about the public toilets provision?

26.5% of the comments noted that the availability of facilities was good, and 9.9% noted that they were in good locations. Many of the observations noted that the toilets were essential for different people:

- Gwynedd residents (6.6%),
- Visitors (4.6%),
- Families and children (3.0%)
- with a specific health condition (2.1%)
- elderly (1.3%)

See full responses in Appendix 2.

What can be improved in terms of the public toilets provision?

The main comment regarding what can be improved in terms of the provision was the hygiene of the facilities. 24.1% of the comments noted - ensuring a supply of suitable toiletries, need to improve or modernise the facilities and better lighting.

16.1% of the comments noted the need to increase or protect the number of public toilets that are open. 12.5% of the observations stated that the opening and closing hours and periods needed to be reviewed.

See full responses in Appendix 2

Are people aware of any local businesses that are part of the community toilets grant scheme?

In Gwynedd there are 35 businesses and local organisations that are part of the Community Toilets Grant Scheme. This means that any member of the public can use their facilities. 76.9% of those who answered noted that they were not aware of any local businesses that are part of the scheme.

| | Number | % |
|--------------|--------|--------|
| Not answered | 38 | 3.2% |
| No | 925 | 77.9% |
| Yes | 239 | 19.9% |
| Total | 1202 | 100.0% |

How easy is it to find a public toilet when needed?

36.5% stated that it was 'Difficult' or 'Very difficult' to find a public toilet and only 19.7% stated that it was 'Easy' or 'Very easy'. The remainder stated that they were 'Not easy or difficult' or did not answer the question.

78.5% of the respondents noted that they like to find where the nearest public toilets are by using signs.

Consultation 'Which services are important to you?'

Gwynedd Council conducted the 'Which services are important to you?' consultation in October 2018. The purpose of the consultation was to explain the financial position facing the Council to the residents and organisations of Gwynedd; In addition to offering an opportunity

for residents and organisations in Gwynedd to have their say on which services provided by the Council are most important to them.

Over 2,400 were consulted and generally across the county public toilets were not a high priority (ranked 44 out of 59). However, public toilets were in 11th position (out of 59) with people over 65 years old and 25th (of 59) for people with disabilities.

The Tywyn area included 'Public toilets' (5th position) in their top ten priorities. 'Public Toilets' are placed much higher (ranked 20th or higher) than the results for the whole of Gwynedd.

In terms of the 10 lowest ranking services out of 59, there are some differences in each local area compared to the whole of Gwynedd. The Bangor, Caernarfon and Dyffryn Nantlle areas ranked 'Public Toilets' amongst the lowest 10.

Public toilets were ranked 51st by the under 25 age group compared to the responses as a whole. To the contrary, they were ranked 11th by the responders over 65, which is a great deal higher (20 positions or higher) in terms of importance that the responses as a whole.

Self-advocacy Group

The group noted that they needed to be looked after and they did not want to have to pay to use them, although they knew that this would help with costs.

Gwynedd Older People's Council

Public toilets was one of the most important services for this group. The group noted that sufficient toilets were required in public places to enable older people to go out and travel with confidence.

Equality Core Group

We consulted with a Core Equality Group that represents the following groups:

- Refugees Group;
- Cytûn;
- Meirionnydd Access Group;
- Gwynedd Older People's Council;
- Men's Sheds Caernarfon;
- Hunaniaith;
- Bangor Indians and Friends Association

- Unique Transgender Network;
- Council of Sign Sight Sound;
- North Wales Independent Advocacy Service;
- Victim Support Centre;
- Bangor Islamic Centre

The Group considered public toilets to be extremely important for older people, young families and the disabled. They preferred grants for local businesses but these need to be advertised more, and expand their number and this would allow better facilities and more suitable changing places for people with additional needs. The Group noted that it was right for people to pay for using the facilities.

LGBT Group + GISDA

LGBT Group and GISDA were consulted. Some noted that the Council needs to provide gender neutral toilets and the facilities were currently unsuitable, dirty and closed too early.

Town and Community Councils

By working in partnership with Town and Community Councils the Council receives information about the needs of their communities. The Council has received observations that facilities in some of the communities are in a poor state and need to be upgraded. Other observations note that the opening hours need to be extended and that the provision should be available all year round.

Tourism

In the Public Toilets Questionnaire, tourism organisations noted that toilets were essential for visitors and they needed to be open throughout the year. The tourism sector is very important to Gwynedd. The STEAM report indicates that over 7.25 million tourists visited Gwynedd in 2017, a number that has increased annually since 2012.

9. What will we be doing?

Recognising that there are no quick fixes and that austerity measures mean that the Council will continue to face financial pressures the Council is committed to the following to mitigate the gaps between what toilet provision is available and identified need:

Provision of clean, safe and appropriately maintained facilities

The Council will review its cleansing operations and standards on a periodic basis to ensure the most efficient and effective provision within allocated resources and will also review the opening hours of facilities in key locations. It will also conduct an audit of the baby changing facilities available and strive to increase the availability where possible and practicable. The Council will continue to engage with Police, Community Safety and residents, community groups and others to ensure that the facilities are as safe as possible.

Maximise availability of toilets through partnership and other provision

Continue to work with communities to maintain the current partnership scheme and continue to work with local businesses to better promote the use of their toilet facilities under the Community Grant Scheme especially in areas where they may be a gap in provision. We will do this by:

- Website and social media
- Improved signage for the businesses which will include the logo stipulated by the Welsh Government
- List of premises on tourism sites

Publicise and promote toilet provision information through webpages and other media

Mapping locations is an important part of our Strategy. We want people who need to visit a toilet to easily be able to access information about the location, opening times, accessibility and type of facilities available. We warmly welcome a decision by Welsh Government to create, with the support of local authorities, an online map of all existing toilet facilities available for public use in Wales. This map will not only help people to find local toilets but also take the stress out of planning journeys further afield. The Council will be providing up-to-date information to ensure all toilets in Gwynedd are included in this national map.

We also will provide a direct link to the national map on our website, when it is made available. The link to the Lle portal that will host the map, is: <u>http://lle.gov.wales/home</u>

We will regularly review the facilities that have been included at least every two years, in line with our progress reports and Strategy review periods, as detailed below. If we hear of changes to the availability of facilities, such as closures or changes to opening times, or indeed new businesses allowing use, we will update the information in a timely manner rather than waiting until the review date.

Ensuring public awareness of toilet location, through good direction signage and individual facility information signs

The toilet logo sticker will be displayed by those business currently operating under the community grant scheme and on relevant Council buildings that have been mapped. Consideration will also be given to improving the physical signposts to direct the public to available toilets in key locations such as transportation hubs within the County.

Assess the availability and distribution of facilities based upon demand

Ideally, the distribution of resources and facilities within Gwynedd should be arranged to deal effectively with the profile of demand. The periodic review of the Strategy can focus on the profile of demand to identify changes that could maximise effectiveness of the service provided.

Sustainable provision within the budget available

The Council is committed to sustainability through its carbon management plan and within its operations which include the provision of toilet facilities. Through the grant funding we have received to date we have ensured and will continue to ensure environmental considerations when facilities are improved or refurbished for example the recent refurbished facilities we have improved the lighting in these facilities through installing LED lighting.

10. Review, Reporting and Revision

The Act requires local authorities to undertake regular reviews of the local Strategy and provide progress reports. These should be done on a two year cycle, except where there is a general local authority election in which case the review should be carried out within one year of the election and either the Strategy redrafted or, an interim progress report provided.

Timescales for our planned review and reporting cycle is set out in the table below:

| Statutory review & interim progress report for period 30 th May | June to October 2021 | |
|---|----------------------------------|--|
| | | |
| 2019 to 30 th May 2021. | | |
| Secure Cabinet approval | October & November 2021 | |
| Publish interim progress report on website | 30 th November 2021 | |
| Review within one year of local authority election (5 th May | By 4 th May 2023 | |
| 2022). | | |
| If changes to the Strategy republish the fully approved | By 3 rd November 2023 | |
| document. | | |
| If no changes to the Strategy, prepare an interim progress | December 2024 to April 2025 | |
| report for 22 nd November 2022 to 22 nd November 2024. | | |
| Secure Cabinet approval | April / May 2025 | |
| Publish interim progress report on website | By 22 nd May 2025 | |
| Repeat this review process and production of interim progress statements every 2 years or | | |

within one year of a local authority election

11. Next Steps

We have consulted on the draft strategy and have updated the content in respect of the progress that has been made with the national mapping of local toilet facilities. We have also incorporated the recommendations made by the Communities Scrutiny Committee and the responses to the public consultation to inform this final strategy.

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