

# Response ID ANON-YHE4-356W-F

Submitted to **Changing Places Toilets: Building Standards Consultation**

Submitted on **2019-05-13 17:10:10**

## Questions

### 1 Do you support the proposal to introduce a requirement for Changing Places Toilets in certain buildings through building regulations?

Yes

#### Please set out your reasons for this response. :

The National Carer Organisations in Scotland fully support the requirement for Changing Places Toilets (CPT) through building regulations and view this as a very welcome opportunity for Scotland to create greater equality of access for those with complex care needs and their carers.

As acknowledged in the consultation paper, the existing Changes Places specification has proved to be successful where it is already implemented however we agree that it is now time to go further than good practice and establish Changing Places Toilets as a requirement.

The paper states that 'the benefits from the provision of Changing Places Toilets are societal', and we would emphasise this further in recognition of Article 30 of the UN Convention on the rights of persons with disabilities: The right to participate in cultural life, recreation, leisure and sport. Article 30 additionally makes specific reference to access sporting, recreational and tourism venues, and to be able to access places for cultural performances or services.

We know from our work that access to suitable sanitary provision is critical to people with complex needs and their families, not only in being able to access all of the above, but also to fully participate in the routines of daily life. We know that planning for what might appear to be a simple task – such as a trip to the shops – can involve a level of complexity based suitability of access, facilities, and travel times, which become especially important if suitable sanitary facilities are not available.

Providing access to a network of Changing Places Toilets of a consistent standard has the potential to be transformative for some families in Scotland. It also goes some way in addressing what is already a recognised need and in reducing a significant imbalance in equality of access.

However, with this in mind, we would like to see the proposals under section 3.12.13 extended and be more ambitious.

The current proposals suggest that changing places toilets should be provided on construction of:

- A shopping centre/mall with a gross floor area of 30,000m<sup>2</sup> or more;
- A single retail premises with a gross floor area of 10,000m<sup>2</sup> or more;
- A place of entertainment or place of assembly with a capacity of 2,000 persons or more;
- A hospital;
- A secondary school providing community facilities; or
- A leisure centre or similar building containing a swimming pool.

We believe that the thresholds of 30,000m<sup>2</sup> and 10,000m<sup>2</sup> for shopping centres and retail premises respectively are set too high, and these should be reduced. Similarly, the 2,000 capacity threshold for places of entertainment or assembly should also be reduced.

Our view is that setting these thresholds too high would reduce the number of regional venues having to provide CPT. This is particularly significant as people with complex needs who are from more rural communities may have to travel further distances to access the above – making adequate access to sanitary provision even more important.

Similarly, we would also like to see the addition of primary schools to the list, and the removal of the swimming pool clause from leisure centre provision. We feel this better reflects the diversity of Scottish communities where primary schools are often hubs within smaller localities, and leisure centres provide a full range of community activities not limited to leisure or swimming. We also feel that this is more in line with the principles of community empowerment, which have tackling inequalities as a specific focus.

### 2 Do you agree with the proposed circumstances, listed in draft clause 3.12.13 within the consultation document, where a Changing Places toilet should be provided on the construction, conversion or extension of a building?

Yes

#### Please set out your reasons for this response. :

### 3 Are there any other situations where you consider building work should trigger a requirement to provide a Changing Places Toilet?

Yes

#### Please set out your reasons for this response. :

Where a building listed in the above category undergoes significant refurbishment but is not converted or increased by 25% or more, there should be requirement to give consideration to whether the addition of a Changing Places Toilet can be included within the scope of the work. For example, an extensive refurbishment of the internal works of a museum may not include an extension of floor space, but may offer an opportunity to include a changing places toilet as part of the refurbishment.

**4 Please use this question to provide any other commentary or observations you have on the proposal to make provision for Changing Places Toilets through building regulations.**

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## **About you**

**What is your name?**

**Name:**

Kate Hogarth

**What is your email address?**

**Email:**

Kate.hogarth@sharedcarescotland.com

**Are you responding as an individual or an organisation?**

Organisation

**What is your organisation?**

**Organisation:**

National Carer Organisations

**If you're responding on behalf of an organisation, which of the following types most accurately describes your organisation:**

Voluntary Organisation

**If other, please specify.:**

**The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:**

Publish response only (without name)

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes

## **Evaluation**

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

**Matrix 1 - How satisfied were you with this consultation?:**

Neither satisfied nor dissatisfied

**Please enter comments here.:**

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Very satisfied

**Please enter comments here.:**