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## **Royal College of Occupational Therapists Submission to Ministry of Housing, Communities and Local Government on Changing Places Toilets**

This submission is made on behalf of the Royal College of Occupational Therapists, the professional body for occupational therapists across the UK.

The submission is made in response to the Ministry of Housing, Communities and Local Government on Changing Places Toilets. Further information on any aspect of this response can be gained by contacting the College.

### **Executive Summary**

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The Royal College of Occupational Therapists welcomes the proposed increased provision of Changing Places toilets.

Occupational therapists consider the relationship between what a person does every day (occupations), how illness or disability impacts upon the person and how a person's environment supports or hinders their activity (PEO Model). Using this approach, occupational therapists help people to continue or re-engage with participating fully in daily life, including work, social activities and maintaining roles and responsibilities. The College therefore supports this initiative.

### **Submission**

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**Questions 1 and 2:** please see information above and contact details below

**Consultation questions:**

**Questions on options for increasing provision of Changing Places toilets**

#### **Question 3**

**Do you support the Government's intention to increase the provision of Changing Places toilets?**

Yes. Increased provision of Changing Places toilets would help to promote social inclusion for people with disabilities and their carers. This would assist in reducing the stigma and discrimination people may face. The increased provision would recognise the need for extra facilities that would assist people to engage in meaningful occupations (activities that are important to them). It would also encourage people to access buildings in their communities that they may previously have avoided. Increased provision would help reduce the current limitations people experience regarding where they choose to travel to.

#### **Question 4**

**If yes, do you agree that the Government should introduce a mandatory requirement for Changing Places toilets in Building Regulations?**

Yes, but it is important to engage professionals with the appropriate skills in assessment to ensure the environment meets people's needs. Many occupational therapists are skilled in this type of assessment and can advise on accessible and adaptable environments to meet the needs of people with disabilities.



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**Question 5**

***If no, do you think the Government should take a different approach? If yes, please explain what approach you consider favourable and why.***

N/A.

**Question 6**

***If you support a mandatory requirement, do you agree with the building types listed in Box A?***

Yes.

***If no, do you think the list should be wider or narrower?***

N/A.

***If wider, what other building types do you think a mandatory requirement should apply to?***

N/A.

***If narrower, which buildings would you exclude?***

N/A.

**Question 7**

***If you support a mandatory requirement, do you agree with the size, capacity and other triggers in Box A in relation to each building type?***

Yes.

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***Please indicate yes or no against each building type and its trigger.***

***Shopping centre with a gross floor area of 30,000 m<sup>2</sup> or more*** Yes

***Single retail area with a gross floor area of 2,500 m<sup>2</sup> or more*** Yes

***Service areas on motorways and all-purpose trunk roads*** Yes

***Major transport termini with an estimated or actual footfall of at least 10 million per annum*** Yes

***A place of entertainment with a capacity of 2,000 persons or more*** Yes

***Cultural centres with over 3,000 visitors expected per year*** Yes

***Cinema complex with 5 or more screens/or a seating capacity of 500 or more*** Yes

***Theatre with a seating capacity of 500 or more*** Yes

***Public library over 3,000m<sup>2</sup>*** Yes

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**Sport and leisure buildings and hotels over 5,000m<sup>2</sup> Yes**

**If no, please indicate what trigger you consider appropriate for each building type.**

N/A

**Shopping centre**  
**Single retail area**  
**Service areas**  
**Major transport termini**  
**A place of entertainment**  
**Cultural centres**  
**Cinema complex**  
**Theatre**  
**Public library**  
**Sport and leisure buildings and hotels**

**Question 8**

**Do you agree that a standard-sized Changing Places toilet of 12m<sup>2</sup> should be provided in new buildings listed in Box A?**

Yes.

**If no, please explain your reasons.**

N/A

**Question 9**

**Where a Changing Places toilet is provided in a building (listed in Box A) that undergoes a material alteration, an extension or a change of use, should a smaller-sized facility of a minimum of 3m by 3m be provided? Please explain your reasons.**

Yes. As stated above, increased provision of Changing Places toilets would help to promote social inclusion for people with disabilities; if it is not possible to provide the standard sized facility, then a smaller one should be provided, as long as it can still be utilised without causing difficulties for those using it (including carers). The standard sized room should still be prioritised when considering space for Changing Places toilet provision. It would be beneficial if a smaller sized room is to be installed, a standard sized Changing Places toilet should be in the vicinity/locality as an option (e.g. in a town centre), so that the person needing to use the facility can make an informed choice. This may be an issue for people who use non-standardised wheelchairs e.g. 'Tilt and Space/Recline' models. Any smaller sized room should have details signposting people to alternatives such as a standard sized Changing Places toilet.

**Question 10**

**Do you agree that the standard and smaller sized Changing Places toilet include all the equipment listed in boxes B & C?**

'Changing Places - a Practical Guide'

<https://www.dropbox.com/s/2zdfw4yiww9ryxe/Changing%20Places%20a%20Practical%20Guide.pdf?dl=0> published by the Changing Places Consortium lists the critical factors for Changing Places room layout (p31):

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- Direct access from the door into the clear manoeuvring space
  - Sufficient clear space to enable a wheelchair user and two assistants to manoeuvre around the room
  - Fixed and free standing equipment positioned to maximise the manoeuvring space
  - Easy direct transfer using hoist between clear manoeuvring space, WC and changing bench
  - Peninsular WC positioned to provide room for an assistant on either side of the WC
  - If installed, shower unit and detachable shower head located close to head of changing bench
  - Privacy curtain or screen positioned to shield the WC and to provide adequate space either side, but where it will not cause an obstruction when retracted.

If the above 'critical factors' can be incorporated into both the standard and smaller sized Changing Places toilets, then all of the equipment listed in boxes B and C should be included.

***If no, please indicate whether you think more or less equipment should be included.***

N/A

***If less, please indicate what should not be included from the list of equipment in Boxes C & D.***

N/A

***If more, please indicate what should be added.***

N/A

### ***Question 11***

***Please use this question to provide any other commentary or observations you have on the proposals to make provision for Changing Places toilets and the size of equipment in Changing Places toilets.***

The British Standard BS8300:2009 (regarding the requirements of Changing Places Toilets) states that the 'adequate space for a disabled person when they are not in their wheelchair, their wheelchair and one or two carers is 12 sqm (3mx4m).

### ***Questions on costs and equality impacts***

#### ***Question 12***

***Do you agree with the cost estimates for building Changing Places toilets?***

N/A

***If no, please explain what you consider to be an appropriate cost range and provide evidence to show why.***

N/A

#### ***Question 13***

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***Do you agree with the build rate estimates of 156 additional Changing Places toilets per annum and the associated costs?***

N/A

***If no, please explain the build rate and cost estimates you consider appropriate and provide evidence to show why.***

N/A

***Question 14***

***Do you have any evidence that you could provide on ongoing maintenance costs of Changing Places toilets?***

N/A

***If yes, please include your evidence in your response.***

N/A

***Question 15***

***Do you have any comments on the initial equality impact assessment?***

N/A

***If yes, please provide your comments including any evidence to further determine the positive and any negative impacts.***

N/A

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**About the College**

The Royal College of Occupational Therapists (RCOT) is pleased to provide a response to this consultation. RCOT is the professional body for occupational therapists and represents over 33,000 occupational therapists, support workers and students from across the United Kingdom. Occupational therapists work in the NHS, Local Authority social care services, housing, schools, prisons, care homes, voluntary and independent sectors, and vocational and employment rehabilitation services.

Occupational therapists are regulated by the Health and Care Professions Council (HCPC), and work with people of all ages with a wide range of occupational problems resulting from physical, mental, social or developmental difficulties.

Occupational therapy improves health and wellbeing through participation in occupation. The philosophy of occupational therapy is founded on the concept that occupation is essential to human existence and good health and wellbeing. Occupation includes all the things that people do or participate in. For example, caring for themselves and others, working, learning, playing and interacting with others. Being deprived of or having limited access to occupation can affect physical and psychological health.

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**Contacts**

For further information on this submission, please contact:



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