

Safe use of changing facilities

Introduction

This guidance has been produced in response to a number of enquiries from individuals and clubs seeking advice about the safe use of changing facilities.

These include queries from:

- adults who feel uncomfortable about sharing changing rooms with young children
- organisers unclear about the level of supervision they should provide
- concerns raised about unaccompanied children using facilities

Clubs, facilities and those with responsibility for children and young people have a general duty of care towards them. However there are no specific legal requirements regarding the use of changing facilities. This paper is therefore intended as practice guidance to support individuals and organisations to consider issues relevant to their particular context; and to develop and implement policies and procedures that provide a safe environment for children and young people.

The term 'children' describes any person under the age of 18.

Existing national governing body, local authority or facility policies

Many national governing bodies of sport (NGBs) and other organisations, such as local authorities and private sports facilities, may already have guidance and policies in place which should be followed by affiliated clubs or other user groups.

This briefing may be used in the absence of any other guidance, and to address issues or circumstances not covered in such a policy. It may assist in the review and updating of existing policies and procedures to support improvements in safeguarding and to develop a safer environment.

A selection of example policies are included at the end of this document.

Guidance about the design on changing facilities can be obtained from the Chartered Institute for the Management of Sport and Physical Activity (CIMPSA) at www.cimspa.co.uk/ or visit our [sport and leisure](#) guidance for further information.

Type of facility

A major consideration in establishing a safe use policy for changing facilities is whether or not the facilities will be used exclusively by junior team/s or athletes. Typically this would be the case where a club owns, hires or manages its own facility, or has negotiated sole use of a more public facility at a particular time. The advantage of this type of arrangement is that it negates any concerns arising from children mixing with adults when changing or showering.

However, many changing facilities are also used by other adults (other sports teams, individual athletes, or members of the public) for example in the case of a local authority swimming pool or privately owned gymnasium. In these circumstances there is a need for additional steps to be taken to ensure adequate supervision of the children while changing. This will avoid risks associated with mixed-facility use and to prevent or reduce opportunities for unwanted contact between the young people and these adults when changing or showering. It is important for staff/volunteers to balance the need for adequate supervision with the need to ensure young children are afforded appropriate levels of privacy.

All facilities should have a safeguarding policy and procedures for reporting any concerns and staff/volunteers are advised to familiarise themselves with these at the outset.



Issues to consider and address

Adults using the changing rooms at the same time as children

Ideally groups of children and young people should have sole use of changing facilities. This obviates any risks and potential vulnerability associated with mixing with adults or other young people (known or unknown to them) when changing and showering. Even when using public facilities, arrangements can be considered to address any potential concerns:

- there may be a separate room/facility available for the group
- it may be possible to negotiate specific time slots for the group, and the coaches/helpers, to have exclusive use of the changing rooms
- a team area within the changing facility could be designated and nobody else allowed in that area
- children and young people may opt to change at home before they arrive for the activity*

*Remember that many children and young people are very self conscious and anxious about undressing in front of others. Staff/volunteers should consider offering the option of changing at home as a matter of course.

If mixed use of the changing facility is unavoidable, then at least two members of staff (of the same gender as the children) should supervise the group. It is important that staff/volunteers seek to balance the need for adult supervision with the rights of children to privacy in this context.

Supervision in the changing facility may also be necessary when:

- children are too young to be left alone or change themselves. Organisers of groups of children under eight years should make arrangements for their supervision while changing before and after the activity. Although most children of school age (four years old) may be capable of changing their clothes, many [leisure facilities](#) have established guidelines that any child below the age of eight years must be accompanied.
- the group includes disabled children who require additional support and assistance with changing (note this should be undertaken by prior agreement with their parent or professional carer)
- children could injure themselves or access a potential risk such as a swimming pool that is unattended
- there are concerns about bullying, fighting or other troublesome behaviours taking place which need to be managed.

Who should supervise?

If you have decided that the children and young people need supervision, staff/volunteers should consider who will carry this out. This task provides access to children in circumstances of increased vulnerability and therefore careful consideration should be given to ensuring that those undertaking this task have been assessed as being suitable to do so.

- **Numbers** – organisers are recommended to have more than one adult supervising, as this will ensure cover in the event of an accident or incident occurring or if one supervisor is called away.
- **Gender** – it is considered good practice to ensure that children are supervised by staff/volunteers of the same gender while changing.
- **Timings** – by agreeing a very clear timetable for use of the changing facilities by children, the supervising adults and any coaches or officials respectively, the risks associated to any extended contact between the adults and children are minimised.
- **Carry out safe recruitment practices including:**
 1. criminal records checks for individuals whose roles make them eligible by virtue of their role meeting the current definition of regulated activity
 2. references – these should include a reference from a recent, previous employer/club where they have worked with children/young people
 3. role description – providing clear details about the boundaries of their role



4. code of conduct – a document that individuals sign up to that clarifies the standards of behaviour expected of staff/volunteers.

More details about safe recruitment practices are available on the [CPSU Website](#).

Parents as supervisors

Parents are often involved in supervising children during sports activities and outings, and can provide valuable support to organisers and coaches. Where they are responsible only for their own child (or by agreement their relatives' or friends' child/ren) this constitutes a private arrangement outside the responsibility of the activity organisers. However, when parents undertake a formal supervisory role at the request of or with the agreement of the organiser which includes having responsibility for other people's children, the same steps should be taken to establish their suitability as for any other supervisory position (as outlined above).

Unsupervised children in sport or leisure facilities

There are potential risks associated with inadequate adult supervision levels of young children in changing/shower areas.

Parents' (or carers') responsibilities:

Parents and carers have a responsibility to ensure that their children are appropriately supervised while they are attending a sport/leisure facility. It is parents responsibility to judge whether it is safe and appropriate to allow their unaccompanied child to visit a sport or leisure facility.

This judgement should be based on:

1. their child's general developmental maturity
2. their child's awareness of the potential risks
3. the level of supervision and care provided within the facility

Parents may wrongly assume that staff will take responsibility for the supervision of their children within a sport or leisure facility, or within specific areas such as changing rooms. Parents should therefore be informed about the facility's expectations about supervision of their children, including the use of changing rooms and shower areas (which may vary depending on how changing areas are designed and operated).

Facility operators' responsibilities:

When children are given access to facilities, operators assume a duty of care for them. The level of responsibility will vary depending on:

1. if the child is alone and unsupervised
2. with parent/carer/s
3. attending an activity
4. attending an activity staffed by the facility
5. attending a school group or club
6. attending a public session

Operators have a responsibility to put in place appropriate safeguarding arrangements which include promoting and implementing a policy for admitting unaccompanied children. This information should be provided to parents and other users informing them about the facility's policy regarding unaccompanied children using the facility, and any rules about the supervision of young children within the facility (particularly in changing/shower areas where potential safeguarding risks are increased).

Many facilities currently use the age of eight as a guide (based sector guidance for an unaccompanied child to attend a swimming pool). In practice, while facilities need to be able to establish a lower threshold for



admission that is practical to operate, identifying an age for this purpose is difficult given variations in children's physical, psychological and emotional development.

While the facility may set the lower age limit, it is for parents (who know most about their children and have primary responsibility for their welfare) to judge if their child needs to be accompanied even if older than this limit.

Facility's should have a process for responding to children below this minimum age of 8 who may arrive, or be left, at the facility alone. Refusing entry or asking an unaccompanied child to leave the centre would raise obvious safeguarding concerns. Consideration may be given to consulting with Children's Social Care or police in these circumstances.

Further guidance can be found on our [sport and leisure facilities webpage](#).

What about mixed gender teams?

Many sports operate mixed gender teams at several age group levels and arrangements to enable the groups to change separately should always be made. Solutions may include:

- each gender using a different room or facility
- each gender having a distinct time slot
- everybody changing at home before they leave
- each gender having an allocated area of a larger shared facility

Sample policies

[England Cricket Board \(ECB\) Guidelines on Changing Rooms and Showering Facilities \(June 2013\); PDF](#)

The England Cricket Board requires all ECB affiliated cricket clubs must have a changing policy. This will depend upon facilities available, access to those facilities and the number of children involved.

ECB provide further guidance and best practice for clubs within their changing policy. These guidelines apply to adults, and children sharing changing facilities. Clubs should identify, and develop, the framework that best suits their changing arrangements, taking into account the number of children involved.

[Amateur Swimming Association's \(ASA\) Wavepower \(PDF\)](#)

Wave Power outlines all of the ASA policies and procedures. See section 2.4 page 65 for The ASA changing room policy guidance. The ASA have been asked by many clubs to clearly state what responsibility the club has for swimmers in changing rooms before, during and after training or competition. Under the Duty of Care to Safeguard Children the club have a responsibility for the wellbeing of children in the changing rooms. This guidance provides information and support for clubs regarding the following areas:

- Responsibility during a club session
- Information for parents regarding changing facilities
- Responsibilities after a session is complete

After increasing concern The ASA have developed guidance regarding indecent images and child abuse images (**see section 2.4 page 67**) and are currently working to educate children through clubs and parents. The ASA have also been working with facility providers to change the design and use of changing areas to prevent the increasing trend of the inappropriate and illegal use of mobile devices in changing rooms.

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