

Safe use of changing facilities and toilets

Note: Due to coronavirus (COVID-19), some changing facilities may be closed or sections cordoned off, and social distancing will apply.

Introduction

This guidance has been produced in response to enquiries from individuals and organisations seeking advice about the safe use of changing facilities and/or toilets. These include queries about:

- 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
- use of gendered changing rooms by transgender or transitioning children
- toilets or changing rooms at a venue being used by young people for an event, but which can still be accessed by members of the public (such as at a leisure centre, public park or open space)

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

Clubs and other organisations, facilities and those with responsibility for children 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.

* This could include leisure centres, schools, private gyms or public parks and open spaces used for organised activities and events. Also, the context may relate to individual young people or groups, clubs, or organisations hiring facilities for training, competitions, events or festivals – in which case the planning process must include clarity about the **third-party hire arrangements and responsibilities**.

Existing national governing body, local authority or facility policies

Many national governing bodies of sport (NGBs), local authorities and private sports facilities may already have guidance and policies in place, which should be followed in the first instance.

This briefing may be useful in the absence of any other guidance, and to address issues or circumstances not covered in such a policy. A selection of example policies is included at the end of this document.

Type of facility

A major consideration in establishing a safe use policy for changing facilities is whether the facilities will be used exclusively by junior teams 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 reduces the safeguarding risk of children mixing with adults when changing or showering.

However, many changing facilities are also used by other adults (sports teams, individual athletes, or members of the public). For example, in the cases of a local authority swimming pool, a privately-owned gym or a public park. In these circumstances, there is a need for additional steps to be taken.

All facilities should have a **safeguarding policy and procedures** for reporting any concerns, and staff and volunteers are advised to familiarise themselves with these. In the case of a public park, for example, the activity organiser should find out who manages the facility and what their relevant policies are.

Supervision in the changing facility

If mixed use of the changing facility by adults and children is unavoidable, at least 2 members of staff (of the same gender as the children) should supervise the group. It is important that staff and 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
- **leisure facilities** have established guidelines that any child below the age of 8 years must be accompanied (even if children younger are capable of changing themselves)
- the group includes disabled children who require additional support and assistance with changing (note that 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 harmful behaviours taking place that need to be managed
- there are concerns about the prospect of photographs being taken in changing rooms

Who should supervise?

If you have decided that children need supervision, staff and 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. Consider the following:

- 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's considered good practice to ensure that children are supervised by staff or volunteers of the same gender while changing
- timings – by agreeing a very clear timetable for use of the changing facilities by children, the risks associated to any extended contact between the adults and children are minimised
- carry out safe recruitment practices, including:
 - ✓ **criminal records checks** for individuals whose roles make them eligible
 - ✓ **self-declaration** – completion of an appropriate self-declaration form as part of safe recruitment
 - ✓ **references** – these should include a reference from a recent previous employer where they have worked with children
 - ✓ **role description** – provide clear details about the boundaries of their role
 - ✓ **code of conduct** – a document that individuals sign up to that clarifies the standards of behaviour expected of staff and volunteers



For further information, take a look at our topic page on **safer recruitment**.

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' children), 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 as for staff and volunteers to make sure they are suitable for the role.

Unsupervised children in sport or leisure facilities

There are potential risks associated with inadequate adult supervision levels of young children in changing and 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 or 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:

- their child's general developmental maturity
- their child's awareness of the potential risks
- the level of supervision and care provided within the facility

Parents may wrongly assume that staff will take responsibility for 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. Parents should clarify these points before they let their children go to a facility alone.

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 if the child is:

- **alone and unsupervised**
- with parents
- attending an activity
- attending an activity staffed by the facility
- attending a school group, club or other activity managed by a third party (for example, a school games event or festival)
- 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 policy regarding unaccompanied children and any rules about the supervision of young children within the facility.

Many facilities currently use the age of 8 as a guide (based on sector guidance for an unaccompanied child to attend a swimming pool). In practice, while facilities need to be able to establish a minimum age for admission that is practical to operate, identifying a child's age can be difficult.

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.

Facilities 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.

Further guidance can be found on our **sport and leisure facilities** topic page.

Third-party hirers

Organisations hiring facilities should ensure they are aware of:

- key safeguarding contacts at the facility, should an issue arise
- changing room layouts (for example, single gender, cubicles or village style)
- whether members of the public have access to the changing facilities and toilets at the same time as the children
- other activities taking place that could impact on the use of changing facilities and toilets
- the particular changing needs of any of the children and young people under their supervision; this may include gender, medical conditions, or disabilities, which could mean special equipment (such as hoists or changing mats) being required

If members of the public will also be using the toilets and changing facilities, make sure that there is staff presence at these points:

- to monitor and ensure that contact between young people and members of the public is appropriate
 - to motivate and encourage young people to return to their groups in a timely manner
- to help young people if they are lost

Processes must be in place for **missing children or found children** who do not belong to the activity or event but who have been found or passed on to facility managers or event organisers.

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

Transgender and transitioning children

There are several factors to consider when addressing the needs of transgender or transitioning children and changing facilities. These include:

- the child's feelings and preference about which gendered changing room they'd like to use

- the privacy of the child
- the feelings and privacy of other children in the same changing room
- practical arrangements such as leaving a child unsupervised any risks of bullying or unwanted behaviour towards that child

If a child self-identifies as a gender that differs from the gender they were assigned at birth, they may wish to start changing with other children of the same gender identity or ask for privacy.

Clubs, facilities and coaches should try to make reasonable adjustments to changing arrangements to suit the child's needs and reduce the risk of bullying behaviour or distress.

Reasonable adjustments could include:

- providing a private, separate changing space for the child
- supporting the child with any changes to previous changing arrangements
- educating other children in the team on gender identity and celebrating difference arranging for that child to change at a different time to other children or at home

In most cases, children who are able to self-identify as transgender are able to articulate their wishes. Best practice is to consult with both the child (and their parents where necessary) about any potential changes to arrangements.

For further information, see our topic page on [working with LGBT+ children](#).

Sample policies

England Cricket Board (ECB)

The England Cricket Board requires all ECB affiliated cricket clubs to 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.

☆ [ECB guidelines on changing rooms and showering facilities \(June 2017; PDF\)](#)

Swim England

All of Swim England's policies and procedures are outlined in the document 'Wavepower'. The guidance on page 80 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

Swim England developed guidance regarding indecent images and child abuse images (page 82) in response to the increasing trend of the inappropriate and illegal use of mobile devices in changing rooms.

☆ [Wavepower 2020-2023](#)

FA Respect

The FA's Respect campaign also has guidance for clubs on changing rooms and shower facilities.

☆ [Best Practice Guidance – Changing Rooms and Showering Facilities \(2019; PDF\)](#)

Further information

Information and resources related to this and other safeguarding topics are available on the CPSU website: the cpsu.org.uk/help-advice/topics

