



**Armagh City  
Banbridge  
& Craigavon**  
Borough Council

# **Changing Places Policy**

**September 2023**

<b>ARMAGH CITY, BANBRIDGE AND CRAIGAVON BOROUGH COUNCIL</b>	
<b>Policy Number:</b>	<b>GRSC/P43/V1.0</b>
<b>Title of Policy:</b>	<b>Changing Place Policy</b>
<b>No of Pages (including appendices):</b>	<b>23</b>
<b>Version:</b>	<b>1.0</b>
<b>Issue Date:</b>	<b>26<sup>th</sup> September 2023</b>
<b>Policy Nominated Officer:</b>	<b>Gillian Dewart</b>
<b>Equality screened/Rural Impact Assessed by</b>	<b>Clare Weir</b>
<b>Equality screening/Rural Impact Assessment date:</b>	<b>06/10/2022</b>
<b>Amendment Version Issue Date:</b>	
<b>Approved by:</b>	<b>Full Council 25<sup>th</sup> September 2023</b>
<b>Review Date:</b>	<b>26<sup>th</sup> September 2026</b>

### **AMENDMENT RECORD SHEET**

Remove and destroy old pages. Insert new pages as indicated.

<b>Revision Number</b>	<b>Page Number</b>	<b>Date Revised</b>	<b>Description of Revision</b>



## POLICY CONTENTS

1. Introduction .....	3
2. Aim/Purpose .....	3
3. Scope .....	3
4. Policy Detail .....	4
6. Related Policies .....	5
Appendix 1 – Example Layout South Lake Leisure Centre .....	6
Appendix 2 – Areas of Priority .....	7
Appendix 3 – Policy Screening Form .....	9
Appendix 4 – Rural Needs Impact Assessment .....	16

## **Introduction**

This document outlines Armagh City, Banbridge & Craigavon Borough Council's commitment to improve access to Changing Places Toilets (CPT) for people with profound and multiple learning disabilities, people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis, and those with similar needs, perhaps due to medical conditions or older age.

Many disabled people and people with similar needs, are unable to use standard accessible toilet facilities because they do not provide enough space or the right equipment. Some people need specialist equipment and support from one or more carers/assistants to allow them to use toilets safely and comfortably, with dignity and hygienically.

The layout of an accessible toilet is better suited to disabled people who are able to use toilet facilities independently.

Changing Places Toilets enable anyone, regardless of their disability, to go to the shops, attend hospital appointments, enjoy community life, socialise, travel, access education, training and employment, and participate in public life.

Changing Places Toilets should be provided in addition to standard accessible toilets.

Further detail about Changing Places Toilets is included in Appendix 1

## **Aim**

Council recognises the importance of Changing Places Toilets and how valuable they are to many disabled people and their families/carers. Without them, carers are often forced to change a disabled person on a toilet floor or not go out at all.

The aim of this policy is to ensure a consistent approach is taken when designing new buildings or refurbishing older buildings within Council's estate. The policy will also outline Council's commitment to provision of Changing Places Toilets at events.

## **Scope**

The policy applies to:

1. All officers involved in the design of a new council facility or the refurbishment of an existing council facility, where both of the following criteria are met:
  - A service is provided to the public
  - Standard public toilets are provided

Please note the term facility includes buildings and parks / open spaces.

2. All officers involved in procuring, planning, or delivering large-scale council led events.
3. All officers working to develop local business
4. All officers dealing with larger scale planning applicants.

## **Policy Detail**

Council commits to including a Changing Places Toilet in every new building in which the public will have access to its services and where public toilet provision is available to others.

The Council will also give due consideration to including a Changing Places Toilet when it extends or extensively refurbishes an existing Council-owned building that if being constructed as a new building would fall under the parameters requiring it to have a Changing Places Toilet provided. These schemes will be reviewed on a case-by-case basis at the early stages of feasibility / design to establish whether there is an opportunity to install a Changing Places Toilet.

Council will provide a mobile accessible toilet at a minimum of 12 large-scale Council-led events each year. When planning smaller events, officers should consider use of a venue with a Changing Places Toilet.

Council will develop a priority list of sites including parks and open spaces, where the installation of a Changing Places Toilet would provide most benefit, and will actively seek funding opportunities to progress this list.

Council will register all applicable Changing Places Toilets with the Changing Places Consortium and promote their locations through the Changing Places Website.

Council will provide information about Changing Places Toilets to relevant developers and other large businesses in the Borough to promote the benefits of installing a Changing Places Toilet and share best practice.

## **Technical Booklet R**

Council recognises the recent amendments made to Technical Booklet R, effective from 30<sup>th</sup> June 2022, which require the installation of a Changing Places Toilet in specific types of new buildings or where a whole building is formed by material change of use, where either a specified floor space or capacity is exceeded.

See Technical Booklet R – Amendments Booklet 2022 (AMD 8) for further details.

Council acknowledges that the requirements in Technical Booklet R take priority over this policy.

## **The Disability Discrimination Act (DDA) 1995**

Legislation bans employers discriminating against jobseekers and employees with disabilities, and by service providers discriminating against service-users with disabilities.

It places a duty on employers and service providers to make reasonable adjustments for people with disabilities. These help them to overcome barriers they may face in gaining and remaining in employment and in accessing and using goods and services. The main activities covered are:

- employment, including access to employment
- access to and use of goods, facilities and services, including access to public buildings, shops and leisure facilities and to healthcare, housing and transport
- certain other functions carried out by public bodies, such as policing and issuing licences
- membership of private clubs and use of their facilities

## **Relevant Policies**

## Appendix 1

### Example Layout, South Lake Leisure Centre



These toilets provide specific equipment, including:

1. A height adjustable changing bench
  2. A tracking hoist system
  3. Adequate space (at least 12 square metres wherever possible)
  4. A peninsular / centrally placed toilet with room either side for carers and drop down hand rails
  5. A screen or curtain
  6. Wide tear off paper roll to cover the bench
  7. A large waste bin for disposable of pads
  8. A non-slip floor
- (A shower may be considered where necessary e.g. leisure facilities)

Further details are available at [Changing Places Toilets \(changing-places.org\)](http://changing-places.org)

## Appendix 2

### Armagh City, Banbridge & Craigavon Borough Council

#### Changing Places Toilets – Areas of Priority

Map 1, over the page, highlights existing Changing Places Toilets (including those awaiting registration) and displays a 3-mile zone around each one. Accurate at 25/08/2022

The following are currently in excess of 3 miles from the nearest Changing Places Toilet:

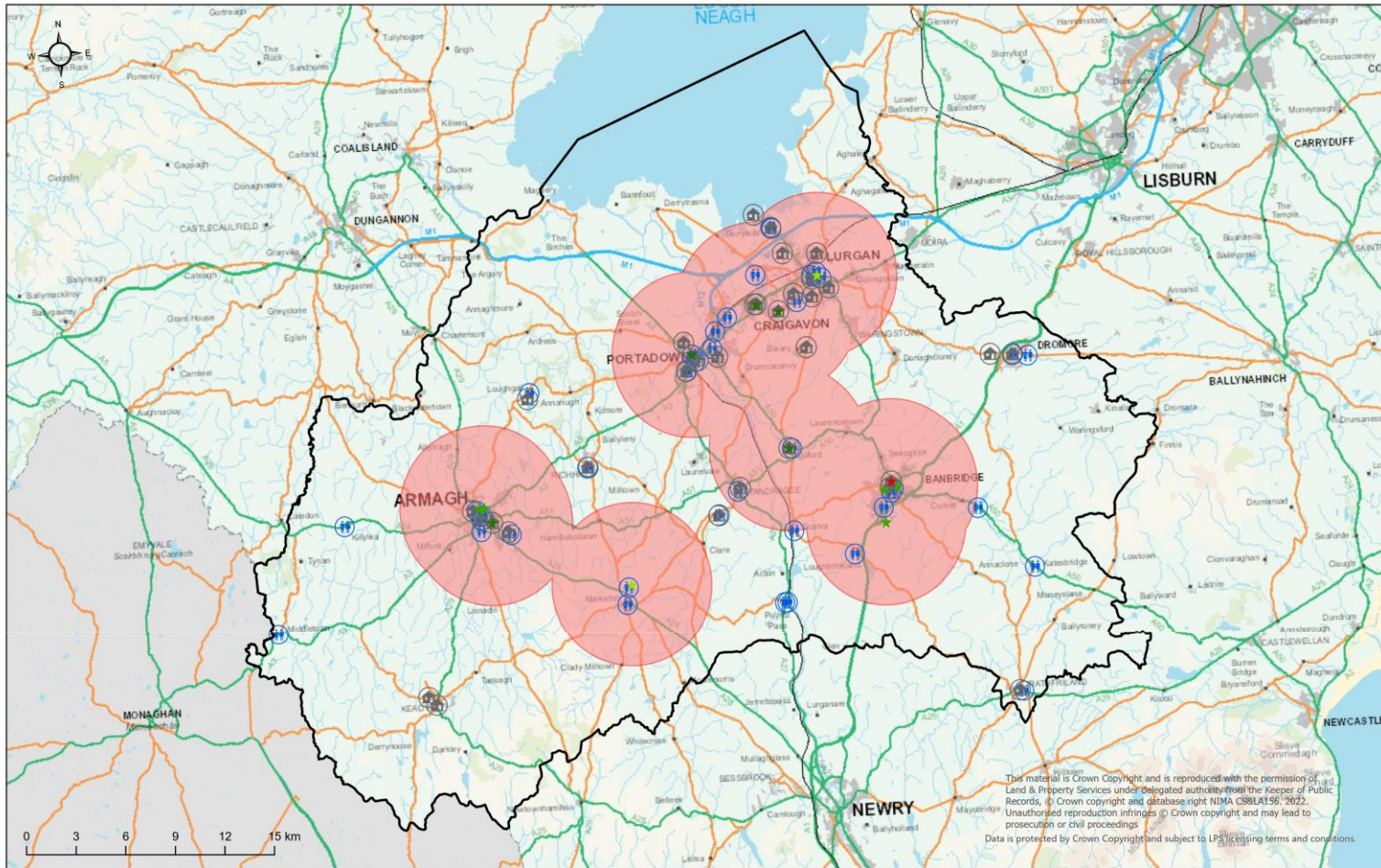
Council Facilities	Public Conveniences
Dromore Town Hall	Clare Glen Toilets, Tandragee
Tommy Makem Arts Centre	Killylea Complex Toilets (Main Street)
Dromore Community Centre	Loughgall Toilets (Main Street)
Keady Recreation Centre	Poyntzpass Toilets (Church Street)
Rathfriland Community Centre	Katesbridge Toilets (Manse Road)
Richhill Recreation Centre	Rathfriland Toilets (Downpatrick Street)
Lough Neagh Discovery Centre	Richhill Toilets (The New Line)
Loughgall Country Park	Scarva Toilets (Main Street)
Clare Glen Caravan Park	Middletown Toilets (Main Street)
	Poyntzpass Towpath Toilets (Railway Street)
	Dromore Square
	Corbet Lough, Banbridge
	Dromore Cemetery

Council recognises that it can cause challenges to travel any distance to use a Changing Places Toilet, however, a reasonable spread of CPTs across the Borough would enable greater access to facilities and open spaces.

The map highlights the towns of Dromore, Keady, Rathfriland and the area between Armagh and Portadown as priority locations for future Changing Places Toilets. Officers will continue to seek funding opportunities to develop suitable provision in these areas.

When comparing sites for a Changing Places Facility, and to make most efficient and effective use of available funding, Officers will consider a range of variables in the decision making process. These will include, proximity to existing CPT, provision of standard WC facilities, provision of catering, ticketed activities, average time spent on site, the capacity of an arts or floor space of a leisure venue if applicable, average weekly opening hours of the facility, the state of readiness, the estimated cost of the works and proximity of staff.





- |                      |                          |
|----------------------|--------------------------|
| <b>Map Key</b>       | <b>Changing Place</b>    |
| Public Conveniences  | Banbridge Leisure Centre |
| Council Facilities   | Existing Council         |
| 3 mile buffer        | Existing Other           |
| ABC Council Boundary | To Be Registered         |

A map indicating locations of Changing Places within ABC Council area

A 3 mile buffer has been applied to each Changing Place location



Map 1.

## Appendix 3 - Policy Screening Form

### Policy Scoping

Policy Title: \_\_\_\_\_ **Changing Places Policy** \_\_\_\_\_

**Brief Description of Policy (please attach copy if available). Please state if it is a new, existing or amended policy.**

The Changing Places Policy is a new policy which aims to:  
Improve access to Changing Places Toilets for people with a range of disabilities.

**Intended aims/outcomes. What is the policy trying to achieve?**

The aim of this policy is to ensure a consistent approach is taken when designing new buildings or refurbishing older buildings within Council's estate. The policy will also include:

- Identify priority locations for CPTs, including outdoor sites, to ensure sufficient coverage
- Consider the provision of a portable CPT at large events
- Identify ways of promoting CPTs with local businesses

### Policy Framework

Has the policy been developed in response to statutory requirements, legal advice or on the basis of any other professional advice? Does this affect the discretion available to Council to amend the policy?

At the request of Elected Members

**Are there any Section 75 categories which might be expected to benefit from the policy? If so, please outline.**

Disabled people and people with long term health conditions

**Who initiated or wrote the policy (if Council decision, please state). Who is responsible for implementing the policy?**

Who initiated or wrote policy?	Who is responsible for implementation?
Requested by Leisure & Community Services Committee  Written by a Changing Places Working Group	All Officers: <ul style="list-style-type: none"><li>- With responsibility for building or refurbishment of facilities.</li><li>- With responsibility for procuring, planning or delivering large-scale council-led events.</li><li>- Who work with larger local businesses (Economic Development or Planning)</li></ul>

**Are there any factors which might contribute to or detract from the implementation of the policy (e.g. financial, legislative, other)?**

Financial impact of installations  
Legislative – Building Control Requirements

**Main stakeholders in relation to the policy**

Please list main stakeholders affected by the policy (e.g. staff, service users, other statutory bodies, community or voluntary sector, private sector)

Users of Council facilities and services

**Are there any other policies with a bearing on this policy? If so, please identify them and how they impact on this policy.**

Armagh City, Banbridge and Craigavon Borough Council Corporate Plan - Safe, accessible and welcoming facilities

## Available Evidence

Council should ensure that its screening decisions are informed by relevant data. What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

Section 75 category	Evidence
Religious belief	
Political opinion	
Racial group	
Age	
Marital status	
Sexual orientation	
Men and women generally	
Disability	<p>Technical Booklet R – Amendments Booklet 2022 (AMD 8)            The Disability Discrimination Act (DDA) 1995            A working group was established with representation from across Council departments including Building Control, Economic Development and Facility Management.            Evidence of need, from the Changing Places Website  <a href="https://www.changing-places.org/pages/view/what-are-we-campaigning-for">https://www.changing-places.org/pages/view/what-are-we-campaigning-for</a></p>
Dependants	

## Needs, experiences and priorities

Taking into account the information gathered above, what are the different needs, experiences and priorities of each of the following categories in relation to this particular policy/decision?

Section 75 category	Needs, experiences and priorities
Religious belief	
Political opinion	
Racial group	
Age	
Marital status	
Sexual orientation	
Men and women generally	
Disability	<p>Reasonable adjustments for people with disabilities, to help them to overcome barriers they may face in accessing and using goods and services</p>
Dependants	

## Screening Questions

### 1. What is the likely impact on equality of opportunity for those affected by this policy for each of the Section 75 categories?

Category	Policy Impact	Level of impact (Major/minor/none)
Religious belief		None
Political opinion		None
Racial group		None
Age	Positive	Minor
Marital status		None
Sexual orientation		None
Men and women generally		None
Disability	Positive	Minor
Dependents		None

### 2. Are there opportunities to better promote equality of opportunity for people within the Section 75 categories?

Category	If yes, provide details	If no, provide reasons
Religious belief		No
Political opinion		No
Racial group		No
Age	Yes, in accessing goods and services	
Marital status		No
Sexual orientation		No
Men and women generally		No
Disability	Yes, in accessing goods and services	
Dependents		No

### 3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion, or racial group?

Category	Details of Policy Impact	Level of impact (major/minor/none)
Religious belief		None
Political opinion		None
Racial group		None

### 4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Category	If yes, provide details	If no, provide reasons
Religious belief		No
Political opinion		No
Racial group		No

**Multiple Identity**

Generally speaking, people fall into more than one Section 75 category (for example: disabled minority ethnic people; disabled women; young Protestant men; young lesbian, gay and bisexual people). Provide details of data on the impact of the policy on people with multiple identities. Specify relevant s75 categories concerned.

The proposed project will have a positive impact on disabled people as well as those with multiple identities.

**Disability Discrimination (NI) Order 2006**

Is there an opportunity for the policy to promote positive attitudes towards disabled people?

Yes

Is there an opportunity for the policy to encourage participation by disabled people in public life?

Yes

**Screening Decision**

**A: NO IMPACT IDENTIFIED ON ANY CATEGORY – EQIA UNNECESSARY**

Please identify reasons for this below

**B: MINOR IMPACT IDENTIFIED – EQIA NOT CONSIDERED NECESSARY AS IMPACT CAN BE ELIMINATED OR MITIGATED**

Where the impact is likely to be minor, you should consider if the policy can be mitigated or an alternative policy introduced. If so, an EQIA may not be considered necessary. You must indicate the reasons for this decision below, together with details of measures to mitigate the adverse impact or the alternative policy proposed.

Positive minor impact only. No EQIA required.

## C: MAJOR IMPACT IDENTIFIED – EQIA REQUIRED

If the decision is to conduct an equality impact assessment, please provide details of the reasons.

### **Timetabling and Prioritising**

**If the policy has been screened in for equality impact assessment**, please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3 with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

<b>Priority criterion</b>	<b>Rating (1-3)</b>
Effect on equality of opportunity and good relations	
Social need	
Effect on people's daily lives	

The total rating score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the council in timetabling its EQIAs.

Is the policy affected by timetables established by other relevant public authorities? If yes, please give details.

### **Monitoring**

Effective monitoring will help the authority identify any future adverse impact arising from the policy. It is recommended that where a policy has been amended or an alternative policy introduced to mitigate adverse impact, monitoring be undertaken on a broader basis to identify any impact (positive or adverse).

Further information on monitoring is available in the Equality Commission's guidance on monitoring ([www.equalityni.org](http://www.equalityni.org)).

Identify how the impact of the policy is to be monitored

## Approval and Authorisation

A copy of the screening form for each policy screened should be signed off by the senior manager responsible for that policy. The screening recommendation should be reported to the relevant Committee/Council when the policy is submitted for approval.

Screened by	Position/Job title	Date
Gillian Dewart	Sports Development Manager	06/10/2022
Approved by	Position/Job Title	Date
Neil Thompson	Head of Health & Recreation	21/08/23

**Please forward a copy of the completed policy and form to:**

[mary.hanna@armaghbanbridgescraigavon.gov.uk](mailto:mary.hanna@armaghbanbridgescraigavon.gov.uk)

**who will ensure these are made available on the Council's website.**

**The above officer is also responsible for issuing reports on a quarterly basis on those policies "screened out for EQIA". This allows stakeholders who disagree with this recommendation to submit their views. In the event of any stakeholder disagreeing with the decision to screen out any policy, the screening exercise will be reviewed.**



## Appendix 4

### SECTION 1

Defining the activity subject to Section 1(1) of the Rural Needs Act (NI) 2016

#### 1A. Name of Public Authority

Armagh City, Banbridge & Craigavon Borough Council

#### 1B. Please provide a short title which describes the activity being undertaken by the Public Authority that is subject to Section 1(1) of the Rural Needs Act (NI) 2016

The Changing Places Policy is a new policy which aims to:

Improve access to Changing Places Toilets for people with a range of disabilities.

#### 1C. Please indicate which category the activity specified in Section 1B above relates to

Developing a	Policy	X	Strategy		Plan	
Adopting a	Policy		Strategy		Plan	
Implementing a	Policy		Strategy		Plan	
Revising a	Policy		Strategy		Plan	
Designing a Public Service						
Delivering a Public Service						

#### 1D. Please provide the official title (if any) of the Policy, Strategy, Plan or Public Service document or initiative relating to the category indicated in Section 1C above

Changing Places Policy

**1E. Please provide details of the aims and/or objectives of the Policy, Strategy, Plan or Public Service**

The aim of this policy is to ensure a consistent approach is taken when designing new buildings or refurbishing older buildings within Council's estate. To include:

- Identify priority locations for CPTs, including outdoor sites, to ensure sufficient coverage
- Consider the provision of a portable CPT at large events
- Identify ways of promoting CPTs with local businesses

**1F. What definition of 'rural' is the Public Authority using in respect of the Policy, Strategy, Plan or Public Service?**

Population Settlements of less than 5,000 (Default definition).	X
Other Definition (Provide details and the rationale below).	
A definition of 'rural' is not applicable.	

*Details of alternative definition of 'rural' used.*

*Rationale for using alternative definition of 'rural'.*

*Reasons why a definition of 'rural' is not applicable.*

## **SECTION 2**

### **Understanding the impact of the Policy, Strategy, Plan or Public Service**

<b>2A. Is the Policy, Strategy, Plan or Public Service likely to impact on people in rural areas?</b>			
Yes	X	No	If the response is <b>NO</b> GO TO Section <b>2E</b> .

<b>2B. Please explain how the Policy, Strategy, Plan or Public Service is likely to impact on people in rural areas.</b>
<p>In developing the Policy, the Working Group considered a map of existing Changing Places Toilets and the locations of Council-owned public toilets, in an effort to identify gaps. Appendix 2 (Areas of Priority), highlights areas/facilities which are more than 3 miles from the nearest CPT.</p> <p>When comparing sites for a Changing Places Facility, and to make most efficient and effective use of available funding, Officers will consider a range of variables in the decision making process. These will include, proximity to existing CPT, provision of standard WC facilities, provision of catering, ticketed activities, average time spent on site, the capacity of an arts or floor space of a leisure venue if applicable, average weekly opening hours of the facility, the state of readiness and the estimated cost of the works.</p> <p>Some of these measures will be impacted by the rurality of a facility.</p>

<b>2C. If the Policy, Strategy, Plan or Public Service is likely to impact on people in rural areas differently from people in urban areas, please explain how it is likely to impact on people in rural areas differently.</b>
<p>The range of variables to be considered for a new CPT, if funding becomes available, may favor facilities in urban areas, as they are more likely to be larger facilities, with longer opening hours and providing catering.</p> <p>The considerations will be applied equally to all facilities regardless of location.</p>

A Mobile Changing Places Toilet will be available for 12 large-scale Council-led events annually. In the case of a large event in a rural area, this facility could be used to mitigate impact.

**2D. Please indicate which of the following rural policy areas the Policy, Strategy, Plan or Public Service is likely to primarily impact on.**

Rural Businesses	
Rural Tourism	
Rural Housing	
Jobs or Employment in Rural Areas	
Education or Training in Rural Areas	
Broadband or Mobile Communications in Rural Areas	
Transport Services or Infrastructure in Rural Areas	
Health or Social Care Services in Rural Areas	
Poverty in Rural Areas	
Deprivation in Rural Areas	
Rural Crime or Community Safety	
Rural Development	
Agri-Environment	
Other (Please state)                      Access to Services and Community Provision	

**If the response to Section 2A was YES GO TO Section 3A.**

**2E. Please explain why the Policy, Strategy, Plan or Public Service is NOT likely to impact on people in rural areas.**

--

### **SECTION 3**

#### **Identifying the Social and Economic Needs of Persons in Rural Areas**

**3A. Has the Public Authority taken steps to identify the social and economic needs of people in rural areas that are relevant to the Policy, Strategy, Plan or Public Service?**

Yes	X	No	If the Response is <b>NO</b> GO TO Section <b>3E</b> .
-----	---	----	--

**3B. Please indicate which of the following methods or information sources were used by the Public Authority to identify the social and economic needs of people in rural areas.**

Consultation with Rural Stakeholders		Published Statistics	
Consultation with Other Organisations		Research Papers	
Surveys or Questionnaires		Other Publications	
Other Methods or Information Sources (include details in Question 3C below).			X

**3C. Please provide details of the methods and information sources used to identify the social and economic needs of people in rural areas including relevant dates, names of organisations, titles of publications, website references, details of surveys or consultations undertaken etc.**

A map was produced to identify the locations of existing CPTs and Council facilities including public toilets.

**3D. Please provide details of the social and economic needs of people in rural areas which have been identified by the Public Authority?**

If the response to Section 3A was YES GO TO Section 4A.

**3E. Please explain why no steps were taken by the Public Authority to identify the social and economic needs of people in rural areas?**

## **SECTION 4**

### **Considering the Social and Economic Needs of Persons in Rural Areas**

**4A. Please provide details of the issues considered in relation to the social and economic needs of people in rural areas.**

Proximity of Changing Places Toilets in relation to other facilities.

## **SECTION 5**

### **Influencing the Policy, Strategy, Plan or Public Service**

**5A. Has the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, been influenced by the rural needs identified?**

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	If the response is <b>NO</b> GO TO Section <b>5C</b> .
-----	--------------------------	----	-------------------------------------	--

**5B. Please explain how the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, has been influenced by the rural needs identified.**

--

If the response to Section 5A was YES GO TO Section 6A.

**5C. Please explain why the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or the delivery of the Public Service, has NOT been influenced by the rural needs identified.**

All considerations applied equally across urban and rural areas.

**SECTION 6**

**Documenting and Recording**

**6A. Please tick below to confirm that the RNIA Template will be retained by the Public Authority and relevant information on the Section 1 activity compiled in accordance with paragraph 6.7 of the guidance**

I confirm that the RNIA Template will be retained and relevant information compiled.	✓
--	---

<b>Rural Needs Impact Assessment undertaken by:</b>	Clare Weir
<b>Position/Grade:</b>	Community Sport Active Inclusion Officer
<b>Department/Directorate</b>	Health & Recreation
<b>Signature:</b>	<i>Clare Weir</i>
<b>Date:</b>	06/10/2022
<b>Rural Needs Impact Assessment approved by:</b>	Gillian Dewart



<b>Position/Grade:</b>	Sports Development Manager
<b>Department/Directorate</b>	Health & Recreation
<b>Signature:</b>	<i>Caitlin Dewant</i>
<b>Date:</b>	06/10/2022