

Changing Places Toilets:

Planning guide

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Ministerial Foreword

I am incredibly committed to increasing Changing Places Toilets provision across Scotland.

In my previous role as Minister for Local Government, I amended Scottish Building Regulations to make it the law that Changing Places Toilets are built in all new large public buildings. So this is a natural next step.

Access to toilet facilities is a fundamental human right and I am committed to realising our vision that Scotland respects and fulfils our human rights obligations.

I want to see attitudes transform across Scotland so that more people are aware of, and understand the importance of, Changing Places Toilet facilities.

This responsibility doesn't just fall to government. We need to work together as one Scotland to highlight the incredible value of these facilities in opening up our communities for all, and encourage development across the country.

The provision of such fundamental facilities offers everyone in Scotland dignity and freedom.

Kevin Stewart MSP

Minister for Mental Wellbeing and Social Care



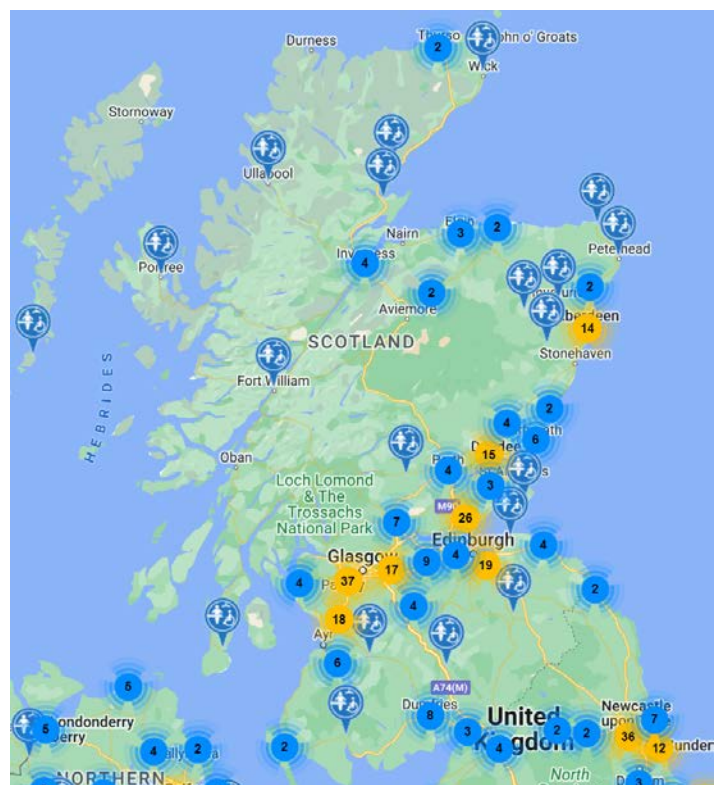
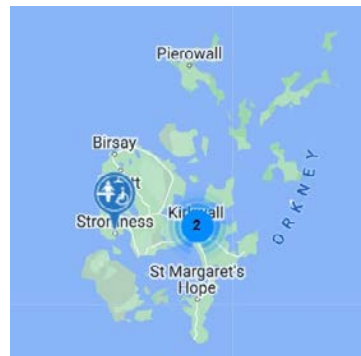
Introduction

This document aims to provide further information on Changing Places Toilets (CPTs) and offers guidance to those considering installing a CPT in both existing and new buildings.

This guidance document has been produced in collaboration with [PAMIS \(Promoting a more inclusive society\)](#) who are co-chairs and co-founders of the [Changing Places Consortium](#) and offer expert advice on CPTs in Scotland.

The Scottish Government is committed to working with disabled people to develop policies and the approaches required to solve problems and dismantle barriers. We are proud to be drawing on the vast lived experience that PAMIS brings.

PAMIS'S Changing Places Toilets report 2021 highlights that there are currently just under 250 CPTs in Scotland. Once a CPT is [registered with PAMIS](#) – Scotland's representative of the Changing Places Consortium – details are uploaded on the Consortium's [interactive map](#). Other organisations, such as [Euan's Guide](#), may contain further details on CPT provision within certain venues or locations.



Background

Changing Places Toilets (CPTs) are larger accessible toilets designed to meet the needs of disabled people who need carer support and require specialist equipment – in many cases they may be living with multiple and complex disabilities.

They offer adequate space for a disabled person when they are not in their wheelchair, as well as space for their wheelchair and one or two carers; and contain equipment to enable safe and easy use of the facilities, including an adult-sized, height-adjustable changing bench, a ceiling track and a centrally placed peninsular toilet.

Without such facilities, disabled people and their families are often excluded from activities or even prevented from going out altogether. Having to use unsuitable facilities due to the lack of fully accessible toilets also increases the risk of disabled people, and their carers or assistants, compromising their health and dignity.

The right to sanitation, and by extension toilet provision, is a human right. This right is ratified in international law under Article 11 of the United Nations International Covenant on Economic, Social and Cultural Rights.

CPTs make a real difference to disabled people and their families and we want to encourage the development and provision of more CPTs across Scotland.

The Scottish Government amended the Scottish Building Regulations legislation in 2019 to make it the law that CPTs were built in all new large public buildings. These provisions are detailed in the [Building standards technical handbook 2020](#). At the same time, we also amended our Planning System to include these amended building regulations and further detail can be found within the [Planning Circular 1/2020: Changing Places Toilets Regulations](#).

CPTs

What are CPTs?

Many disabled people, particularly those with multiple and complex needs, cannot use public toilets or standard accessible toilets because these facilities do not meet their needs. CPTs are larger, accessible toilets designed so that children and adults, who may need carer support, appropriate equipment and more space, can use toilet facilities in public venues or spaces. CPTs have some key design features which differ from a standard accessible toilet. Compared to a standard accessible toilet, a CPT:

- is larger (12m²) to allow sufficient turning room for larger-power wheelchairs, accompanying carers, or family members, as well as the specialist equipment required;
- has a height-adjustable adult-sized changing bench to enable people who are unable to sit on the toilet to lie down while being changed or having their personal care needs attended to;
- has a ceiling hoist to lift people out of their wheelchairs onto a changing bench or toilet safely and securely, depending on their needs; and,
- has a centrally placed peninsular toilet which allows for access either side for people who require support from both sides.

Who uses CPTs?

CPTs offer a vital facility to thousands of disabled people and their families and carers whose needs cannot be met in current public toilet provision. This includes, but is not limited to:

- people with profound or multiple learning disabilities;
- people with muscular dystrophy;
- older people;
- Veterans;
- people with limited mobility or who require the use of a larger wheelchair; and
- people who require a calm and quiet environment and may have sensory sensitivities.

CPTs are essential to ensuring equitable access to places and buildings.



“We rely on Changing Places Toilets as a family because without them we must cut our days short or change our son on a toilet floor. This issue impacts us all hugely. It’s heartbreaking to have to put your child through something so undignified and unhygienic when going to the toilet is a basic human right. And it is extremely upsetting for our daughter to witness how differently her brother is treated simply because he is disabled. Our fear is as he grows older his world will shrink unless the provision of Changing Places Toilets increases to meet his needs.”

Why are CPTs needed?

We know that the demand for CPTs in Scotland is much higher than the current provision. Where people shop, go out or travel should not be determined by their disability. Without access to a CPT, people often have to resort to:

- changing their loved one on a toilet floor or in the boot of their car, which is unsanitary and risks injury to the disabled person and carer when lifting out of a wheelchair;
- sitting in soiled clothing until a suitable toilet is found or they return home;
- dehydrating themselves to avoid needing to use a toilet on a day out;
- simply not going out due to the lack of fully accessible toilet facilities; and,
- in some cases, surgery such as catheter insertion as a long-term solution.

Many people are rendered 'socially incontinent' simply because there are no suitable public toilets. This is unacceptable. It does not respect human rights, does not afford dignity and impacts on health and wellbeing.

The provision and geographical spread of CPTs across Scotland needs to be increased so that disabled people can take part in everyday activities with the same dignity as everyone else. The provision of CPTs can be life changing for disabled people as these facilities allow people to access employment, leisure and travel opportunities, enabling them to live healthy and active lives.

Where CPTs should be built

Anywhere the public has access should be considering the requirement of installing a CPT. This could range from town centres, shopping centres, museums, train stations, airports and hospitals, to parks and beaches, sports centres, entertainment facilities and much more.

The UK Changing Places Consortium commissioned [research demonstrating where people need CPTs in the UK](#).

CPTs can be built anywhere – creativity and flexibility have proven that anywhere can be adapted to fit a CPT.

Case Study – Serco NorthLink Ferries

A key priority within [Going Further: Scotland's Accessible Travel Framework](#) is to increase CPT provision across key transport hubs. Serco operate the lifeline Northern Isles ferry service for passengers and freight between the Scottish mainland (Scrabster and Aberdeen harbours) and the Orkney (Stromness and Kirkwall harbours) and Shetland Islands (Lerwick harbour), providing essential access and supplies for islanders.

The NorthLink ferry fleet comprises three vessels, MV Hamnavoe, MV Hjalmland and MV Hrossey. In 2019, NorthLink ferries approached Scottish charity PAMIS, the lead organisation in Scotland for Changing Places Toilets, to explore opportunities for installing CPTs onboard their ships. With some significant design challenges around securing the equipment during rough sea crossings, as well as restrictions around space and available ceiling height, the NorthLink design team successfully found solutions and developed plans that were fully compliant with British Standards. The build phase of this project also presented challenges as ferries have a limited time at dry dock when adaptation work can be completed. The NorthLink ferry fleet now all have CPTs on board and were the first UK ferry operator to invest in CPTs on their ships. Making journeys for essential healthcare and leisure opportunities is now easier for families but the toilet facilities have also made the beautiful Northern Isles more accessible for tourists.

Mum and carer Jenny Whinnet (pictured):



“This is an exciting development for families and carers. It permits people who need these facilities to travel further afield confidently and with dignity. This is very different to a few years ago when it was so difficult for me to travel with my son because there were no Changing Places Toilets available.”

Paul Wheelhouse, Minister for Energy, Connectivity and the Islands (2019):



“I’m very pleased to see these new facilities up and running on board both the NorthLink passenger ferries serving the Aberdeen to Northern Isles routes. We know accessible travel not only enables people to enjoy equal access to our beautiful country, but it also enables people to fully participate in society and improve the quality of their lives, so we want to continue to identify and remove any disabling barriers which prevent people from making journeys or lead to them having an unpleasant time on board. It’s very important that Scotland’s ferry services are fully accessible, offering the best passenger experience possible to everyone and this targeted investment marks very welcome progress on that journey.”

Case Study – Ullapool Harbour



Ullapool is the mainland port for ferry services to the Isle of Lewis in the Western Isles and also serves as a port for cruise liners with over a quarter of a million passengers using the ferry services each year. Ullapool Harbour Trust refurbished the public toilets and incorporated a new CPT facility within the existing building with dedicated parking space outside.

Kevin Peach, Harbourmaster:



“The end result is a lovely CPT facility housed in the previously derelict and neglected lower floor of the village’s public toilets building, owned by Highland Council. We have a visitor book inside and those that use it are so appreciative of the clean and functional space. I’ve chatted to a number of people who care for those with severe disabilities and they mentioned the CPT network very much influencing their holiday destination choice.”



Considerations

There are several important things to think about when planning to build a CPT. It is important to consult expert organisations as well as specialist CPT supplier companies. The Changing Places Consortium provide a free [CPT Practical Guide](#) which includes planning and design advice, equipment and environment specifications and technical advice, management and maintenance guidance and the legislative background for CPTs.

Identifying an appropriate space for your CPT

A CPT requires a minimum space of 4 x 3 metres (12m²). This provides adequate manoeuvring space for wheelchairs including larger-powered wheelchairs or adapted and customised wheelchairs. It also gives space for several carers and/or family members to support the individual.

The height of the ceiling must be a minimum of 2.4 metres to accommodate the hoisting of an individual.

Other factors to consider are the availability of disabled parking spaces at your venue and the accessibility of the routes to the CPT.

Consulting stakeholders

When planning the provision of a new CPT, consultation with relevant organisations and individuals will help with the design process and in the selection of equipment. This will ensure that the facility meets a wide range of needs. It might be useful to contact organisations and people such as:

- PAMIS;
- local and national disability groups;
- local and national carers' groups;
- local authority access officers and equalities teams;
- Access Consultants or Auditors – a list of which is available from the [National Register of Access Consultants](#);
- occupational therapists; and,
- third sector organisations.

Planning, design and equipment

In most cases, venues considering building a CPT will need the services of an architect or building surveyor to prepare the plans and obtain the relevant statutory consents. There is also a range of specialist CPT suppliers who offer a full design and planning service. Most specialist CPT suppliers provide a site visit service and can provide costings for the provision and/or installation of equipment. They can also often find solutions in older buildings which may have challenges regarding the space available.

The Changing Places Consortium offers [a list of CPT providers](#) as well as the [CPT Practical Guide](#), which contains example designs showing several different room arrangements and detailed information on key elements such as lighting and décor, assistance alarms, types of changing benches, maximisation of manoeuvring space and correct installation of the hoist. The guide also provides comprehensive equipment and environment checklists and covers all aspects of the design process.

It is also recommended to seek advice from a fully qualified access consultant to assist with broader accessibility issues.

PAMIS can review CPT plans to ensure that they meet the required criteria for registration.

Maintenance and management of a CPT

Efficient management and maintenance of the CPT is essential to their day-to-day operation and sustainability. Good management includes regular cleaning and servicing of equipment as well as provision of clear signage and instructions on the use of specific equipment. Staff training is important particularly for front-of-house, cleaning and security staff.

For guidance on how best to train staff or to engage the services of a qualified trainer, contact PAMIS and the Changing Places Consortium.

Regularly testing alarm systems and ensuring risk assessments are in place is also important.

Certain regulations govern the frequency and type of maintenance, for example, hoists need to be serviced and maintained in accordance with [Lifting Operations and Lifting Equipment Regulations](#). The level of security required for a CPT will vary depending on the location and management of the facility. The [CPT Practical Guide](#) includes information on maintenance and management.

Promotion and registration

Once a CPT is nearing completion and ready to open to the public, it is highly recommended to [register the facility](#) with the Changing Places Consortium. The Consortium can add details of the facility to the [CPT interactive map](#) and assist in its promotion. Only registered CPTs can use the official branding and appear on the map. In all cases, instructions explaining how to access the CPT should be displayed on the venue's website.

Mobile CPTs

Outdoor events such as festivals, fairs or shows should consider adding a mobile or modular CPT alongside the provision of accessible and standard toilets. Mobile options are particularly useful solutions for seasonal provision. Modular CPTs should have step-free access and be fitted with the same equipment as a permanent CPT. Modular units should also be connected to the mains water supply and be clearly signposted. PAMIS provide [more information on mobile CPTs](#) in Scotland.

The Pamiloo

Thousands of people with complex needs in Scotland are unable to attend events or visit outdoor venues due to a lack of appropriate toilet provision. PAMIS is a Scottish charity that support people with Profound and Multiple Learning Disabilities and their carers. Many of these families require access to CPTs in order to enjoy days out

and take part in events and activities. Following a successful fundraising campaign in 2017, PAMIS acquired Scotland's first mobile CPT – the Pamiloo. A key donator was Scottish Southern and Electricity Networks (SSEN) who acknowledged the potential for this resource being used as part of resilience planning in emergency/adverse situations.

The Pamiloo is based on a Peugeot Boxer van and has been specially adapted to include an adult sized mobile changing trolley, ceiling hoist with full room coverage, a peninsular toilet, wash basin with hot running water and internal heating. Users access the vehicle using an electric wheelchair lift ramp at the rear, with a side access door for accompanying carers. The Pamiloo has the specialist equipment and additional space that a CPT user needs. The vehicle is compact, requiring no special driving licence category and can operate without mains power for two-to-three days.





The Pamiloo is used to support PAMIS'S activity and days out programmes and has more recently been hired by partner organisations to make their events more accessible. The Pamiloo has attended a wide variety of outdoor events across the country including Doune the Rabbit Hole Festival, TRNSMIT festival, British Touring Cars at Knockhill racing circuit, Children's Hospices Association Scotland family fun days, Wigtown Book Festival, Christmas Lights Switch On, and pantomimes. The vehicle also enabled a young woman to attend her school prom with her friends, an opportunity many take for granted.

Mobile CPT vehicles along with modular semi-permanent units can provide a very effective solution for short term hire to make an event or rural location more accessible. PAMIS are currently working with partners in the design of an eco-trailer version of a mobile CPT.

Further information and advice

If you are interested in finding out more about CPTs, please refer to:

- [resources and services](#) available from PAMIS, including a [free CPT enquiry and advice service](#);
- [resources and information](#) available from the Changing Places Consortium;
- the CPT [interactive map](#);
- [information on registering your CPT](#);
- [case studies](#) about existing CPT venues;
- the British Building Standards BS [8300-1:2018](#) and [BS 8.300-2:2018](#);
- the [Scottish Government's Scottish Building Standards publication](#);
- information on the [Town and Country Planning \(Changing Places Toilets Facilities\) \(Scotland\) Regulations 2020](#);
- the [National Register of Access Consultants](#); and,
- PAMIS'S [information on mobile CPTs](#).



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