



## Public Consultation on Draft Universal Design Guidelines for Changing Places Toilets

The Centre for Excellence in Universal Design (CEUD) at the National Disability Authority (NDA) has developed draft Universal Design Guidelines for Changing Places Toilets. We are inviting you to submit your feedback on these draft guidelines.

The guidelines are aimed at designers, building managers and owners of facilities as well as clients, industry professionals and disability stakeholders. The purpose of the guidelines is to:

- provide good practice guidance on the provision, location, and design of Changing Places Toilets, taking a Universal Design approach
- provide good practice guidance on managing and maintaining Changing Places Toilets
- complement implementation of the Building Regulations (Part M Amendment) Regulations 2022, which make provision for Changing Places Toilets, having regard to the use and size of a building.

The preferred mode for providing feedback is by completing this feedback form. A completed form should be returned by email to [info@ceud.ie](mailto:info@ceud.ie) or by postal mail to:

Universal Design Guidelines for Changing Places Toilets Public Consultation,  
National Disability Authority,  
25 Clyde Road,  
Ballsbridge, Dublin 4,  
D04 E409.

We welcome submissions from individuals, organisations, and public bodies.

It is not intended that you provide personal or confidential information as part of the submission process.

Please ensure that you return this form to us by **5pm on Friday 12<sup>th</sup> January 2024.**

## Consultation questions

We would like to learn your thoughts on the draft Universal Design Guidelines for Changing Places Toilets.

### Consultation questions

1. Do you think the **language** used in the draft guidelines is clear and easy to understand? Yes/No

In general, yes much of the language is clear and easy to understand. There are instances whereby technical and legal language is used, however we understand that at these are industry specific guidelines for designers and builders, a certain level of this is inevitable. The Easy-To-Read version of the guidelines is accessible with a good level of detail on what should be expected from a Changing Places facility for disabled people and their family and carers to understand what to expect. We would suggest that in addition to the Easy-To-Read version of the guidelines that a Plain English version be developed. Many family carers and community members would not automatically look to the Easy-To-Read version, as it is very simplistic, but may struggle to read some of the more technical aspects of the main version. An accessibly written plain English version would find a medium between these two versions for the majority of the support community.

2. Do you think the **structure** of the draft guidelines is clear and easy to understand? Yes/No

*Please reflect on the following points when answering the questions that follow:*

- *The clarity of the draft Universal Design Guidelines for Changing Places Toilets*
- *What might be added to the guidelines*
- *What might be removed from the guidelines*

*Any improvements that could be made*

Yes.

3. Please provide your feedback on **Sections 1-4: Statement on Language, Introduction and Context, Key Considerations Overview**

In general these sections are clear.

We are pleased to see multiple references to family carers within these sections of the guide. It is important for those designing and maintaining these

facilities that a wide variety of users and their supporters, carers and personal assistants need information on accessing these facilities.

However, there is one section which we feel needs more clarity if intended for an audience of individuals not involved in the provision of buildings. ‘*Section 3.7 – National Building Regulation Requirements*’ is very technical in its use of language. We of course understand that one of the main audiences for this document is those providing these facilities (planners, architects, builders, local authorities etc.) However, as family members and disabled people are one of the named audiences also, some provision must be given to explaining these elements. This is one of the reasons we have recommended in the previous section that a Plain English version of the guidelines be developed, which includes more detail than the Easy-To-Read version, but which is geared specifically towards those not educated and trained in legislative matters and/or building management.

‘*Section 4 - Key Considerations Overview*’ is particularly clear, and provides an example of how a Plain English version of these guidelines could be written to ensure family members, staff and volunteers, and disabled people themselves have access to plainly written information which is not short of detail but avoids overly technical language.

4. Please provide your feedback on **Section 5: Provision**

Similar comments per the above section (re: technical language usage)

5. Please provide your feedback on **Section 6: Location**

Particularly helpful in this section is the repeated comments re: ensuring the ease of access for all users to the Changing Places facility, regarding location, security measures etc.

6. Please provide your feedback on **Section 7: Design and Installation**

We again appreciate that those in need of specific technical guidance in designing, building and provision of Changing Places facilities are one of the audiences of this document. Therefore, the particular dimensions and all legal and recommended technical information is required. However, the specificity of this section will not be relevant to families, paid carers/ assistants nor to disabled people themselves, who are also named as audiences for this document. Of more benefit here to those audiences would be a general set of expectations rather than multiple floorplans etc. Again, a Plain English version of these guidelines specifically for disabled people, their supporters and carers, would allow for a higher level of detail than the Easy-To-Read version, but less

technical information that is likely to be not of interest to them. The risk of including such overly technical information is that those not versed in that language may feel overwhelmed or intimidated and will miss the important information contained within the guidelines which is relevant to them, causing them to be under- or misinformed.

We would also like to commend the report for including information regarding neurodiversity and noise controls etc. Many families in Ireland are caring for children and adults with noise and spatial sensitivities, who are often overlooked in the discussion of accessible toilets and spaces such as this.

7. Please provide your feedback on **Section 8: Management and Maintenance**

We suggest that information regarding the diversity of those needing access to Changing Places facilities be included in the section regarding staff education and training. In the past, some family carers have indicated that if they are not caring for a person with an obvious physical disability they have had difficulties in accessing accessible toilets and similar facilities. There are many different users of such facilities, which the guide outlines multiple times. However, staff in public buildings need to be aware that not all disabilities or conditions which require access to Changing Places facilities are visible. Disabled people and their carers and supporters should not be required to 'prove' a disability or their need to access such facilities. This should be included in the guidelines for staff training in this guide.

8. Are there **any other comments or suggestions** on the draft **Universal Design Guidelines for Changing Places Toilets** you would like to make?

Once again we would like to take this opportunity to commend the authors of these guidelines for their significant work and multifaceted approach to the guidelines. We know through our work with family carers that having access to Changing Places facilities can mean the difference between being a part of the community, and not.

As outlined in the previous sections, we recommend the drafting of a complementary Plain English version of these guidelines for the specific audience of disabled people, family carers and supporters who require more detailed information that is necessary for the Easy-Read version, but may become overwhelmed by technical information and jargon contained in this version of the guide.

We wonder if the experience in other countries (e.g. the UK) in developing these guidelines been reviewed/considered? We think this would be a useful action to take, if not already done so.

Thank you for taking the time to give us feedback on the draft Universal Design Guidelines for Changing Places Toilets.

<b>Name of Organisation or Public Body (if applicable)</b>	Care Alliance Ireland
--	-----------------------

### **Next steps**

Once the period for receiving feedback has ended, the Centre for Excellence in Universal Design will review and analyse the responses. The feedback will inform further development of the draft Universal Design Guidelines for Changing Places Toilets. The guidelines will be presented to the NDA Board for sign off, after which they will be published.