



Safe Use of Changing Facilities Guidance

Introduction

This guidance has been produced in response to enquiries from clubs 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
- activity organisers unclear about the level of supervision they should provide unaccompanied children using facilities
- use of gendered changing rooms by transgender, gender-questioning or non-binary 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

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

Clubs 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 document is therefore intended as practice guidance to support individuals and organisations to consider issues relevant to their particular context.

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 players. 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 (teams, individuals, or members of the public).

Clear posters on Changing Facility doors should be displayed, reminding members that the facilities are shared and not for the sole use of children or adults.

Restricting use of the Changing Facility

The club itself will know their context better than anyone else and may decide that the safest way to manage changing is to request that all unaccompanied children change and shower at home. This will need to be clearly communicated to parents or carers and posters should be displayed to remind members of this policy.

Supervision in the Changing Facility

If a group activity for children is taking place at the club and a 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 when they are in the changing facility. 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
- 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
- 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 (Enhanced DBS Certificate)

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 at the Club

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 club. 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.

Club responsibilities

When children are given access to facilities, operators assume a duty of care for them. The level of their responsibility will vary depending on the specific context. For instance, whether the child is:

- alone and unsupervised at the venue
- with parents or carers
- attending an activity
- attending an activity staffed by the facility
- attending a public session

Clubs therefore have a responsibility to put appropriate safeguarding arrangements in place that include promoting and implementing a policy for admitting unaccompanied children.

This will help to safeguard potentially vulnerable children, reduce safeguarding incidents and support the efficient working of the club.