

## Safe use of changing facilities

### Introduction

This guidance has been produced in response to a number of enquiries from individuals and clubs seeking advice about the safe use of changing facilities.

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

**Note:** The term ‘children’ describes any person under the age of 18.

Clubs, 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.

### Existing national governing body, local authority or facility policies

Many national governing bodies of sport (NGBs) and other organisations, such as 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 or not 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 (other sports teams, individual athletes, or members of the public); for example, in the cases of a local authority swimming pool or a privately owned gym. 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.

## Issues to consider and address

### Adults using the changing rooms at the same time as children

Ideally, groups of children should have sole use of changing facilities. This reduces any risks and potential vulnerability associated with mixing with adults or other young people (known or unknown to them) when changing and showering. Even when using public facilities, arrangements can be considered to address any potential concerns:

- there may be a separate room or space available for the group
- it may be possible to negotiate specific time slots for the group, and the coaches or volunteers to have exclusive use of the changing rooms
- a team area within the changing facility could be designated and nobody else allowed in that area
- children may opt to change at home before they arrive for the activity\*

\*Remember that many children are very self-conscious and anxious about undressing in front of others. Staff and volunteers should consider offering the option of changing at home as a matter of course.

### 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:
- organisers of groups of children under 8 years should make arrangements for their supervision while changing before and after the activity.
- although most children of school age (4 years old) may be capable of changing their clothes, many **leisure facilities** have established guidelines that any child below the age of 8 years must be accompanied
- 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 which need to be managed

### 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
  - **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 details, take a look at our topic page on [safe 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 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.

#### 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 or club
- 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.

### What about 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 a number of factors to consider when addressing the needs of transgender or transitioning children and changing facilities. Things to consider are:

- 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 the Swim England's policies and procedures are outlined in the document 'Wavepower'. See section 2.4, page 65 for the ASA changing room policy guidance. Swim England has been asked by many clubs to clearly state what responsibility the club has for swimmers in changing rooms before, during and after training or a competition. Under the Duty of Care to Safeguard Children, the club has a responsibility for the wellbeing of children in the changing rooms. This guidance 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

After increasing concern, Swim England has developed guidance regarding indecent images and child abuse images (see section 2.4, page 67) and is currently working to educate children through clubs and parents. Swim England has also been working with facility providers to change the design and use of changing areas to prevent the increasing trend of the inappropriate and illegal use of mobile devices in changing rooms.

- [Wavepower \(2016-19; PDF\)](#)

### 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 \(2017; PDF\)](#)