

# Public Document Pack

**Democratic Services Section  
Legal and Civic Services Department  
Belfast City Council  
City Hall  
Belfast  
BT1 5GS**

## **MEETING OF STRATEGIC POLICY AND RESOURCES COMMITTEE**

Dear Alderman/Councillor,

I enclose a copies of the report for the following items to be considered at the meeting to be held at 9.30 am on Friday, 13th December, 2024.

Yours faithfully,

John Walsh

Chief Executive

### **AGENDA:**

#### **3. Matters referred back from Council/Motions**

- (c) Notice of Motion – Addressing Educational Inequalities in Belfast (Pages 1 - 4)
- (d) Notice of Motion – Armed Forces Covenant (Pages 5 - 8)

#### **4. Belfast Agenda/Strategic Issues**

- (c) Changing Places Toilet Policy (Pages 9 - 40)

#### **8. Operational Issues**

- (d) Minutes of City Hall/City Hall Grounds Installations Working Group 12th December (Pages 41 - 44)
- (f) Minutes of the Meeting of the Disability Working Group 11.12.24 (Pages 45 - 50)

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<b>Subject:</b>	<b>Notice of Motion – Addressing Educational Inequalities in Belfast</b>
<b>Date:</b>	13 <sup>th</sup> December, 2024
<b>Reporting Officer:</b>	Nora Largey, City Solicitor/Director of Legal and Civic Services
<b>Contact Officer:</b>	Jim Hanna, Democratic Services and Governance Manager

## Restricted Reports

Is this report restricted?

Yes

☐

No

☒

Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number

1. Information relating to any individual
2. Information likely to reveal the identity of an individual
3. Information relating to the financial or business affairs of any particular person (including the council holding that information)
4. Information in connection with any labour relations matter
5. Information in relation to which a claim to legal professional privilege could be maintained
6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Sometime in the future

Never

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## Call-in

Is the decision eligible for Call-in?

Yes

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No

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<b>1.0</b>	<b>Purpose of Report/Summary of Main Issues</b>
	To bring to Members' attention a motion in relation to Addressing Educational Inequalities in Belfast, which the Standards and Business Committee considered at its meeting on 21 <sup>st</sup> November.
<b>2.0</b>	<b>Recommendation</b>
	<p>Members are asked to note that in accordance with Standing Order 13(i) that Notices of Motion which commit the Council to expenditure must be referred to the appropriate committee for consideration and report.</p> <p>At this time Members are only asked to note that the Notice of Motion has been received and that, if agreed, a subsequent report will be brought to Committee outlining a detailed consideration of the Notice of Motion and the potential costs implications.</p>
<b>3.0</b>	<b>Main Report</b>
3.1	<p><b><u>Key Issues</u></b></p> <p>The Standards and Business Committee, at its meeting on 21<sup>st</sup> November, considered the following motion which had been received for submission to the Council on 2<sup>nd</sup> December:</p> <p><b><u>Addressing Educational Inequalities in Belfast</u></b></p> <p>“In light of the DENI ‘RAISE’ programme in response to the ‘Fair Start’ report, the Council resolves to:</p> <ol style="list-style-type: none"> <li>1. Support the RAISE programme and align it with the Belfast Agenda.</li> <li>2. Establish a cross-party committee to monitor progress and ensure community engagement.</li> <li>3. Commit to continuous improvement in addressing educational inequalities, including writing to the Education Minister to seek confirmation that his department will proactively respond to feedback about the targeting of the programme and ensure it reaches the communities most in need.</li> </ol> <p>This motion aims to ensure coordinated, effective, and inclusive efforts to reduce educational inequalities in Belfast.”</p> <p>Proposer: Councillor David Bell  Seconder: Councillor Long</p>
3.2	The motion calls upon the Council to undertake a number of actions to address education inequalities.

	<p>The Committee may be aware that the Belfast Strategic Partnership (BSP) was previously a partnership between Belfast City Council, the PHA and Belfast Trust. It has been superseded by the establishment of the Community Planning Partnership.</p> <p>One of the working groups of the BSP was the Lifelong Learning Group. They had established a Lifelong Learning Charter and undertook a range of community-based learning activities – including the Festival of Learning. While the BSP no longer exists, that Lifelong Learning Group continues to meet – and the main focus of their activities remains the annual festival of learning, scheduled to take place in April next year. This is usually a week-long programme of events to promote learning opportunities across the board. It does not have a specific focus on any type of learning or any target group. Membership of the group involves Belfast City Council, UU, QUB, Forum for Adult Learning, BMC and a number of community-based learning partners. The work on the Learning City group is coordinated through our Community Planning team which bring updates to Strategic Policy and Resources Committee on the work. The Motion will therefore be referred to this Committee.</p>
3.3	<p><b><u>Financial and Resource Implications</u></b></p> <p>None at this stage as there is no commitment to proceed with the Notice of Motion. Details of any financial and resource implications will be reported at a subsequent meeting.</p>
3.4	<p><b><u>Equality or Good Relations Implications / Rural Needs Assessment</u></b></p> <p>This motion, if agreed, may have potential equality, good relations and rural needs implications and should be subject to our normal screening process as appropriate.</p>
<b>4.0</b>	<b>Documents Attached</b>
	None

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<b>Subject:</b>	<b>Notice of Motion – Armed Forces Covenant</b>
<b>Date:</b>	13 <sup>th</sup> December, 2024
<b>Reporting Officer:</b>	Nora Largey, City Solicitor/Director of Legal and Civic Services
<b>Contact Officer:</b>	Jim Hanna, Democratic Services and Governance Manager

## Restricted Reports

Is this report restricted?

Yes

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No

☒

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6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Sometime in the future

Never

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## Call-in

Is the decision eligible for Call-in?

Yes

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No

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<b>1.0</b>	<b>Purpose of Report/Summary of Main Issues</b>
	To bring to Members' attention a motion in relation to the Armed Forces Covenant, which the Standards and Business Committee considered at its meeting on 21 <sup>st</sup> November.
<b>2.0</b>	<b>Recommendation</b>
	<p>Members are asked to note that in accordance with Standing Order 13(i) that Notices of Motion which commit the Council to expenditure must be referred to the appropriate committee for consideration and report.</p> <p>At this time Members are only asked to note that the Notice of Motion has been received and that, if agreed, a subsequent report will be brought to Committee outlining a detailed consideration of the Notice of Motion and the potential costs implications.</p>
<b>3.0</b>	<b>Main Report</b>
	<b><u>Key Issues</u></b>
3.1	<p>The Standards and Business Committee, at its meeting on 21st November, considered the following motion which had been received for submission to the Council on 2<sup>nd</sup> December:</p> <p><b><u>Armed Forces Covenant</u></b></p> <p>"That this Council recognises the unique skills that are held by Armed Forces service leavers; recognises that many veterans can face disadvantages compared to the general population, arising from military life, when accessing services and as such, this Council commits to signing up to the Armed Forces Covenant immediately."</p> <p>Proposer: Alderman James Lawlor</p> <p>Seconder: Alderman Dean McCullough</p>
3.2	<p>The motion calls upon the Council to sign to the Armed Forces Covenant. The Strategic Policy and Resources Committee is responsible for policy and HR matters and the motion has to been referred to this Committee in the first instance in order for officers to ascertain what is involved and to ascertain what, if any, the Council's commitments would be in signing the Armed Forces Covenant if the Committee is minded to agree to the motion.</p> <p><b><u>Financial and Resource Implications</u></b></p>
3.3	<p>None at this stage as there is no commitment to proceed with the Notice of Motion.</p> <p>Details of any financial and resource implications will be reported at a subsequent meeting.</p> <p><b><u>Equality or Good Relations Implications / Rural Needs Assessment</u></b></p>
3.4	<p>This motion, if agreed, may have potential equality, good relations and rural needs implications and should be subject to our normal screening process as appropriate.</p>



<b>4.0</b>	<b>Documents Attached</b>
	None

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<b>Subject:</b>	Changing Places Toilet Policy
<b>Date:</b>	13 December 2024
<b>Reporting Officer:</b>	Nora Largey, City Solicitor and Director of Legal and Civic Services
<b>Contact Officer:</b>	Russell Connelly, Policy, Research and Compliance Officer Michael Johnston, Language Officer

<b>Restricted Reports</b>	
Is this report restricted?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.	
Insert number <input style="width: 40px;" type="text"/>	
<ol style="list-style-type: none"> <li>1. Information relating to any individual</li> <li>2. Information likely to reveal the identity of an individual</li> <li>3. Information relating to the financial or business affairs of any particular person (including the council holding that information)</li> <li>4. Information in connection with any labour relations matter</li> <li>5. Information in relation to which a claim to legal professional privilege could be maintained</li> <li>6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction</li> <li>7. Information on any action in relation to the prevention, investigation or prosecution of crime</li> </ol>	
If Yes, when will the report become unrestricted?	
After Committee Decision After Council Decision Sometime in the future Never	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

<b>Call-in</b>	
Is the decision eligible for Call-in?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	The purpose of this report is to provide Members with a final version of the draft Changing Places Toilet Policy for Belfast City Council.
<b>2.0</b>	<b>Recommendations</b>
2.1	<p>The Committee is asked to:</p> <ul style="list-style-type: none"> <li>• approve the draft Changing Places Toilet Policy (Appendix 1).</li> </ul>
<b>3.0</b>	<b>Main report</b>
3.1	<p><b>Background</b></p> <p>A motion proposed by Councillor Ross McMullan calling for the introduction of a Changing Places Toilet Policy for Belfast City Council was referred to the SP&amp;R committee on 1<sup>st</sup> September 2021. The committee adopted the motion and agreed that a report be brought to a subsequent meeting providing details on how it would be facilitated, resourced and managed. An update report was brought to this working group on 10th October 2023, which endorsed the draft Policy and recommended that it be brought back to SP&amp;R for approval. The SP&amp;R committee on 24<sup>th</sup> November 2023 approved the draft Changing Places Toilet Policy for public consultation. The public consultation began on 29<sup>th</sup> January 2024 and ended on 22<sup>nd</sup> April 2024. The final draft Changing Places Toilet Policy was reviewed by the internal CPT Officer Working Group on 29<sup>th</sup> August 2024, by CMT on 25 September 2024 and by the Disability WG on 11<sup>th</sup> December 2024.</p>
3.2	<p><b>Public Consultation Report</b></p> <p>90 people responded to the Public Consultation and the findings were:</p> <ul style="list-style-type: none"> <li>• 75.4% of the respondents agreed with the draft Changing Places Toilet Policy, with a smaller percentage (17.9%) disagreeing.</li> <li>• 66% of the respondents used the Parks at least once week.</li> <li>• 39.7% of the respondents have a disability.</li> <li>• 57.5% of the respondents were carers/dependents.</li> </ul> <p>Two written responses were received from Christine McClements and Tourism Northern Ireland.</p> <p>The written responses told us that the wording of the draft policy was not acceptable, for example, the Council should be committed, and not to strive to do and that there should be a required inclusion of CPT facilities at large events. There also should be a commitment to a rolling programme of addressing the CPT deficit and toilet needs identified.</p>

3.3	<p><b>Changing Places Toilet Policy</b></p> <p>Two main recommended amendments have been made to the final draft Policy. The final draft Policy now states that ‘the Council will commit to’, instead of ‘the Council will strive to’ provide as required a Changing Places facility in every large building.</p> <p>And also, the Council will make it a commitment for large events being organised by external organisers/promoters to provide CPT facilities. The Council will also make an effort to include Changing Places facilities or to make toilet provision more accessible when extending or extensively refurbishing an existing Council-owned building when it is reasonable to do so.</p>
3.4	<p><b>Other requests in relation to accessible toilets</b></p> <p>Members will note that the Council have received several requests recently in relation to improving physical access within council toilets, including requests from a number of campaigns in relation to Stoma Friendly toilets and also correspondence from the Crohn’s and Colitis UK campaign “Not Every Disability Is Visible”. These campaigns have each requested the introduction of disposable facilities with accompanying signage/posters promoting the various causes.</p> <p>It is proposed that in response to such requests, that officers advise that one of the first steps in the implementation of the CPT policy will be an audit of all accessible toilet provision across the Council estate. The purpose of this review would be to help identify any gaps and to quantify the level of resources which would be required to upgrade toilets and increase accessibility in order to make the toilets stoma, Crohns and colitis friendly.</p>
3.5	<p><b>Financial &amp; Resource Implications</b></p> <p>Whilst the commitments in the policy can be met within existing budgets it is likely that there will be financial implications in the roll out of Changing Places Facilities following the audit of accessible toilet provision in the Council’s estate.</p>
3.6	<p><b>Equality or Good Relations Implications/Rural Needs Implications</b></p> <p>An Equality Screening report and a Rural Need Impact Assessment have been completed.</p>
4.0	<p><b>Appendices – Documents Attached</b></p>
	<p>Appendix 1 - Final draft Changing Places Toilet Policy</p> <p>Appendix 2 – Report on the Consultation Conducted by Belfast City Council into the Draft Changing Places Toilet Policy</p>

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# Belfast City Council

## **CHANGING PLACES TOILETS DRAFT POLICY**

## CONTENTS

1. Introduction
2. Background
3. What are Changing Places Toilets (CPTs)?
4. Belfast City Council approach
5. References

Appendix 1 - Relevant legislation

Appendix 2 – Building Regulations



## 1. Introduction

This policy sets out Belfast City Council's approach and commitment to providing Changing Places Toilet facilities in public places within council facilities and across the council area.

Changing Places Toilets (CPTs) meet the needs of people with profound and multiple learning disabilities as well as people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis. These specialised toilet facilities make public places and spaces accessible and inclusive for everyone, including children, adults and older people with complex needs or mobility issues. Where they are not provided, people are changed on a toilet floor, which is dangerous, unhygienic and undignified. Without them, people may be excluded entirely from certain public spaces.

Installing Changing Places Toilet facilities is a practical step through which public bodies can demonstrate that they are taking positive action to promote equality of opportunity for disabled people, as outlined in the Disability Equality Duty.

The Council will commit to:

- provide as required a Changing Places facility in every new large building development<sup>1</sup> in which the public will have access to its services and where public toilet provision is available for others (in accordance with Building Regulations - Part R).
- make every effort to include Changing Places facilities when we extend or extensively refurbish an existing Council-owned building where it is reasonable to do so.
- review where such Changing Places facilities could be installed on the council estate e.g playgrounds, parks
- when organising a large public event, consider if it can take place at a venue that already has a Changing Places facility or include a mobile/portable facility, if a permanent Changing Places toilet is not available.
- require organisers of all large-scale public events (e.g. concerts, festivals) on council property to commit for customers to have access to either a fixed or portable Changing Places facility as part of the design of the event.
- When organising smaller public events, encourage small scale events organisers to undertake an accessibility audit and to provide a Changing Places facility where possible.

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<sup>1</sup> Large buildings developments are defined in the Department of Finance Amendments to Technical Booklet R (June 2022) - Paragraph 6.14A <https://www.finance-ni.gov.uk/sites/default/files/publications/dfp/AMD%208%20final.pdf>

## 2. Background

Thousands of people with profound and multiple learning disabilities, as well other disabilities that severely limit mobility, cannot use standard accessible toilets.

People may be limited in their own mobility so need equipment to help them or may need support from one or two carers to either get on the toilet or to have their continence pad changed. Standard accessible toilets (or "disabled toilets") do not provide changing benches or hoists and most are too small to accommodate more than one person. Without Changing Places toilets, the person with disabilities is put at risk, and families are forced to risk their own health and safety by changing their loved one on a toilet floor. This is dangerous, unhygienic and undignified.

It is now accepted and expected that everyone has a right to live in the community, to move around within it and access all its facilities. Government policy promotes the idea of "community participation" and "active citizenship," but for some people with disabilities the lack of a fully accessible toilet is denying them this right. Providing these toilets in public places would make a dramatic difference to the lives of thousands of people who desperately need these facilities.

The Department of Finance recently updated the Building Regulations to make provisions requiring Changing Places toilets in certain buildings commonly used by the public. This new requirement for Changing Places Toilets is in addition to the current requirements for standard accessible toilets and will benefit around 7,000 people in Northern Ireland. The new statutory guidance came into effect on 30 June 2022 and applies to buildings constructed after this date.

### Benefits for the council and others

There are a number of benefits that a Changing Places facility can bring both to the ourselves and the wider council area. These include:

- **Compliance** – we have a statutory duty under the Disability Discrimination Act to ensure all of our premises are accessible. The provision of Changing Places facilities helps us to meet this obligation.
- **Customer benefits** – Changing Places facilities provide people with disabilities with the ability to freely attend council properties, locations and events knowing that they can safely visit a clean, hygienic toilet at all times. It also provides family members and carers with the freedom to plan visits to such locations without worrying about when or for how long they can attend.
- **The Purple Pound** – the purple pound refers to the combined spending power of people with disabilities in the UK. At last estimate, it has a value of over £200 billion in the UK economy which can represent a huge amount of new custom for businesses or service providers that are accessible to disabled people.
- **Reputation** – Any business or service provider which installs Changing Places facilities will be clearly demonstrating that it cares for the disabled and their families. This improves their reputation and provides them with a unique selling point over and above their competitors.

### 3. What are Changing Places Toilets (CPTs)?

Changing Places Toilets (CPTs) meet the needs of people with profound and multiple learning disabilities, as well as people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis. However, the range of people who may need to use a CPT can also include for example people living with stroke, older people who require assistance, people who are unable to transfer independently or have no sitting balance, people who are doubly incontinent or who have total dependency on assistants.

These toilets provide specific equipment including a height adjustable adult-sized changing table, a tracking hoist system, adequate space for a disabled person and up to two carers, a peninsular WC with room either side and a safe and clean environment including tear off paper to cover the bench, a large waste bin and a non-slip floor.

These facilities enable people with complex care needs to take part in everyday activities such as travel, shopping, family days out or attending a sporting event.

An example of a Changing Places Toilet is shown below



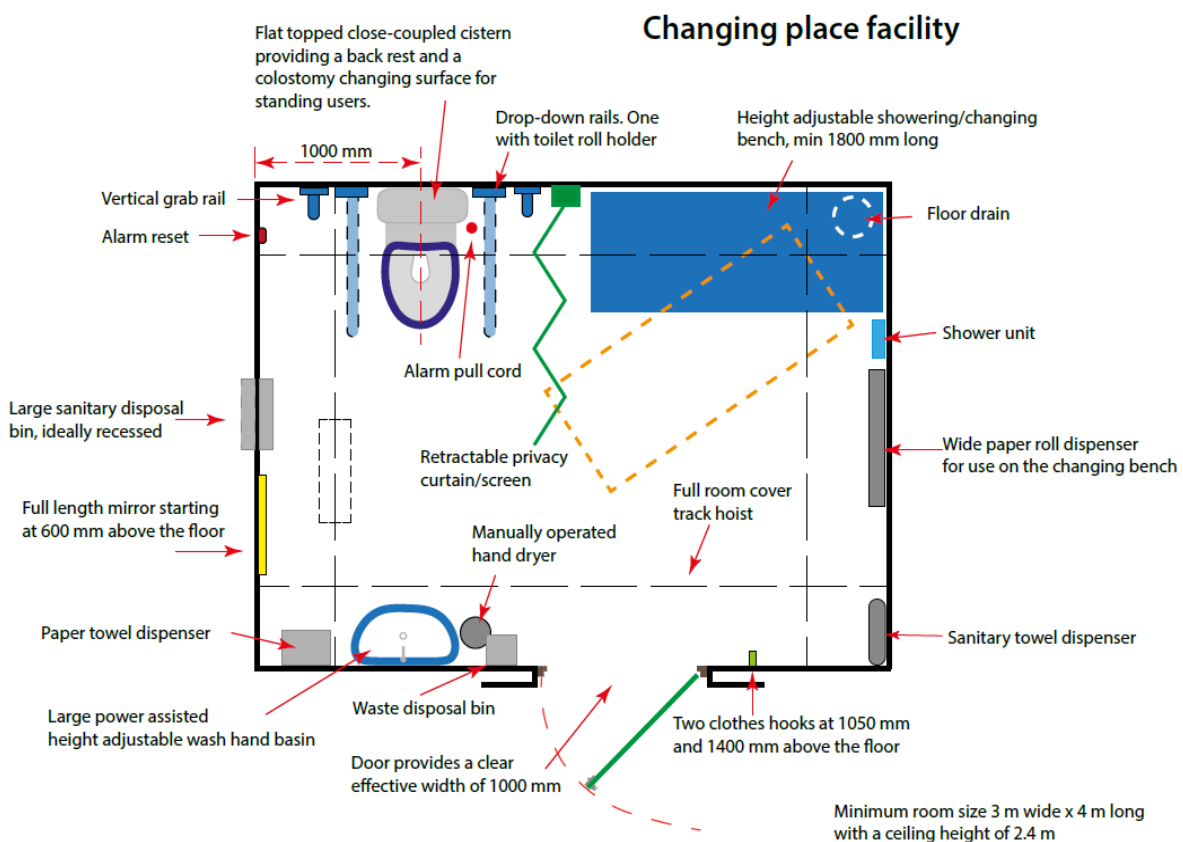
*Image from Changing Places Consortium*

A standard-sized CPT facility is a room with a floor area of 12m<sup>2</sup> (3m wide and 4m long, with a ceiling height of 2.4m). A room of 3m x 4m gives a rectangular space to allow users and carers to move between each piece of equipment in the toilet.

Changing Places Toilets have a range of features including:

- A tracking hoist covering the full room
- A height adjustable adult changing bench which is easily cleaned
- A peninsula WC with drop down support rails and 1m clearance each side
- A non-slip floor
- Optional adjustable shower
- Adjustable height sink
- Privacy curtain or screen
- Alarm pull cords and reset button
- Comfortable temperature for undressing
- Welcoming and interesting decoration with visual contrast to highlight equipment, door frames and door handles

It is important for a wheelchair user to be able to move in a wheelchair between each item and to have the space for up to two carers, to transfer or hoist the user from the wheelchair on to the fold down bench or from the wheelchair on to the peninsular toilet, or from the toilet to the adjustable changing bench. These movements between sink, bench and toilet will vary given the size of the adult or child and the size of their wheelchair. Hoists lift (and lower) the user and ease manual handling for the carers. BS 8300 Part 2 new Code of Practice sets out CPT layout and fixtures detail standards.



## 4. Belfast City Council's Approach

The Council already have a number of Changing Places Toilet (CPT) facilities within the council estate. We have Changing Places facilities in the following locations:

- Belfast City Hall
- Belfast Zoo
- Andersonstown Leisure Centre
- Olympia Leisure Centre
- Lisnasharragh Leisure Centre
- Brook Leisure Centre
- Girdwood Community Hub
- Waterfront Hall
- Templemore Baths

### 4.1 Provision of Changing Places Toilet facilities within the Council Estate

When reviewing the provision of any future Changing Places Toilet facilities within the Council estate we will consider the following factors in advance of any decision.

#### Existing provision

The requirement for Changing Places Toilet facilities will be based on the existing level of provision as identified via a review of relevant buildings and locations on the council estate. It should be accepted that not all buildings or locations will require a Changing Places facility to be provided. We will also take into account the availability of Changing Places Toilets in non-council assets. Consideration must be given to the proximity of any other CPT facilities and whether an alternative facility is within walking distance.

The location of 'Changing Places' facilities across Belfast can be found at the following link [www.changingplaces.uktoiletmap.org/](http://www.changingplaces.uktoiletmap.org/)

#### Cost / Investment Priority

The Council aspire to provide Changing Places Toilet facilities in public places within council facilities and across the council area. Whilst cost alone will not be the deciding factor in any decision, the cost of installing any specific Changing Places facility will clearly need to be carefully considered in conjunction with all of the other capital programme priorities identified by the council.

The cost of a specific facility may be greatly influenced by the location. For example, the costs for installing a CPT in a new building will differ from the cost to install a CPT in an existing building. Other cost considerations may include structural changes to an existing building, changes to entrance or exit points, maintenance costs and security costs.



## **Management and Maintenance**

The management and maintenance of any such CPT facility will need to be carefully considered when examining any proposal. Following installation there will be ongoing costs associated with cleaning, checking and maintaining the equipment within the facility. Other ongoing costs include the removal of sanitary waste and the provision of sanitary products such as the wider tear off paper roll. Staff will also need to be trained on room set up, including how and when to put the hoist in the charging position, how to identify any problems within the facility and procedures to follow and who to contact should a fault or problem arise.

Staff should not need to be trained on the operation of the equipment. If a customer and their carer wish to use the facility but are unsure how to do so they should be advised not to use it at all.

## **New builds**

All new builds are required to comply with The Building Regulations 2012 which were amended in June 2022 to make provision for Changing Places Toilets and to introduce criteria for the provision of Changing Places Toilets in certain in-scope buildings, depending on their type and size in terms of footprint or capacity when larger buildings, commonly visited by the public, are newly built or where a building is formed by a material change of use.

This new requirement for Changing Places Toilets is in addition to the current requirements for standard accessible toilets. (See Appendix 1)

## **Existing council buildings**

We will make every effort to include a CPT facility or to make toilet provision more accessible when we extend or extensively refurbish an existing council owned building where it is reasonable and practicable to do so.

There may be some other council buildings which do not meet the criteria above and which may be relatively smaller in size, but for which the provision of a Changing Places facility might be appropriate.

## **Wider Council estate**

The Council will carry out a review to determine where Changing Places facilities could be installed on the wider council estate, including in our parks and open spaces. This review will take a range of factors into consideration including affordability, location and other site-specific information.

## **4.2 Provision of Changing Places Toilet Facilities at Events**

### **Events organised by Council**

When organising public events, the council will consider if it can take place at a venue that already has a Changing Places facility or will make reasonable adjustments to ensure that customers have access to either a fixed or portable Changing Places facility as part of the design of the event.

### **Events organised by external organisers**

#### **Any large scale outdoor event**

Any outdoor event at which more than 5,000 people will be in attendance is deemed to be a “large scale” event. However, it will be at the discretion of the Council to determine whether an event is defined as “large scale” for the purposes of this policy (based on a range of factors including location and area covered, duration, attendees, impact on surrounding area or services, etc.).

It will be a condition of hire (whether the event requires an entertainments licence or otherwise) that event organisers must complete the Planning Checklist for Large Scale Events at Section E of the Council’s Inclusive Events Guide for review by the EDU team.

Event organisers must include an access audit within the Event Management Plan which is submitted in support of the event. The organiser will be required to include a CPT as part of their site set-up unless they provide justifiable reasons as to why such a facility is not required.

An officer of the Council involved in management of the land for hire must ensure these steps are followed.

#### **Small scale community events**

For small scale community events that are on council land we will request that the organisers complete the Small Scale Events Checklist at Section E of the Council’s Inclusive Events Guide.

### **Inclusive Events Guide**

All event organisers must have regard to the Council’s Inclusive Events Guide, which has information on how event organisers can make events accessible to visitors. There is information on how organisers could make reasonable adjustments at events venues by considering time, space, adjustability and attitude.

A copy of the Inclusive Events Guide can be found at the following link

(link to be provided)

## REFERENCES

Changing Places: the practical guide (The Changing Places Consortium)

<https://www.changing-places.org/>

[Link to PDF version here](#)

Changing Places: legal framework concerning provision of Changing Places public toilets

[Link to PDF version here](#)

Disability Discrimination Act 1995

<https://www.legislation.gov.uk/ukpga/1995/50/contents>

The Building Regulations (Northern Ireland) – AMD 8 – Amendments to Technical Booklet R

<https://www.finance-ni.gov.uk/sites/default/files/publications/dfp/AMD%208%20final.pdf>

British Standard 8300:2018 – Design of buildings and their approaches to meet the needs of disabled people

<https://www.thenbs.com/PublicationIndex/documents/details?Pub=BSI&DocID=320547>

Health and Safety at Work Act 1974

<https://www.legislation.gov.uk/ukpga/1974/37/contents>

Health and Safety at Work Order (Northern Ireland) 1978

<https://www.legislation.gov.uk/nisi/1978/1039>

The Purple Guide to the Health, Safety and Welfare at Outdoor Events

<https://www.thepurpleguide.co.uk>



## Appendix 1

### Relevant legislation

#### British Standard (BS) 8300

British Standard 8300:2018 – Design of buildings and their approaches to meet the needs of disabled people, provides guidance on good practice for the design of new buildings and their approaches to meet the needs of people with disabilities. As a code of practice, this British Standard takes the form of guidance and recommendations.

The guidance in this standard covers a wide range of impairments and the use of the built environment by people with disabilities who may be residents, visitors, spectators, customers, employees, or participants in sports events, performances and conferences, and recommends that Changing Places toilets should be provided in larger buildings and complexes. It also provides guidance on the installation of Changing Places toilets.

#### The Building Regulations (Northern Ireland) 2012

The Building Regulations (NI) 2012 Technical Booklet R (Access to and use of buildings) makes provision for Changing Places Toilets. Recent amendments to the Building Regulations introduced criteria for the provision of Changing Places Toilets in certain in-scope buildings, depending on their type and size in terms of footprint or capacity when larger buildings, commonly visited by the public, are newly built or where a building is formed by a material change of use.

This new requirement for Changing Places Toilets is in addition to the current requirements for standard accessible toilets. The new statutory guidance effective from 30 June 2022 can be accessed at the following link.

<https://www.finance-ni.gov.uk/sites/default/files/publications/dfp/AMD%208%20final.pdf>

#### Northern Ireland Act 1998

Section 75 of the Northern Ireland Act As well as complying with anti-discrimination law, service providers who are public authorities are subject to Section 75 of the Northern Ireland Act 1998. This means that, in carrying out their work, public authorities must have due regard to the need to promote equality of opportunity for a range of groups including between persons with a disability and persons without.

#### Disability Discrimination Act 1995

Section 49A of the Disability Discrimination Act 1995 (as amended by the Disability Discrimination (NI) Order 2006) requires the Council, as a public body, to promote positive attitudes towards disabled people and to encourage participation by disabled people in public life when carrying out its functions.

Under the Disability Discrimination Act 1995 (DDA), service providers have a duty to make reasonable adjustments to enable disabled people to access their services. Reasonable adjustments may mean changing practices, policies or procedures if they make it impossible or

unreasonably difficult for disabled people to access a service. Failure to make a reasonable adjustment when one would have been appropriate may be held to be discrimination.

**Provisions under Disability Discrimination Act: discrimination, and justification for less favourable treatment.**

Discrimination occurs in the case of a provider if, “for a reason which relates to the disabled person’s disability, he treats him less favourably than he treats or would treat others to whom that reason does not or would not apply” (s.20). It is also discrimination if a s.21 duty to make reasonable adjustments (see below) is not complied with. However, in both cases, it is only discrimination if the provider cannot show that the less favourable treatment is justified. Less favourable treatment can be justified on a number of grounds. The Act states that less favourable treatment could be justified if the provider of services believes, and it is reasonable in all the circumstances for him/her to believe, that one of these grounds applies (s.20):

**Health and Safety**

One of the grounds capable of justifying less favourable treatment, and relevant to public Changing Places toilets, is that of health and safety. The Act states: “in any case, [where the less favourable treatment] is necessary in order not to endanger the health or safety of any person (which may include that of the disabled person)” (s.20). There are clearly very real health and safety issues around the use of hoists and changing benches in public toilets. However, if a provider were to put forward such an argument, it would have to show that its health and safety argument was based on proper and well-informed risk assessment.

Under s.2 of the **Health and Safety at Work Act 1974**, all employers have a duty to “ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees”. The Health and Safety at Work Order (Northern Ireland) 1978

**The Management of Health and Safety at Work Regulations 1999** contain, amongst other things, an explicit obligation to carry out a risk assessment in relation to both employees (r.2) and non-employees (r.3).

## Appendix 2

### Technical Booklet R – Access to and use of buildings: October 2012.

The changes to Technical Booklet R take effect from 30th June 2022. The previous editions will continue to apply to work started before 30th June 2022, or to work subject to a building notice or full plans applications submitted before that date

Changing Places Toilets should be provided in the following types of new buildings:

Assembly, entertainment and recreation buildings\* with a capacity of 350 people or more; or a collection of smaller buildings associated with a site used for assembly, entertainment and recreation, such as theme parks, zoos and venues for sport and exhibitions, with a capacity of 2000 people or more;

- shopping centres/malls, or retail parks with a gross floor area of 30,000 m<sup>2</sup> or more;
- retail premises with a gross floor area of 2500 m<sup>2</sup> or more;
- leisure and sport buildings with a gross floor area of 5000 m<sup>2</sup> or more;
- hospitals and primary care centres;
- cemetery and crematorium buildings.

*\* Assembly, entertainment and recreation buildings can be defined as buildings such as amusement arcades; art galleries; cinemas; concert halls; conference centres; further education colleges; hotels that provide functions, leisure and sport facilities; libraries open to the public; motorway service areas; museums; places of worship; theatres; university buildings open to the public; or any other buildings or sites as defined by these thresholds, which are open to the public and used for the purposes of assembly, entertainment or recreation.*

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# Report on the Consultation Conducted by Belfast City Council into the Draft Changing Places Toilet Policy

April 2024

## 1. Introduction

A motion proposed by Councillor Ross McMullan calling for the introduction of a Changing Places Toilets Policy for Belfast City Council was referred to the SP&R Committee by the Council on 1 September 2021. The Committee adopted the motion and agreed that a report be brought back to Committee providing details on how it would be facilitated, resourced, and managed.

An update report was brought to the Disability Working Group in February 2023 summarising the motion and the proposed approach. A Changing Places Toilet Policy officer working group met regularly and their input has helped inform the various factors which the policy must consider including how it will be facilitated, resourced, and managed.

Following further updates a final draft Policy was endorsed by the Disability Working Group in October 2023 and then approved by the Strategic Policy and Resources Committee to go out to public consultation.

The draft Policy went out to public consultation on 19<sup>th</sup> January for a period of twelve weeks. The findings of the consultation are included in Section 3 of this report.

## 2. Draft Changing Places Toilet Policy

The draft policy sets out Belfast City Council's approach and commitment to providing Changing Places Toilet facilities in public places within council facilities and across the council area.

Changing Places Toilets (CPTs) meet the needs of people with profound and multiple learning disabilities as well as people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis. These specialised toilet facilities make public places and spaces accessible and inclusive for everyone, including children, adults and older people with complex needs or mobility issues. Where they are not provided, people are changed on a toilet floor, which is dangerous, unhygienic and undignified. Without them, people may be excluded entirely from certain public spaces.

Installing Changing Places Toilet facilities is a practical step through which public bodies can demonstrate that they are taking positive action to promote equality of opportunity for disabled people, as outlined in the Disability Equality Duty.

### 3. Responses from the online consultation questionnaire

In total there were 90 responses to the survey. Respondents were asked to what extent they agreed or disagreed with the draft Changing Places Toilet Policy.

To what extent do you agree or disagree, with the Council's approach as laid out at Section 4 in the policy?	Definitely agree	Somewhat Agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	Total
Respondents*	54	13	6	6	10	89
<b>Percentage</b>	<b>60.8</b>	<b>14.6</b>	<b>6.7</b>	<b>6.7</b>	<b>11.2</b>	<b>100</b>

\*1 person skipped the question

The statistics above show that most respondents (75.4%) agreed with the draft Changing Places Toilet Policy, with a smaller percentage (17.9%) disagreeing.

#### Key themes in the survey responses

A detailed examination of the comments received revealed a number of common themes:

1. More Changing Places Toilet facilities needed.
2. Clean Toilets required.
3. Single Sex Changing Places Toilet facilities.
4. Dual Language signage for Toilets.
5. Accessing current Changing Places Toilet facilities.
6. Legal duties/wording of draft Policy.

#### 1. More Changing Places Toilet facilities needed – comments.

*"More of these toilets are needed along with other toilets as the facilities in Belfast City Centre are a disgrace."*

*"As a disabled person myself, I agree very strongly with this proposal as I personally find it can be very difficult at times using a public toilet which has limited space for a wheelchair or rollator."*

*“Toilet facilities need to be available for all people, including disabled people.”*

*“More facilities needed so people can participate in activities.”*

*“As a parent of a severely disabled child. This is so needed. A standard disabled bathroom is not big enough. By the time you get a wheelchair, them, and yourself in. My child has some mobility but sometimes it isn’t the best. I’ve had to change nappies on the ground which isn’t hygienic. My child is 15 years old. So, using a changing table is easier for them and me.”*

*“We have a child who is a full-time wheelchair user, and it is very hard to find suitable changing toilet facilities for us. This adds greatly to the planning of days out.”*

*“Not enough locations.”*

## **2. Clean Toilets required – comments.**

*“Not enough clean toilets or proper changing areas.”*

*“City need clean toilets.”*

*“The toilet facilities in Belfast are at best, woeful. I mean for the general public too. It puts people off going into the town centre because really, the only toilets are the ones with sliding doors in the street and everything in them is soaking. We need a state of the art facilities that includes everyone so they can be wheeled into/walk into.”*

*“We need public toilets that are clean and safe, the one in Botanic Park is disgraceful. We need public toilets in the town that open at 8 in the morning.”*

*“Belfast Healthy Cities works to make Belfast a clean, safe physical environment. Thus we recommend understanding changes that can be made to improve the safety and perceived safety of the area in which these changing facilities are located to make sure they are safe, comfortable and accessible. Examples of ways to improve areas to decrease anti-social behaviour and improve the overall quality of these locations includes, more greening projects, frequent cleaning, better lighting (inside and outside changing rooms), and other infrastructure to improve safety. By making sure both the inside and outside of these changing room locations are safe, clean and comfortable, it would be arguably make them more accessible, improve maintenance and use.”*



*“Management and maintenance - Likewise, the paragraph on “Management and maintenance” fails to mention that these CPTs will be provided alongside other public toilets (male, female & accessible) that have or will similarly have cleaning, checking and maintenance regimes in place. The addition of a CPT represents a minor addition to existing or required management and maintenance. Any and all items of Council equipment require maintenance, checking and repair procedures, from kettles and cooking equipment in staff rooms and community hub kitchens, photocopiers and computers in offices, gym and sports equipment in leisure and sports centres etc. It would be unreasonable and inequitable to regard the minor extension of standard cleaning & maintenance regimes and repair of equipment that is essential to provide safe and dignified toileting to disabled people as in any way begrudged or overly burdensome in comparison to all other Council equipment and facilities.”*

### **3. Single Sex Changing Places Toilets – comments.**

*“Do not agree with same sex areas or areas where children will be.”*

*“Single sex changing facilities should be preserved in order to prevent safeguarding issues arising particularly in parks and playgrounds.”*

### **4. Dual Language signage for Toilets – comments.**

*“There is no mention in the draft of the Irish Language. All Changing Places Toilets and associated spaces should carry full dual-language English-Irish signage, including main signs, emergency signage and health and safety signage, in line with the BCC languages strategy and the European Charter for Regional Minority Languages.”*

*“There is no reference at all to bilingual signage and I would strongly urge the Council to ensure that any future policy sets out clearly that all signage, from directional, informational, warning, both internal and external, are bilingual. As I understand, the Council are working towards an Irish Language policy and as such, policies such as these should be future-proofed and in keeping with Council’s obligations under the European Charter for Regional or Minority Languages.”*

*“Once again, there is no reference to bilingual signage. I would strongly encourage Council to ensure all signage, directional, informational, warning (both internal and external) are bilingual (Irish/English).”*

*“In an era of incoming Irish Language legalisation, I feel that all signage in public spaces operated by Belfast City Council should include bilingual (Irish/English) signage.”*

## 5. Accessing current Changing Places Toilet facilities – comments

*“There is a legal requirement to provide suitable facilities and yet there are still inaccessible buildings never mind toilets. The provision of CPT should be compulsory in every public building. Existing toilets for able bodied can be reappropriated for the space required on ground floors and abled bodies can use facilities on other floors. Whilst the radar key doors are also good to stop non-disabled people using and abusing the CPT, it is extremely annoying that you have to track down staff to open the toilets if you don’t have a key with you. Abled bodied don’t have to ask for their toilets to be opened!”*

*“Definitely agree, this needs to be carried out ASAP, there is three sets of toilets and changing facilities in my local park, not one of them open.”*

*“In addition, we encourage policymakers to also consider how these facilities will be accessed such as will they remain open all hours, or key or code access be required. Should the facilities need key or code access, we suggest taking into account needing a system to ensure that they are available to all users, including those both living in the council areas as well as visitors, in an easy and time efficient manner that does not negatively impact users or accessibility.”*

## 6. Legal duties/wording of draft Policy – comments

*“The use of the words ‘strive to’ is unacceptable and this should be changed to ‘commit to’ The word ‘strive’ places no obligation on the Council to achieve anything in relation to the list that follows on, thereby rendering this ‘Policy’ document practically meaningless. First bullet point – the first point on the list which the Council will only strive to do is ‘provide as required Changing Places facility in every new large building development in which the public will have access to its services and where public toilet provision is available for other (in accordance with Building Regulations Part R).’ Firstly, it is both highly offence and completely inappropriate for the Council to place any equivocation on fulfilling its mandatory statutory obligations to meet the minimum standards of the NI Building Regulations. The recent amendment to NI Building Regulations to include Changing Places Toilets (CPTs) under defined thresholds, represents hard won toileting rights for disabled people, and it is not for the Council to decide to disapply those rights in any circumstances.”*

*“A CPT requirement, which is prescribed in NI Building Regulations, would clearly meet the threshold for a reasonable adjustment under the Disability Discrimination Legislation because how could it not be reasonable to comply with minimum statutory requirements? Secondly, the Council should be aiming to go beyond the minimum requirements of the Building Regulations by committing to provide a CPT in al new build development which the public will have access to. The Disability Discrimination (NI) Order 2006 (2006 Order) places new duties on public authorities when carrying out their functions to have regard to the need: to promote positive attitudes towards disabled people and to encourage participations by disabled people in public life. It is clear that the extension of the Disability Discrimination Act in this way imposes further duties and expectations on the public sector not to discriminate against disabled people across the whole range of its public activities.”*

*“Second bullet point – the second point on the list of what the Council will strive to do is ‘make every effort to include Changing Places facilities when we extend or refurbish a council-owned building where it is reasonable to do so’. This point in itself includes three equivocations (underlined). It is difficult to see how any disabled person or carer could include a CPT under this Policy document proposal. This statement is so heavily equivocated as to be completely meaningless. It is always reasonable to provide a new CPT in an extended or extensively refurbished public community building availing of public money and what would be unreasonable is disabled children and adults to be lying on disgusting public toilet floors within community buildings that have been subject to extensive refurbishment or extension. Whilst there may be particular refurbishment projects where there may be an extraordinary significant insurmountable technical or cost barrier, perhaps in a historical building, the omission of a CPT must only be permitted in exception circumstances, and this should be stated in these clear terms under this policy point. A lesser standard disabled changing facility should also be considered too as an alternative in these particular circumstances, as these too are suitable for registration with the Changing Places Consortium.”*

*“Third Bullet Point – the third point on the list of what the Council will strive to do is ‘review where such Changing Places facilities could be installed on the council estate for example playgrounds and parks.’ The carrying out of this review should be an absolute commitment and not a ‘strive to’. There is no reason why this review couldn’t be carried out. Secondly the point does not go on to state what happens with the information following the review. The Council should go on in the policy document to commit to a rolling programme of addressing the CPT deficit and toilet need identified. What use is a review that isn’t linked to any programme of action?”*

*“Fourth Bullet Point - Comments The fourth point on the list of what the Council will strive to do is ‘when organising a large public event, consider if it can take place at a venue that already has a changing places toilet or include a mobile/portable facility, if a permanent Changing Places toilet is not available.’ Again, it should be an absolute commitment to provide a changing places toilet at ALL large events in this policy document and not a strive to consider. I understand that other Councils such as Mid & East Antrim and Causeway Coast and Glens Councils have committed to the following actions under their Changing Places Policies for large and small events providing changing places toilet facilities at all large scale public events and events funded by Council, moving smaller events to venues where there already is a changing places facility where practical and advertising small events beforehand so that people who may wish to attend and require a CPT can be accommodated where feasible. The Belfast City Council policy for large and small scale events should be no less favourable for disabled people than what other Councils have determined reasonable provision for same.”*

*“Fifth Bullet Point - The fifth point on the list of what the Council will strive to do is ‘require organisers of all large-scale public events (for example concerts and festivals) on council property to make reasonable adjustments to ensure that customers have access to either a fixed or portable Changing Places facility as part of the design.’ It is entirely unacceptable that this policy would only apply to large scale events on Council property. A large-scale event that is funded by Council using public money should have to provide a CPT whether it is located on Council property or not. This is certainly what is applied in other Council areas where, for example Dalfest & Stendhal Festivals and NW200 are all required to provide CPTs as a condition of Council funding. Disabled people and carers no longer accept being denied safe, dignified and hygienic toileting arrangements at large events. As Belfast is our capital city, many of the large-scale events will be regionally significant*

*appealing to people from all over Northern Ireland. Disabled people expect and demand the same access to safe, dignified, hygienic and convenient toileting arrangements that everyone else enjoys. Notably in September 2020, the Equality Commission for Northern Ireland supported a disabled changing places toilet user in two cases that year alleging disability discrimination in respect of the non-provision of suitable toilet facilities because as a changing places toilet user he was unable to use the toilet facilities provided at events - see The Equality Commission report at link [Access to toilets key independence for disabled people \(equalityni.org\)](#) Belfast City Council should not be funding the potential discrimination of disabled people either on or off Council property.”*

*“Background to Changing Places Toilet Policy - The policy points in this draft document are insufficient in respect of providing clear unequivocal commitments to address the significant and serious adverse impact on disabled people and carers caused by a lack of CPTs in public community buildings, as described in the ‘Background to Changing Places Toilet Policy.’ It is factually incorrect to state that the Building Regulations Statutory Guidance that came into effect on 30th June 2022 applies to buildings constructed after this date. It is my understanding that it is the date on which the building control application was submitted that determines whether the new CPT requirements will apply. A building constructed today where the Building Control application was submitted prior to 30th June 2022, can be constructed without a CPT, although this would clearly be unacceptable for any new large publicly funded community development.”*

*Benefits for the council and others - In the section “Benefits for the Council and Others” considers the topic of Compliance. It is my understanding that the recent changes to the Building Regulations shifts the dial in relation to the consideration of reasonable adjustments under Disability Discrimination legislation in respect of CPTs. If it is considered reasonable under statutory guidance to provide a CPT at certain building or premises capacity or size thresholds, then this will inform an assessment of reasonableness where disabled people consider that they have been treated less favourably than others and discriminated against due to denial of safe and dignified toileting options. Prior to the Building Regulation amendments there would have been no statutory guidance references against which to assess the reasonableness of CPT provision. Furthermore, Customer Benefits are described but the Council fails to consider potential recruitment and employee benefits as a new employee may be a changing places toilet user. The presumption that changing places toilet users will always be ‘passive’ customers rather than people who can be employed by the Council to enhance the skills and diversity of Council staff is unacceptable. I know a number of changing places toilet users who are employed or could benefit from a changing places toilet in their place of employment.”*

*“Existing Provision - The paragraph on ‘Existing Provision’ states that ‘it should be accepted that not all building or locations will require a Changing Places facility to be provided. We will also take into account the availability of any other CPT facilities or whether an alternative facility is within walking distance.’ This is inequitable policy as the availability of other public toilets are not taken into account in relation to the provision of toilets for other people. Non-disabled people are not required to leave the building they are attending in search of a nearby toilet within “walking distance”. What does the Council consider walking distance, or more appropriately, wheeling distance, to be? Will the accessibility of the “walking distance” route even be checked? Would a requirement to cross a major road be considered acceptable? If changing places toilet users are entitled to use a blue badge parking bay providing the benefit of short distance routes into a building, how then would it be*

*considered reasonable to direct a severely disabled person and carers hundreds of metres out of said building to find a toilet? Changing places toilet users should be provided an equitable standard of conveniently accessible toileting. Why should a changing places toilet user, like a severely disabled wheelchair user child, have to be taken out in the pouring rain or ice and snow to access toileting? Why should a changing places toilet user attending a course or seminar have to spend their breakout times leaving the building to access toileting rather than enjoying any food or drink on offer or having opportunities to socialise or network?”*

*“Cost and Investment Priority - The paragraph on ‘Cost and Investment Priority’ states that other considerations to installing a CPT will include maintenance and security costs. All Council facilities and equipment have maintenance and security costs. It is unlikely that a CPT would ever be provided on a standalone basis in an area that had no other public toilets, buildings, facilities, or Council equipment. A CPT should not be considered any differently or any more burdensome on the public purse than any other toilet or Council facility or item of equipment that staff or members of the public require. Furthermore, this section fails to mention that over a number of years funding has been available specifically for Access and Inclusion improvements which can be used to fund new CPTs (mobile and permanent). Recently Causeway Coast and Glens Borough Council purchased two new mobile facilities for Council events with Departmental funding from DfC and DAERA. This section should include a commitment to make funding applications at every available opportunity/funding release to aim to fund and expand provision of Council CPTs and other accessibility improvements at significantly reduced or zero cost to Council.”*

*“Events Organised by external organisers -Large scale outdoor events - Finally, the ‘Events organised by external organisers - Large scale outdoor events’ is entirely unacceptable, should it relate to larger numbers or people being needed to achieve the threshold. It is unclear in what way this discretionary determination may be implemented, and this requires clarification. It would clearly be absolutely unacceptable and abhorrent if Council, at its discretion, arbitrarily decided to increase the 5,000 people threshold, for the sole purpose of denying disabled people a changing places toilet at said event which the Council acknowledges that lack of CPTs results in disabled people being changed on a toilet floor which is dangerous, unhygienic and undignified or them being excluded entirely. I would again direct the Council to consider the Equality Commission report on the two cases that they supported in relation to a changing places toilet user being denied changing places toilets at two separate large events.”*

### 3.2 Use of Council facilities.

Respondents were asked to provide answers on how often they would use council facilities.

The responses were:

	Never/don't use	A few times a year	Once a month	Once a week	Daily	Total
Community Centres	22	29	10	20	8	89
Leisure Centres	18	33	5	23	9	89
Parks	6	13	10	32	27	89
Playgrounds	37	14	10	16	10	89

\*1 respondent skipped this question.

Most of the respondents (66%) used the Parks at least once week.

### 3.3 Encountered any issues accessing toilet or changing facilities.

Respondents were asked to provide answers on whether they or someone they care for or someone they have been with, ever encountered any issues accessing toilet and changing facilities.

The responses were that 60.2% had encountered issues. 39.8% had encountered no issues.

Comments from those who had encountered issues:

*"I have a son who is disabled and requires care and a standard disabled toilet isn't big enough sometimes for him to even turn his wheelchair in."*

*"Falls Park in particular is very short of suitable facilities and facilities in general."*

*"Some facilities are out of use on some occasions."*

*“I have MS which made me incontinent. My main issue was gaining access to toilet facilities when I can clean myself appropriately and have room to put on clean clothes. There is a lack of these facilities, and it is good to hear that these facilities will be/are available as it means I will be able to return to shopping in Belfast City Centre.”*

*“Disabled toilets at Ormeau Park have been locked when the park is open.”*

*“Parks and playground toileting facilities are inadequate in general.”*

*“As mother to a severely disabled child who requires changing places toilets, our family is excluded from attending events and using community facilities due to the lack of changing places toilets. The lack of changing places toilets in community buildings and facilities prevent disabled children and adults and carers from being full and active citizens with many choosing to not participate due to lack of safe, dignified, hygienic and convenient changing places toilet facilities. Further opportunities to provide greater socialising, employment, education, health and wellbeing and public participation events and forums for disabled people are stymied by the lack of fully inclusive community buildings available within the Council area. Lack of changing places toilets is a barrier to participation and opportunity for disabled people, older people and carers.*

### **Other comments in relation to our Equality Screening**

*“We appreciate policymakers including a public consultation process and ensuring that The Disability Advisory Panel have a say. As Community engagement needs to be at the forefront of policy consultation, we strongly recommend that when completing the public consultation process the equality screening be taking into consideration, for example we recommend policymakers meet directly with residents, carers, medical professionals, as well as those living with a disability. These groups are those who are impacted by availability and quality of facilities, who will be using these facilities and have important knowledge on the topic areas. Meeting with these groups will allow policymakers, to better understand how this policy will impact them, what locations need changing rooms and what infrastructure needs to be in place. It is important to meet directly with those affected and work based on their needs. Additionally, when choosing who to meet with it is important to have direct representation from hard-to-reach groups, especially those often left behind and who have a unique perspective. This includes women, the elderly, disabled, minority groups and economically disadvantaged.*

*Also, adolescents and children have a voice but are often left out of consultation processes. The Belfast Healthy City process used in engaging children in the design of the built environment can also be used for this policies consultation process – examples of engagement techniques with children can be used from below publication.*

[https://www.belfasthealthycities.com/sites/default/files/publications/19042%20-%20HC%20Engaging%20Children%20%28Print%29\\_0.pdf](https://www.belfasthealthycities.com/sites/default/files/publications/19042%20-%20HC%20Engaging%20Children%20%28Print%29_0.pdf)

*In relation to question 13 regarding using this policy to help disabled people be actively able to participate in society, we recommend considering asking questions in relation to what areas of society these groups are missing out on due to lack of facilities and prioritising these locations first. For example, through public consultations policymakers may find a number of young people living with a disability may be unable to use their local park due to the lack of available changing facilities, thus prioritising improving facilities within this park over other locations may become a key need for policymakers. We also recommend looking at other groups who may benefit from use of these facilities such as the elderly, who may not have a carer or disability but are aging and could benefit from different infrastructure in public toilet facilities. As well as an increase in the number of public toilets available for use. Thus, these changing rooms could also have a positive influence on active aging and allow elderly individuals to participate more in society.”*

#### **Other comments in relation to our Rural Needs Impact Assessment**

*We encourage policymakers to make sure public consultations, surveys, questionnaire etc. be completed directly with involvement from those living in rural areas of Belfast. These areas would have their own set of unique needs, and facility locations which may be similar or different to urban areas. Thus, it would be important to make sure these unique needs are understood and being considered when developing this policy. Similarly, to urban area plans this policy would also have an opportunity to have an indirect impact on inequalities faced by groups within rural areas as well as lessen any gaps that may exists between rural and urban areas, especially in terms of placemaking, accessibility, inclusivity, and public infrastructure.*

#### **4 Written submissions**

Over the course of the consultation period the Council received two written responses to the survey from Christine McClements and Tourism Northern Ireland.

Both submissions can be read in full in Appendix 1 (Christine McClements) and 2 (Tourism Northern Ireland).

#### **5 Survey Report**

The full survey report can be read in full in Appendix 3.



## 6 Conclusion

75.4% of the respondents agreed with the contents of the draft Changing Places Toilet Policy. 39.7% of the respondents have a disability and 57.5% were carers/dependents.

There are comments for the Members Disability Working Group and CTP Working Group to consider in the draft Changing Places Toilet Policy:

- Page 4. Should the Policy state that 'the Council will commit to', instead of 'the Council will strive to provide as required a Changing Places facility in every large building.
- Add a commitment to roll out a programme of addressing the Changing Places Toilets deficit and toilet needs being identified.
- Consider making it a commitment for large events being organised by external organisers/promoters to provide CPT facilities.

The above suggestions will be reviewed before a finalised draft Changing Places Toilet Policy brought to CMT. The Members Disability Working Group will review and comment on the finalised draft Changing Places Toilet Policy before it is brought to the SP&R committee.

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## City Hall/City Hall Grounds Installations Working Group

Thursday, 12th December, 2024

### THE CITY HALL/CITY HALL GROUNDS INSTALLATIONS WORKING GROUP MINUTES

HELD IN THE LAVERY ROOM AND  
REMOTELY VIA MICROSOFT TEAMS

Members present: Councillor Flynn (Chairperson);  
The Lord Mayor, Councillor Murray;  
Alderman Rodgers; and  
Councillor de Faoite.

In attendance: Ms. K. Mullen, Client Manager; and  
Mr. C. Mealey, Committee Services Officer.

#### **Apologies**

Apologies were reported on behalf of Alderman Lawlor.

#### **Declarations of Interest**

There were no declarations of interest recorded.

#### **Installation of LGBT Stained-Glass Window in City Hall**

The Client Manager provided the Working Group with an update in respect of the design and concept for a new LGBT stained-glass window in Belfast City Hall.

The Working Group were presented with an updated draft sketch of the stained-glass window.

The Client Manager informed the Working Group that the amendments made by the design team sought to reflect the feedback received at a recent workshop that was held with Members, the design team, and stakeholders, to consider the design and concept.

She advised the Members that the updated draft sketch would be further refined and that additional details would be added. She further advised that a final sketch would be submitted to the Working Group in January, 2025.

During discussion, Members of the Working Group stated that they were content with the overall design and concept of the stained-glass window, however, suggested several minor amendments to the design.

After discussion, the Working Group agreed, that subject to minor amendments and refinements, to approve the design and concept of the new LGBT stained-glass window.

Chairperson

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## Disability Working Group

Wednesday, 11th December, 2024

### DISABILITY WORKING GROUP HELD IN PERSON AND REMOTELY VIA MICROSOFT TEAMS

Members present: Councillor Brooks (Chairperson); and  
Councillors Abernethy, Brennan, Doherty and Smyth.

In attendance: Mr. R. Connelly, Policy, Research and Compliance Officer;  
Ms. S. McNeill, Policy, Research and Compliance Officer;  
and  
Mrs. S. Steele, Democratic Services Officer.

#### **Apologies**

No apologies were reported.

#### **Minutes**

The minutes of the meeting of 14<sup>th</sup> October, 2024 were taken as read and signed as correct.

#### **Declarations of Interest**

No declarations of interest were recorded.

#### **Draft Changing Places Toilet Policy**

Mr. Connelly, Policy, Research and Compliance Officer, advised the Members that the final draft Changing Places Toilet Policy had been reviewed by the Changing Places Toilet (CPT) Working Group on 29th August 2024 and by the Corporate Management Team (CMT) on 29th September 2024. He reminded the Members that a public consultation had been undertaken between 29th January and 22nd April 2024. 90 people had responded to the consultation, with the following findings:

- 75.4% of the respondents agreed with the draft Changing Places Toilet Policy, with a smaller percentage (17.9%) disagreeing;
- 66% of the respondents used the Parks at least once week;
- 39.7% of the respondents have a disability; and
- 57.5% of the respondents were carers/dependents.

In addition, two written responses had been received. The written responses had advised that the wording of the draft policy was not acceptable, for example, it stated that 'the Council should be committed', and not to strive to do and that there should be a required inclusion of CPT facilities at large events. It also stated that there should also be a commitment to a rolling programme of addressing the CPT deficit and toilet needs

identified. The officer detailed that, as a direct result of the feedback, amendments had been made to the final draft Policy, advising that the final draft Policy now stated that 'the Council will commit to', instead of 'the Council 'will strive to' provide as required a Changing Places facility in every large building.

The Members were also advised that the Council would make it a commitment for large events being organised by external organisers/promoters to provide CPT facilities. The Council would also make an effort to include Changing Places facilities or to make toilet provision more accessible when extending or extensively refurbishing an existing Council-owned building when it was reasonable to do so.

The Members noted that the Council had received several recent requests in relation to improving physical access within Council toilets, including requests from several campaigns in relation to Stoma Friendly toilets and also correspondence from the Crohn's and Colitis UK campaign "Not Every Disability Is Visible". These campaigns had each requested the introduction of disposable facilities with accompanying signage/posters promoting the various causes.

The officer detailed that it was proposed that, in response to such requests, officers would advise that one of the first steps in the implementation of the CPT policy would be an audit of all accessible toilet provision across the Council estate. The purpose of this review would be to help identify any gaps and to quantify the level of resources which would be required to upgrade toilets and increase accessibility where feasible to do so.

The Working Group noted the update provided.

### **Update on Disability Actions – Delivering an Accessible City for All**

The Working Group considered the undernoted report:

#### **"1.0 Purpose of Report or Summary of main Issues**

**The purpose of this report is to provide Members with preliminary work that has been carried out to develop a strategic roadmap for delivering an accessible city for all by 2035.**

#### **3.0 Main report**

##### **3.1 Background**

- 3.1 Councillor Ross McMullan raised a Notice of Motion at Strategic Policy and Resources in June 2020. The full Notice of Motion is set out in the appendix attached to the report.**

**Objective 5 in the Notice of Motion highlighted the need to develop a strategic roadmap for delivering an accessible city for all by 2035 that leaves no one behind that provides a common strategic vision of disability access and inclusion across all its strategies and plans and outlines how we will get there.**



Members will note that some aspect of the Notice of Motion from Councillor McMullan has progressed in that Disability Working Group has been established and as part of that the Council's Disability Advisory Panel will be invited to attend the Working Group periodically to provide a forum for councillors, our Disability Advisory Panel, council officers as well as other relevant stakeholders and experts from time-to-time, to discuss and progress actions on Belfast City Council's commitment to becoming an accessible city for all by 2035.

Councillor Ruth Brooks, the City Solicitor and the Language Officer have all been appointed as disability champions to create a focal point for elected members and council staff to improve access and inclusion in the delivery of Council services and have a key role in strategic policy making to deliver a common vision of disability inclusion.

Parts 4 and 5 of the Notice of Motion committed the Council to undertake an independent consultation report on models of best practice of accessibility and inclusion and developing a strategic roadmap for delivering an accessible city for all by 2035 that leaves no one behind and that provides a common strategic vision of disability access and inclusion across all its strategies and plans.

#### **4.0 Preliminary work carried out**

- 4.1** Section 49A of the Disability Discrimination Act 1995 (as amended by the Disability Discrimination (NI) Order 2006), outlines duties to promote positive attitudes toward disabled people and encourage participation by disabled people in public level. Pursuant to those commitments, as well as commitments within the Language Strategy, the Council adopted a Disability Action Plan for the period 2022-2025 in April 2022. A copy of the current Action Plan can be found at the following link:

<https://www.belfastcity.gov.uk/Documents/Disability-Action-Plan-2022-2025>

As the Plan is due to expire next year, officers have begun preliminary work on a new Action Plan which will go beyond compliance with our statutory obligations and will focus on how the Council can drive a common strategic vision of disability access and inclusion across all its strategies and plans.

In parallel to that work, officers intend to appoint an external consultant early in the New Year to carry out an Accessibility Audit across the Council which will, amongst other things, help to inform the new draft Action Plan.

Stakeholder engagement will also be key to delivering the ambition of having an accessible city for all by 2035.

As part of that preliminary engagement, the Council had an engagement stall facilitated by the Equality and Diversity Unit with the support of an external facilitator at the International Day for People with Disabilities event at City Hall on 3rd December 2024.

Engagement exercises were conducted to capture the current issues faced by people with disabilities. Information was captured in different formats e.g. audio recordings via a recording booth and writing on post stickers. Themes explored were:

- what is going well in Belfast?
- what could be better in Belfast?
- what does a vision of an accessible city look like?

The outcome of the engagement was a success with a lot of constructive feedback from individuals with a disability and disability stakeholders contributed to the engagement at the event.

Elected members will also be aware of the Council's ABLE network, which Membership of the ABLE network is open to all council staff who consider themselves to have a disability; as well as carers, allies or supporters of people with disabilities.

The network aims to work on the following themes:

- Awareness of disability /able to work
- Benefits of the network in raising the profile of disability, providing guidance and support to staff and managers
- Listen and share experiences
- Encourage people to disclose if they have a disability

The ABLE Network and Disability Advisory Panel will also be key stakeholders and representatives of both groups will be invited to attend a future meeting of the Working Group to inform the Action Plan at the earliest point.

An update report on the Accessibility Audit and the emerging Action Plan will be presented to the next meeting of the Group.

## **5.0 Financial and Resource Implications**

The actions set out in this paper can be met through existing budgets and resources."

A Member referred to the success of the recent International Day for People with Disabilities event at the City Hall on 3rd December 2024 and commended all those involved in the event.

The Chairperson welcomed the update and work undertaken. She referred to correspondence that she had recently received advising that Ulster Rugby had a 'temporary sensory room' which they were keen to share with other Sports Clubs throughout the city and she encouraged the Members to promote this amongst their local communities and organisations.

Noted.

Chairperson

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