

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 from adults who feel uncomfortable about sharing changing rooms with young children, organisers unclear about the level of supervision they should provide and concerns about unaccompanied children using facilities.

Clubs, facilities and those with responsibility for children and young people 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 for children and young people.

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

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 by affiliated clubs or other user groups.

This briefing may be used in the absence of any other guidance, and to address issues or circumstances not covered in such a policy. It may assist in the review and updating of existing policies and procedures to support improvements in safeguarding and to develop a safer environment.

A selection of example policies are included at the end of this document.

Guidance about the design on changing facilities can be obtained from the Chartered Institute for the Management of Sport and Physical Activity (CIMPSA) at www.cimspa.co.uk/

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 team/s 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 negates any concerns arising from 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 case of a local authority swimming pool or privately owned gymnasium. In these circumstances there is a need for additional steps to be taken to ensure adequate supervision of the children while changing. This will avoid risks associated with mixed-facility use and to prevent or reduce opportunities for unwanted contact between the young people and these adults when changing or showering. It is important for staff/volunteers to balance the need for adequate supervision with the need to ensure young children are afforded appropriate levels of privacy.

All facilities should have a safeguarding policy and procedures for reporting any concerns and staff/volunteers are advised to familiarise themselves with these at the outset.

Issues to consider and address

Adults using the changing rooms at the same time as children

Ideally groups of children and young people should have sole use of changing facilities. This obviates 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/facility available for the group
- it may be possible to negotiate specific time slots for the group, and the coaches/helpers, 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 and young people may opt to change at home before they arrive for the activity*.

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

If mixed use of the changing facility is unavoidable, then at least two members of staff (of the same gender as the children) should supervise the group. It is important that staff/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 eight years should make arrangements for their supervision while changing before and after the activity. Although most children of school age (four years old) may be capable of changing their clothes, many leisure facilities have established guidelines that any child below the age of eight years must be accompanied.
- the group includes disabled children who require additional support and assistance with changing (note 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 troublesome behaviours taking place which need to be managed.

Who should supervise?

If you have decided that the children and young people need supervision, staff/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.

- 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 is considered good practice to ensure that children are supervised by staff/volunteers of the same gender while changing.
- Timings – by agreeing a very clear timetable for use of the changing facilities by children, the supervising adults and any coaches or officials respectively, 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 by virtue of their role meeting the current definition of regulated activity
 - references – these should include a reference from a recent, previous employer/club where they have worked with children/young people
 - role description – providing 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/volunteers.

More details about safe recruitment practices are available on the [CPSU Website](#).



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' child/ren) 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 to establish their suitability as for any other supervisory position (as outlined above).

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.

Examples of policies:

England Netball

Where possible, parents should be responsible for their own child in the changing rooms.

The following guidelines should be adhered to:

- players aged 10 and under must be supervised at all times in changing rooms by two members of staff, of the same gender as the players
- adults working with young teams, including volunteers, coaches, umpires or staff, should not change or shower at the same time when using the same facility as young players
- mixed gender teams must have access to separate male and female changing rooms
- if young players play for adult teams, they and their parents must be informed of the club's policy on changing arrangements
- if young people are uncomfortable changing or showering in public, no pressure should be placed on them to do so. Encourage them to do this at home
- if your club has disabled players, involve them and their carers in deciding how, if applicable, they wish to be assisted to change and ensure they provide full consent to any support or assistance required
- if adults and young people need to share a changing facility, the club must have consent from the parents that their child/children can share a changing room with adults in the club
- if young people need to share changing facilities with adults, their parents should be allowed to supervise them while they are changing.

England Cricket Board (ECB) Guidelines on Changing Rooms and Showering Facilities (October 2007)

All ECB affiliated cricket clubs must have a Changing Policy. This will depend upon facilities available, access to those facilities and the number of children involved.



The following provides a framework of best practice and guidance for a Changing Policy to be developed within the club. 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.

Best practice principles to be adopted by clubs, wherever possible, are as follows:

- Adults must not change, or shower, at the same time using the same facility as children
- Adults should try to change at separate times to children during matches, for example when children are padding up
- If adults and children need to share a changing facility, the club must have consent from parents that their child(ren) can share a changing room with adults in the club
- If children play for adult teams, they, and their parents, must be informed of the club's policy on changing arrangements
- Mixed gender teams must have access to separate male and female changing rooms
- Mobile phones must not be used in changing rooms
- If children are uncomfortable changing or showering at the club, no pressure should be placed on them to do so. Instead suggest they change and shower at home.

Rugby Football Union Policy and Guidance

Adults and children must never use the same facilities to shower or change at the same time. Adults must only enter changing rooms when absolutely necessary due to poor behaviour, injury or illness. Adults must only ever enter the changing rooms by themselves in an emergency and when waiting for another adult could result in harm to a child.

If children or vulnerable adults need supervising in changing rooms, or coaches or managers need to carry out a range of tasks in that environment this must involve two suitably vetted adults of the same gender as the children or vulnerable adults. For mixed gender activities separate facilities should be available.

If the same facilities must be used by adults and children or vulnerable adults on the same day a clear timetable should be established. No pressure should be placed on children or vulnerable adults who feel uncomfortable changing or showering with others, if this is the case they should be allowed to shower and change at home.

Where a disability requires significant support from a parent; or carer, the person concerned and their parents should decide how they should be assisted to change or shower. Before any assistance is offered by another person, appropriate consent should be given by a parent.

Amateur Swimming Association (ASA) Changing Room Policy

Duty of care to swimmers in changing facilities

The ASA have been asked by many clubs to clearly state what responsibility the club has for swimmers in changing rooms before, during and after training or competition.

Under the Duty of Care to Safeguard Children the club have a responsibility for the wellbeing of children in the changing rooms. This does not mean the parents have no responsibility but parents are often not in the pool complex at the time when children are swimming and training to exercise their duty of care. For this reason clubs must be clear to parents under what circumstances they require parents to remain at the pool



throughout a session. For example with young children who require assistance in changing or for those children with a disability who may require additional help the club cannot provide.

Responsibility during a club session

The issue of club responsibility during training sessions when a swimmer uses the toilets or changing room has been raised on several occasions. The ASA view is that while a child is training she/he remains under the responsibility, under the duty of care, of the person who is teaching/coaching him/her at that time on behalf of the club. If a swimmer goes out of the pool area, the coach/teacher should be aware of this. If she/he fails to return in a reasonable time, or appears upset upon leaving the poolside the coach/teacher should request a suitable club official to ensure that he/she is all right. It is best practice for two persons to look for the swimmer (the second person could be a senior swimmer or another parent).

If a complaint is received that an incident has occurred in the changing room between a swimmer and any other person the club has a duty to act upon that concern and investigate appropriately. If the incident involves a person not associated with the club, the pool manager should be made aware and consideration given as to whether the statutory agencies need informing.

Information for parents regarding changing facilities:

- Ensure that parents are made aware that changing facilities at venues may be shared by both club members and members of the general public.
- Ensure parents are made aware of the type of changing rooms i.e. separate for male and female or changing villages.
- Ensure behaviour of swimmers in changing rooms is part of the swimmers' code of conduct.
- Ensure parents are aware they should not be in the changing room while their swimmers are changing, unless the swimmer is of an age where help is required from parents or the swimmer requires additional specific assistance. This is generally at an age that is stipulated by the pool hirer, usually 7 or 8 years of age.
- In such circumstances the parent must be the same gender as the child, unless the facility has family changing facilities or is a "mixed changing village".
- Ensure where running events where other clubs are involved that meet organisers advise parents and competitors (via the meet information) if the facilities are likely to be open to the general public at any time during the meet.

The ASA do not advise adults to supervise changing facilities as that places them and the children at risk of allegations of improper behaviour and a precedent that could potential lead to children being put at risk.

Responsibility after a session is completed.

The ASA view is that each affiliated club has a duty of reasonable care to swimmers, which extends to an awareness of the area and process relating to the collection of junior member by their parents or carers, in so far as is possible, at the conclusion of a session. (i.e. that a swimmer is not left unsupervised if a parent is late). This has to be age appropriate, i.e. a 17 year old is capable of getting themselves home, but a 12 year old is not.

However, if a club uses changing rooms that are also accessible to non club members for public swimming lanes it would be extreme to expect a club to search the changing areas in case a junior club member was there. Best practice would be for a club to make all junior members and their parents aware that if children are not collected by a parent, then they should make that known to the club Welfare Officer, coach or whoever a club deem to be appropriate, and for the nominated individual to ensure that the club member is supervised appropriately until a parent arrives or the parent communicates alternative arrangements.

If a parent fails to collect a child the club should follow the procedure outlined in the "ASA Policy on Guidance on Late Collection of Children".



ISRM (now CIMPSA) – in conjunction with the CPSU

It is recognised that there are a number of risks specific to the changing room ranging from health and safety to supervision ratios. The purpose of this guidance is to identify and promote best practice and to minimise these risks.

The presence of unsupervised children, particularly in open changing or shower areas, can cause concern for facility staff and members of the public.

Sport and recreation facilities may provide an environment within which adults who are motivated to harm children may choose to act. Therefore, providing proper supervision at the time a child is most vulnerable is important.

It is recommended that Local Education Authority (LEAs), schools and sport and recreation service providers have in place the following practices and procedures relating to changing.

- Where possible separate school changing areas should be made available. It is not appropriate for members of the public to share the same changing facilities as those used by school swimmers.
- Facility providers wherever possible should make arrangements for separate changing areas or changing times to be made available for school swimming sessions where a pool is used by members of the public at the same time. Where this is not possible appropriate supervision arrangements should be agreed between the pool and school.
- Within facilities providing ‘village’ changing accommodation or equipped with group or family changing, a responsible adult should undertake the supervision of the changing area.
- Group or family changing areas may be mixed and may require male and female supervision.
- Responsible persons accompanying children to a pool should be able to take under eights into an “opposite sex” changing room where there is no other responsible person to take the child into a “same sex” changing room, as it is reasonable to assume that a child deemed too young to swim unaccompanied is also too young to fend for him or herself in a changing room or to change unaccompanied.
- There is also a serious risk that if a young child under the age of eight is allowed into a changing room unattended, then the child might also enter the pool area and even the pool, on their own without the protection of an accompanying carer, and so be at risk of drowning.

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