

Response ID ANON-YHE4-35V8-G

Submitted to **Changing Places Toilets: Building Standards Consultation**

Submitted on **2019-05-13 11:57:36**

Questions

1 Do you support the proposal to introduce a requirement for Changing Places Toilets in certain buildings through building regulations?

Yes

Please set out your reasons for this response. :

The Mobility and Access Committee for Scotland (MACS) welcomes the proposals to introduce a requirement for Changing Places toilets in certain buildings. Many disabled people and their families cannot carry out basic day to day essential visits and journeys or enjoy days out due to the lack of accessible facilities. A standard accessible toilet poses many barriers in terms of its size and lack of essential equipment.

2 Do you agree with the proposed circumstances, listed in draft clause 3.12.13 within the consultation document, where a Changing Places toilet should be provided on the construction, conversion or extension of a building?

Yes

Please set out your reasons for this response. :

The draft text within 3.12.13 is based around the 'Medical Model' of disability; "standard accessible sanitary facilities do not meet their needs" and could be argued that this places the emphasis on the individual. A preferred description would be based around the Social Model; standard accessible sanitary facilities pose barriers for many people due to the layout, limited size and lack of appropriate equipment. MACS would advocate for a change of wording to reflect this and the Social Model of Disability

MACS welcomes the guidance in relation to conversions and extensions to existing buildings and that a Changing Places toilet is in addition to standard accessible accommodation.

3 Are there any other situations where you consider building work should trigger a requirement to provide a Changing Places Toilet?

Yes

Please set out your reasons for this response. :

MACS welcomes the increased focus and increase in the number of Changing Places toilets and would strongly recommend the inclusion of transport termini (bus, rail and ferry), airports and service stations. We would stress that improvements to increase tourism numbers need to consider the needs of disabled people and the inclusion of Changing Places toilets will fit in with this aim.

As well as developments to accommodate increased visitor and tourism numbers, MACS would advocate that Changing Places toilet facilities are introduced where funding is being allocated by the Scottish Government from the Scottish Rural Tourism Infrastructure Fund (being administered by VisitScotland) to ensure these sites and attractions offer equity of access for disabled people.

4 Please use this question to provide any other commentary or observations you have on the proposal to make provision for Changing Places Toilets through building regulations.

Please use this question to provide any other commentary or observations you have on the proposal to make provision for Changing Places Toilets through building regulations. :

MACS is pleased to contribute to this consultation and is happy these changes are being considered. MACS is also keen that the guidance within the Technical Handbook includes specific details, i.e. the 200kg weight limit and different heights for certain items, such as the paper towel dispenser.

MACS believes in a Scotland without barriers that isolate and exclude disabled people from making their choice of successful door to door journeys and the inclusion of Changing Places toilets will enhance journeys for many people.

Although not directly relevant to this consultation, MACS would like to stress the need for more toilets to suit all our differing abilities being available in all public spaces. Many people's mobility is limited by fear of being able to find a toilet when needed.

About you

What is your name?

Name:

Mobility and Access Committee for Scotland (MACS)

What is your email address?

Email:
MACS@gov.scot

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Mobility and Access Committee for Scotland

If you're responding on behalf of an organisation, which of the following types most accurately describes your organisation:

Advisory Body / Committee

If other, please specify.:

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

The Word version for the survey should have been more visible on the home page.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly dissatisfied

Please enter comments here.:

Completing the survey on behalf of a group, committee, organisation etc does not allow for easy sharing of comments.