Inclusive Toilet Provision at UCL

Many members of the UCL community have shown interest in the subject of toilet provision on campus. Much of this interest has focussed on the objective of ensuring that UCL provides an inclusive campus that supports the requirements of particular groups in our community with differing needs. Inclusive toilet provision is a complex and sometimes conflictual subject. This document sets out some of the parameters and key considerations for UCL Estates as custodians of toilet provision on campus.

# Regulations impacting toilet provision at UCL

* Workplace health, safety, and welfare. Workplace (Health, Safety and Welfare) Regulations 1992. See Annex A.

These regulations apply differently to different building types but for most UCL buildings they will apply to new buildings and existing buildings where modification, extension or conversion occurs to the building.

* Approved Document M Access to and Use of Buildings – volume 2 Buildings other than dwellings. See Annex B.

Approved Document M applies to new buildings and work carried out on existing buildings. It provides guidance on satisfying ‘reasonable provision’ under the Building Regulations, which apply when new buildings are constructed and when certain alterations and extensions are undertaken. Approved Document M provides one way of satisfying the regulatory requirements; however alternative approaches may also be acceptable (and should be justified in an ‘Access Statement’). The requirements in Approved Document M have changed over time, so consideration needs to be given to the relevant requirements when works were undertaken. For instance, the standards on wheelchair accessible WCs have changed over time, including an increase in the room size expected. UCL therefore has a number of different wheelchair accessible toilets built to a number of different standards across our sites.

# Good practice guidance / codes of practice

* BS 6465-1:2006 Sanitary installations. Code of practice for the design of sanitary facilities and scales of provision of sanitary and associated appliances (+A1:2009). See Annex C
* BS8300-2:2018 Code of Practice. Design of an accessible and inclusive built environment See Annex D
* Sustainable Development Goals (UNICEF 2016) SG 6

# Identified requirements within the UCL community

We have been made aware through feedback and staff and student engagement that members of our UCL community have a range of different preferences and requirements in relation to toilet access; this is often linked to individuals’ identities and/ or protected characteristic(s), including disability, sex, and gender. For example, EDI related concerns include:

* The need for accessible toilets for disabled individuals where use of other toilet provision is not an option.
* A preference/ need for single sex/gender toilets[[1]](#footnote-1), based on religion, belief, or cultural requirements.
* A preference/ need for gender neutral facilities.
* The need for a cubicle containing a wash hand basin when using sustainable period products (including those supporting UCL’s [Project Period](https://www.ucl.ac.uk/sustainable/project-period) campaign).
* Information on the features of different wheelchair accessible WCs on campus.
* The provision of hygiene bins in all toilets, including male toilets.

# Estates approach to toilet provision

UCL Estates approach to toilet provision must not only abide by relevant regulations but also be mindful of the differing requirements within our community.

The planning of toilet facilities is always based on the overall provision within a building to ensure as much choice and possible for all building users.

Recently UCL Estates has been updating its ‘washroom standards’ (toilets and showers) (currently in draft form). Under the guidance of the Access and Inclusion Manager, the washroom standards have been updated to set address some of the EDI concerns raised by staff and students at UCL. The standards stress the importance of providing a full complement of toilets facilities in all new buildings going forward but also highlight the need to review provision within existing buildings, aiming to provide:

* Unisex wheelchair accessible WC
* Ambulant disabled person’s cubicles
* Single sex/ gender toilet provision
* Gender neutral toilet provision
* And, in larger buildings (and strategically across the sites),‘changing place’ toilets (see Annex B 5.73 and Annex D 18.6)

Before the UCL washrooms standards update the Access and Inclusion Manager met with staff and student leads representing different interest groups and protected characteristics to understand fully each group’s requirements, and to discuss how to balance any conflicts in an inclusive manner. This feedback was incorporated into the draft washroom standards and has been considered on all projects whilst the draft standards are being completed.

Through this feedback it has become clear that an issue which needs to be addressed is the need for information on where the different types of toilet accommodation is located, and difficulties in finding a toilet that met an individual’s requirements. Only gender-neutral toilets are listed on the Estates website. The Access and Inclusion Manager is currently working to secure funding to look at an accessible digital platform that could provide information on the locations of different toilet types across campus, along with other inclusion information in the future (in a manner that meets the Digital Accessibility Regulations).

# Advice to departments

Departments wishing to review their toilet provision outside scheduled building maintenance will be required to meet the cost locally. A [service request](https://www.ucl.ac.uk/estates/customer-helpdesk/raise-service-request) should be submitted to Estates, please note [prioritisation is applied to requests](https://www.ucl.ac.uk/estates/customer-helpdesk/helpdesk-response-times) raised.

Any requests for changes to toilet provision will be considered within the context of the whole building.

Departments are advised not to take unauthorised local action to change existing toilet facilities as doing so may cause problems with UCL’s compliance with relevant regulations and could have a knock-on effect that reduces inclusion for other groups within our community.

## Annex A

## The Workplace (Health, Safety and Welfare) Regulations 1992, Regulation 20

20.(1) Suitable and sufficient sanitary conveniences shall be provided at readily accessible places.

(2) Without prejudice to the generality of paragraph (1), sanitary conveniences shall not be suitable unless—

(a) the rooms containing them are adequately ventilated and lit;

(b) they and the rooms containing them are kept in a clean and orderly condition; and

(c) separate rooms containing conveniences are provided for men and women except where and so far as each convenience is in a separate room the door of which is capable of being secured from inside.

## Annex B Approved Document M access to and Use of Buildings – volume 2 Buildings other than dwellings.

Section 5.7 – The provision of toilet accommodation will satisfy Regulation M1 or M3 if:

a) where there is space for only one toilet in a building, it is of a wheelchair-accessible unisex type, but of greater width to accommodate a standing height wash basin;

b) at least one wheelchair-accessible unisex toilet is provided at each location in a building where sanitary facilities are provided for use by customers and visitors to a building, or by people working in a building;

c) at least one WC cubicle is provided in separate-sex toilet accommodation for use by ambulant disabled people;

d) where there are 4 or more cubicles in separate-sex toilet accommodation, one of these is an enlarged cubicle for use by people who need extra space, in addition to any provision under 5.7(c).

e) at least one changing places toilet is provided in the following types of buildings (see list).

# Annex C

## BS 6465-1:2006 Sanitary installations. Code of practice for the design of sanitary facilities and scales of provision of sanitary and associated appliances (+A1:2009).

5.2.2.1 Toilets should be located so that people do not have to trouble up or down more than one floor to visit a toilet.

5.3.2.9 At least one urinal and washbasin should be fitted at low level for shorter people and children.

5.3.3 Where more than 2 WCs are recommended in tables 3 to 13, and washbasins are included within the WC compartment, WC provision should be increased by 25%, i.e., one additional washroom per four WCs or part thereof should be provided.

6.4.1h Staff is permanent stationary positions in buildings should not have to walk more than 100m or travel up or down more than one floor to use sanitary facilities.

# Annex D

## BS8300-2:2018 Code of Practice Design of an accessible and inclusive built environment

18 - Good inclusive design provides choice for a multitude of users: for example, single user gender‑neutral sanitary accommodation can be helpful for transgender people and also useful for parents with young children, people who need assistance, etc.

Frequently, accessible sanitary accommodation is misused for other purposes such as baby feeding because no alternatives are available, when this is by no means appropriate or suitable. It might be desirable to provide a dedicated hygienic space with a washbasin such as for those who might need to express milk or for parents who wish to be private.

18.1.2 - Where only one bathroom, shower room, changing room or toilet can be provided, it should be a unisex type, preferably designed for right‑hand transfer (see examples in 18.5.3.1). Where more than one unisex facility can be accommodated, a choice of left‑hand and right‑hand transfer layouts should be provided.

18.5 - Disabled people ought to be able to find and use suitable toilet accommodation no less easily than non‑disabled people. The space requirements for suitable toilet accommodation are generally driven by the requirements of wheelchair users, although the facilities might also be used by people with other access requirements.

The recommendations for toilet accommodation given in this subclause are based on the extent to which wheelchair users and people with ambulant mobility impairments are able to approach, transfer to and use sanitary facilities. Toilet accommodation normally takes the form of a unisex accessible toilet or an enlarged cubicle in a separate‑sex toilet washroom.

Within separate‑sex toilets, a WC compartment can be provided specifically for people with ambulant mobility impairments, which takes pressure off wheelchair-accessible provision. It is advantageous to provide some unisex self‑contained toilets for use by all. Such facilities, where the washbasin is within a cubicle or compartment, can provide gender‑neutral facilities as well as potential benefits where the balance of male and female users fluctuates.

18.5.1 - A unisex wheelchair-accessible facility is intended for independent use. Changing Places (CP) toilets are intended for assisted use and provide the most appropriate solution for people who require high levels of assistance; recommendations for CP toilets are given in 18.6.

Where space is limited, e.g. in small business premises, the provision of a single wheelchair-accessible toilet compartment of unisex design instead of separate‑sex facilities caters for all needs with less demand on space.

Wheelchair-accessible unisex compartments are more easily identified than single‑sex compartments and are more likely to be available when needed. Some disabled people need to use a toilet more frequently than other users, making it desirable that, generally, accessible toilets are not made available to the general public.

At least one unisex wheelchair-accessible toilet (see 18.5.3.1) should be provided at each location where toilet accommodation is provided for the use of customers, employees or visitors.

Where there is only one toilet available in a building, or self‑contained unit within a building, it should be of unisex wheelchair-accessible corner design, but enlarged to accommodate a standing‑user height washbasin, with its rim 780 mm to 800 mm above the floor, in addition to the hand rinse basin. An enlarged unisex accessible toilet should also be provided where full washing facilities are required.

When more than one unisex wheelchair-accessible toilet with corner WC is planned, a choice of layouts suitable for left‑hand and right‑hand transfer should be provided, preferably with the handing indicated by a touch‑legible pictogram.

Where separate‑sex cubicle arrangements are provided, at least one cubicle suitable for use by people with ambulant mobility impairments (see 18.5.3.3) should be provided and identified within each range of WC cubicles in separate‑sex toilet washrooms, irrespective of whether a wheelchair‑accessible cubicle has been provided in the same range. Where separate‑sex cubicles are the preferred approach, at least one unisex self‑contained toilet should be provided in accordance with Figure 39.

Where unisex self‑contained cubicles or compartments are provided, at least one cubicle suitable for use by people with ambulant mobility impairments should be provided and identified within each range of facilities

18.5.3.1 - The unisex accessible toilet shown in Figure 40 should not incorporate baby changing facilities.

Where there is only one toilet in a building or self‑contained unit within a building, an enlarged unisex accessible toilet containing baby changing facilities, as shown in Figure 44, should be provided.

NOTE 7 Combining an accessible toilet and baby changing facility is acceptable only in the smallest of buildings or self‑contained units within a building with low levels of demand where it is not feasible to provide more than one toilet. Combining use can lead to extended wait times for all users and is therefore to be avoided.

18.5.4 - Wheelchair users might be able to pull themselves to a standing position to use a urinal, or they might be able to use a urinal from their wheelchair. The lower urinal position shown in Figure 47 is also beneficial to a person of restricted stature or a child.

Where a urinal suitable for a wheelchair user is situated in a wheelchair‑accessible male washroom, one washbasin with its rim between 680 mm and 700 mm should also be provided.

18.6 - A Changing Places (CP) toilet is a room with a WC, hoist, basin, adult-sized changing bench and optional shower, for use by people with complex and multiple impairments who require the help of up to two assistants. The space needs to be fitted with a fixed tracked-hoist system so that assistants can fit the user’s slings to the hoist and move the person to the various items in the facility.

Any building where the public have access in numbers would benefit from provision of a CP toilet. Such facilities are particularly important in buildings that might offer the only suitable sanitary accommodation within a locality (e.g. transport interchanges), buildings where visitors might be expected to spend long periods of time (e.g. leisure and sport complexes), or buildings where public services are provided (e.g. those operated by local authorities). Commercial facilities such as large retail and leisure premises would be suitable as they provide longer opening hours and are likely to have a regular cleaning regime.

CP toilets require extended space to accommodate disabled people, often with large complex wheelchairs with elevated leg rests, a reclining facility or integral oxygen cylinders, and space to fit slings for use with the hoist. It also needs to be possible for a wheelchair to be parked within the facility when not in use without compromising the safe access and use of the equipment.

As CP toilets are not designed for the use of independent wheelchair users, or to be used as baby changing facilities, it is desirable for facility providers to indicate the location of the nearest unisex accessible toilet and the nearest baby changing facility.

Where possible, a CP toilet should be located close to other managed facilities in a development. If remote from the reception/management point, the facility should have controlled access.

The CP toilet should be in addition to, not instead of, the provision of standard and accessible toilets. A sign should be provided at the entrance to the CP toilet indicating the location of the nearest unisex accessible toilet and any baby changing facilities.

1. When a trans person starts to live in their acquired gender role on a full-time basis they should be afforded the right to use the toilets appropriate to the acquired gender to avoid discrimination. Equality Act 2010 Employment Statutory Code of Practice (S17.55) and The Recruitment & Retention of Transgender Staff- Guide to Employers (P14) - endorsed by the Government Equalities Office [↑](#footnote-ref-1)