

G28 – Changing Room Guidance

The policies and guidelines referenced within this document are those of Paddle UK and its Home Nation associations.

This guidance has been produced to support clubs, facilities, event organisers, and others in the paddling community. This guidance is intended to provide practical guidance to support the development of policies and procedures which fit each specific environment, as there are no specific legal requirements regarding the use of changing facilities. Where possible, Paddle UK encourages constructive discussions with individuals alongside this guidance to understand how they can create more accessible and inclusive opportunities.

Key Principles:

- **Right to privacy:** everyone has the right to use a facility they feel is appropriately private.
- **Sensitivity:** people may feel uncomfortable changing with others in the facilities or under the arrangements you may have available. In this instance, you should work with the paddler to provide alternative opportunities to change.
- **Safeguarding:** in instances where changing facilities are accessed by under 18s or mixed groups (i.e. adults and children), consider whether a level of supervision by responsible and vetted adults is appropriate. Appropriate supervision may involve having responsible and vetted adults accessible to children in the vicinity of the changing rooms rather than inside.
- **Inclusive approaches:** some paddlers will have additional needs or request reasonable adjustments. It is important to work with individuals to find changing facilities and solutions that meet their needs. You can find specific community guidance later in this document.
- **Timing:** if using shared facilities consider providing specific time slots for changing for men, women, boys and girls, to change with their respective groups, to ensure privacy and safety. If appropriate this should happen at both the beginning and at the end of sessions.
- **Signposting:** all facilities must be adequately signposted, including by gender; whether you have a timetable for changing slots; and to identify accessible facilities if available.
- **Publicise and uphold your policy:** make sure your policy is widely available, accessible, understood, and upheld. This should include who to report breaches or concerns to if they occur.
- **Photography and mobile phones:** photography should not be permitted in changing facilities and showers, and clubs, providers and event organisers should make their policy on permitting mobile phones or other recording devices in changing facilities clear.

Types of available changing facilities

The places where paddling happens do not always have the same types or amount of changing facilities available. This section provides guidance based on the type of changing facility you have available to you.

Indoor changing areas with privacy cubicles:

1. Privacy cubicles should be used where possible to ensure privacy for all. Adults and children should not change in the same cubicle (unless you are the parent or guardian of the child/children), and cubicles should be used by individuals one at a time.
2. Accessible and disabled cubicles should be reserved for those with additional needs only.

Indoor communal changing areas:

1. Where facilities are communal, steps need to be taken to provide appropriate levels of privacy. A solution may be to provide specific changing time slots for men, women, boys and girls respectively, both at the beginning and the end of each session. If this is not possible, and paddlers are not comfortable with this arrangement, paddlers may wish to arrive changed for their activity, and change at home afterwards.
2. Where possible providers should offer separate senior and junior (under 18) facilities.
3. Utilise signage and/or assign a volunteer to ensure arrangements are adhered to.
4. No one should be forced to use changing facilities if they are uncomfortable with the level of privacy, and you should work with them to provide alternative opportunities if required.

No specific changing areas:

1. Public nudity, even while changing, is not appropriate, so paddlers should take steps to ensure they are able to avoid this wherever possible.
2. If there are no suitable facilities available for changing, deliverers may recommend that paddlers arrive already changed for their session, and that they leave in kit where suitable.
3. Changing robes, such as those offered by Gill, Dryrobe or Decathlon, allow individual privacy for people to change before and after paddling.
4. Where resources allow, changing tents should be utilised to provide individual changing space for paddlers to change.

Signposting to further support

Paddle UK recognises that clubs and providers may have specific situations they may require support with, or be working with groups and communities that have individual needs or considerations. To support this, additional guidance has been developed around providing suitable changing facilities for children and young people; disabled paddlers; trans, non-binary and intersex paddlers; and paddlers from other religious and cultural backgrounds. This guidance can be found in the community-specific guidance and support information below.

If there has been a breach of your changing room policy, or a safeguarding, welfare or discrimination issue has been raised to a club, centre or other provider, this should be referred in the first instance to the relevant individual - this may be a Welfare Officer or centre manager. If you need support with managing a safeguarding incident or have a welfare concern to report, please contact safeguarding@paddleuk.org.uk. If you need support with potentially discriminatory policy or behaviour, information about this policy, or require further resources, please contact equality@paddleuk.org.uk.

Community-specific Guidance and Support

There are often community-specific needs for paddlers of different backgrounds and identities. This section offers recommendations for good changing room practice and to ensure everyone can have a safe and enjoyable paddling experience. While this guidance is a starting point, the needs and perspectives of paddlers from all backgrounds can be varied and multifaceted, particularly if individuals have intersectional identities. Therefore, where possible, Paddle UK encourages clubs, providers and centres to be open to constructive discussions with individuals alongside this guidance to understand how they can create more accessible and inclusive opportunities.

► Changing room guidance for disabled paddlers

There is a wide range of disabilities and experiences of disability, and therefore each individual will likely have a specific set of needs, which may even be different from a person who has the same disability type. Disabilities can be visible and non-visible, and can include a wide range of long-term health conditions. They can include mental health problems, learning disabilities, or conditions related to age. It is therefore not appropriate to challenge a paddler with a non-visible disability using an accessible facility.

1. It is important to make it clear whether accessible facilities, including showers and changing cubicles or rooms, are available for people with disabilities. This should be communicated via websites, social media channels or directly with the individual where relevant.
2. Where accessible facilities are available, these should be actively maintained, kept in suitable working order, and be cleaned regularly.
3. Accessible facilities should not be used as general use facilities unless otherwise signposted, and should be made available for when disabled paddlers need to use them.
4. There may be occasions where paddlers require additional support to change; for example, where there is a physical or intellectual disability which impacts their ability to change independently. On these occasions, an agreed support plan is to be followed. There should be adequate supervision of at least two Enhanced DBS checked adults supporting paddlers with additional needs.
5. People with complex or multiple disabilities may be supported by a carer(s), and have individual care plans in place. It is important for clubs, centres and coaches to be aware of these, and work with the individuals who understand how to implement them and support the individual.
6. If accessible facilities are not available at the venue or facility you use, ensure that any paddlers attending your sessions are clearly aware that this is the case, and work with them to address any other ways in which you can support them.

Resources for further guidance:

[Activity Alliance, Inclusion 2024 Education Hub](#)

[Club Matters, Engaging disabled people](#)

[Level Playing Field, Making Your Club More Accessible to Disabled People](#)

► Changing room guidance for children and young people

One way of reducing the risks associated with adults and children sharing changing facilities is to provide separate, gender-specific facilities for both adults and juniors. However, we acknowledge it's not always possible or practical to provide this, and in such cases, other safeguarding measures should be put in place. More information can be found in [this CPSU guidance](#).

Unlike some other sports where there is a clear separation between adult and junior sessions, paddling often has mixed age groups. Therefore when it comes to the use of changing rooms it is not always easy to allocate specific time slots for use for adults only or use for children only (although this is an option which may work for some venues).

The following guidance when arranging changing facilities for children and young people should be considered:

1. Gender-specific changing rooms must be made available. Guidance on supporting transgender, non-binary and intersex paddlers, including young people, can be found later in this document.
2. Ensure that this Changing Room Policy and the contact details of who to report concerns or breach of the policy to are clearly posted in or near each changing room for all users to see.
3. Ensure that parents and guardians of U18s understand, and agree to, your Changing Room Policy, and are aware they are for mixed age group use.
4. There should not be a time when one adult is alone in the changing room when U18s are present and vice versa, unless the U18 is accompanied by their parent or guardian.
5. Where possible, coaches should shower and change at a different time or in a different changing facility to the group they are coaching.
6. Mobile phones, cameras or any other recording devices must not be used in changing rooms at any time.
7. Parents of U18s should be allowed to supervise their child (of the same gender) whilst in the changing room.
8. Children under the age of 8 can change, when accompanied by their parent, in the changing room of the opposite gender.

Resources for further guidance:

- [CPSU, Safe use of changing facilities guidance](#)
- [NSPCC, Safeguarding considerations for changing rooms](#)
- [CPSU, Photography in changing rooms and showers](#)

► Changing guidance for paddlers with religious and cultural backgrounds

Considering the needs of paddlers from a range of religious or cultural backgrounds can ensure that everyone can access a suitable changing facility, and can enjoy their paddling experience. Ensuring you have suitable channels to receive feedback or suggestions for improvements can also ensure that the policies and procedures you have in place are inclusive for all.

1. Paddlers from a range of religious and other cultural backgrounds may have a variety of needs and requirements - the best way to ensure everyone has suitable changing facilities available to them is to ask them in a private and sensitive manner.
2. Ensure that where possible, paddlers are able to change in individual settings, preferably private cubicles, regardless of their background or identity. Where this is not possible, ensure that there are appropriate gendered facilities for paddlers to change.
3. For centres or providers working with communities where English may not be the primary language, consider utilising signage with dual language translations included for clarity.
4. Paddlers from some religious backgrounds may need to change or remove headwear such as hijabs, kippahs or wigs in order to change into suitable paddling kit. If individual changing facilities are not available, ensure that these paddlers have an opportunity to use an empty communal changing facility to do so.
5. Be mindful that if your sessions are taking place during religious and cultural festivals or celebration periods, paddlers may need to pray during their paddling activity. Changing rooms may not be suitable spaces for prayer, and ensuring the information about changing facilities is readily available can help individuals to make alternative arrangements.

Resources for further guidance:

- [GoPaddling, Considerations for Muslim paddlers](#)
- [Youth Sport Trust, Breaking Boundaries Faith Guide](#)
- [Sport England, Research and data on Faith Groups](#)
- [Sport England, Research and data on Ethnicity](#)

► Changing guidance for transgender, non-binary and intersex paddlers

Clubs, providers and event organisers may find providing suitable changing facilities for transgender, non-binary and intersex paddlers challenging due to unclear and confusing information, or fear of legal repercussions. The following guidance aims to provide clarity, and support the process of identifying a suitable policy approach.

1. Wherever possible, people who are trans, non-binary or intersex should be supported to use the changing facilities of their choice. Even where some of these considerations apply, you should always consider the least restrictive option where possible.
2. Trans, intersex, or non-binary people should not be excluded from changing facilities unless it can be evidenced that this is “[a proportionate means of achieving a legitimate aim](#)”. This means you must be able to demonstrate a good reason based on evidence, such as dignity, privacy, preventing trauma or ensuring the health and safety of others, that a person has been prevented from using a facility or offered a service.
3. You should record the evidence base and rationale for decision-making to ensure you are acting within the law. Changing room guidance or policies should be made readily available to your service users.
4. It should be a priority to ensure that trans, non-binary or intersex people are not subject to discrimination, bullying or harassment while using changing or toilet facilities, or accessing any other services.
5. When making and applying decisions, treat all individuals with dignity and respect. Seek to balance the interests and needs of those who use, or wish to use the facilities. You should always consider how your actions will affect all service users, including trans, non-binary or intersex people.
6. It is also important to note that any person, regardless of their gender identity, may not feel comfortable using certain facilities for any reason (for example having previously been a victim of violence), and they should also be supported to use private or separate facilities wherever possible.
7. It may be helpful to utilise facilities which are gender-neutral and single occupancy, and allow people to change individually (with access to a toilet or shower) as this can provide a safe space to everyone, regardless of their gender identity or other backgrounds.
8. Where possible, consider using non-gendered signs in order to signpost to facilities that can be used by anyone. **Please note that it is not appropriate to use accessible toilets and changing rooms as gender-neutral facilities unless they have been specifically allocated in this manner.**
9. The CPSU outlines that “Using gendered changing facilities can be a source of stress for transgender and non-binary children. Sport and activity providers should consider how to support these young people to use the changing rooms that they feel comfortable with. Your policies should reflect that decisions need to be made on a case by case basis, taking into consideration all children’s safety.”

Remember that trans, non-binary or intersex people may not wish to and do not have to disclose their identity to volunteers or staff. **It is not appropriate to challenge a person’s gender identity based on assumption.** Therefore, making information about the facility provision, as well as

changing room policies, readily available on websites or in member inductions can ensure individuals are able to use facilities safely and without risk of harassment.

You should also make it clear to all Club members or service users that incidents of discrimination or harassment, including homophobia or transphobia, will not be tolerated. If you require support with managing incidents of these behaviours, contact equality@paddleuk.org.uk.

Further resources can be found below:

- [NSPCC, Safeguarding LGBTQ+ children and young people](#)
- [Mermaids, Including LGBT Young People in Sport: A Guide](#)
- [Equality and Human Rights Commission - Separate and single-sex service providers: a guide on the Equality Act sex and gender reassignment exceptions](#)