



The Supported Needs
& Disability Office



Directives & Standardisation The Accessible Toilets of Gibraltar



MINISTRY OF EQUALITY

HM Government of Gibraltar

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Introduction

16% of the world's population identifies as a person with a Disability, the largest minority group in the world. With an ageing population and Disability rising, the importance of providing and maintaining standardised accessible toilets across Gibraltar is paramount. The toilet facilities across Gibraltar must reflect the demand of its community and visitors.

The installation of accessible toilets, that comply with the legal standards laid out in The Disability Act, Disability Strategy, British Standards and Document M, ensures the necessary securement of The United Nations Human Right of access to sanitation without discrimination for persons with Disabilities and medical conditions that require access to an accessible toilet.

What is an accessible toilet?

Accessible toilets are designated toilets specifically designed to meet the accessibility needs of persons with Disabilities, and those whom do not identify with a Disabled identity, but due to certain medical conditions, need to access larger toilets promptly with the necessary facilities.

Accessible toilets create positive action to ensure that the barriers faced by persons with Disabilities and those with medical conditions in personal care are removed as far as possible, enabling equity.

Accessible toilets are different from non-accessible toilets. They have different facilities such as; grab rails, shelves, alarms and different layouts, equipment, lighting and flooring that remove the restrictions of non-accessible toilets. Accessible toilets are intentionally designed to meet the needs of a wide range of Disabilities and medical conditions and to accommodate their carers, guardians or family member with them if required.

Who can use an accessible toilet?

Through the RADAR Key system, anyone who identifies as having a Disability or a long term medical condition which means they need to access an accessible toilet can apply for a RADAR key through The Supported Needs and Disability Office. Tourists who hold a RADAR key are also permitted to use these toilets. Tourists who have forgotten or not yet claimed a RADAR key but identify as a person with a Disability or relating medical condition can contact the relevant authority listed at the entry point of the accessible toilet to gain access.

Under Schedule 3 of The Disability Act 2017 a person with a Disability is anyone who has an, 'impairment or severe disfigurement with long-term substantial effects that affects the ability to perform normal day-to-day activities.'

Disabilities or medical conditions can be either visible or non-visible, this does not affect a persons right to use an accessible toilet. There is a perception that all accessible toilet users are wheelchair users, when in actual fact wheelchair users only make up around 8% of persons with Disabilities, you cannot tell by looking at somebody as to whether or not they have a Disability, such as colostomy bags, catheters and feeding tubes. Carers, guardians or family members accompanying a person with a Disability or medical condition are also permitted to join the user inside the accessible toilet to provide assistance if required.

Why do we need accessible toilets?

By law, the provision of accessible toilets is a mandatory requirement. Under The Disability Act 2017, Sections 6 (General Obligations), 7 (Positive Action), 8 (Duty to have regard), 13 (Accessibility: general provisions), 14 (Access to facilities and premises open to the public), 15 (Living independently and being included in the community), 21 (Participation in political and public life) protect the rights of persons with Disabilities to be able to access accessible toilet facilities.

The Disability Strategy, United Nations Conventions on the Rights of Persons with Disabilities, and UN Resolution A/RES/64/292 declaring the 'right to water and sanitation services that are physically accessible within, or in the immediate vicinity of,' further enhances these rights to accessible toilets.

British Standards and 'Document M' provide the specific legal requirements for facilities, fixtures and fittings that an accessible toilet must have and maintain to comply with the law. Accessible toilets ensure that the barriers faced by persons with Disabilities in participating and enjoying community life are broken down.

Why do we need to standardise accessible toilets?

Accessible toilets should be accessible for all types of Disabilities, being safe, clean and accessible from the point of entry. Providing a set standard ensures adherence to legislation, improves quality of facilities and helps to further break down barriers for persons with Disabilities or medical conditions.

There is no 'minimum standard' for accessible toilets, all toilets must have the correct facilities, fixtures and fittings that an accessible toilet must have and maintain to comply with the law. Persons with Disabilities and medical conditions must have security in knowing that each toilet they visit has these provisions. This guide, in accompaniment with The Disability Strategy provides an effective tool to achieve this standardisation, by meeting and exceeding base guidelines.

Toilet Accessibility Guide



Accessible Toilet
Not every disability is visible



Accessible Entry

The location, position and entry of the accessible toilet must not in anyway present barriers for persons with a Disability to be able to access the toilet, setting them apart from non-accessible toilets in Gibraltar. This includes step-free access, hand rails, tactile paving, dropped curb, level access, light-weight wide doors and convenient locations. Where possible, approach lobbies should be avoided to prevent the creation of additional barriers for persons with Disabilities. There must be a minimum of 1.5m squared of free unobstructed space outside of the toilet.



Accessible toilet doors should open outwards, to allow for more space to manoeuvre inside, and making it easier to exit, not encroaching on space inside. It is recommended that doors should be at least 90cm wide, with a 950mm, outward opening door, to allow for large mobility aids such as powered wheelchairs with a carer to be able to access the toilet without difficulty. Accessible toilet doors should be easy to open with a maximum pressure of 20N, rising butt hinges are recommended to be used where possible.



Accessible handles must be used, where the door can be opened in a variety of ways such as hand, elbow, or leg.

Users must be able to locate, access and enter the toilet with ease. Ensure that the toilet is clearly sign-posted, displaying the international Disability symbol on the door, and in a convenient location. In addition to the display of the accessible toilet symbol, also ensure inclusive signage that represents inclusion for non-visible Disabilities such as 'not all Disabilities are visible'.

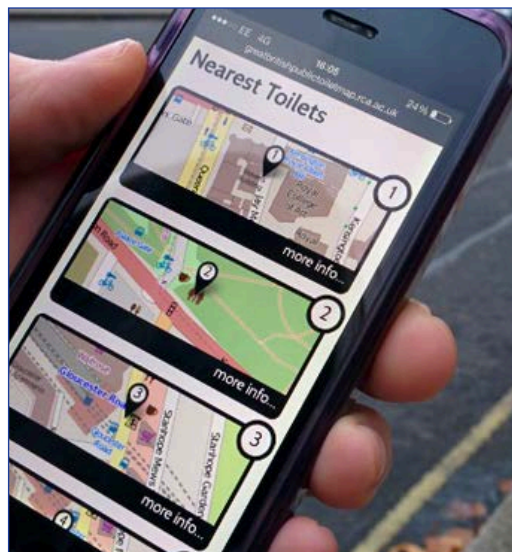


Accessible toilets must never be used for storage such as cleaning supplies and equipment which will create dangerous hazards for users. The entry point and entire toilet must be kept clear and tidy to prevent accessibility barriers. This includes not using hooks, rails or ledges to also store or hang unnecessary items.



Positive Communication

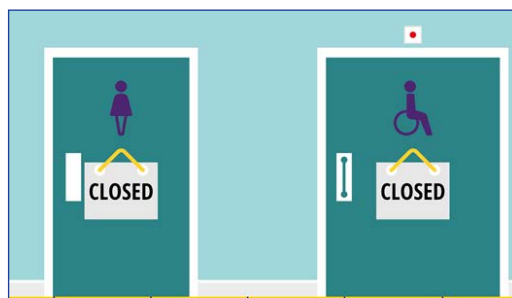
Most persons with Disabilities who require the use of an accessible toilet will research the location of facilities in advance to plan their journeys or outings. Ensure that information is widely provided on the location of accessible toilets, and in alternative accessible formats. This can be done via social media, websites, toilet locator apps, press, or by providing a contact number to ask an individual directly. This information should also be available in multiple languages to ensure accessibility for Gibraltar's tourists. A map of the accessible toilets around the City Centre can be obtained from The Supported Needs and Disability Office.



When providing information of facilities available ensure that this is provided in a variety of formats such as images, videos, audio, face-face communication and text. This information should include the facilities which are available, if it is locked with a Radar Key, dimensions and access routes.



If an accessible toilet is out-of-order, be sure to update communication avenues to warn in advance, and provide the closest alternative. Information should also be provided as to how long the toilet will be closed, and where to find a suitable alternative.



Information should be displayed in the accessible toilet in a variety of formats for persons with Disabilities, such as safety helplines, access to support and guidance.



RADAR Locks

RADAR Keys, also known as an NKS Key allow for persons with Disabilities to access locked accessible toilets without delay across Gibraltar, without having to wait for an attendant to locate a key and unlock the toilet on request.



Accessible toilets should always be locked with a RADAR key where possible, to prevent non-Disabled people using these toilets and preventing quick access for persons with Disabilities, and to ensure that toilet usage is minimised to keep them as clean as possible.



As RADAR keys control the master locking system, another user is able to gain entry if the toilet is occupied already. It is therefore imperative to ensure that there is a clear audio and visual alarm system such as an additional accessible internal bolt or lighting system to identify to others the toilet is in use and protect personal privacy.



There must be a clear information point on the entry of the accessible toilet providing accessible contact details for users who may have forgotten or do not own a key, to ask for the toilet to be unlocked.



Toilets

The toilet should be positioned higher than toilets for persons who do not have disabilities to allow for wheelchair users and those with reduced mobility to more easily transfer onto the toilet from equal levels. The height of the toilet should be between 390mm and 500mm, most standardly at 450mm, to be accessible for as many different Disabilities as possible.



The toilet flush must be located on the side, away from the wall, so that the flush can be more easily reached from a seated position, and away from a wheelchair or mobility aid transfer space so that the flush is not blocked. The toilet flush should be a paddle design, with an ergonomic push to allow for easier use.



Accessible toilets must have a cushioned backrest to support users from behind. The toilet seat should remain vertical when positioned against the backrest.



Both right and left hand transfer should be available where possible, where not possible the use of an angled lateral transfer toilet should be applied. Obstructions to legs and footplates must always be avoided.



Grab Rails

Grab rails must be available throughout the toilet, including entry points, sinks, ledges and toilet. Rails ensure that persons with a Disability are able to maintain balance, locate key facilities and more easily transfer.



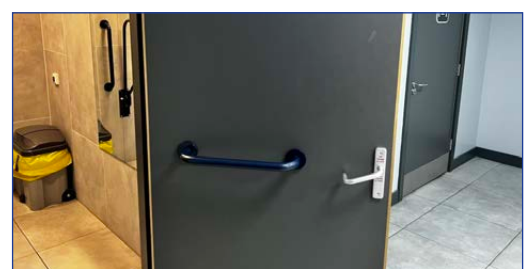
There should be a minimum of 5 grab-rails available. Grab rails must be properly secured with stable substrates and fittings to prevent accidents when weight or pressure is applied with a persons body weight.



Grab rails must be wall-mounted vertically, diagonally at 15 degrees, and horizontally, with at least one drop-down grab rail on either side of the toilet for left and right-hand transfer.



A contrasting coloured horizontal grab rail should be fixed across the inside of the door to assist with opening and closing the door.



Red Emergency Cords

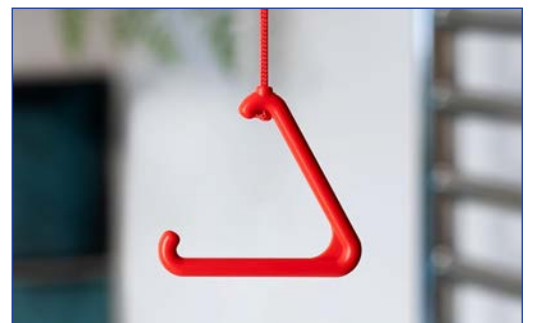
All accessible toilets must be fitted with a working red emergency cord, ensuring safety for those who are more likely to fall, become injured or require emergency assistance.



Emergency cords must hang all the way to the floor, and never be tied up. Staff should regularly check that the emergency cord is hanging correctly and has not been tied or hung to the side out of the way.



Emergency cords must be positioned between the toilet and transfer space. The handle of the emergency cord must feature a triangular design, so that it is easier to grip and grab.



Red emergency cords when pulled must automatically connect to a trained member of staff to provide assistance.



Sinks

Sinks should be positioned as close to the toilet as possible, within 140mm-160mm, without converging on transfer spaces. Sinks should be reachable from the position of a seated toilet user for those that need to wash their hands previous to dressing and moving.



Sinks should be fitted at a wheelchair users height of 720mm-740mm, to allow a person to be able to position themselves as close as possible.



The sinks should be wide, and shallow enough to allow for splashes without the user getting wet, and have a ledge at the rear for the position of personal hygiene products such as stoma care and continence products that require use of the sink, but not too large to create obstruction for wheelchair users.



Where possible, and if space allows, a second sink can be provided, fitted at a standard height between 780mm and 800mm. Vanity units must not be boxed in, which will prevent wheelchair access underneath the sink.



Lighting

Accessible toilets should always be brightly lit to allow users to navigate as easily as possible. Where there is a light switch, ensure it is at the correct height, placed near the door, and of a contrasting colour to the wall so that it is easier to locate on the wall.

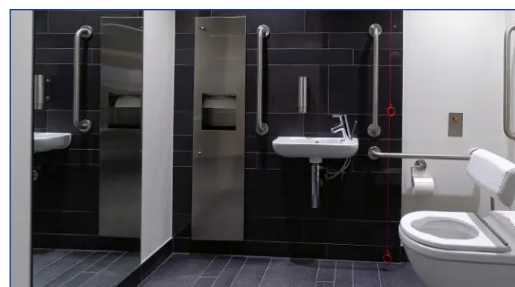


Where there is a sensor/automatic light in place, ensure that the sensitivity is high and the detection beam is set lower for those that may not be able to manoeuvre as freely. Also ensure that the timer is set for a longer period of time before turning off, to avoid persons with Disabilities being left in the dark and in danger. Senior lights should be avoided where possible in favour for accessible switches.



Mirrors

Full length large mirrors must always be placed so that both seated and standing users are able to view themselves. Mirrors must be fixed to the wall, in a convenient place, to avoid obstructions. It is important to note that persons with stoma bags, catheters and dexterity issues depend on mirrors to ensure their dignity is maintained



Hooks

There should always be a minimum of 2 hooks available in an accessible toilet. One should be situated at an appropriate height, reachable from a seated position, for coats and clothing, and a second near the toilet for medical equipment such as feeding tubes and catheter bags, reachable from a seated position.



Hanging hooks must have a rounded design so as not present a hazard for anyone whom might bump into it, and should be positioned at 1250mm from the level of the floor.



Baby Changing Facilities

Baby changing tables must be mounted flush to the wall, at an appropriate height, to not encroach on transfer or manoeuvre space. There must be adequate room around the changing table to allow for ease of movement around the facility when the table is folded down. The baby changing table must have accessible and inclusive handles, buttons and straps so that it is as easy as possible to use.



Sanitary & Hygiene Bins

Accessible toilets must always have large hygiene bins available, positioned by the toilet. They should be emptied regularly to create a sanitary environment.



Large bins should be provided for sanitary, continence, stoma and other personal hygiene items that a user wishes to dispose of. Accessible toilets are gender neutral and must also therefore accommodate for all users. These bins should be accessible in their design, for example not using foot-activated bins, so that all users are able to access them.



Shelves

All accessible toilets must have at least one shelf available for personal items such as bags and clothing, as well as items the person with Disabilities may need whilst visiting the toilets, such as sterile dressings, colostomy bags, stoma bags, catheters or period products.



Shelves should be placed in convenient position near the toilet and sink, at an appropriate height that does not cause obstructions or potential hazards. Shelves must also have rounded corners so as not to cause danger for those whom might bump into it. Shelves should be placed at a height between 800mm and 1000mm.



Spacious Design

'The bigger the better' - accessible toilets should be much larger than non-Disabled toilets to allow users to manoeuvre around more easily, have space to change, transfer and manage their care. It is also important to remember that the user may have a carer or guide dog with them, so the cubicle must be large enough to accommodate this. The design and layout of the accessible toilet must always allow for a 1500mm minimum turning circle.



It is recommended that accessible toilets should measure at a minimum 2.2m length by 1.5m wide. The height of an accessible toilet must be between 440mm to 500mm. Accessible toilet fixtures and fittings (such as changing tables and frames) should be always be kept clear of the manoeuvre and transfer spaces to prevent obstructions.



Gender Neutrality

Accessible toilets in Gibraltar are gender neutral, and must therefore provide facilities for all genders. Accessible toilets should never be a combination of non-accessible and accessible toilets, for example the female toilet also being the accessible toilet.



Accessible toilets should be kept as clear as possible for those who need to urgently access facilities. Where 3 toilets (female, male and accessible) is not possible, and there is availability for only 2 toilets, the non-accessible toilets available should also be gender-neutral.



Conscious Decoration

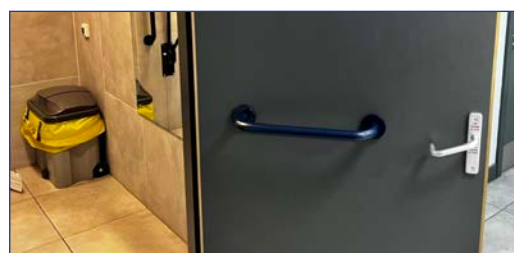
Accessible toilets should be decorated neutrally with plain solid colour walls creating a more accessible environment for visual differences and being more neurodivergent friendly.



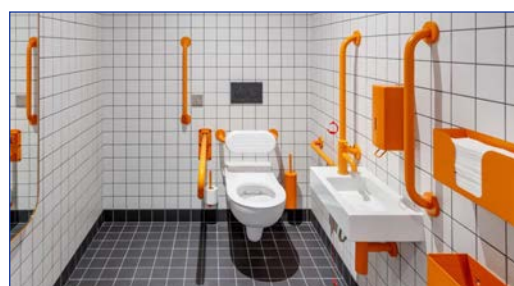
The floor of the accessible toilet should be a high contrast solid colour to the walls, to create a clear distinction of the edges of the facilities.



The door of the accessible toilet should be a high contrast solid colour to the walls, to clearly identify entry and exit, with a contrasting door handle.



Hand rails, toilet seats, taps, switches, dispensers, shelves, hooks, for example, should be a high contrasting solid colour to the walls and surroundings, to ensure they are more easily locatable users.



Flooring must be non-slip to prevent falls, but must not be too grippy or textured that it prevents access for a mobility aid user. Flooring must also not be reflective that might create visual difficulty in navigation.



Water Access

The water available within the accessible toilet must be drinkable, clean and safe, as it is likely to be not just be used for hand washing but also personal care such as catheter and colostomy cleaning.



Taps and water access points must be fitted with anti-scald protection valves to prevent temperature increases to protect against accidents or injury. All water temperature controls should be as easy as possible to use, with water temperature not exceeding 41 degrees centigrade.

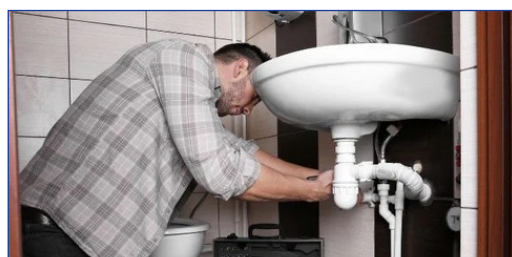


All taps must have a lever-grip or long-levers to ensure all different types of Disabilities are able to use them. The water pressure in accessible toilets should be sufficiently low to prevent splashes which may cause slips or discomfort to users.



Safety

All pipes, water routes and electrical wires must be boxed in at all times to avoid accidents and injuries which may be caused by protrusions or water. All screws, fittings and hooks must be securely fitted with no raised sharp surfaces which may cause injury.



All fixtures and fittings must have rounded edges such as grab rails, sinks, hooks and shelves.



All accessible toilets must adhere to fire regulations, national and international standards.

Personal Hygiene

Soap dispensers should be positioned between the sink and the toilet at a suitable height for a seated position. Soap dispensers should be easy as possible to use, such as touch-free, wall mounted and not create an obstruction.



Both paper towels and a hand dryer should always be available, for those who are more sensitive to noise or skin pressure, and for those who require paper towels for personal hygiene such as catheters, stomas and colostomy bags. Paper towels and dryers should be placed next to the sink at an appropriate wall-mounted guide height of 940mm.



Hand sanitiser dispensers should also be available upon entry and exit from the accessible toilet, wall-mounted at an appropriate height.



Sanitary product dispensers such as towels and tampons should be placed on the wall so that it does not cause obstruction, are easy to operate, and at an appropriate height.



Toilet tissue dispensers should be reachable from a seated position on the toilet, at a height of 700mm from the floor and within 300mm from the edge of the toilet seat. Dispensers should be tissue, as opposed to roll dispensers, to avoid users having to tear sheets from a roll.



Cleanliness & Management

Accessible toilets must be kept clean, tidy, clear of obstructions and hygienic at all times, both inside and outside.



All cleaning and management staff must be trained in understanding the components and necessities of accessible toilets to ensure correct management and review. For example keeping emergency cords hanging, keeping transfer zones clear, and shelves clean and unobstructed.



Regular checks for maintenance, refurbishment and decoration must be performed to avoid potential safety hazards such as loose fittings. If the toilet must be closed at any time, advanced warning must be given as detailed within 'Positive Communication'.



Supplies such as soap, hand towels and toilet tissues must be regularly checked and replenished when necessary.



Changing Places Toilets

Changing Places toilets differ from the accessible toilets discussed in this document. A Changing Places toilet provides additional equipment such as hoists, overhead tracks, peninsular toilet, more space, chairs, privacy screens and large changing beds in a convenient location for persons with Disabilities.

‘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. 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.’





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