

The Building Regulations (Northern Ireland) 2012 (as amended)

Changing Places Toilet Provision - Summary of Consultation Responses and intended post consultation actions

February 2022

Contents

Background and introduction to proposals	3
Overview of the consultation	5
Responses to consultation questions	8
Question 1: Do you support the proposal to introduce criteria for CPT facilities provision (in addition to the current accessible sanitary provisions), in certain buildings through building regulations statutory guidance?	8
Question 2: Do you agree with the defined in scope/relevant types of large buildings commonly used by the public, where a CPT facility should be provided for a new building or where a building is formed by a material change of use?	12
Question 3: Do you agree with the set criteria (the building function, its people capacity or gross floor area) for the defined in scope/relevant buildings?.....	16
Question 4: The Department acknowledges that there may be complexities associated with CPT provision in existing buildings undertaking extension or alteration works, but would welcome further views and supporting evidence. Do you agree with the Department on the need for further supporting evidence and can you provide such, regarding CPT retro-fit installation to existing buildings undertaking extension or alteration works?	19
Question 5: Do you agree with the analysis/principal assumptions, costs and impacts set out in the Part R consultation stage RIA?.....	25
Question 6: Have you any additional comments on the proposals you wish to provide?.....	27
Conclusions and Departmental intended post consultation actions	32
Annex A : List of respondents and response to questions on confidentially and post consultation contact.....	33
Question: The Department of Finance would like your permission to publish your consultation response. Please indicate if you wish your response to be treated as confidential.	33
Question: We may wish to contact you again in the future, but we require your permission to do so. Are you content for the Department of Finance to contact you again in relation to this consultation exercise?	34

Background and introduction to proposals

1. The Department of Finance (“the Department”) has responsibility for maintaining the building regulations in Northern Ireland.
2. Building Regulations apply to most building work and are made generally to ensure the health, safety, welfare and convenience of people in and around buildings, to further the conservation of fuel and power, to protect and enhance the environment and to promote sustainable development. The Regulations apply to building work, typically involving:
 - Erection, alteration or extension of a building;
 - Material change of use of a building.

Building Regulations, comprising some 16 Parts, are supported by statutory technical guidance which is known here as Technical Booklets (TB).

3. The current building regulations are The Building Regulations (Northern Ireland) 2012 (as amended), (the Building Regulations) and were made using powers provided in the Building Regulations (Northern Ireland) Order 1979 (as amended) (“the Order”).
4. In June 2020, the Finance Minister, Conor Murphy, tasked the Department’s Building Standards Branch (BSB) with work to introduce a requirement into building regulation for the provision of Changing Places Toilets (CPTs).
5. Part R (Access to and use of buildings) of the Building Regulations sets minimum access standards for all new buildings. It is supported by statutory guidance in Technical Booklet R. It is proposed to introduce provisions for the installation of CPTs in certain Buildings meeting specified criteria by amending statutory guidance in Technical Booklet R.
6. CPTs meet the needs of people with profound and multiple learning disabilities, as well as people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis. These toilets provide specific equipment including a height adjustable adult-sized changing table, a tracking hoist system, adequate space for a disabled person and up to two carers, a peninsular WC with room either side and a safe and clean environment including tear off paper to cover the bench, a large waste bin and a non-slip floor. These facilities enable

people with complex care needs to take part in everyday activities such as travel, shopping, family days out or attending a sporting event.

7. Prior to making any amendment to building regulations, the Department undertakes consultation with the local Building Regulations Advisory Committee (NIBRAC) “and such other bodies as appear to the Department to be representative of the interests concerned” (article 5(4) 1979 Order).
8. The Committee was consulted on the proposals prior to the consultation issuing. It is considered that this consultation satisfies the above duty in relation to other bodies for the proposals to include provisions for CPTs in technical guidance.
9. Further information and the consultation documents can be found on the Department’s website at the following link:

[Consultation Proposals for amendment of Technical Booklet Guidance to Part R \(Access to and use of buildings\) – Changing Places Toilets Provision | Department of Finance \(finance-ni.gov.uk\)](https://www.finance-ni.gov.uk/consultation-proposals-for-amendment-of-technical-booklet-guidance-to-part-r-access-to-and-use-of-buildings-changing-places-toilets-provision)

Overview of the consultation

10. The Department carried out a 12-week public consultation from 28 July to 20 October 2021, to seek views on proposed amendment to Technical Booklet R (Access to and use of buildings) to make provision for Changing Places Toilets.
11. Consultees were first asked to answer some questions to provide background information and the Changing Places Consultation comprised six questions as follows
- **Q1.** *Do you support the proposal to introduce criteria for CPT facilities provision (in addition to the current accessible sanitary provisions), in certain buildings through building regulations statutory guidance?*
 - **Q2.** *Do you agree with the defined in scope/relevant types of large buildings commonly used by the public, where a CPT facility should be provided for a new building or where a building is formed by a material change of use?*
 - **Q3.** *Do you agree with the set criteria (the building function, its people capacity or gross floor area) for the defined in scope/relevant buildings?*
 - **Q4.** *The Department acknowledges that there may be complexities associated with CPT provision in existing buildings undertaking extension or alteration works, but would welcome further views and supporting evidence. Do you agree with the Department on the need for further supporting evidence and can you provide such, regarding CPT retro-fit installation to existing buildings undertaking extension or alteration works?*
 - **Q5.** *Do you agree with the analysis/principal assumptions, costs and impacts set out in the Part R consultation stage RIA?*
 - **Q6.** *Have you any additional comments on the proposals you wish to provide?*
12. The consultation package was available online on the DoF website and responses could be made on the Citizen Space platform. An online information event was held on 6 October at which the Department explained the proposals and answered some questions from attendees. While this was aimed at construction industry representatives, access was not restricted so anyone could attend.
13. The consultation was promoted in the following ways:
- Notification of the proposals was sent to a total of 351 recipients – 320 by email and 31 by post. In addition, a link to the Draft Equality Screening document was sent to all on the statutory list on the day of the consultation launch.

- 10 social media posts were issued by the Department's Press Office on Facebook and Twitter across the 12 weeks, which clicked through to either the press release or the consultation web page. Some of these included video content of the Minister and two of the Technical Sub-Committee members, who explained the importance of the proposals and encouraged responses. Relevant individuals and organisations, including Disability Action and the Changing Places Consortium, were tagged into most of the tweets. Two of the tweets promoted the construction industry information event to clarify the proposals, which took place on 6 October, tagging in relevant industry bodies.
14. Initially 88 responses were made on Citizen space. The remaining 9 were submitted by email and added manually to Citizen Space to facilitate the analysis of responses
15. The Department analysed the responses and considered that the issues raised in the responses could be grouped into technical Themes.
16. The Department's technical response to the Themes raised under each consultation question, are **highlighted in red text** under the sub-heading 'Department consideration', concluding with the 'Department's Response (post consultation proposals)'.
17. A total of 97 responses was received, as follows:
- 25 from organisations
 - 72 from individuals
18. Individual respondents represented the largest response returns at 74%, with the majority of these responses on non-technical matters, beyond the scope of the Building Regulations. Nonetheless, where any individual's response could be reasonably categorized under a technical Theme, the Department has endeavored to consider those inputs accordingly. A total of 25 technical Themes are considered within this response document.
19. The Department agrees with the broad opinion of the individuals, that access to a toilet is a basic/ fundamental human right in a civilized society. We continue to support this position (within the remit of Building Regulations applicable construction works) where sanitary accommodation is to be provided for all users, with Part R setting the technical standards for those sanitary facilities to be

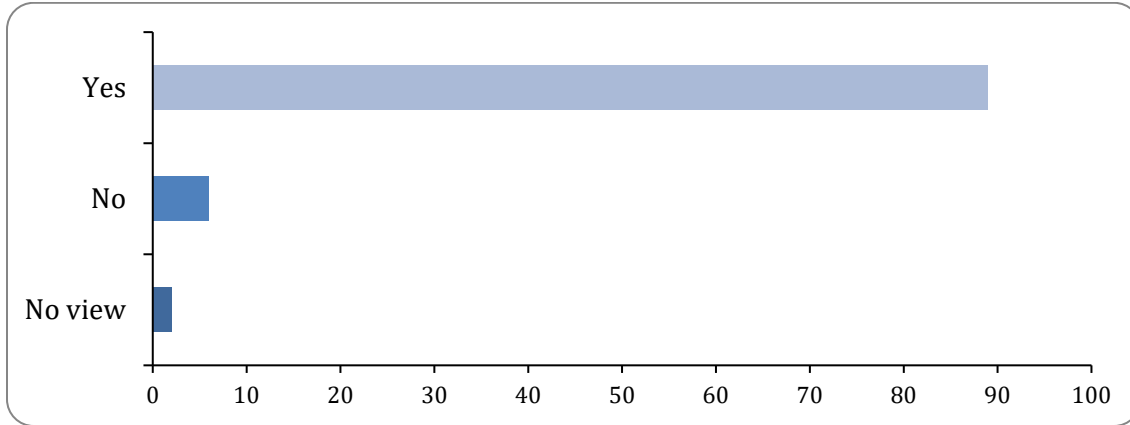
accessible and inclusive (no less available for disabled people than for non-disabled people).

20. Building regulations are only applicable at the time that building work takes place. Regulations set the technical standard for that building work, they do not trigger the primary need or requirement to undertake the retro-fit work. Regulations do not apply retrospectively for existing buildings, because these should comply with the Regulations in force at the time they were built. Building regulations do not impose ongoing management requirements.
21. Building regulations do not set different Part R requirements, depending on the geographical locality or tenure of a building (its urban or rural context) – they are applied for the ‘construction phase’ of the building, not at the ‘Planning development’ phase (other legislation determines building locality, prior to the application of building regulations).
22. The Department is aware that CPT installation through the application of building regulations alone may not deliver a regional strategy or focused area coverage at a local needs level. There is currently no equivalent here to the CPT retro-fit funding policy that exists in England. This would be a policy matter for another Department with the lead on disability policy/ strategy and with a track record of establishing and administering grant funding in that area.

Responses to consultation questions

Question 1: Do you support the proposal to introduce criteria for CPT facilities provision (in addition to the current accessible sanitary provisions), in certain buildings through building regulations statutory guidance?

24. There were 97 responses to this part of the question.



Option	Total	Percent
Yes	89	91.75%
No	6	6.19%
No view	2	2.06%
Not Answered	0	0.00%

25. The Department proposal noted that local building regulations do not mandate the provision of toilets for sanitary convenience, beyond that required for a dwelling. Sanitary requirements for buildings other than dwellings are set by other legislation, where building regulations set technical standards for those sanitary facilities to be accessible and inclusive, within Section 6 of Technical Booklet R compliance guidance. Therefore, regulation amendment is not necessary, rather a standard for CPT facilities provision needs to be included, in addition to the current accessible sanitary provision standards within the statutory guidance.

Q1 comments

26. There were 47 responses to this part of the question.

27. The vast majority of respondents (92%) supported the proposal to introduce criteria for CPT facilities provision.

28. Some respondents, who both agreed and disagreed with the introduction of criteria for CPT facilities, suggested further consideration for example with regard to building types relevant here, the need for a dedicated Changing Places fund, and targeted CPT facilities especially in school settings. Some District Councils pointed to potential ambiguities in application (beyond new build and material change of use relevant building works), and in interpretation. These themes are represented below:

- **Theme 1:** *“Further consideration needs to be given to the building types included in the list compiled to date to be appropriate and relevant in Northern Ireland, for example - new public toilet facilities are not listed”*.
– **14 responses** (District Councils-6 / BCNI-1 / NILGA-1 / Organisations-2 / Individuals-4).

Department consideration: The building types considered appropriate for CPT facilities are those identified in BS 8300-2: 2018 (Clause 18.6), informed by CP Consortium guidance/ development for the UK. New public toilets are not specifically listed by BS 8300 or Consortium guidance, as LA and Council public toilet policy had used partnering arrangements via similar BS 8300 listed buildings, commonly visited by the public. Where standalone public toilet facilities have been developed, they tend to be associated with public parks, gardens, theme parks etc – this type of public toilet accommodation building is captured under the proposed criteria within 6.14A grouping (a).

The themed responses that suggest the need for further consideration of building types relevant in the ‘Northern Ireland setting’, have not been evidenced or supported by analysis, therefore the Department has accordingly, not been able to assess this suggestion.

- **Theme 2:** *“Need for Central Government funding through ‘inclusivity funding’ as unlike other regions in the UK, Northern Ireland does not have a dedicated Changing places Fund.”*
– **7 responses** (District Councils-5 / BCNI-1 / NILGA-1).

Department consideration: “Inclusivity funding” or a “Changing Places Fund” is not within the gift of building regulations policy intervention. The Department is aware that CPT installation through the application of building regulations alone, may not deliver a regional strategy or focused area coverage at a local needs level. There is currently no equivalent here to the CPT retro-fit funding policy in England. This would be a policy

matter for another Department with the lead on disability policy/ strategy and a track record of establishing and administering grant funding in that area.

- **Theme 3:** *“There is ambiguity / inconsistency within TBR in so far as the Guidance applies to Building Work associated with provision of CPTs in New Build and Material Change of Use scenarios, but does not apply to Building Work associated with extensions and alterations to relevant buildings”.*

– **6 responses** (District Councils-4 / BCNI-1 / NILGA-1).

Department consideration: The Department acknowledges that the consultation TBR does not specifically focus on the provision to extensions and alterations. New build and material change of use formed building works, were statistically captured in analytical databases, that have informed the CPT policy impact assessments. Currently there are no databases for relevant existing building extension or alteration works, available to the Department. The Department wishes to address this, hence the seeking of evidence or supporting data analysis response, as part of the consultation **Q4** question input.

- **Theme 4:** *“Reservations regarding the wording proposed in TBR. In particular the ‘Should’ vs ‘shall’ argument still remains and can be open to interpretation”.*

– **6 responses** (District Councils-4 / BCNI-1 / NILGA-1).

Department consideration: In the 2012 amendment and thereafter, building regulations have been expressed in broad functional terms, with the mandatory requirements (regulations) applied using terms such as “shall”. Similarly, in 2012 with the Technical Booklet standards move from d-t-s (deem to satisfy) to guidance, (where the applicant has the option to use, or to choose equivalent ways to demonstrate compliance with the requirements of building regulations) that guidance has been expressed in terms such as “should” – this is a constant throughout the technical guidance in TBR.

- **Theme 5:** *“Consider a statutory requirement for CPT facilities under Building Regulations to be the preferred option”.*

– **1 response** (District Council-1).

Department consideration: Amendment to regulation has not been deemed necessary, rather a standard for CPT facilities provision needs to be included, in addition to the current accessible sanitary technical

standards within TBR Section 6 guidance – the basis for updating the current CPT advisory guidance. CPT facilities will be embraced within the suite of inclusive sanitary accommodation standards, standards consistently applied through guidance.

The statutory requirements for sanitary provision (water closet requirement) in buildings other than dwellings, are set by other legislation, thereafter building regulations Part R through TBR set the technical standard for those sanitary facilities to be accessible and inclusive.

- **Theme 6:** *“It would appear that a CPT facility is being recommended for compliance irrespective of toilet provision for visitors, customers or staff”.*
– **1 response** (District Council-1).

Department consideration: The proposals for CPT facilities are to be applied in a specific targeted manner (for in scope buildings) in addition to (not “irrespective of”) wheelchair accessible facilities, and to complement enlarged compartment facilities, and ambulant facilities. Sanitary accommodation suitable for all building users, under new/ expanded para 6.11 guidance, now includes CPT facilities in large building developments, within that suite of inclusive sanitary accommodation. Thereafter para 6.12 – 6.14A guidance (and targeting provisions) will focus on specific user group facilities, that encompass inclusive sanitary accommodation.

- **Theme 7:** *“CPT provision especially in school settings”.*
– **2 responses** (Individuals-2).

Department consideration: There are other specific design guides or specialist standards that already set requirements for ‘CPT provision in school settings’. An example being: The Department of Education public guidance document for the design and construction of school building projects – specifically the Generic Needs Brief, which sets requirements for ‘hygiene rooms’. CP Consortium recommendations accept and acknowledge that in schools, CPTs are identified as hygiene rooms, with their provision/ numbers being determined by the student needs. The proposed criteria (in this case for Universities and Further Education Colleges), once again has been informed by BS8300-2 and the CP Consortium guidance, which recognise the benefits of provision in large buildings that are open to the public.

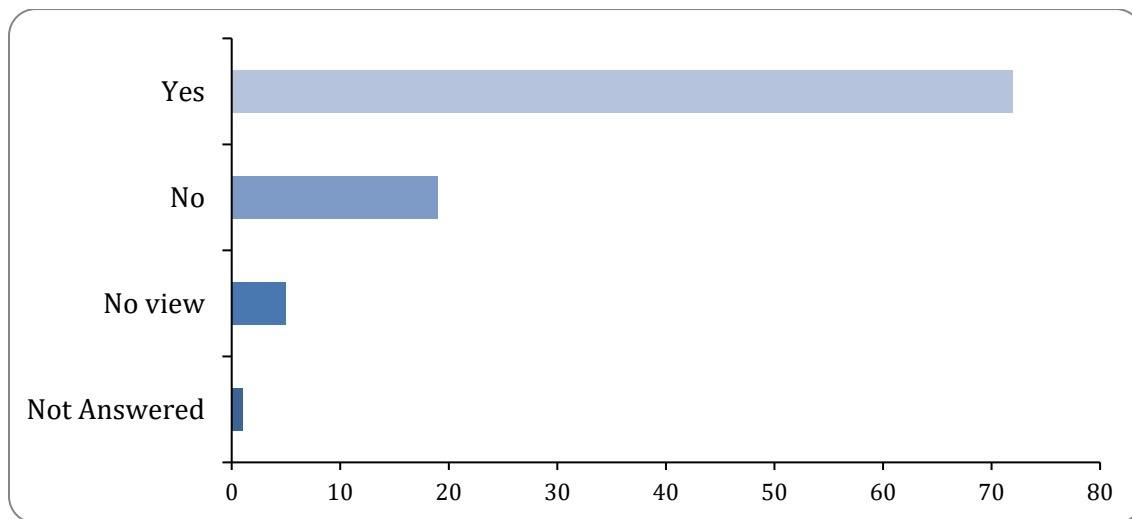
Department’s Response (post consultation proposals)

29. Having considered the consultation responses, the Department will introduce criteria for CPT facilities provision (in addition to and complementing the current

inclusive sanitary accommodation provisions), in certain buildings through building regulations technical guidance, within Section 6 of Technical Booklet R compliance guidance.

Question 2: Do you agree with the defined in scope/relevant types of large buildings commonly used by the public, where a CPT facility should be provided for a new building or where a building is formed by a material change of use?

30. There were 96 responses to this part of the question.



Option	Total	Percent
Yes	72	74.23%
No	19	19.59%
No view	5	5.15%
Not Answered	1	1.03%

31. The Department’s proposal was to include a CPT facility provision standard within the accessible sanitary accommodation standards to Part R of the Building Regulations statutory guidance, having removed Appendix A Informative guidance on CPT facilities.

32. In particular to define in scope new/ relevant large buildings commonly used by the public, such as shopping centres, retail premises, sports/ leisure buildings, hospitals/ primary care buildings, cemetery/ crematorium buildings and more specifically places of assembly, entertainment and recreation; building types, that

had been informed by BS 8300-2:2018 Clause 18, and the Changing Places Consortium.

Q2 comments

33. There were 38 responses to this part of the question.
34. The majority of respondents (74% or 79% of those that expressed a view) supported the defined in scope/ relevant types of large buildings proposed, buildings commonly used by the public where a CPT facility should be provided.
35. Some respondents, who disagreed with the types of large buildings defined as in scope/ relevant, suggested further consideration for example again with regard to building types relevant locally, the need for a dedicated Changing Places fund, and targeted CPT facilities especially in school settings. Some respondents also suggested focusing on major transport terminal/ interchanges, while accepting that another Department has a transport station policy for CPT installation already in place. Outdoor spaces such as beaches, and play/ country parks were also suggested. These themes are represented below:

- **Theme 1:** *“Further consideration needs to be given to the building types included in the list compiled to date to be appropriate and relevant in Northern Ireland, for example - new public toilet facilities are not listed. Another example - a small rural graveyard proposing to build a single toilet for visitors will be required to construct a changing place facility!”*
– **9 responses** (District Councils-4 / BCNI-1 / NILGA-1 / others-3).

Department consideration: As noted in response to Q1 similar Theme, the building types considered appropriate for CPT facilities are those identified in BS 8300-2: 2018 (Clause 18.6), informed by CP Consortium guidance/ development, supported by other jurisdictions in Britain. A response stating that the list of building types is not appropriate/ relevant here, suggesting that the ‘Northern Ireland setting’ requires different building types to Britain, needs to be supported with evidence. The proposed building types/ triggers have been considered in a focused, targeted, and proportionate/ practical manner, to increase the potential for CPT facilities. However as always, the enforcement of the requirements is a Building Control matter, where Building Control apply CPT criteria that they determine appropriate/ reasonable, based on the plans application details deposited by the applicant. In regard to *“a single toilet for visitors”*,

the Department would also note that a CPT facility is in addition to current accessible toilet standards, not in lieu of – therefore should be considered a part of a suite of sanitary accommodation. Relevant in scope buildings, that include toilets commonly used by the public, should be designed to be suitable for all people.

- **Theme 2:** “Need for Central Government funding through ‘inclusivity funding’ as unlike other regions in the UK, Northern Ireland does not have a dedicated Changing places Fund”.
– **6 responses** (District Councils-4 / BCNI-1 / NILGA-1).

Department consideration: As noted in response to **Q1** similar Theme, “Inclusivity funding” or a “Changing Places Fund” is not within the gift of building regulations policy intervention. When a fund is being considered here, this will be a policy matter for another Department who lead on disability policy/ strategy and have a track record of establishing and administering grant funding in that area.

- **Theme 5:** “Consider a statutory requirement for CPT facilities under Building Regulations to be the preferred option”.
– **1 response** (District Council-1).

Department consideration: As noted in response to **Q1** similar Theme, amendment to regulation has not been deemed necessary, rather a standard for CPT facilities provision needs to be included, in addition to the current accessible sanitary technical standards within TBR Section 6 guidance.

- **Theme 7:** “CPT provision especially in school settings”.
– **5 responses** (Health profession-1/ Organisations-1/ Individuals-3).

Department consideration: As noted in response to **Q1** similar Theme, there are other education building design guides or specialist standards, that already set requirements for ‘CPT provision in school settings’ – specifically the Generic Needs Brief, which sets requirements for student “hygiene rooms”. Universities and Further Education Colleges criteria has been informed by BS8300-2 and the CP Consortium guidance, which recognise the benefits of provision in large buildings that are open to the public.

- **Theme 8:** “Include all buildings where secondary care or social care is provided, for example, day care and residential facilities.”
– **1 response** (Health profession-1).

Department consideration: The BS 8300-2: 2018 list informed by the CP Consortium guidance/ development, recognise the benefits of provision in large buildings that are open to the public. Large buildings that will provide a suite of sanitary accommodation, that is managed and has consistent opening hours – when the facilities can be accessed. The secondary/ social care aspect of private care and residential buildings, would be beyond the scope of building regulations intervention – for large buildings more commonly visited by the public. RQIA (for the regulation of) health and social care standards, would already set criteria for such facilities.

- **Theme 9:** *“Certain areas appear to have been omitted such as major transport terminals or interchanges”.*
– **4 responses** (District Councils-1 / Organisations-2 / Individuals-1).

The Transport Advisory Organisation *“recognise that building regulations are not the only lever for increasing the provision of CPTs across Northern Ireland. Having raised the inclusion of transport termini in the scope of the regulation, we fully recognise that through discussion with the Department for Infrastructure and Translink, there is a policy commitment in place to ensure all new or refurbished mainline stations will have a CPT facility.”*

Department consideration: As identified by the Transport Advisory Organisation input, DfI and Translink policy interventions already require the provision of CPT facilities in transport termini, while also setting criteria for CPT installation with regard to size of termini, and range of works that would trigger such provisions. Therefore, the Department does not intend to introduce additional criteria, where another department/ public service provider have already set such targeting criteria – particularly where such provisions are in response to duties under the Code of Practice on rights of Access, Goods, Facilities, Services and Premises.

- **Theme 10:** *“A process which allows for outdoor spaces to be made compliant, such as beaches, play parks, country parks and other outdoor large scale tourist destinations, should be fully explored at this stage”.*
– **6 responses** (District Councils-1 / Organisations-1 / Individuals-4).

Department consideration: Building regulations are only applicable at the time that building work takes place. Regulations set the technical standard for that building work, they do not trigger the primary need or requirement to undertake the new construction or retro-fit work. The Regulations only come into effect for applicable works, in association with a relevant building/ structure.

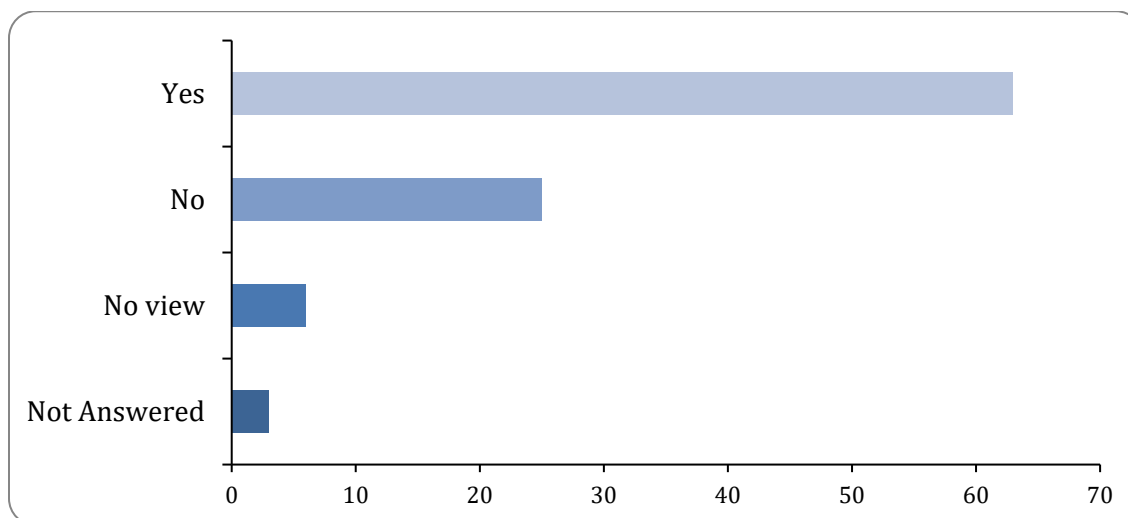
Any proposed relevant building associated with an outdoor space such as public parks, gardens, theme parks, beaches etc – where it has been designed with sanitary accommodation, that building (or collection of buildings associated with that site) would be assessed under the proposed criteria within 6.14A grouping (a).

Department’s Response (post consultation proposals)

36. Having considered the consultation responses, the Department will define in scope/ relevant types of large buildings commonly used by the public, where a CPT facility should be provided for a new building or where a building is formed by a material change of use. Those defined relevant building types, having been informed by BS 8300-2: 2018 (Clause 18.6), and by CP Consortium guidance/ developed for the UK.

Question 3: Do you agree with the set criteria (the building function, its people capacity or gross floor area) for the defined in scope/relevant buildings?

37. There were 94 responses to this part of the question.



Option	Total	Percent
Yes	63	64.95%
No	25	25.77%
No view	6	6.19%
Not Answered	3	3.09%

38. The Department proposal was to include a CPT facility provision standard within the accessible sanitary accommodation standards to Part R of the Building

Regulations statutory guidance, having removed Appendix A Informative guidance on CPT facilities.

39. In particular to set criteria for the defined in scope buildings, to trigger CPT provision based on variables such as the building function and its people capacity or gross floor area. The proposals aimed to use triggers that are measurable by District Council Building Control. Size and capacity are tangible measures for example, so the proposal was to use these in most cases - in a properly targeted proportionate manner.

Q3 comments

40. There were 32 responses to this part of the question.

41. Two thirds of respondents (65% or 71% of those that expressed a view) agreed with the proposed set criteria for the defined in scope/ relevant types of large buildings, where a CPT facility should be provided.

42. Some respondents, who disagreed with the criteria/ types of large buildings defined as in scope/ relevant, suggested further consideration for example again with regard to building types/ criteria relevant in a local setting. Some of the Councils considered the 350 people capacity as not a large enough limit, whereas in contrast other respondents suggested that CPT provision should not be limited to large buildings. These themes are represented below:

- **Theme 1:** *“Accepts that the existing evidence base from other jurisdictions identifies certain buildings, however further consideration needs to be given to the set criteria proposed for application in a Northern Ireland setting. This could take the form of a survey of where CPTs have been provided on a voluntary basis to date!”*
– **8 responses** (District Councils-6 / BCNI-1 / NILGA-1).

Department consideration: As noted in response to **Q1** similar Theme, the building types considered appropriate for CPT facilities are those identified in BS 8300-2: 2018 (Clause 18.6), with criteria informed by CPT research/ development/ guidance, supported by other jurisdictions. A response stating that the list of building types/ criteria needs further consideration, suggesting that the “Northern Ireland setting” requires

different building types/ criteria to Britain, needs to be supported with evidence.

With regard to surveys of existing CPT voluntary facilities and the subsequent control of future installations, the CP Consortium collects all this data to inform their UK (including NI) mapping. As far as the Department is aware, there has been no suggestion from the Consortium that CPT provisions here, need to refocus to take account of any particular regional issue.

- **Theme 11:** *“A building holding 350 people as defined is not necessarily “a large building” and may result in requirement for many more changing place facilities than initially proposed”.*
– **6 responses** (District Councils-4 / BCNI-1 / NILGA-1).

The Theme 11 input Councils / BCNI / NILGA, would appear in contradiction to other Councils, along with Health profession/ Organisations and individuals – who suggest CPT facilities should not be limited to larger buildings.

Department consideration: A 350 person capacity building may not be considered by some Councils as a large building, however in a regional context it would appear appropriate and proportionate in the potential delivery of future CPT facilities. New build and newly formed relevant buildings analysis would project/ suggest doubling CPT potential, when compared to setting a 1000 person capacity trigger (potentially 7-8 units per annum for that key grouping using a 350 capacity trigger). The Department would not consider the provision of additional CPT facilities as an unintended consequence.

- **Theme 12:** *“The requirement to provide CPTs should not be limited to larger buildings”.*
– **3 responses** (Health profession-1 / Organisations-1 / Individuals-1)

Department consideration: In contrast other respondents have suggested that the 350 person capacity trigger for assembly, entertainment and recreation buildings, is not large enough to be defined as a large building. Therefore, there needs to be a balanced trigger set for large buildings informed by research and developments in Britain – that targets buildings that can provide a suite of inclusive sanitary accommodation, along with management/ maintenance regimes, controlled opening hours and access (based on BS 8300-2: 2018 recommendations). The 350 person capacity trigger (as considered under

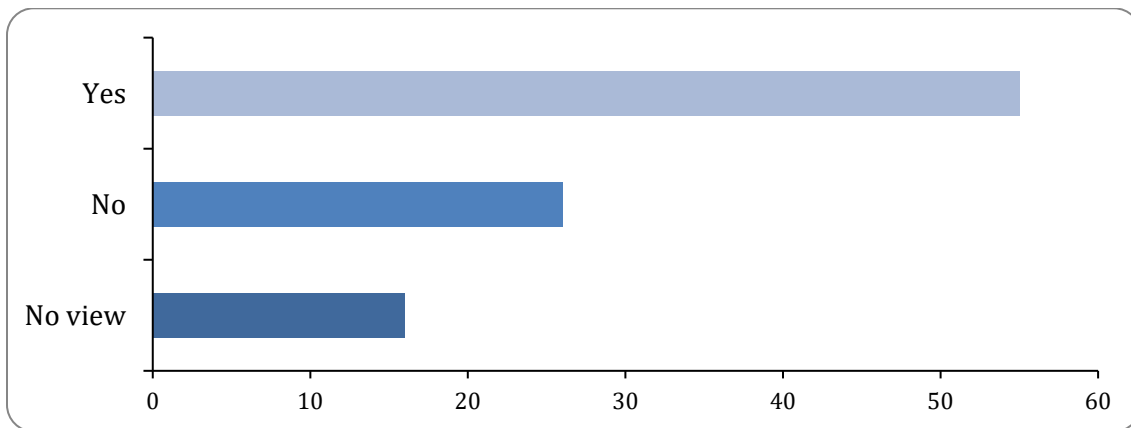
technical Theme 11 above) would appear appropriate and proportionate in the potential delivery of future CPT facilities.

Department’s Response (post consultation proposals)

43. Having considered the consultation responses, the Department will set criteria (the building function, its people capacity or gross floor area) for the defined in scope/relevant buildings as proposed. Those relevant building types/ functions having been identified in BS 8300-2: 2018 (Clause 18.6), with criteria informed by CPT research/ development/ guidance, supported by jurisdictions in Britain.

Question 4: The Department acknowledges that there may be complexities associated with CPT provision in existing buildings undertaking extension or alteration works, but would welcome further views and supporting evidence. Do you agree with the Department on the need for further supporting evidence and can you provide such, regarding CPT retro-fit installation to existing buildings undertaking extension or alteration works?

44. There were 97 responses to this part of the question.



Option	Total	Percent
Yes	55	56.70%
No	26	26.80%
No view	16	16.49%
Not Answered	0	0.00%

45. During the 2019 last Public Consultation process in England, there were a range of responses that identified complexities, when applying CPT design requirements to existing in scope buildings - for example where substantial

(>25% of area) extension or alteration works are proposed. The extent of these complexities were such that the lead UK Administration determined that an independent body of research was warranted. MHCLG had progressed the commissioning of this ergonomic research package.

46. Nonetheless, a public consultation question had been specifically included, as an opportunity for respondents to provide any research/ evidence/ independent analysis, supporting databases etc, to inform policy intervention impact assessments in support of criteria for 'CPT retro-fit installation'¹.

Q4 comments

47. There were 41 responses to this part of the question.

48. Just over half of respondents (57% or 68% of those that expressed a view) agreed with the Department on the need for further supporting evidence, with regard to 'CPT retro-fit installation' for existing buildings undertaking extension or alteration works. No 'CPT retro-fit installation' criteria supporting research/ evidence/ independent analysis, or supporting databases were presented by respondents, however BCNI did indicate access to evidence in their response.

49. Some respondents, who disagreed with the need for evidence to substantiate or inform criteria for existing buildings undertaking extension or alteration works – suggested it is the responsibility of the designer to use innovation to overcome these complexities, and for Building Control professionals to assess compliance. However other respondents sought further consideration on existing access to any CPT retro-fit provision, and raised concerns that considering criteria for extensions should be anything but arbitrary, with alterations likely to be even more problematic.

50. The District Councils again pointed to potential inconsistencies in application (beyond new build and material change of use relevant building works), and that existing building alteration CPT works are no different to material change of use CPT works.

¹ Changing Places Toilet facility retro-fit installation, triggered when an in scope existing large building undergoes extension or alteration works, where those works meet certain criteria.

51. Some respondents from experience questioned the use of these facilities (for their intended use), and the need for such facilities. These themes are represented below:

- **Theme 13:** *“Do not agree with the Department on the need for further supporting evidence, as the challenge has always existed for designers to demonstrate compliance across a wide range of building regulations”.*
– **8 responses** (District Councils-6 / BCNI-1 / NILGA-1).

However other District Councils have concluded that, *“they do not consider that determination of the threshold for application to extensions could be anything other than arbitrary, and the application to alterations is likely to be even more problematic”* (suggesting a considerable challenge for designers/ Building Control professionals, without focused criteria). Also their experience of having provided CPT facilities, concluded *“that these facilities have either never been used for their intended purposes, or have had very limited use as confirmed by the Councils’ estates department”* – suggesting consistency issues for Building Control assessment, and the need for set criteria.

Department consideration: Some respondents did not understand the need for supporting evidence (research, independent analysis, supporting databases etc.) to inform policy intervention impact assessments, in support of criteria for ‘CPT retro-fit installation’. Policy interventions here require policy makers to impact assess any proposal that could affect business, the Construction Industry, Industry professionals, other Agencies, Support Groups and end-users.

Impact assessments need to be informed with analytical datasets (quantitative data with defined focus/ targeting, within sufficient yearly data ranges), that clearly encompass/ identify the affected Groups, and the type/ scope of works – to project the potential cost/ benefits/ outcomes/ or any mitigation measures. Currently there are no databases for relevant existing building extension or alteration works, available to the Department. In an attempt to address this, the Department had asked for evidence or supporting data analysis response, as part of this **Q4** question inputs.

In the absence of respondent evidenced research or analytical database returns, to inform impact assessment, the Department still recognise the potential for ‘CPT retro-fit installation’ associated with buildings undergoing substantial extension/ alteration. The Department will ask in a Phase 2

process (post Tascomi² pilot), BCNI to avail of their Building Control completions database, to assemble a 3 or 5 year database to inform this next phase policy development.

There is also ongoing CPT facilities ergonomic research (commissioned by MHCLG), that will also inform the next phase of technical development.

The suggestion that it is the responsibility of designers to use innovation to overcome these complexities, and for Building Control professionals to assess compliance, does not take into account the District Council and designer questions raised here in response to **Q4**, clearly confirming the need for set criteria – to establish consistency for ‘CPT retro-fit installation’ design and enforcement.

- **Theme 14:** *“Alternative proposals can be submitted and considered by Local Councils in support of these specific cases - these could include an access statement. With the functional nature of Building Regulations it is the responsibility of the designer to use innovation to overcome these complexities and Building Control professionals to assess compliance”.*
– **8 responses** (District Councils-6 / BCNI-1 / NILGA-1).

Other District Councils have however concluded that they *“do not consider that determination of the threshold for application to extensions could be anything other than arbitrary and the application to alterations is likely to be even more problematic”* (suggesting consistency issues for designers/ Building Control professionals assessing compliance). Other Organisations also noted the need for guidance/ criteria – *“accessibility needs to be taken into consideration, turning spaces, access to the space, if it is a retrospective installation”.*

Department consideration: Alternative proposals submitted for specific cases where a CPT facility is being considered for application to extension of alteration works still needs to be assessed against set criteria to establish consistency of application for designers and enforcement officers alike. It would be inappropriate (and open to continuing challenge) to apply/ enforce a ‘CPT retro-fit installation’ policy without established building types, existing access approach considerations, existing sanitary provision considerations, especially without set triggers for applicable retrospective works – that have not been informed by development/ research/ database analysis or supported by impact assessment.

² Tascomi is the IT system used by the District Councils to record information about building regulations applications

The noted Department considerations to technical Theme 13 are equally valid for this technical Theme 14, where it is evident from District Councils and designer queries raised, that there is a need for set criteria – to establish consistency for ‘CPT retro-fit installation’ design and enforcement.

- **Theme 15:** *“This is no different from alterations required to provide a CPT in an existing building undergoing a material change of use”.*
– **8 responses** (District Councils-6 / BCNI-1 / NILGA-1).

Department consideration: Statutory guidance on ‘CPT retro-fit installation’ associated with extension or alteration works has not been included in this first phase as considered previously under Theme 3 and 13, where there is no available database to inform the setting of appropriate/ proportionate criteria. Unlike new build and material change of use formed building works, where they were statistically captured in analytical databases, that have informed the CPT policy impact assessments. The Department cannot, therefore, set technical guidance criteria for extension/ alteration types of works that should include ‘CPT retro-fit installation’, without similar analytical evidence/ review and impact assessment.

The comparison of existing building alteration works with buildings formed by material change of use, is not relevant here as it will not inform evidenced analysis or support impact assessment.

- **Theme 3:** *“Due consideration also needs to be given regarding clarity and consistency of Guidance provided, in regard to Section 1.2 - 1.4 which states an extension should be treated in the same manner as a new building”.*
– **6 responses** (District Councils-4 / BCNI-1 / NILGA-1).

Department consideration: The Department acknowledges that the consultation TBR does not focus on the provision to extensions and alterations – this may appear an inconsistent approach, where TBR sets accessibility performance standards for these same works. Nonetheless, without the same statistically captured analytical datasets that informed criteria development for new build and material change of use formed building works – the Department considers it prudent to address any additional criteria for ‘CPT retro-fit installation’ (within technical guidance), in the next phase.

- **Theme 16:** *“Many buildings across the health and social care estate are established, with no plans for rebuilding in the foreseeable future. All options (for CPT facilities) should be considered in terms of reasonable adjustments”.*
– **1 response** (Health profession-1).

Department consideration: Building regulations are only applicable at the time that building work takes place. The Regulations do not apply retrospectively for existing buildings, because these should comply with the Regulations in force at the time they were built. They do not trigger the primary need or requirement to undertake the new construction or retro-fit work. Reasonable adjustment requirements for the provision of facilities or fitting in respect of a service provider, would be a specific duty applicable under local DDA legislation. Thereafter building regulations TBR would set the ‘relevant design standard’ for that proposed facility/ works to be considered accessible and inclusive.

- **Theme 17:** *“An existing building undergoing major refurbishment work should only be deemed relevant if it meets the proposed criteria. Major refurbishment work should be defined using a financial scale or in reference to the square footage. Where both criteria are met, the building owners/operators must submit an ‘Operating Plan’ that would outline what provision they would put in place”.*
– **1 response** (Organisations-1).

Department consideration: The Department agrees with the need for ‘CPT retro-fit installation’ criteria for CPT facilities within existing buildings (*major refurbishment*), however without supporting research, evidence, informed databases and analysis, the setting of appropriate and proportionate criteria (with triggers such as *financial scales* or *square footage* area) cannot be developed into supporting impact assessments. Building regulations do not impose ongoing management (*Operating Plan*) requirements.

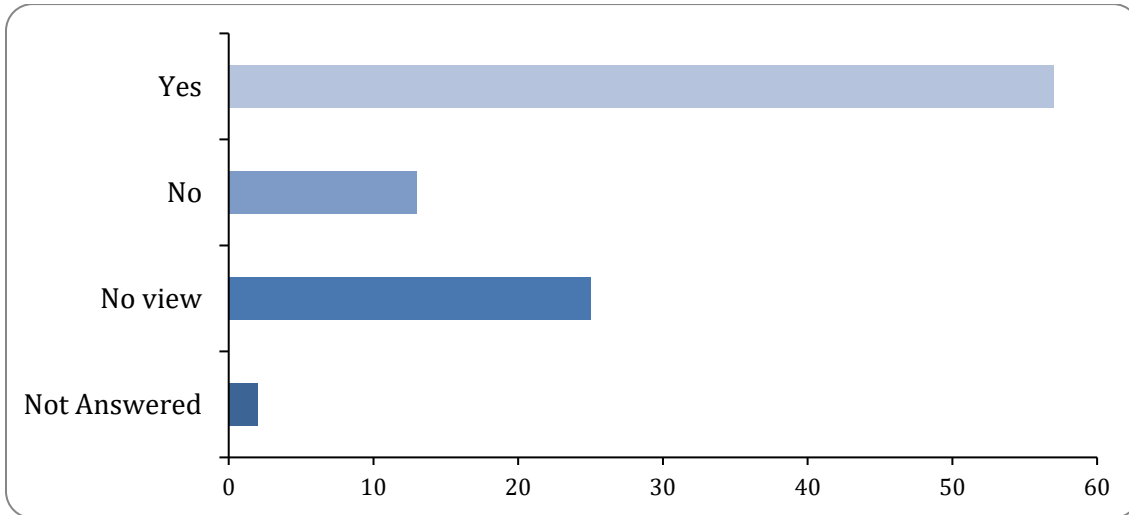
Department’s Response (post consultation proposals)

52. Having considered the consultation responses, the Department will continue to pursue further supporting evidence, regarding ‘CPT retro-fit installation’ associated with extension or alteration works to existing buildings, to inform development/ analysis and impact assessment for the setting of technical guidance criteria. In addressing the current lack of available statistical datasets, BCNI will be asked (in a Phase 2 process) to avail of their Building Control completions database, to assemble a 3 or 5 year database to inform this next

phase policy development. GB ongoing CPT facilities ergonomic research, will also inform the Phase 2 technical development.

Question 5: Do you agree with the analysis/principal assumptions, costs and impacts set out in the Part R consultation stage RIA?

53. There were 95 responses to this part of the question.



Option	Total	Percent
Yes	57	58.76%
No	13	13.40%
No view	25	25.77%
Not Answered	2	2.06%

54. A Part R Consultation DRAFT Regulatory Impact Assessment (RIA) was published as part of the consultation documents, seeking respondent's further evidence to inform a final stage RIA. The DRAFT RIA analysis compared the amendment (that is Option 2) against the option of doing nothing (Option 1). Option 1 was not considered valid as it would not set a clear compliance standard for CPT provision. This is not a new policy rather a current policy update, hence the minimal Options selection.

55. Analysis suggested that Option 2 may result in an overall cost implication however, it is anticipated at this stage, that there will be a minimal cost impact

given that the guidance change is targeted at large new build or material change of use formed buildings.

Q5 comments

56. There were 28 responses to this part of the question.

57. Nearly 30% of respondents expressed no view to this question, however of those that did express a view 82% (59% of respondents) agreed with the analysis/ principal assumptions, costs and impacts set out in the Part R consultation stage RIA. Some of the District Councils and BCNI replicated BCIS building cost NI figures for a range of CPT installations, evidence that was shared previously with the Department/ NIBRAC Sub-committee, when developing the consultation stage RIA. No further supporting evidence/ cost analysis was presented by respondents.

58. Some District Councils suggested that recent and current construction price increases needed to be factored into the RIA. This theme is represented below:

- **Theme 18:** *“Based on these figures the costs included in the analysis provided appear reasonable. However, given the recent and current price increases being experienced for construction materials and Labour, we recommend a further evidence based analysis”.*
– **7 responses** (District Councils-5 / BCNI-1 / NILGA-1).

Department consideration: The Department understands the need for independent cost analysis, which in the case of this RIA, has been provided by DoF Economist colleagues. Liaison with DoF Economists would focus (albeit not exclusively) on projected new build installation costs for a CPT facility, within larger building design projects. Subsequently, specific local projects with CPT installation costs were sought to inform the consultation DRAFT RIA. The views and evidenced returns from NIBRAC Part R Technical Sub-Committee, informed and updated CPT cost installation analysis. Along with the installation cost supporting analysis noted by BCNI, the Department had also included a 7% addition to those installation costs, which would address projected cost of construction increase, with industry suggesting an increase range between 1.5 -5.5% (Tender Price Inflation Forecast 2021/22).

Department's Response (post consultation proposals)

59. Having considered the consultation responses, the Department will develop the Final RIA based on the analysis/ principal assumptions, costs and impacts set out in the Part R consultation stage RIA, in support of the proposed CPT facilities technical guidance for new build and material change of use formed buildings.

Question 6: Have you any additional comments on the proposals you wish to provide?

60. There were 61 responses to this part of the question.

61. A number of the earlier Questions **Q1- Q5** themes were revisited here, such as the need for a dedicated Changing Places fund, potential inconsistencies in application (beyond new build and material change of use relevant building works), and to ensure transport hubs/ terminals will also be subject to the requirement for CPTs. Some District Councils sought clarification on other sanitary provision legislation, on a combined accessible toilet unit, on CPT facility detailing and the Prescribed Fees update. One organisation's entire response focused on accessible housing standards. These themes are represented below:

- **Theme 2:** *“Need for Central Government funding through ‘inclusivity funding’ as unlike other regions in the UK, Northern Ireland does not have a dedicated Changing places Fund”.*
– **12 responses** (District Councils-5 / BCNI-1 / NILGA-1 / Organisations-2 / Individuals-3).

Department consideration: As noted in response to **Q1**, a similar Theme, “Inclusivity funding” or a “Changing Places Fund” is not within the gift of building regulations policy intervention. When a fund is being considered here, this will be a policy matter for another Department with the lead on disability policy/ strategy and a track record of establishing and administering grant funding in that area.

- **Theme 4:** *“Regulation 91 (Access and use) states ‘Reasonable provision shall be made for people to have access to, into, within and to use a building and its facilities’.”*
– **6 responses** (District Councils-4 / BCNI-1 / NILGA-1).

Department consideration: As noted in response to **Q1**, a similar Theme, in the 2012 amendment and thereafter, building regulations have

been expressed in broad functional terms, with the mandatory requirements (regulations) applied using terms such as “shall”. Similarly, in 2012 with the Technical Booklet standards move from d-t-s (deem to satisfy) to guidance, that guidance has been expressed in terms such as “should” – this is a constant throughout the technical guidance in TBR.

- **Theme 3:** *“The proposals for amendment to Technical Guidance in Technical Booklet R creates ambiguity. This ambiguity is exacerbated in contradiction within Guidance contained within Technical Booklet R, in regard to Section 1.2 - 1.4 which states an extension should be treated in the same manner as a new building”.*
– **6 responses** (District Councils-4 / BCNI-1 / NILGA-1).

Department consideration: The Department acknowledges that the consultation TBR does not actually focus on the provision to extensions and alterations – this may appear a contradictory approach, where TBR sets accessibility performance standards for these same works. Nonetheless, without the same statistically captured analytical datasets that informed criteria development for new build and material change of use formed building works, the Department considers it prudent to address any additional criteria for ‘CPT retro-fit installation’ (within technical guidance) in the next phase.

Theme 19: *“Building Regulations do not require the provision of toilets – this lies elsewhere in other legislation. An informative in Technical Booklet R containing information and links to the appropriate legislation would be helpful”.*

- **5 responses** (District Councils-3 / BCNI-1 / NILGA-1).

Department consideration: Local building regulations do not require the provision of a toilet (water closet) for sanitary convenience beyond that required for a dwelling (‘provision of sanitary appliances’ – regulation 85(1) in Part P). Where sanitary accommodation is a requirement for other buildings, building regulations Part R supported by TBR, sets the technical standard for those sanitary facilities to be accessible and inclusive. As noted, the provisions of sanitary appliances are a matter within Part P ‘Sanitary appliances’ requirements, however to inform this response, the Department would note here examples of toilet provision associated legislation:

- The Workplace (Health safety & Workplace) Regulations 1993 (Northern Ireland): regulation 20 Sanitary conveniences, and the provisions of Part II of Schedule 1.

- Disability Discrimination Act 1995 – Part III Goods, facilities and Services, Section 19 (Discrimination) Section 21 (Adjustment) where toilet facilities would be an anticipated provision.
 - Local Government (Miscellaneous Provisions) (Northern Ireland) Order 1985 Part II Licensing by District Council: Schedule I Public entertainment, para 3(2) conditions sub-para (4)-(5).
- **Theme 20:** *“The proposals indicate a CPT should be ‘separate and in addition to’ other sanitary accommodation – can they be combined i.e. CPT / accessible WC”?*
– **6 responses** (District Councils-3 / BCNI-1 / NILGA-1 / Organisations-1).

Department consideration: No. The proposed amendment to TBR Sanitary accommodation guidance for CPT facilities provision – will be in addition to standard accessible toilet provisions. *“CPTs are in addition to standard accessible toilets, as CPTs are for users with complex care needs who need carer support, whereas the standard accessible toilet is for users who can use the toilet independently. A CPT is designed to provide the carer and user with the necessary support using the toilet, and where the user requires support from either side, or being changed on the changing bench. The whole purpose of CPTs is to ensure there are increased facilities available for those in need.”* (Extract from Consortium Practical Guide). Also refer to the current TBR 2012 Appendix A, last paragraph).

- **Theme 21:** *“BS 8300:2009+A1:2010 has been superseded by BS 8300-1: 2018, what is the rationale for not quoting this newer BS?”*
– **6 responses** (District Councils-4 / BCNI-1 / NILGA-1).

Department consideration: The current TBR update is not a full technical update, therefore it does not require review of paragraph 1.10 guidance for ‘Access statements’ (the other reference to BS 8300). The next full technical update of TBR will consider further BS 8300-1 & 2: 2018 recommendations, to assess where those recommendations differ from or advance the provisions within TBR.

- **Theme 22:** *“A timely full review, and revision of (Prescribed) fees and staffing resources is urgently required, and should run parallel with current proposals to amend Building Regulations”.*
– **7 responses** (District Councils-5 / BCNI-1 / NILGA-1).

Department consideration: The Department is undertaking a review of the fees that district Councils can charge for their building control services.

As part of the review the Department is consulting on interim uplifts to the level of fees in the Building (Prescribed Fees) (Amendment) Regulations (Northern Ireland) 2022. The consultation closed to responses on 19th December 2021 and the department is currently considering the responses.

- **Theme 23:** *“The technical requirements for a CPT facility (layout / specialist fittings) provided in the statutory guidance as opposed to reference to associated documents”.*
– **1 response** (District Council-1)

Department consideration: NIBRAC Technical Sub-committee did consider this point in some detail at the time. The conclusion was that the common situation provisions within Technical Booklet R would not include any technical layout or equipment detail of CPTs, but would out-reference to established guidance in BS 8300-2 and the Changing Places Consortium, as this is where the expertise lies. Out-referencing will also allow this specialised guidance to be updated, independently by these bodies.

This out-referencing approach to other named specialist detailing provisions, is not uncommon within Technical Booklets, a good example being within TBE out-referencing to BB100: Design for fire safety in schools – in respect of means of escape.

- **Theme 9:** *“Ensure that transport hubs and terminals will also be subject to the requirement for CPTs”.*
– **2 response** (District Council-1 / Organisations-1)

Department consideration: As identified by the Transport Advisory Organisation input, DfI and Translink policy interventions already require the provision of CPT facilities in transport termini, while also setting criteria for CPT installation with regard to size of termini, and range of works that would trigger such provisions. Therefore, the Department does not intend to introduce additional criteria where another department/ public service provider has already set such targeting criteria.

- **Theme 24:** *“Where a good level of CPT provision already exists within a locality, there may be grounds for a new relevant building to be excluded from the requirements to provide a Changing Place Toilet”.*
– **1 response** (Organisations-1)

Department consideration: Building regulations CPT proposals are for in scope relevant buildings where any sanitary accommodation is to be provided, that those standards of facilities should include, at least one CPT in addition to the accessible toilets. The criteria are not triggered in relation to the proximity of another *CPT provision within a locality*, rather where there is inclusive toilet accommodation (available to/ visited by the public), that new suite of sanitary accommodation should include CPT facilities.

Accessible toilet accommodation has never been determined by the proximity of accessible toilets in another locality/ building venue (nor should they be) – so CPT facilities should be no different.

- **Theme 25:** “*Consideration should be given to making further amendments to Part R of the regulations to improve access for disabled people to housing and the built environment*”.
– **1 response** (Organisations-1)

Department consideration: *Improved access for disabled people to housing* is not within the scope of this current building regulations TBR guidance update, however, the inclusion of CPT facilities within the proposed technical guidance, will *improve access for disabled people to the built environment* – in particular large in scope relevant buildings, commonly visited by the public.

Other administrations have only considered a detailed review of the mandatory provisions in response to a multi-departmental National Housing Standards review, where accessible housing might form a part element within such a review.

Department’s Response (post consultation proposals)

62. Having considered the consultation additional comments, the Department will set criteria (the building function, its people capacity or gross floor area) for the defined in scope/ relevant buildings as proposed. Those relevant building types/ functions having been identified in BS 8300-2: 2018 (Clause 18.6), with criteria informed by CPT research/ development/ guidance, supported by other jurisdictions.

BCNI will be asked (in a Phase 2 process) to avail of their Building Control completions database, to assemble a 3 or 5 year database to inform the analytical development of technical guidance criteria for ‘CPT retro-fit installation’, for existing in scope buildings undertaking targeted extension or alteration works.

Conclusions and Departmental intended post consultation actions

63. The Department has taken account of the consultation responses received and plans to proceed in two phases as follows:
64. First Phase – The Department intends to move forward in this first phase, with the consultation technical proposals for:
- an amendment of the statutory guidance in Technical Booklet R on “Sanitary accommodation and associated sanitary facilities in buildings other than dwellings” Section 6 (in a new Technical Booklet AMD 8), updating the current accessible and usable performance criteria for accessible sanitary provision standards to include relevant criteria for where a CPT facility should be provided in certain buildings;
 - the proposed definitions of in scope/ relevant types of large buildings commonly used by the public, where a CPT facility should be provided for a new building or where a building is formed by a material change of use. Those defined relevant building types, having been informed by BS 8300-2: 2018 (Clause 18.6), and by CP Consortium guidance/ developed for the UK;
 - setting the proposed criteria (the building function, its people capacity or gross floor area) for the defined in scope/ relevant buildings as above. Those relevant building types/ functions having been identified in BS 8300-2: 2018 (Clause 18.6), with criteria informed by current CPT research/ development/ guidance, supported by other jurisdictions;
 - Identifying within the statutory guidance above, further specialist guidance sources on specific aspects of CPT facility layout and equipment, available from;
 - the Changing Places consortium campaign website;
 - BS 8300-2:2018 Clause 18.6 guidance, Figure 48 as well as Annexes F and G; and
 - the completion of the first phase consultation stage RIA, to be identified as FINAL.
65. Second Phase - the Department plans a Second Phase, because of the absence of supporting evidence in the consultation responses (research, independent analysis, supporting databases etc.). In this next Phase, Building Control completion databases could have the potential to inform policy intervention impact assessments, in support of criteria for ‘CPT retro-fit installation’³

³ Changing Places Toilet facility retro-fit installation, triggered when an in scope existing large building undergoes extension or alteration works, where those works meet certain criteria.

Annex A : List of respondents and response to questions on confidentially and post consultation contact

The following organisations responded to the consultation:

- Belfast Health & Social Care Trust
- Sunflower support NI
- Easability Showers Limited
- Centre for Independent Living NI
- Ards and North Down Borough Council
- Building Control Northern Ireland Committee
- Royal College of Occupational Therapists
- Newry, Mourne and Down District Council
- Fermanagh & Omagh District Council
- Causeway Coast and Glens Borough Council
- Walk It Off NI
- Mae Murray Foundation
- PlayBoard NI
- Mid Ulster District Council
- Royal College of Psychiatrists Northern Ireland
- Royal Society of Ulster Architects

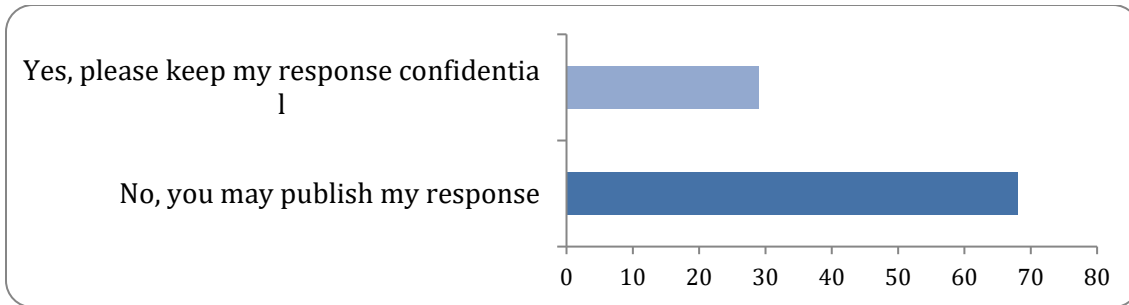
A further 81 responses were received, which have not been listed above for one or more of the following reasons:

- They were from an individual;
- The respondent had indicated they wished for their response to remain confidential; or
- The respondent had not indicated whether or not they wished for their response to remain confidential.

Confidentiality

Question: The Department of Finance would like your permission to publish your consultation response. Please indicate if you wish your response to be treated as confidential.

66. There were 97 responses to this part of the question.



Option	Total	Percent
Yes, please keep my response confidential	29	29.90%
No, you may publish my response	68	70.10%
Not Answered	0	0.00%

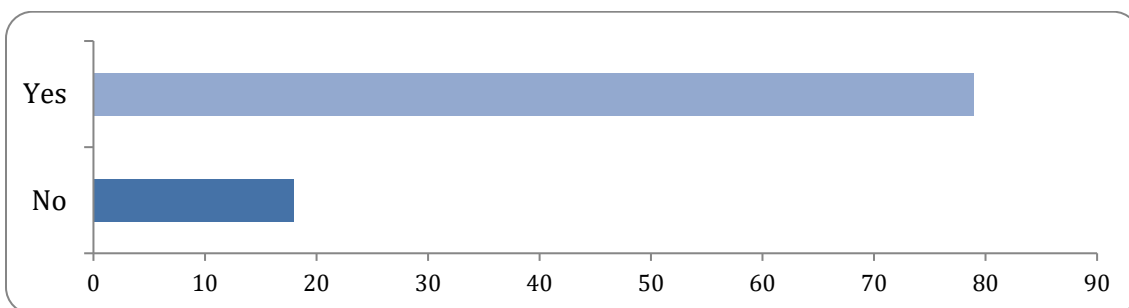
If you wish your response to be treated as confidential, please provide your justification for doing so?

67. There were 13 responses to this part of the question.

Can contact occur?

Question: We may wish to contact you again in the future, but we require your permission to do so. Are you content for the Department of Finance to contact you again in relation to this consultation exercise?

68. There were 97 responses to this part of the question.



Option	Total	Percent
Yes	79	81.44%
No	18	18.56%
Not Answered	0	0.00%