

Appendix: A new FAQ within the Trans and Gender policy.

Practical guidance on toilets and changing facilities within a bowls environment

Good facilities are fundamental in providing opportunities for sport and physical activity for everyone. This includes toilet and changing facilities that are suited to women and men, to younger and older people, to those that are disabled, to those who are pregnant, to parents with babies or young children, to those who are gender reassigned, and to those with certain religious beliefs.

Bowls is an inclusive sport, open to all who wish to be involved in any capacity and Bowls England encourages clubs to cater for the needs of everyone. For example, there is widespread availability of disabled toilets and changing facilities as clubs have adapted their provision over the years and these facilities, appropriately configured and fitted out, might also cater for the needs of other persons as described in the previous paragraph. Smaller clubs in particular should give careful consideration about how limited facilities can be arranged, and how "accessible to all" facilities can help provide for the variety of users of their bowls club.

Bowls England does not issue a prescriptive set of requirements for facilities in clubs because there is a such a variety of physical space, club size, and organisational partnerships. Rather, guidance is based on the principles of equalities laws and the EHRC code.

Clubs must work within the law. The relevant interpretation and guidance is offered by the Equality and Human Rights Commission (EHRC) which is the UK's independent equality regulator whose guidance includes sections on toilets and changing facilities. The EHRC has updated its Code of Practice for Services, Public Functions and Associations. The Code became statutory on 5th August 2026. The Code may be accessed here [Code of practice for services, public functions and associations | EHRC](#)

The following practical guidance is given in good faith to assist clubs. Clubs should follow the EHRC Code and are encouraged to seek independent legal advice on their own particular circumstances where needed.

1. Bowls clubs should follow the EHRC Code. Chapter 13 which refers to sports clubs and associations, is particularly relevant.
2. It is lawful, and required, for sports clubs to have separate facilities for women and for men, based on biological sex. This is a proportionate means of achieving the legitimate aims of protecting the privacy, dignity and safety of women / men.
3. Clubs must consider the needs of all their members and visitors, including trans people. A failure to consider those needs at all could amount to discrimination. Clubs should consider what arrangements or adaptations can reasonably be made to accommodate trans people.

- For example, individual lockable rooms that can be used by anyone. If a club has a separate disabled toilet on the premises this might be relabelled as

“Accessible” and used by anyone. If this approach is taken then the area must be properly equipped. Adjustments might be needed such as coat hooks, shelves, seating and a locker to allow the area to be used for changing.

- For example, a club may have toilets accessible without passing through a changing room and some adaptations may enable some toilets to be accessible to all, and possibly also provide changing.

These types of adaptations can support a range of users.

4. Where clubs cannot immediately identify “accessible to all” facilities they will need to consider what reasonable adaptations to their building could be made, and over what timescale.

5. The Code recognises that it may not always be possible to provide alternative arrangements because of the physical constraints of a building or the disproportionate financial costs.

6. The EHRC code notes “that in many cases it will be proportionate to take a holistic approach. The mix of services in terms of the size of the separate or single-sex or mixed-sex services should reflect the needs and relative numbers of service users with different needs.” In practical terms, given the Code’s emphasis on proportionality, most clubs should seek to provide at least one changing and toilet space that is accessible to all. Such facilities can meet the needs of a wide range of users — including trans people, disabled people, carers, and anyone who prefers greater privacy. Larger clubs, or where there are local needs, might provide further facilities according to need.

7. Clubs should ensure that decisions on facilities are considered by their committee and the reasons for their decisions and actions are clearly minuted.