



INDEPENDENT LIVING  
MOVEMENT IRELAND  
FREEDOM • RIGHTS • EMPOWERMENT

[www.ilmi.ie](http://www.ilmi.ie)

**(Image shows ILMI logo with Text: Independent Living Movement Ireland.  
Freedom, rights, empowerment and website address [www.ilmi.ie](http://www.ilmi.ie))**

**Independent Living Movement Ireland submission on the Review of Building  
Regulations Part M (Access and Use) and to make provision for a changing  
places toilet in certain buildings Department of Housing, Local Government  
and Heritage**

**May 2022**

## **Introduction to Independent Living Movement Ireland**

Independent Living Movement Ireland (ILMI) is a campaigning, national Disabled Person's Organisation (DPO) that promotes the philosophy of independent living and seeks to build an inclusive society. ILMI works with disabled people on a cross-impairment basis. Central to the way we work is to ensure that policy and legislative discourse and decisions that impact on the lives of disabled people have to be directly influenced by those whose lives are directly affected.

Our philosophy can be summed up as: 'Nothing about us without us!' and 'Rights Not Charity'. Our vision is an Ireland where disabled persons have freedom, choice and control over all aspects of their lives and can fully participate in an inclusive society as equals.

## **Social model of disability**

The UNCRPD at its core is framed through an understanding of disability known as the social model of disability. From ILMI's perspective, it is vital that there is a clear and full understanding of what the social model of disability is and how it should inform future discussions on policy development and improvement and policy implementation.

The social model looks at how society is structured and how it disables people. It is not based on a person's impairment, it is focussed on the barriers that exist in terms of attitudes, policy development, access or lack of supports that prevent people from participating in society as equals, with choice and control over their own lives. In this model it is society that disables people from achieving their hopes and dreams, not a person's impairment. The social model informs all aspects of the work of Independent Living Movement Ireland.

## **Language and representation of disabled people**

Independent Living Movement Ireland recognises that language is a very powerful and evocative tool. Therefore, the language and terminology used in this submission has been carefully chosen to reflect the values of equality and empowerment which is at the core of this organisation. The term 'disabled people' has been used throughout the submission in accordance with the UPIAS classification of disability and impairment which has been developed by disabled people themselves (UPIAS 1976). Where disabled people are referred to in the submission this should be understood to include all disabled people, including those with learning difficulties, people experiencing emotional distress and physical and sensory impairments.

## **ILMI observations on Part M:**

- Part M of the building regulations are weak and need to be reviewed by disabled people to see if minimum standards set out are actually working for disabled people. ILMI recommends that Local Authorities need to fully monitor the implementation of Part M.
- ILMI recommends that certificates be issued to confirm homes, offices and public buildings are compliant with relevant access needs. Legislation needs to be altered to ensure compliance, similar to fire safety certificates.
- Homes needs to be “wheelchair liveable” not “wheelchair accessible”. ILMI recommends that Part M of the building regulations needs to be reviewed by disabled people as experts of lived experience and fully monitored by local authorities as per their obligation under the public sector duty.
- Ireland needs to move towards designing and building to maximum standards rather than minimum standards with disabled people involved in the process from the beginning. With this said ILMI supports the implementation of changing places facilities where possible to allow every disabled person access a bathroom in a building as per their human right. Changing places bathroom facilities are accessible to those who may require additional space in the bathroom for assistance or for the use of equipment or for other personal needs. Standard accessible bathrooms do not meet the need of every disabled person. If a disabled person needs assistance in the bathroom or needs equipment to successfully use the facilities a bathroom designed to maximum standards ensures there is dignity for the disabled person when directing a Personal Assistant or using this equipment for example.
- The building regulations 2010 provides a technical guidance document to Part M. ILMI recommends that this needs to be updated urgently with full involvement and engagement with disabled people as per article 4.3 and 29b of the UNCRPD

- It needs to be recognised that Part M has benefits for everybody in society not just people currently living with an impairment or those with reduced mobility. By making all buildings accessible both private dwellings and public buildings it allows all people to participate fully in society as equals
- Inaccessible bathroom facilities can prohibit disabled people from engaging in education, employment, social and cultural life. This is contrary to the state's obligations under articles 5 and 30 of the UNCRPD. Everyone deserves privacy, dignity and respect.