

Toilet Policy



King Henry VIII 3-19 School Ysgol 3-19 Brenin Harri'r VIII

We believe in the limitless capacity for everyone to achieve great things.

Effective from: September 2023

Approved by Governors: July 2023

Reviewed by Governors: October 2024, October 2025, October 2026

Next Review Due: October 2027

1. Introduction

King Henry VIII 3-19 School values and respects our pupils and wants them to be able to benefit from excellent provision and practice. We therefore recognise that having safe and open access to well-maintained toilet facilities where they feel comfortable throughout the school day, is essential for their health, wellbeing, and learning.

This policy is based around the **School toilets: Good practice guidance for schools in Wales** as part of Welsh Government guidance for schools and Local Authorities on how to provide and maintain good quality, hygienic toilet facilities for pupils. It corresponds with the minimum standards for hygiene in the Welsh Network of Healthy School Schemes (WNHSS) National Quality Award, and supports wider public health work in schools to improve health and wellbeing. It also fulfils interventions recommended by the Health Protection Agency in the Children's Environment and Health Strategy for the United Kingdom.

All guidance makes it clear to schools that they should provide pupils with the appropriate facilities to encourage them to use their school toilets and to enable them to wash their hands thoroughly afterwards. This relies upon schools providing the basics of soap, warm water and automatic hand dryers/paper towels to ensure hand-hygiene compliance.

2. Legal Responsibility

Section 542 of the Education Act 1996 allows Welsh Ministers to prescribe, by way of secondary legislation, the standards for school premises, including school toilet facilities. The prescribed standards for schools are currently contained in the Education (School Premises) Regulations 1999.

The regulations and the non-statutory guidance are aimed at Local Authorities (LAs) and set out matters such as the number of toilets required in a school dependent on the age and number of pupils; the separation and location of facilities depending on age and gender of pupils; and the dimensions of facilities within school toilets. Regulation 17(3) of the 1999 Regulations requires the responsible body to ensure the health, safety and welfare of the occupants of a school building. Toilets form part of a school building and good hygiene can therefore be considered in this context.

Governing Bodies are responsible for monitoring the schools' arrangements for health and safety management. This responsibility includes providing a brief statement in the school governors annual report on the provision of toilet facilities for pupils registered at the school and arrangements in place to ensure their cleanliness. The Education Act 2002 places responsibility for 'safeguarding and promoting the welfare of children who are pupils at the school' with the LA and the governing body. It also states that LAs and governing bodies are required to consult with pupils in connection with these matters, and while not having a statutory responsibility, school councils play an important part in delivering good facilities. The governing body and the Headteacher of a school must consider any matter communicated to them by the school council and respond.

The United Nations Convention on the Rights of a Child (UNCRC) is an international convention that sets out the civil, political, economic, social and cultural rights of children. Welsh Government has adopted the UNCRC as the basis of all its work for children and young people. Some of the articles within the UNCRC that can be seen to relate directly to the provision of good toilet facilities include:

- Article 3 – The best interests of the child
- Article 6 – The right to develop healthily
- Article 16 – The right to privacy
- Article 23 – The right to receive special care and support if you have a disability
- Article 24 – The right to good quality health care

In order to ensure that these rights are met and to comply with the Equality Act 2010, all children must be treated as individuals and continence issues should be assessed on an individual basis.

Achieving continence is one of many developmental milestones and should not be considered more significant than any others. Educational establishments are expected to meet the individual needs of children with delayed personal development in the same way they would meet the needs of children with delayed language or any other kind of delayed development. Children should not be excluded purely because of incontinence issues and providers should work in partnership with parents and carers to address this issue in a positive and supportive manner.

School Admission

- No child will be refused admission to school based solely on incontinence issues
- In line with the Equality Act 2010, any reasonable adjustments will be considered in order to meet the needs of an individual child
- If a child has complex continence needs, a continence healthcare plan may be required when they start school and relevant healthcare professionals will be closely involved in this process

3. Mandatory minimum standards

The Education (School Premises) Regulations 1999 stipulate minimum standards for school premises. The regulations set out the number of toilets and washbasins that should be provided according to the number of pupils in all existing and new maintained schools.

Toilets

- Pupils over 5 years of age: 1 toilet for every 20 pupils
- Pupils under the age of 5: 1 toilet for every 10 pupils
- In special schools: 1 toilet for every 10 pupils, regardless of age

Washbasins

Where the majority of pupils are under 11, there should be as many washbasins as toilets.

Where the majority are over 11:

- Washrooms with 1 toilet must contain at least 1 washbasin
- Washrooms with 2 toilets must contain at least 2 washbasins
- Washrooms with 3 or more toilets must have at least two thirds the number of washbasins as there are toilets

The regulations require toilet areas for male and female pupils over the age of eight to be separate unless there are dedicated unisex toilets, properly equipped and for users with special needs.

Girls toilets

Providing the basic number of sanitary fittings will not, in itself, mean that all the relevant standards have been met. The regulations require washroom facilities (water closets, washbasins and sinks) to be adequate having regard to the ages, gender and number of pupils and any relevant special requirement they may have. Girls toilets should not have urinals.

Staff toilets

Staff toilets, other than those designed for disabled access, must be separate from pupils' toilets. Staff must not use pupil toilets at any time. Pupils are not to use toilets designated for staff.

4. School Aims

- To promote the health and wellbeing of all staff and pupils.
- To respect the rights of everyone to feel comfortable and safe.
- To provide good quality toilet facilities throughout the school site for all pupils, staff and visitors.

5. Objectives, Standards and Arrangements

Objectives

- To ensure that all pupils have access to toilet facilities that are safe, clean, accessible, appropriately equipped and suitable for their individual needs.
- To promote the dignity, privacy, independence and wellbeing of all pupils when using toilet facilities.
- To ensure that pupils who menstruate can manage their periods with dignity, privacy, accessibility and without embarrassment during the school day.
- To ensure that appropriate arrangements are in place to support pupils who require assistance with toileting or personal care.
- To ensure that appropriate arrangements are in place to support pupils who require access to menstrual products or other menstrual-related support during the school day.
- To maintain high standards of cleanliness, hygiene, safeguarding and supervision within toilet areas.
- To ensure that pupils understand expectations regarding the appropriate use and care of toilet facilities.
- To provide opportunities for pupils to contribute to the monitoring and improvement of toilet facilities.

Facilities and Accessibility Standards

- All toilet facilities will provide suitable handwashing and drying facilities, including a water supply, liquid soap and toilet tissue.
- Toilet facilities and associated fittings will be appropriately sized and positioned for the age, height and needs of the pupils using them.
- Accessible toilet facilities will be available to pupils who require them and will be readily accessible from across the school building.
- The privacy and dignity of pupils using toilet facilities will be protected through appropriate privacy measures, including functioning indicator bolts on cubicle doors.
- Sanitary disposal units will be provided in all appropriate female toilet cubicles and emptied regularly.
- Appropriate cleaning products will be used, and adequate ventilation or extraction will be provided in toilet areas where access to fresh air is limited.

Menstrual Provision and Period Dignity

The school recognises that menstruation is a normal part of life and that pupils who menstruate should be able to manage their periods safely, privately and with dignity during the school day.

The school is committed to reducing embarrassment, stigma and barriers to learning associated with menstruation and will:

- Provide free period products for pupils who require them during the school day;
- Make period products available at identified locations across the school so that pupils can access them discreetly and without unnecessary barriers;
- Ensure that sanitary disposal units are available in all appropriate female toilet cubicles and are emptied regularly;
- Consider individual circumstances and reasonable adjustments where a pupil requires additional or more frequent access to toilet facilities because of menstruation or menstrual health needs;
- Recognise that menstrual pain, heavy menstrual flow, anxiety about leakage or other menstrual-related difficulties may affect a pupil's concentration, wellbeing and ability to participate fully in learning;
- Ensure that pupils are able to seek support from an appropriate member of staff where they have concerns relating to menstruation;

- Promote a culture in which pupils can discuss menstruation appropriately and without embarrassment or stigma.

Privacy, Personal Care and Accessibility Arrangements

- The privacy and dignity of all pupils using toilet facilities will be maintained through appropriate privacy measures, including functioning indicator bolts on all cubicle doors.
- Appropriate support will be available to enable disabled pupils to access toilet facilities safely, promptly and with dignity.
- Information about the locations where free period products can be accessed will be communicated to pupils and kept under regular review.
- In line with the Equality Act 2010, reasonable adjustments will be considered and implemented where appropriate to meet the individual needs of pupils.
- Individual intimate care plans will be developed where required, providing clear guidance for staff supporting pupils with personal care, toileting and continence needs.
- Pupils who require assistance with toileting or personal care will be supported in a manner that promotes independence, maintains privacy and dignity, and reflects their individual needs and agreed care arrangements.
- Pupils who are not fully continent will be prompted or supported to use the toilet as appropriate throughout the day.
- Pupils who require assistance will be accompanied to the toilet promptly when they indicate their need.
- Personal care will only be provided by appropriately vetted and authorised members of staff, in accordance with safeguarding procedures.
- Pupils will be supported to develop independence in personal care and encouraged to develop appropriate personal hygiene routines as they grow in independence.
- Where specialist toilet or personal care facilities are required, the school will liaise with relevant Occupational Therapists and Local Authority officers to ensure that appropriate provision is in place.
- The rights and needs of transgender pupils will be respected through the availability of appropriate unisex toilet facilities.

6. Toilet Management and Supervision

- Toilet facilities will be maintained in a clean, hygienic, fresh and fully functional condition throughout the school day through an effective programme of cleaning, supervision and inspection.
- Upper Phase pupils will use a toilet pass when accessing toilet facilities during lesson time, in accordance with school procedures.
- Staff on duty during break and lunchtime will monitor toilet areas to promote appropriate use and pupil safety.
- Staff will discourage unnecessary congregation in toilet areas and report any concerns or incidents to a member of SLT.

7. Pupil Expectations, Hygiene and Voice

- Pupils will be reminded of the school's expectations and values, including the importance of respecting others and taking care of school facilities.
- Warm water, soap and paper towels will be available for pupils to wash their hands, and pupils will receive appropriate guidance and reminders about effective handwashing and personal hygiene informed by relevant Welsh Government guidance.
- Appropriate reminders and visual prompts will be displayed within toilet areas. (Appendix 1).
- School Council meetings will provide opportunities for pupils to share their views about toilet facilities and make suggestions regarding their use, condition and upkeep. (Appendix 2).

Menstrual Ambassadors Group

The school will support a Menstrual Ambassadors Group to promote awareness, dignity and openness around menstruation. The group may:

- Support the promotion and appropriate distribution of free period products;
- Help monitor and communicate where period products are available;

- Contribute to awareness-raising activities and talks for younger pupils;
- Provide an appropriate pupil voice in relation to menstrual provision and period-related concerns;
- Help promote a supportive school culture in which pupils can talk about menstruation without embarrassment or stigma.

The Menstrual Ambassadors Group will work alongside school staff to support the school's commitment to period dignity, inclusion and pupil wellbeing.

8. Procedures for Personal Care

In line with the Equality Act 2010, reasonable adjustments will be considered to meet the individual needs of pupils. Where a pupil requires assistance with personal care or experiences a toileting accident, staff will follow the school's agreed personal care and safeguarding procedures.

Routine Personal Care

- Pupils who are in nappies will be checked regularly and changed promptly when required, in accordance with their individual care arrangements.
- Appropriate personal care equipment, including gloves, wipes and disposal bags, will be readily available.
- Changing mats and other relevant equipment will be cleaned and disinfected after each use.

In the Event of a Toileting Accident

- A member of staff will inform the teacher or another member of staff before supporting the pupil.
- There is no requirement for two adults to be present when changing a pupil; however, all relevant safeguarding procedures must be followed at all times.
- The pupil's privacy and dignity will be maintained throughout.
- Wet or soiled clothing will be removed and clean clothing provided where necessary.
- Clinical waste will be disposed of appropriately.
- The changing area will be cleaned and disinfected after use.
- Where an accident has occurred on another surface or piece of equipment, staff will ensure that the affected area is cleaned and disinfected.
- Parents/carers will be informed discreetly of a toileting accident at the end of the session, where appropriate.
- Frequent episodes of soiling and/or wetting will be discussed with parents/carers to establish an appropriate course of action for the pupil, including use of the school's Continence Pathway (Appendix 3).

9. Medical Reasons for Unlimited Toilet Access

A very small number of pupils may require unrestricted access to the toilet facilities for medical reasons. The provisions outlined in this policy regarding toilet access do not apply to these pupils.

These pupils may use the toilet facilities whenever required, regardless of the time of day or whether the facilities are being used by other pupils. They will be provided with a toilet pass, which they can show when they need to leave a lesson to use the toilet.

This may include pupils experiencing menstrual where unrestricted or additional access to toilet facilities is required. Individual circumstances will be considered sensitively and reasonable adjustments will be made where appropriate.

10. Toilet use during the school day

Before School

Primary Phase

- Within the Primary Phase building, all toilets are available for pupils to use from the start of Breakfast Club at 08:00 am

Secondary Phase

- Within the Secondary Phase building, the PE toilets and the toilets next to the SRB are available for pupils to use from 8.25 am
- A member of staff is on duty in this area during this time.

Form Time – Secondary Phase

- Toilets are not routinely available during Form Time, as pupils have the opportunity to use the toilets before the school day begins.

Breaktime and Lunchtime

- Toilets are available for pupils to use during breaktime and lunchtime.

Primary Phase

- Pupils have access to private cubicle toilets adjoined to, or immediately outside, their classrooms.

Secondary Phase

- Pupils have access to the PE toilets, toilets next to the Library and toilets next to the SRB.
- No other toilet facilities should be used by pupils during breaktime or lunchtime.

After School

- All toilet facilities are available for pupils to use after school.

During Lessons – Rationale

It is important to manage the use of toilet facilities during lesson time in order to:

- Ensure pupils do not miss valuable learning time or important learning activities unnecessarily.
- Reduce unnecessary movement around the school and minimise potential supervision and safeguarding risks.
- Ensure pupils can access the toilet when they have a genuine or urgent need to do so.

During Lessons – Use of Toilets

All pupils have a right to access their education and the school aims to minimise disruption to learning. However, there will be occasions when a pupil needs to use the toilet during lesson time.

If a pupil asks to use the toilet during a lesson, or during a learning activity within the Primary Phase, staff should consider whether the pupil needs to use the toilet immediately or whether they can reasonably wait until the learning activity has been completed.

Where a pupil needs to use the toilet during lesson time, staff should remind them to be as quick as possible so that they minimise the amount of learning time missed.

In addition, staff will:

Primary Phase

- Allocate a TA to accompany a pupil if it is considered that they are unable to independently access the toilet effectively and safely.
- Check on a pupil to ensure their safety if they have accessed the toilet independently and have been there for more than five minutes.

Secondary Phase

- Provide pupils using the toilet with a toilet pass, which is worn on a lanyard.
- Collect the toilet pass when the pupil returns to class.
- Record the pupil's toilet use on Class Charts.

Only one pupil may leave a class to use the toilet at any one time.

Staff should respond sensitively to pupils who need to access toilet facilities because of menstruation or menstrual health needs. The toilet access arrangements should not prevent a pupil from accessing the toilet when they have an immediate or urgent menstrual-related need. Where a pupil has an identified ongoing

need for additional or unrestricted access, appropriate reasonable adjustments should be considered in line with Section 9.

During Lessons – Times When Toilets Are Available

Primary Phase

- Toilets are available for pupils to use throughout the school day.

Secondary Phase

- Toilets are routinely available during the middle 10 minutes of each lesson, unless a pupil has an immediate or urgent need to use the toilet.

This approach aims to minimise the amount of learning time pupils miss because:

- Important teacher explanations and the introduction of new learning often take place at the beginning of lessons.
- Review, consolidation and preparation for the next lesson often take place towards the end of lessons.
- Pupils have opportunities to use the toilets before school, during breaktime and lunchtime, and after school.

Therefore, the routine toilet access times during lessons are:

Lesson Toilet access

Period 1	9.20am – 9.30am
Period 2	10.20am – 10.30am
Period 3	11.40am – 11.50am
Period 4	12.40pm – 12.50pm
Period 5	2.20pm – 2.30pm

11. Monitoring, Evaluation and Review

The effectiveness of this policy will be monitored through:

- regular checks of toilet facilities, cleanliness, hygiene and accessibility;
- monitoring of any concerns, incidents or damage relating to toilet use;
- monitoring of pupils' access to toilets and any identified barriers to appropriate toilet use;
- feedback from pupils regarding period dignity and menstrual provision;
- feedback from the Menstrual Ambassadors Group;
- feedback from pupils and staff;
- consideration of individual needs and reasonable adjustments where required;
- monitoring of personal care arrangements and any identified areas of concern;
- consideration of safeguarding, privacy and dignity when reviewing procedures; and
- reporting significant concerns or identified areas for improvement to the Governing Body, as appropriate.

Where monitoring identifies concerns or areas for improvement, the school will take appropriate action to address them. The Toilet Policy will also be reviewed yearly and updated where necessary to reflect changes in legislation, Welsh Government guidance, school procedures, identified needs or feedback from pupils and staff.

12. Maintenance of toilets and cleaning facilities

Maintenance Requests

All Maintenance Requests are to be made through the Deputy Headteacher who will action any works needing to be carried out, including through the procurement of outside services if required.

Further Information:

1. School toilets: Good practice guide for schools in Wales

<https://www.gov.wales/sites/default/files/publications/2018-03/school-toilets-good-practice-guidance-for-schools-in-wales.pdf>

2. ERIC: The children's bowel and bladder charity <https://eric.org.uk/>

Appendix 1

How should we wash our hands?

HOW TO WASH YOUR HAND PROPERLY



WET YOUR HANDS WITH WATER



APPLY ENOUGH SOAP TO COVER ALL HAND SURFACES



RUB HANDS PALM TO PALM



LATHER THE BACKS OF YOUR HANDS



SCRUB BETWEEN YOUR FINGERS



RUB THE BACKS OF FINGERS ON THE OPPOSING PALMS



CLEAN THUMBS



WASH YOUR FINGERNAILS AND FINGERTIPS



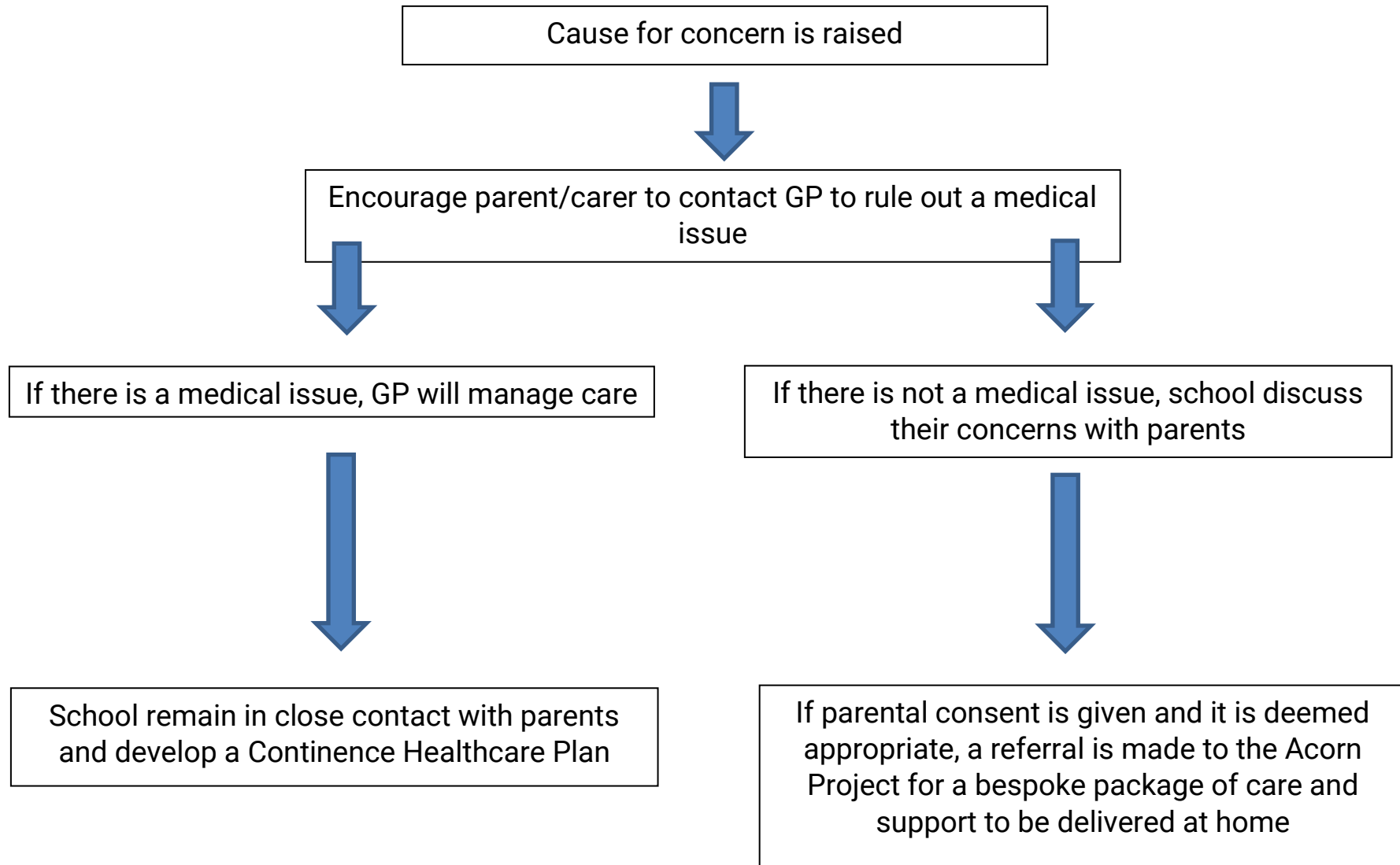
RINSE HAND

Appendix 2

School Toilet Questionnaire

We would like you to answer the questions below as it's important to know what you think about school toilets. Please tick the correct box. Thank you for answering honestly.			
1. Are you: male? ☐ female? ☐ How old are you? What year are you in?			
2. What do you think of your school toilets? Nice ☐ Okay ☐ Quite bad ☐ Really horrible ☐			
3. Do you use the school toilets? Always ☐ Sometimes ☐ Only when I really have to ☐ Never ☐			
4. When do you use the school toilets? Only at break times ☐ Only during class ☐ Whenever I need to ☐			
5. Do you wash your hands after using the school toilet? Always ☐ Sometimes ☐ Never ☐			
6. Have you come across the following problems in your school toilets?	Never	Sometimes	Often
No toilet paper			
No warm water for washing hands			
No soap for washing hands			
No hand towels/dryers			
People can look over/under doors			
Doors that don't lock			
Smelly, dirty or messy			
Toilets blocked or not working			
Not enough toilets			
Being scared of other learners in the toilets			
Not enough time to use the toilet			
Not allowed to use the toilet when you need to			
7. Give your school toilets a mark out of 10			
Would you like to say anything else about your school toilets? Can you suggest ways they could be improved?			

Appendix 3 Continence Pathway



Appendix 4

Continence Healthcare Plan

Child's name _____

Date of commencement _____

Date of first review _____

Date of second review _____

Name of staff member _____

Other professionals involved:

- ☐ Health Visitor
- ☐ G.P
- ☐ School Health Nurse
- ☐ Other _____

Outline of the support needs (informed by Parent Questionnaire)

INDEPENDENCE What is required of the support staff to ensure that the child can be as independent as possible?	
TOILETING TIMES Does the child need to be prompted at regular intervals?	
COMMUNICATION How does the child let you know that they need the toilet?	
TOILET FACILITIES Does the child require more privacy? Does the child require a footstool or insert seat?	

MANUAL HANDLING AND LIFTING? Does the child need to be lifted? Can the child be changed standing up? Is any additional training required?	
CONSISTENCY Is there consistency required between home and school? How will this be ensured?	
LIAISON Are there other issues that may be making toileting difficult?	
ADDITIONAL SUPPORT Has a referral been made in agreement with the parents for additional support at home (Acorn Project)	
SPECIFIC ADVICE Any specific instructions required for interventions such as catheterisation or stoma care, allergies, risks etc.	

OUTCOME

Completed by:

Date of completion: