



Introduction

This response is submitted by Unite the Union. Unite is the UK's largest trade union with 1.6 million members working in the private and public sectors. The union's members work in a wide range of industries including agriculture, forestry, horticulture, docks, construction, manufacturing, food manufacturing, distribution and retail, financial services, road, rail, air and sea transport, print, media, not for profit sectors (including youth and community workers), local government, private contractors providing public services, education and the health service. In particular we represent school nurses, school maintenance workers and school support staff.

General Points

- Unite welcomes the publication of this document which provides a useful overview and guidance for schools on this very important issue.
- We note that it is largely confined to advice on toilet provision for pupils. Whilst this is absolutely right, we feel that including guidance to governors and head teachers to help protect workers is essential to prevent infection and other health and safety hazards in schools. For example while there is excellent guidance on supporting children with special needs, there is no guidance on issues such as staffing implications, manual handling and other health and safety issues.
- The guidance rightly advises that the pupils should be consulted on and involved in developing policies. However, there is no guidance on consulting staff, including elected safety representatives, on these policies and procedures, which they will play a central part in implementing.

Specific comments

Protecting Workers

The guidance refers to the Workplace (Health, Safety and Welfare) Regulations 1992 as amended in relation to employees. It would be helpful to expand upon their requirements in the guidance to remind governors and head teachers of the requirements in relation to toilet and washing facilities, rest areas, and facilities for nursing mothers.

The Management of Health and Safety at Work Regulations 1999 and other regulations lay down a number of requirements in relation to health and safety management including carrying out risk assessments. Issues to be considered when carrying out risk assessments in this context may include manual handling of people and equipment; control of substances hazardous to health, the provision and maintenance of appropriate equipment and facilities; the provision of personal protective equipment and lone working.

Consulting employees

The employer is required under the Safety Representatives and Safety Committees Regulations 1977 to consult with safety representatives elected by recognised trade unions. We feel that the guidance should make this clear in relation to issues such as negotiating policies, and then monitoring and reviewing them and consulting those concerned on other issues such as risk assessments. School toilet policies, hygiene/infection control policies and health and safety policies are all examples of where consultation with employees should take place, including with school nurses.

The best practice guidance on page 5 should include a point on consulting with employees and/or their representatives, on such policies and involving them in monitoring and review. This is of course reflected in the draft policy at Annex A, but it would be helpful to highlight this in the body of the guidance.

Protecting pupils and employees

The guidance needs to reflect more fully the health and safety issues which may arise. These could include:

Manual handling of pupils with physical disabilities

Pupils who are unable to communicate, recognise hazards or move around independently

Using mechanical aids and equipment

Minimising the risk of infection

Managing difficult behaviour

Lone working where an employee may work one to one with an SEN pupil.

When considering the requirements of pupils with special needs, associated staffing, resource and equipment (for example manual handling issues) should also be considered and included in the policy.

Infection control may also mean developing continence policies in consultation with all concerned. These would describe how incidents should be dealt with to protect all concerned, and also cover vomiting incidents. They could also cover issues such as building a supportive relationship with the parent/carer, including others such as the class teacher, school nurse; practical considerations such as the provision of spare clothing by parents if

necessary; facilities to be provided; and procedures to be followed in the event of an incident.

Risk assessments should consider the control of infection including providing appropriate protective clothing, designating areas for nappy changing, and cleaning up body fluid spills.

The Health Protection Agency provides useful guidance on Infection Control in Schools at

http://www.hpa.org.uk/web/HPAwebFile/HPAweb_C/1274087715902

It would be useful to provide a short list of sources of further information.

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Llywodraeth Cynulliad Cymru
Welsh Assembly Government

www.cymru.gov.uk

Welsh Assembly Government

Consultation Document

School Toilets

Best Practice Guidance for Primary
and Secondary Schools in Wales



Date of issue: **1 November 2010**

Action required: Responses by **24 January 2011**

Audience:

Governing Bodies and Head Teachers of Maintained Schools in Wales; Local Authorities; Teaching and other Unions; Diocesan Authorities

Overview:

This document provides best practice guidance for Governing Bodies and Head Teachers on issues relating to the standards of toilets and related facilities required in schools in Wales

Action required:

Governing Bodies, Head Teachers and Local Authorities to have regard to this non-statutory guidance in respect of provision and management of toilets and toilet facilities for pupils at their schools.

Further information:

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Related documents:

Mind the Germs! Infection Control Guidance for Nurseries, Playgroups and other Childcare Settings (Welsh Assembly Government – 2006)

Teach Germs a Lesson! Infection Control Guidance for Primary Schools and Secondary Schools. (Welsh Assembly Government – 2006)

Contents

| | |
|---------------------------------------|----|
| Foreword | 1 |
| Legal Background and Responsibilities | 2 |
| School Toilet Policy | 3 |
| Access, Security and Supervision | 4 |
| Structural Issues | 5 |
| Toilets Facilities | 6 |
| Washbasins, Water and Hand Hygiene | 7 |
| How Should We Wash Our Hands? | 8 |
| Female Sanitary Products and Disposal | 9 |
| Toilet Hygiene | 10 |
| Management and Maintenance | 11 |
| Annexes | 12 |
| Acknowledgements | 13 |

1. Foreword

This booklet is one of three that the Welsh Assembly Government has developed following the outbreak of Escherichia coli (E.coli) in Welsh schools in 2005. Following the outbreak the National Assembly for Wales appointed Professor Hugh Pennington to hold a public inquiry to ‘*enquire into the circumstances that led to the outbreak of E.coli O157 infection in South Wales in September 2005 and into the handling of the outbreak; and to consider the implications for the future and make recommendations accordingly.*’ Professor Pennington’s report, which was presented to the First Minister on 19th March 2009, made a series of 24 recommendations aimed at public sector bodies and food businesses. One of those recommendations was that every local authority should have a programme of audits to ensure that all schools have adequate toilet and hand washing facilities.

This booklet sets out best practice guidance for school toilets in primary and secondary schools to help inform that audit process. It is aimed at school Governing Bodies and Head Teachers, although Local Authorities should also have regard to the guidance as an employer of school staff.

This guidance takes account of the findings and recommendations on cleanliness, condition and privacy raised by the Children’s Commissioner in his 2004 report ‘Lifting the Lid’ on the Nation’s School Toilets¹ and the Estyn report on “Food and Fitness in Schools”. 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 well being, e.g. as part of WNHSS and that undertaken by the school nursing service. It also fulfils interventions recommended by the Health Protection Agency in the Children’s Environment and Health Strategy for the United Kingdom.

We must provide children with the appropriate facilities to encourage them to use their school toilet and to enable them to wash their hands thoroughly afterwards. This relies on all schools providing the basics of liquid soap, warm water and paper towels to ensure hand hygiene compliance. The Welsh Assembly Government has issued this best practice guidance document with the expectation that it will contribute to improving the standard of provision in respect of toilet facilities within schools.

Our aim is to make school toilets accessible, clean and safe by encouraging the adoption of the highest possible standards. We have a duty to educate children about how to best look after their own health and to respect the facilities provided to them.

We all have a role in reducing infection and the spread of disease. This guidance will help us do that but it will rely on you to make it happen.

Endorsement..... Endorsement.....

¹ Lifting the Lid <http://www.childcomwales.org.uk/uploads/publications/27.pdf>
Codi'r Clawr <http://www.complantcymru.org.uk/uploads/publications/32.pdf> (Welsh version)

2. Legal Background and Responsibilities

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 have been supplemented by “Welsh Office Circular 15/99: The 1999 School Premises Regulations”. The Regulations and the non statutory guidance offered by Circular 15/99 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 sex 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. Specific standards for school washrooms will be discussed under the relevant sections of this booklet.

It is the responsibility of Local Authorities to ensure that school premises conform to the prescribed standards in the Regulations. Responsibility for investing in school buildings and compliance with the building regulations that apply to schools is vested in different bodies depending on the type of school. That responsibility falls to a Local Authority in the case of community, voluntary controlled, maintained nursery schools and community, special and foundation schools, and pupil referral units. It is the responsibility of the Governing Bodies in the case of voluntary aided schools.

In the case of community, voluntary controlled schools etc where LAs have responsibility, the management of the health and safety of staff, volunteers, visitors and pupils is, in practice, delegated to the head teacher. LAs must provide health and safety guidance and ensure that the head teacher and relevant staff are trained in their health and safety responsibilities.

Governing Bodies are responsible for monitoring the schools arrangements for health and safety management. Good practice should include producing 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 accessibility, safety and cleanliness.

As **recognised employers**², LAs, Governing Bodies or school premises proprietors in the case of some independent schools, have responsibilities for the health and safety of staff, volunteers, visitors and pupils. These responsibilities derive from the Health and Safety at Work etc. Act 1974 and associated regulations. Whilst the **Workplace (Health, Safety and Welfare) Regulations 1992**³ only apply to school staff and not to pupils, the Regulations do provide valuable guidance with regard to toilets. Health and safety legislation is enforced by the Health and Safety Executive (HSE) in Educational settings.

² www.teachernet.gov.uk/wholeschool/healthandsafety/responsibilities/

³ www.opsi.gov.uk/si/si1992/UKsi_19923004_en_1.htm

Whilst not specifically mentioning toilets, the **Education Act of 2002**⁴ 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 decisions affecting their welfare.

Whilst not having a statutory responsibility School Councils can also play an important part in delivering good facilities. The National Assembly for Wales School Councils (Wales) Regulations 2005⁵ passed under the Education Act 2002 require all maintained primary, secondary and special schools to establish a School Council. The Regulations state that both the Governing Body and the Head Teacher of a school must consider any matter communicated to them by the School Council and respond. Statutory guidance on School Councils⁶ includes amongst the list of issues which it would be appropriate for a School Council to consider: “improvements to the school environment such as toilets”.

In respect of pupils who have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities, the **Disability Discrimination Act 1995**⁷ and **Special Education and Disability Act 2001** should be consulted in association with the **Education (School Premises) Regulations 1999**⁸. Further general guidance on duty can be gained from the Disability Rights Commission’s **Code of Practice for Schools**⁹.

Children and Young People’s Rights

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 Assembly Government has adopted the UNCRC as the basis of all our work for children and young people. Welsh Assembly Government’s seven core aims for children and young people summarise the UNCRC and form the basis for decisions on priorities and objectives nationally. They should also form the basis for decisions on strategy and service provision locally. The seven core aims for all children and young people are:

1. Have a flying start in life.
2. Have a comprehensive range of education and learning opportunities.
3. Enjoy the best possible health and are free from abuse, victimisation and exploitation.
4. Have access to play, leisure, sporting and cultural activities.
5. Are listened to, treated with respect, and have their race and cultural identity recognised.

⁴ www.opsi.gov.uk/acts/acts2002/ukpga_20020032_en_1

⁵ www.opsi.gov.uk/legislation/wales/wsi2005/20053200e.htm

⁶ Guidance for Governing Bodies on the Establishment and Operation of School Councils NAFW 42/2006 23 October 2006.

⁷ <http://www.legislation.gov.uk/ukpga/1995/50/contents?timeline=true>

⁸ <http://www.legislation.gov.uk/ukpga/2001/10/contents>

⁹ <http://nationalstrategies.standards.dcsf.gov.uk/node/84546>

6. Have a safe home and a community which supports physical and emotional well-being.
7. Are not disadvantaged by poverty.

The UNCRC generally defines a child as any person under the age of 18; however, since 2004 all policy making for children and young people (0-25) in Wales has been based on the UNCRC and has followed a 'rights-based' approach. This recognises that all children and young people are rights holders and that everyone who provides services and support to them bears a duty to help them to access these rights. It is important to understand which of these rights within the UNCRC are relevant to the service or support being provided. Some of the articles within the UNCRC can be seen to relate directly to this area including:

- Article 3 – The best interests of the child
- Article 6 – The right to develop healthily
- Article 12 – The right to participate in decision making
- 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

Although these articles cover some of the specific relevant rights, they need to be read and considered in the spirit of the entire **UNCRC** and its principles¹⁰. Further information is available from the **Welsh Assembly Government website**¹¹.

¹⁰ <http://www2.ohchr.org/english/law/crc.htm>

¹¹ <http://wales.gov.uk/topics/childrenyoungpeople/rights/?lang=en>

3. School Toilet Policy



Pupils' toilets project an image of a school - good or bad - and have an effect on pupil morale, behaviour and potentially health. As the Children's Commissioner for Wales stated in his Lifting the Lid report in 2004 – *'the lack of priority given to these basic amenities, is seen by many children as an indication of the lack of priority – and respect - given to them by society at large.'*

The problem is that school toilets may not be high up on the list of a school's budget and priorities for improvement. The state of the school toilets is often, however, the most concerning issue for pupils. A written school toilet policy provides a powerful indication to children and parents that the school values and respects the health, safety and well-being of its pupils. A policy enables a school to develop and maintain a shared philosophy and co-ordinated approach to their school toilets and how pupils are allowed to use them. It encourages schools to audit the toilets properly and to take into account the needs of pupils.

Advice on developing an effective school toilet policy (Annex A) is provided by the **BOG Standard Campaign for better toilets for pupils**¹². The campaign was launched in the UK in April 2003. It is the campaigning arm of the national charity, Education and Resources for Improving Childhood Continence (ERIC). The campaign is a joint venture between ERIC, Community Practitioners' and Health Visitors' Association, School Councils UK and the British Toilet Association.

The BOG Standard website was created to raise awareness of the campaign, and to provide information and resources to pupils, parents, school staff and governors, health professionals, designers and architects, journalists and local and national government. The website provides a range of resources to help teachers and parents improve pupils' toilets in schools including checklists, guidance and a teaching pack. The Welsh Assembly Government encourages school Governing Bodies and Head Teachers to use this website to help them to improve standards in school toilets. The best practice outlined in this booklet draws heavily from the advice it provides.

Best practice:

- Schools have a written school toilet policy in order to:
 - Maximise pupils' access to toilet facilities during the day to promote the health, well-being and learning opportunities of all pupils.
 - Provide good quality toilet facilities throughout the school.
- The policy is drawn up with the participation of pupils, and makes reference to how the school intends to keep the toilets clean, hygienic and in good condition.

¹² <http://www.bog-standard.org/>

- Pupils are involved in the development, approval, implementation and review of the policy. Pupils should be involved in all stages in line with the United Nations Convention on the Rights of the Child and the National Participation Standards for Children and Young People.
- The policy is approved by governors, communicated to the whole school and reviewed regularly with the participation of pupils.

4. Access, Security and Supervision

For children to stay healthy, they need to drink water regularly throughout the day. They also need to empty their bladder and bowels regularly and fully when the need first arises. Children need open access to fresh drinking water; inadequate fluid intake may be due, consciously or unconsciously, to toilet avoidance or inadequate opportunities to visit the toilets.

There are occasions when children will need to ‘hold on’ before they can visit the toilet, but repeated prolonged delays can cause distress and health problems. Holding on can lead to constipation, which in turn can result in soiling. For some children any delay is impossible. Each child’s bladder and bowels are individual and their bladder and bowel capacity are very variable, function to their own timetable and will differ according to a multitude of variable factors. A child’s timetable is therefore unlikely to conform to the school’s timetable. Pupils may not have the opportunity to go to the toilet between each lesson and there may be long periods in the school day without a break. In *Lifting the Lid*, the Children’s Commissioner found that 35% of respondents said that it was difficult to get permission to use the toilets during lesson times.

Restricting toilet access to set times encourages ‘I’ll go just in case’ practice which may contribute to ‘small-bladder syndrome’. Emptying the bladder before it’s full can reduce capacity and means the bladder doesn’t get used to holding on until it’s full. This can create problems such as needing to go more often during the day and night, and having to get to the toilet in a hurry to prevent accidents. At the same time, the amount of fluid a child can drink before needing to go to the toilet is reduced.

Pupils may also avoid emptying their bowels at school. This can be due to a lack of privacy, poor toilet conditions, and not enough time to use the toilet. Locks are essential for privacy and if missing, will contribute to toilet avoidance. Toilets that are in a poor state and in need of refurbishment and more frequent cleaning may be more likely to attract poor behavior. School toilets can become an adult-free zone. It is important that children feel safe to use toilet facilities at all times and staff and pupils should work to develop strategies to ensure this is achieved.

Best practice:

- Toilets are open and accessible to all pupils throughout the hours of school opening.
- Pupils are always allowed to use the toilet, whenever they need to – with this message openly communicated to pupils, teachers and parents in the school policy and on an ongoing basis.
- Schools communicate to parents the need for schools to be informed of special toileting needs in respect to pupils.

- Schools have regard to the advice provided by Education and Resources for Improving Childhood Continence through its BOG Standard Campaign on good toileting practice for children with or without continence problems (**Annex B**).
- Toilet cubicles are private and have a door with a working lock that is easy for pupils to operate from the inside but not easily opened from the outside by other pupils.
- Staff are provided with a means to open the doors from the outside (e.g. with a special tool or key) in case of emergency. Schools need to consider the storage location of the key if the toilets are not located close to where staff are sited.
- In line with the whole school anti-bullying policy, which schools are required to have, bullying is prevented within the confines of toilet areas by clearly communicating the agreed school policy to all pupils and staff (no loitering, no group discussion etc).
- There is a process of staggered checks in toilet areas or an equivalent means of monitoring, by school staff, as a deterrent and the means to identify bullying, or non-consensual activity which could be misconstrued as bullying.
- Smoking is not allowed within the confines of school grounds by pupils with procedures in place to ensure this prohibition is checked within the toilet area.
- Individual rights in respect of dignity and personal belief are not undermined by the management or provisions within toilet areas.
- CCTV should only be considered when there is a pressing need and all other options have been tried and failed. Schools that capture images using CCTV are required by law to adhere to the Principles of the Data Protection Act. Guidance for organisations using CCTV is available from the **Information Commissioner**¹³. The **BOG Standard website** also provides useful information on alternative approaches to the use of CCTV cameras¹⁴.

¹³ http://www.ico.gov.uk/for_the_public/topic_specific_guides/cctv.aspx

¹⁴ <http://www.bog-standard.org/faq.aspx>

5. Structural Issues

The school should promote washroom/toilet area environments which are safe, reliable, maintainable and user-friendly. Pupils need to feel comfortable and safe to encourage them to use the toilet. Well lit, bright, colourful toilets help boost pupil morale. Involving pupils in their design and decoration encourages ownership, pride and reduces vandalism. Ease of cleaning also needs to be considered when designing and refurbishing toilets. Most pupils' toilets need cleaning at least twice a day. An extended day may increase this to three or more times. Soap dispensers that leak, awkward corners and cracked surfaces all contribute to a dirty environment.

Guidance on design standards for schools will be provided in the **21st Century Schools**¹⁵ Standards with the aim to present best practice across a range of aspects of school design including school toilets. Useful advice on school toilet design is also provided on the **Teacher net website**¹⁶.

Best practice:

- All washroom/toilet areas are protected from adverse weather.
- Toilets are adequately lit. Sensor lighting could be used, or switches could be placed in locations so that they cannot be easily interfered with by anyone.
- All windows have frosted glass if urinals or the inside of a cubicle can be seen from them.
- Toilets are warm enough to be comfortable in winter.
- Cubicles have walls and doors that cannot be peered over or under wherever possible. There shouldn't be gaps around hinges.
- Doors are fixed sturdily to the walls or partitions, so that a door cannot be lifted off its hinges. Door closures are robust and close gently against the frame to avoid trapped fingers.
- Cubicles are robust enough to withstand normal wear and tear.
- If possible, an Integrated Plumbing System, where panels conceal cisterns and pipes, should be used. Access panels should be lockable and not able to be opened by pupils.
- Urinals are individually screened.
- Urinals are positioned so they can't be seen from outside the toilets when the door is open.
- Mirrors are positioned so they don't enable people to see urinals or cubicles from the outer door.

¹⁵ www.wales.gov.uk/docs/dcells/publications/100426summarydocen.pdf

¹⁶ <http://www.teachernet.gov.uk/>

- Malodours are prevented within toilet areas. This can be addressed through adequate cleaning to match volume of use, good ventilation, air fresheners/odour eliminators and automatic flushing toilets. Mechanical ventilation may also be a requirement as an open window is not always adequate or practical.
- If windows need to be opened for ventilation, they are not placed in view of urinals or the inside of a cubicle.

6. Toilet Facilities

The number of toilet facilities provided must be adequate having regard to the ages, gender and numbers of the pupils and any relevant special requirements they may have. They should never be fewer than as set out in The Education (School Premises) Regulations 1999.

Failure to provide suitable toilets for disabled pupils discriminates against a group that is being encouraged to participate in mainstream education and is contrary to the requirements of the Education (School Premises) Regulations 1999. The requirements of pupils with other special needs should also be considered e.g. those with continence problems may require private and appropriate disposal facilities for incontinence products and some pupils with learning difficulties may find it hard to locate toilets that are far from classrooms.



The location of toilets is also important as pupils might have to travel some distance within the school to get to the toilet. This can make teachers reluctant to let pupils out of class to visit the toilet. Toilets located away from classrooms present particular difficulties for pupils with special needs. Toilets attached to each classroom or cluster of classrooms are a particularly good solution. These allow pupils easier access to toilets during lessons and enable teachers to keep a closer eye on pupils.

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: 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 also require toilet areas for male and female pupils over the age of 8 to be separate. Girls' toilets should not have urinals. Staff toilets, other than those designed for disabled access, must be separate from pupils' toilets. Providing the basic number of sanitary fittings will not, of itself, mean that all the relevant standards have been met. The Regulations require washroom facilities (water closets, urinals, washbasins and sinks) to be adequate having regard to the ages, gender and number of pupils and any relevant special requirement they may have.

Best practice:

- There are enough toilet cubicles for girls and boys to prevent significant queues during periods of peak use. The number of cubicles for boys at least equals the number of urinals.
- Toilets are of sound construction so as to cope with a high volume of users.
- Sanitary fittings and fixtures are of good quality and of robust design. Maintenance and replacement costs need to be considered.
- Toilets and fittings are the right size and height for the pupils expected to use them. (size and height of toilets, basins, toilet tissue dispensers etc).
- The toilet flush mechanism is working and easy to use, even for very small children. (Toilets which have a 'light flush' and a 'full flush' may be considered, or toilets which have an automatic flush).
- All toilets have seats. (Ones with an opening at the front of the seat may be most hygienic).
- All toilets have lids. (It is good practice for the lid to be closed when the pupil flushes the toilet in order to minimise the spread of water droplets when flushing).
- All urinals flush automatically and have suitable means of drainage.
- Toilet paper is provided in all toilet cubicles, at the start of a school day, and a process of re-supply in place at a reasonable mid-point of the school day, unless re-supply is required through loss informed by a pupil or member of staff.
- Soft toilet paper is provided (this is preferable to hard, non-absorbent paper. Hard paper is unpopular with users and is a contributing factor to toilet avoidance).

- Toilet paper dispensers are sturdy. If they are bolted back to back between cubicles, it is harder to vandalise them.
- Toilet paper dispensers are big enough to hold commercial size rolls. A lockable cupboard for spares should be sited close by.

Disabled Toilets:

- Disabled pupils have fully accessible toilets, which can be accessed quickly and easily from wherever they are in the school. This is not restricted to special schools, as there are disabled pupils in mainstream schools. (Access to disabled toilets can be with an electronic key, to prevent other pupils using the toilets).
- BS8300 and Part M of the Building Regulations refer to disabled toilets, and require any toilet room with more than 4 cubicles to have an accessible cubicle.
- There are no steps or other obstacles that would cause difficulties for a wheelchair user or person with limited mobility. Provision should also be made for users with hearing, sight or other sensory impairment.
- Cubicles are big enough to manoeuvre a wheelchair.
- They have handrails fitted at appropriate heights.
- They are able to accommodate a hoist and a member of staff (as some users will need assistance).
- Taps and soap dispensers are suitable for users with poor grip, co-ordination problems and/or limited mobility.

7. Washbasins, Water and Hand Hygiene

Germs are found just about everywhere. They are transferred to our hands when we touch other people, animals, body fluids, contaminated surfaces and raw food, and when we cough and sneeze. They can then be passed into our bodies (e.g. when we eat without washing our hands first), to other people, food and other surfaces that we touch. Thorough hand washing using soap and running water is the single most effective way of stopping germs from getting into our bodies and causing infection¹⁷. Studies show that good hand washing after using the toilet reduces the spread of gastrointestinal infections¹⁸.

Thorough washing with liquid soap and running water removes most germs from our hands¹⁹. It is best to use liquid soap and disposable paper towels because sharing bars of soap and towels can spread germs from one person to another. Using an antibacterial liquid soap can give better protection. Nailbrushes are not recommended. Disposable paper towels are the best option for drying hands because damp towels can harbour germs²⁰. Roller towels are not recommended but, if used, should be part of daily inspection/monitoring and should be changed if visibly dirty, wet, have been pulled off the wall, are hanging down or have come to the end of the roll. Hands that have been washed can be re-contaminated by not being dried or by incorrect drying (such as dirty roller towels or failing to thoroughly dry hands under warm air dryers).

Toilets are an inappropriate, unappealing and unhygienic location for drinking facilities and will discourage pupils from drinking. They should not be used as a site for providing drinking water.



“Given that E.coli O157 causes diarrhoea and can be spread person-to-person by faecal/oral contact, the importance of schools having in place adequate toilet and hand washing facilities and hygiene practices for pupils and staff is obvious.”

[The Public Inquiry into the September 2005 Outbreak of *E.coli* O157 in South Wales]

¹⁷ Horton R (1996) Handwashing: The fundamental infection control principle. *British Journal of Nursing* 4(16):926-933.

¹⁸ Worsley MA, Ward KA, Privett S, Parker L and Roberts JM (eds) (1994) *InfectionControl: A Community Perspective*. England: Infection Control Nurses Association.

¹⁹ Gould D (1994) Making sense of hand hygiene. *Nursing Times* 90(30):63-64.

²⁰ Gould D (1996) Hand hygiene to prevent infection in the community. *Health Visitor* 69(8):325-329.

Best practice:

- Washbasins are adjacent to all toilets and urinals.
- All washbasins are in working order.
- Every sink has hot and cold running water. A mixer tap is preferable. Water must be warm but not so hot that it could scald (a safe maximum temperature (42°C) should be set*).
- If push taps are used, they stay on long enough for pupils to wash their hands properly.
- Taps in washrooms are labelled as non-drinking water. Drinking water supplies of any sort are not located in toilet areas. Schools should ensure that a supply of wholesome drinking water is available, free of charge, located elsewhere within the school – with communication provided to clearly identify its location.
- A minimum of one wall mounted liquid soap dispenser is provided between two washbasins.
- Soap dispensers are replenished on a day-to-day basis and cleaned between refills (not simply topped up). Cartridge, liquid, disposable dispensers are most appropriate. Dispensers should be non-drip.
- Hand-drying provision enables large numbers of users to dry their hands in a limited time frame. Paper towels are generally recommended from a hygiene point of view but must be replenished throughout the day.
- Supervision of hand washing and toileting for young children and those with special needs is provided (Teach Germs a Lesson).
- Washroom/toilet areas have lidded waste bins for used hand-towels.
- Guidance is displayed in all toilet areas for pupils and staff on when and how to wash their hands.
- Washrooms are provided with shatterproof mirrors, at an appropriate height for users.

*Governing Bodies and Head Teachers should be mindful of legionella when planning, procuring or managing hot/cold water systems.

8. How Should We Wash Our Hands?



1. Wet your hands under warm running water.



2. Apply a small amount of soap.



3. Rub your palms together – away from the water.



4. Scrub your fingers and thumbs and the spaces between them.



5. Scrub your nails on your palms.



6. Remember to wash the backs of your hands.



7. Rinse your hands with clean running water.



8. Dry your hands, preferably using disposable paper towels.



9. Female Sanitary Products and Disposal

Many girls start menstruating while at primary school. Some may be shy or embarrassed about being among the first to start their periods and need help to manage their periods comfortably and in sanitary conditions. They need to feel comfortable about obtaining and disposing of sanitary products without drawing attention to themselves. Lack of disposal facilities creates embarrassment and encourages unsanitary practice.

Best practice:

- Sanitary machines are placed in all age appropriate girls' toilets (aged 8 or over) where sanitary towels/tampons can be obtained unobtrusively without having to ask an adult.
 - Secondary schools: each set of toilets (with two or more toilet cubicles) for girls has a sanitary dispenser.
 - Primary schools: a minimum of one set of toilets for girls aged 8 and over has a sanitary dispenser.
- All girls are regularly informed (including at the beginning of every school year) that sanitary products are available to obtain in a discreet manner (and from named females) in an emergency at all times.
- Disposal bags or toilet paper are available in cubicles for girls to wrap used sanitary products in.
- Sanitary disposal units are available in all age-appropriate female toilets within individual cubicles. Ordinary bins are not sufficient.
- Sanitary disposal units are emptied sufficiently often, by a registered company to prevent them from becoming over-full or malodorous.

10. Toilet Hygiene

Although toilet bowls are highly likely to be contaminated with germs, the risk of transmission is usually low²¹. However, transmission may occur through direct contact with the contaminated surface, e.g. by touching the toilet, splashing or during flushing. Therefore, toilets should be checked regularly throughout the day, and cleaned and disinfected as necessary. The frequency of cleaning and maintenance procedures will depend on how many children use the facilities and whether they have good toilet habits. When cleaning is only done once daily, it is much more likely that the toilets will become unsanitary and will be avoided by some children. Good practice guidance on the cleaning of school toilets together with toilet cleaning check lists are available on the [BOG Standard website](#)²².



Best practice:

- All toilet equipment, including cubicle seats, is thoroughly cleaned at the end of each day, and similarly during a non-break time during the day – with consideration given to pupils who require these facilities at this time.
- Washbasins are clean at the start of every day, with a process in place to inspect and maintain this standard during the school day.
- Fixtures and fittings are cleaned at the start of each day and reasonably maintained during the school day.
- Frequent hand contact sites, such as toilet flush handles, taps, doorknobs and waste bins are cleaned and disinfected regularly.
- The general washroom/toilet environment is cleaned at the end of each day with materials that expel and adequately deter germs.
- Disposable cleaning cloths are used whenever possible. If reusable cloths are used, they must be decontaminated after each use and at least once a day. (Cloths and other cleaning utensils can be decontaminated by hot machine-washing (at least 60°C).
- Mops used to clean heavily contaminated areas, e.g. spills of vomit or faeces, are cleaned in a designated sink, rinsed with a disinfectant, wrung as dry as possible and then dried quickly, preferably at high temperatures and then stored with the mop head facing upwards.

²¹ IFH (1998) *Guidelines for prevention of infection and cross infection in the domestic environment*. Intramed Communications s.r.l., Italy. Available at: www.ifh-homehygiene.org/.

²² http://www.bog-standard.org/adults_resources.aspx

- Mops are never cleaned in a sink that is used for food preparation. (Disposable or detachable mop heads that you can hot machine-wash are ideal.)
- Cloths, mops etc. used to clean the toilet area are not used in other areas of the school.
- Cleaning equipment used in toilets is colour-coded to help prevent its accidental use in other school areas.
- A system is in place to monitor the cleanliness of washroom/toilet equipment and its environment.

11. Management and Maintenance

Pupils' toilets project an image of a school - good or bad - and have an effect on pupil morale, behaviour and potentially health. The state of the school toilets can often be of great concern to pupils and visiting parents. Well maintained hygienic toilets provide a visible indication to children and parents that the school values and respects the health, safety and well-being of its pupils. It is important for schools to keep on top of hygiene and maintenance. Once a toilet becomes run down it is much more difficult to clean. If it's in a bad state, it is also not much of a deterrent to vandalism.

Funding is provided to schools through their delegated budget to enable day to day maintenance repairs to be undertaken. It is a matter for individual schools in conjunction with their respective LAs to determine whether school toilets can no longer be repaired safely, or that they do not meet the School Premises Regulations and replacement, upgrade or improvement is the only option. Local Authorities are responsible for investment in school premises and decisions on investment rest solely with them, taking into account the needs and circumstances of their schools. Toilet refurbishment can either be part of an overall investment programme or should form part of a LA's planned maintenance programme prepared in conjunction with their schools.

Best practice:

- The school has a budget allocation for toilet repairs, maintenance and cleaning.
- The school has a process in respect of staff and pupils reporting faults, hazards or resource loss, which is suitably communicated.
- All complaints are taken seriously and dealt with promptly.
- Designated persons, or in some cases a prescribed and controlled rota of persons, are in place to manage the various aspects of washroom/toilet supervision and control.
- Daily, monthly and annual toilet management checklists²³ are used. (Use the data for audit purposes and the enhancement of existing processes and provision).
- Out-of-order toilet equipment is reconditioned within a 24-hour period.
- Inspection regimes are recorded, with the data used for audit purposes and the enhancement of existing processes and provision.
- Records of LA inspection/maintenance or repair of washroom/toilet areas are made and retained with school inspection/maintenance and repair data.
- The provision and maintenance of washroom/toilet facilities is reported and discussed at Governors' meetings.

²³ http://www.bog-standard.org/adults_resources.aspx

- A brief statement is included 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 accessibility, safety and cleanliness.
- The issue of toilet standards and management is included on other relevant school meeting agendas e.g. staff, school council and the PTA. (Include the issue in newsletters and governor reports).
- Similarly, other school meetings featuring staff should include the provision and maintenance of washroom/toilet facilities.

12. Annexes

ANNEX A

Please note

The following example policy has been developed for English schools but could be taken by Welsh Governing Bodies/Head Teachers as a basis for their own policy; however certain provisions within Wales differ from those in England. Specifically, the reference to 'soap' should be substituted by 'liquid soap'. Paper towels are considered preferable for hand-drying. In respect of the reference to PSHCE, the Welsh equivalent is the PSE and the SEAL programme, whilst available on the Welsh Assembly Government website is not universally delivered in Wales. Any such policy could be used as evidence towards meeting the Hygiene indicators for the Welsh Network of Healthy School Schemes National Quality Award.

Sample School Toilet Policy

School name:

Date of policy implementation:

Date of next review:

The named persons for drawing up and leading the review of this policy are:

.....

This document is freely available to the entire school community. It has been approved by the school governors and pupils, and made available in the school newsletter, website and prospectus.

Aims:

- To maximise access to pupils' toilet facilities during the day to promote the health, well-being and learning opportunities of all pupils.
- To provide good quality toilet facilities throughout the school.

Rationale: Why we are writing this policy?

- The school recognises that well-maintained toilet facilities where pupils feel comfortable and safe and have open access to throughout the school day, are essential for health, well-being, and learning.



- We value and respect our pupils and want them to be able to benefit from good provision and practice.

Objectives: What do we want to achieve?

- To ensure that this policy is both accepted and upheld by the whole school community - school management, staff, pupils, governors, parents, site manager, cleaning and ancillary staff.
- To keep all toilets open and available to pupils throughout the school day. While pupils can use toilet facilities at break and lunchtimes if they need to, we ensure pupils have access at all times. We recognise that toilet needs are highly individual and do not conform to regimental timetables. At secondary level, to cut down on the need for pupils to leave lessons, we will provide regular and frequent enough toilet breaks (every 45 – 60 minutes). We recognize that some pupils only feel comfortable going to the toilet when others are not around and will allow children to quietly sign in and out of class to use the toilet without adverse comment.
- To ensure that the toilet and washroom facilities are suitable for the range of anticipated users, including pupils with disabilities and special needs, with adequate lighting, fixtures and fittings.
- To ensure the toilet and washroom facilities cater for the needs of all pupils from ethnic and religious communities, and ensure these needs are met in a sensitive, informed and appropriate manner.
- To ensure that the toilet facilities provide visual and aural privacy for users, ensuring a spare supply of cubicle door locks.
- To ensure that all toilet areas have properly maintained supplies at all times of warm and cold water, soap, hand drying facilities and toilet tissue in dispensers, provided at a convenient height.
- To ensure sanitary disposal units in all female cubicles (for girls aged eight and over) are serviced on a regular basis and to provide sanitary dispensers in female toilet blocks (where applicable).
- To implement and maintain an effective toilet cleaning, supervision and inspection regime to ensure proper standards of provision and cleanliness, throughout the school day.
- To locate drinking water supplies and outlets in safe and appropriate locations, and not in toilet areas.
- To supervise the toilets at break and lunchtimes, if pupils perceive the need. If pupils assume this role, we will train and supervise them to ensure they carry out their duties correctly and do not restrict fellow pupils from using the toilets as and when they need to.
- To actively seek the views of the whole school community in relation to any concerns about toilet provision and access issues (ensuring a child friendly

procedure for pupils to report deficiencies or problems) and to respond seriously to these and deal promptly with any problems highlighted by the pupils.

- To actively consult and involve the pupils in managing the toilets (via the School Council or establish a working group).
- To encourage pupils to respect the toilets and each other (via the School Council, in PSHCE lessons, in form-teacher discussion times, in the Social, Emotional Aspects of Learning (SEAL) programme) and for pupils to establish a Pupil Code of Conduct in toilets and washrooms.
- To regularly include toilet management issues in all appropriate School Council, staff, parent and governor meetings.
- To provide indoor social areas to discourage toilets from being used for such purposes.
- To implement and maintain annual reviews of the policy to monitor that it is being adhered to and remains relevant.

Notes:

- This policy document was produced in consultation with pupils, parents, school staff, governors and the school nurse.
- The school actively supports the provision of open access to well-maintained, clean, private and safe toilet facilities throughout the school day.

ANNEX B

Education and Resources for Improving Childhood Continence - BOG Standard Campaign - good toileting:

Good toileting practice - for children with continence problems:

1. This group of children should be encouraged to make full use of breaks to visit the toilet.
2. They will need the opportunity to make scheduled (perhaps hourly) visits to the toilet.
3. It is important for many of these children to sit down on the toilet and spend several minutes trying to make sure the bladder and bowels are completely empty.
4. They should have the opportunity to visit the toilet in privacy.
5. Many of these children will have a very short warning of the need to go and may need to go frequently, even if they have just been. They should be allowed to leave the class to visit the toilet immediately, without fuss, and without having to wait for permission. Avoid causing embarrassment or making the child 'hang on'.
6. Consider where the pupils sit in class in relation to the door and when regrouping pupils for different activities.
7. In order to develop their bladder capacity and to help avoid constipation and soiling problems, it is important they drink water regularly throughout the school day.

Good toileting practice - for children without continence problems:

1. Most children should be encouraged to only go to the toilet when they feel the need to go.
2. Should not be taught to go 'just in case'.
3. Should not be subject to prolonged delays before going.
4. Should be able to go to the toilet without adverse comment or restriction.
5. Should have open access to toilets when the need arises.
6. Should have the opportunity to visit the toilet in privacy.
7. Should be encouraged to drink water regularly throughout the school day.

13. Acknowledgements

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