

Three Counties Academy Trust



**Toilet, Washroom and Medical Facilities
Policy
#ST7**

Last amended 27th February 2026 (v1.1)

Subject to annual amendment. To be reviewed in full no later than 26th February 2027

Version history

Date	Version	Details	Actioned by	PDF to Websites	Word to Governor Hub
27.02.26	1.1	Formatted to house style and checked against model for updates	MF	✓	✓

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Common abbreviations and acronyms

AA	Admissions Authority	GPA	Government Procurement Arrangement
AAI	Adrenaline Auto-Injector (Epi Pen)	HASH	Herefordshire Association of Secondary Heads
ACM	Asbestos Containing Materials	HBV	Honour Based Violence
AFH	Academies Financial Handbook	HR	Human Resources
AHT	Assistant Headteacher	H&S	Health and Safety
AIR	Attendance Intervention Reviews	HoS	Head of School
APIs	Application Programme Interfaces	HSE	Health and Safety Executive
BAME	Black, Asian and Minority Ethnic Backgrounds	ICO	Information Commissioners Office
BCP	Business Continuity Plan	IHP	Individual Healthcare Plan
BFR	Budget Forecast Return	IRMS	Information and Records Management Society
CAMHS	Child and Adolescent Mental Health Services	IWF	Internet Watch Foundation
CEO	Chief Executive Officer	KCSIE	Keeping Children Safe in Education
CFO	Chief Financial Officer	KS1/2/3/4	Key Stage 1/2/3/4
CIF	Condition Improvement Fund	LAC	Looked After Child
CIN	Child in Need	LADO	Local Authority Designated Officer
CLA	Children Looked After	LGB	Local Governing Body
CMIE	Child Missing in Education	LLC	Low-Level Concerns

COO	Chief Operating Officer	LSA	Learning Support Assistants
COSHH	Control and Substances Hazardous to Health	MASH	Multi-Agency Safeguarding Hub
CP	Child Protection	MAT	Multi-Academy Trust
CPD	Continuing Professional Development	MFA	Multi-Factor Authentication
CSCS	Children's Social Care Services	MFL	Modern Foreign Language
CSE	Child Sexual Exploitation	NCSC's	National Cyber Security Centres
CTIRU	Counter-Terrorism Internet Referral Unit	NPQEL	National Professional Qualification in Executive Leadership
CWD	Children with Disabilities	PA	Persistent Absence
DBS	Disclosure and Barring Service	PAN	Published Admission Number
DDSL	Deputy Designated Safeguarding Lead	PECR	Privacy and Electronic Communications Regulations
DfE	Department for Education	PEP	Personal Education Plan
DHT	Deputy Headteacher	PEEP	Personal Emergency Evacuation Plan
DSE	Display Screen Equipment	PEx	Permanent Exclusion
DSL	Designated Safeguarding Lead	PLAC	Previously Looked After Child
DPO	Data Protection Officer	PP	Pupil Premium
EAL	English as an Additional Language	PSHE	Personal, Social and Health Education
ECT	Early Career Teacher	PSED	Public Sector Equality Duty

EHA	Early Help Assessment	PTFA	Parent, Teacher and Friends Association
EHCNA	Education, Health and Care Needs Assessment	RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
EHCP	Education, Health and Care Plan	RHE	Relationships and Health Education
EHE	Elective Home Education	RSHE	Relationships, Sex and Health Education
ELSA	Emotional, Literacy and Support Assistant	SALT	Speech and Language Therapist
ESFA	Education and Skills Funding Agency	SARC	Sexual Assault Referral Centre
EVC	Educational Visit Coordinator	SBM	School Business Manager
EWO	Education Welfare and Safeguarding Support Officer	SCCs	Standard Contractual Clauses
EYFS	Early Years Foundation Stage	SDQ	Strengths and Difficulties Questionnaire
FBV	Fundamental British Values	SEMH	Social, Emotional, and Mental Health
FGM	Female Genital Mutilation	SENCO	Special Educational Needs Coordinator
FOI	Freedom of Information	SEND	Special Educational Needs and Disabilities
FSM	Free School Meals	SLA's	Service Level Agreements
FTS	Find a Tender Service	STEM	Science, Technology, Engineering and Maths
GAG	General Annual Grant	TA	Teaching Assistant
GDPR	General Data Protection Regulation	TCAT	Three Counties Academy Trust
GIAS	Get Information about Schools	VSH	Virtual School Headteacher

Statement of intent

Three Counties Academy Trust (TCAT) has a duty to provide appropriate toilet, washing, changing and medical facilities for pupils and ensure they are maintained and kept safe for use at all times. It is essential that all facilities are maintained to a standard that, so far as is reasonably practicable, ensures the health, safety and welfare of all pupils.

The policy will enable each TCAT school to:

- Safeguard and protect the welfare of pupils and staff
- Ensure pupils and staff can maintain hygienic standards

Provide dignity, decency and privacy where required for pupils.

NB. Where the term “parent” or “parents” is used this includes those who act as carers or have parental responsibility.

1. Legal framework

This policy has due regard to all relevant legislation and statutory and non-statutory guidance including, but not limited to, the following:

- The School Premises (England) Regulations 2012
- Education Act 2002
- Health and Safety at Work etc. Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Equality Act 2010
- DfE 'First aid in schools, early years and further education'
- DfE 'Health and safety: responsibilities and duties for schools'
- ESFA 'Advice on standards for school premises'

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies:

- Behaviour Policy
- Health and Safety Policy (HS1)
- First Aid Policy (HS2)
- MAT Fire Safety Policy (HS11)
- Accessibility Policy (SD1)
- Accessibility Plans (SD2)
- Special Educational Needs and Disabilities (SEND) Policy (SD3)
- Intimate Care Policy (SD4)
- Child Protection and Safeguarding Policy and Procedures (SG1)
- Supporting Pupils with Medical Conditions Policy (SG4)
- Trust and School Security Policy (SG34)

- School Cleaning Policy (ST3)

Central TCAT policies have the policy number identified, e.g. "SG1". Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school's website.

2. Roles and responsibilities

The Trust Board is responsible for:

- The overall implementation of this policy
- Ensuring the proper maintenance and repair of each school's facilities
- Providing strategic oversight to ensure each school's facilities are accessible and suitable for pupils, staff and visitors with SEND
- Ensuring that each school complies with the relevant health and safety and premises management legislation

The Chief Finance Officer (CFO) is responsible for:

- Reviewing this policy in liaison with the Trust Estate Manager
- Coordinating and supervising maintenance and repair work, including securing any external contractors where necessary

Headteachers/Heads of School are responsible for:

- Ensuring the safety of their school's staff and pupils
- Reporting any issues with their premises to the Trust Estate Manager
- Ensuring that all facilities are accessible to, and meet the needs of, pupils with SEND

The Trust Estate Manager is responsible for:

- The day-to-day implementation and management of the stipulations outlined in this policy, in collaboration with the CFO and Headteachers/Heads of School
- Identifying and arranging any maintenance and repair work

- Checking each school's compliance with the relevant health and safety and premises management legislation and reporting any issues to the Trust Board
- Ensuring that hygiene is maintained at each school's facilities, including that the appropriate drainage is in place
- Managing the relevant staff members who are responsible for the management of the premises, e.g. cleaning staff and the site staff

DSLs are responsible for:

- Ensuring that there are appropriate safeguarding measures in place at all times when TCAT school facilities are in use

SENCOs are responsible for:

- Providing advice and guidance to their Headteacher/Head of School and Trust Estate Manager regarding the needs of pupils with SEND to ensure all planning of toilet and facilities takes their needs into account
- Ensuring that adequate support for pupils with SEND is provided to help them access all toilet and washing facilities

Staff are responsible for:

- Ensuring any facilities, e.g. changing rooms, are used appropriately and left in a good condition after they lead a session necessitating their use
- Ensuring pupils are aware of and adhere to their school's Behaviour Policy when using facilities
- Reporting any issues or damage identified in a facility to their Headteacher/Head of School

3. Toilet and washing facilities

The Trust Board, Chief Finance Officer and Executive Headteacher/CEO will ensure that each TCAT school meets its requirements for providing and maintaining toilet and washing facilities.

Suitable toilet and washing facilities will be provided for the sole use of pupils.

TCAT school's offer separate toilet facilities for male and female pupils. Each school will work with pupils to ensure that they can always access toilet facilities in a way that makes them feel comfortable, e.g. in relation to their gender identity.

Suitable toilet facilities will be provided for pupils who are disabled, in line with the 'Pupils with SEND' section of this policy. Although these facilities may be used by pupils and staff who are not disabled, pupils and staff will avoid using the disabled toilet provision wherever possible to ensure that accessible facilities are always available for disabled pupils.

There will be a ratio of at least one toilet per 20 pupils.

Toilet and washing facilities will be planned to ensure that:

- Hand washing facilities are provided within the vicinity of every toilet.
- Facilities are properly lit and ventilated.
- Facilities are located in areas that provide easy access for pupils and allow for supervision by members of staff without compromising the privacy of pupils.
- All individuals have adequate privacy when using the toilet facilities.

Each school will ensure that, wherever possible, individuals are never an unreasonable travel distance away from toilet and washing facilities and that there are adequate toilet facilities on each floor and in each area of the school.

In our secondary provision, shower facilities will be available for all pupils for use after PE or other forms of physical exercise. Shower areas will be separate from toilets to provide adequate privacy. Shower facilities will be separated on the basis of sex. Shower water mixer valves will be regulated by one control key inaccessible to pupils to reduce the risk of scalding. To avoid scalding, the temperature of hot water in showers will not exceed 43°C. The Trust Estate Manager or members of the site team will regularly inspect shower areas when not in use to identify defects, e.g. broken wall tiles, which will be replaced or repaired as soon as possible.

No more than one pupil will be permitted to use individual washing facilities at any one time. Each school will ensure that all pupils are able to access the washing facilities that correspond with their gender identity.

4. Medical facilities

The Trust Estate Manager will ensure that there are appropriate facilities in place to cater for the medical needs of pupils in each TCAT school, including:

- A room for medical examination and treatment
- Accommodation for the short-term care of sick and injured pupils, which includes a washing facility and is near to a toilet facility

Pupils with complex needs will be provided with additional medical accommodation which caters to their needs.

Arrangements to support pupils with medical conditions will be implemented in line with TCATs Supporting Pupils with Medical Conditions Policy.

5. Changing rooms

The Trust Estate Manager will ensure changing rooms are designed to provide dignity, decency and privacy when required for all pupils.

Suitable changing rooms will be provided for all pupils aged 11 and over who partake in PE.

Where PE is taken off site, the Headteacher/Head of School will ensure access to suitable changing rooms and showers is available.

Changing rooms provided off site will not be used at the same time as members of the public unless a thorough risk assessment has been conducted.

Changing rooms provided off site that are shared with pupils from another school will be risk assessed by the Headteacher/Head of School – where possible, this will be done in collaboration with the other relevant school or schools.

Changing rooms will be separated on the basis of sex; however, the school will ensure that there is access to unisex toilets and changing facilities available on-site that are accessible for all members of the school, should they wish to use them.

The Trust Estate Manager or a designated member of the site team will check the changing rooms on a monthly basis to ensure that all pupils have adequate space to change and store their belongings and will work with the Headteacher/Head of School to ensure that all hazards or risks to the health and safety of pupils are mitigated as far as possible.

6. Water supply and drainage

The Trust Estate Manager will ensure that the school's water supply meets the regulatory requirements by carrying out the necessary checks at appropriate intervals, so that:

- Each school has a clean supply of water for domestic purposes, including an adequate supply of drinking water
- Suitable drinking water facilities are provided that are readily accessible at all times and are in a separate area from the toilet facilities
- Cold water supplies that are not suitable for drinking are clearly labelled as such
- Toilet facilities have an adequate supply of cold water
- Washbasins, sinks and showers have an adequate supply of hot and cold water
- The temperature of hot water at the point of use does not pose a scalding risk

The Trust Estate Manager will carry out regular checks to ensure that there is adequate drainage for hygiene purposes and for the disposal of wastewater and surface water – external drainage specialists will be called in should problems arise.

7. Lighting

The lighting in all facilities provided will be suitable and have regard to the nature of activities which normally take place therein.

Lighting controls will be easy to use and accessible to pupils where appropriate.

Outdoor sports facilities will have floodlights if they are likely to be used out of school hours.

8. Pupils with SEND

Headteachers/Heads of School will work with the SENCO to ensure that the needs of pupils with SEND with regard to toilet, washing and medical facilities are taken into account in their Accessibility Plan, and that the facilities in their school adhere to this plan in practice.

Each school will take account of the principles outlined in TCATs Accessibility Policy when managing and maintaining the school's facilities. All staff will have due regard for TCATs Special Educational Needs and Disabilities (SEND) Policy at all times.

All pupils with SEND will have adequate access to disabled toilet and washing facilities where necessary.

Disabled toilets will have a toilet, washbasin and, where possible, a shower or wash-down fitting. Disabled toilets will have a door opening directly onto a circulation space that is not a staircase and can be secured from the inside.

Disabled shower facilities will be fitted with accessibility aids, including a rail and supports to aid pupils with standing.

Disabled toilet and shower facilities will be equipped with a cord which allows pupils using the facilities to call for help if they become ill or injured, or if they are unable to use the facilities without assistance.

Pupils with SEND who have additional support needs with regards to using the toilet, washing or changing will be supported in line with TCATs Intimate Care Policy and Special Educational Needs and Disabilities (SEND) Policy where required.

9. Cleaning

The Trust Estate Manager will be responsible for managing cleaning staff and will ensure that the school's facilities are maintained in a tidy, clean, and hygienic state by monitoring standards, including the implementation of a cleaning schedule.

TCATs School Cleaning Policy will be adhered to at all times.

10. Safeguarding

Each DSL will ensure adequate safeguarding measures are in place at all times when pupils are using their school facilities, in line with TCATs Child Protection and Safeguarding Policy and Procedures.

Staff will always change or shower privately and never in the same space as pupils.

Adequate and sensitive arrangements will be made to take into account the needs of pupils who share certain protected characteristics, including pupils with SEND and pupils whose religions, beliefs, cultural backgrounds, or gender identities pose potential risks to them being able to use toilet or washing facilities in a way that is safe, appropriate for their circumstances and does not cause them any preventable emotional distress.

Supervision of facilities, e.g. changing rooms, to ensure the safety of pupils will be balanced against the need for privacy. When a staff member needs to enter facilities where a level of privacy is expected, e.g. changing rooms, with pupils present, the staff member will give prior warning of their presence.

Where possible, male staff will supervise male pupils and female staff will supervise female pupils.

Pupils will be made aware of the behaviour expected of them when unsupervised.

Any concerns expressed by a pupil about the behaviour of a member of staff in a facility will be listened to and appropriate enquiries conducted by the Headteacher/Head of School and their DSL.

Monitoring and review

This policy will be reviewed in line with the published schedule at the front of this document and at any point material changes require it by the Executive Headteacher/CEO in collaboration with the Board appointed Trustee, the Trust Board and Executive and Senior Leadership.

Any changes made to the policy will be amended by the Executive Headteacher/CEO and will be communicated to Executive Leaders, the TCAT Central Team and to Headteachers/Heads of School, who, in turn, will alert school-based staff.

The next scheduled review date for this policy is 26th February 2027.

Signed by:

_____	Executive Headteacher/CEO	Date: _____
_____	Board appointed Trustee	Date: _____

Appendix A: Toilet, Washing and Changing Facilities Risk Assessment Template

Important note: *This risk assessment identifies typical examples and controls to illustrate how schools may manage certain risks. These can be used as a guide to think about hazards in your school and the steps needed to manage those risks. In order to be compliant with the law and protect your community, you must consider the specific hazards and controls your school needs and **must not** use this template without assessing your school's risks.*

Name of school

Assessment conducted by:	Job title:	Covered by this assessment:
Date of assessment:	Review interval:	Date of next review:

Risk rating		Likelihood of occurrence		
		Probable	Possible	Remote
Likely impact	Major: Causes major physical injury, harm or ill health.	High (H)	H	Medium (M)
	Severe: Causes physical injury or illness requiring first aid.	H	M	Low (L)
	Minor: Causes physical or emotional discomfort.	M	L	L

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
Insufficient awareness of school procedures	Staff, pupils and visitors	M	<ul style="list-style-type: none"> All staff and relevant stakeholders are aware of all relevant policies and procedures including, but not limited to, the following: <ul style="list-style-type: none"> Child Protection and Safeguarding Policy and Procedures Health and Safety Policy Visitor Policy First Aid Policy Accessibility Plan Special Educational Needs and Disabilities (SEND) Policy Intimate Care Policy School Cleaning Policy Cleaning Risk Assessment The Headteacher/Head of School ensures that all relevant policies undergo any necessary reviews. The Headteacher/Head of School conducts regular reviews of this risk assessment. 	<p>[Outline what additional steps are required in line with an assessment of your school's specific circumstances to eliminate the hazard or control the risk.]</p>	<u>Trust Estate Manager</u>	<u>Signature</u> <u>Date</u>
Insufficient toilet and washing facilities	Staff, pupils and visitors		<ul style="list-style-type: none"> There is an adequate number of suitable toilet and washing facilities provided for the sole use of pupils. [Where both single-sex and unisex toilet facilities are provided] A mixture 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<p>of single-sex toilet facilities for male and female pupils and unisex toilet facilities are provided.</p> <ul style="list-style-type: none"> • Unisex facilities contain individual cubicles that can be secured from the inside. • [Where only single-sex toilet facilities are provided] There are separate toilet facilities for male and female pupils. • [Where only unisex toilet facilities are provided] There are unisex toilet facilities that are suitable for use by all pupils. • There is a ratio of at least <u>one</u> toilet per <u>20</u> pupils. • Toilet and washing facilities are planned to ensure that: <ul style="list-style-type: none"> - Hand washing facilities are provided within the vicinity of every toilet. - Facilities are properly lit and ventilated. - Facilities are located in areas that provide easy access for pupils. - All individuals have adequate privacy when using the toilet facilities. 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> • There are adequate toilet facilities on each floor. • [Secondary schools] Shower facilities are available for all pupils. • [Secondary schools] Shower water mixer valves are regulated. • To avoid scalding, the temperature of hot water in showers and taps will not exceed <u>43°C</u>. • The Trust Estate Manager regularly inspects shower areas when not in use to identify defects, which are replaced or repaired. • One pupil is permitted to use individual washing and toilet facilities at any one time. • All pupils can access washing and toilet facilities that correspond with their gender identity. 			
Poor water supply and drainage	Staff and pupils		<ul style="list-style-type: none"> • The Trust Estate Manager ensures that the school's water supply meets the regulatory requirements. • The school has a clean supply of water for domestic purposes. 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> • Suitable drinking water facilities are provided and accessible at all times. • Cold water supplies that are not suitable for drinking are clearly labelled. • Toilet facilities have an adequate supply of cold water. • Washbasins, sinks and showers have an adequate supply of hot and cold water. • The temperature of hot water at the point of use does not pose a scalding risk. • The Trust Estate Manager carries out regular checks to ensure that there is adequate drainage. 			
Risk to pupils with SEND	Pupils		<ul style="list-style-type: none"> • The Headteacher/Head of School works with the SENCO to ensure that the needs of pupils with SEND with regard to toilet, washing and changing facilities are taken into account in the school's Accessibility Plan. • The school takes account of the principles outlined in the Accessibility Policy when maintaining toilet, washing and changing facilities. • All pupils with SEND have access to disabled toilet and washing facilities if needed. 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> Disabled toilets have a toilet, washbasin and, where possible, a shower or wash-down fitting. Disabled toilets open directly onto a circulation space and can be secured from the inside. Disabled shower facilities are fitted with accessibility aids. Disabled toilet and shower facilities are equipped with a cord which allows pupils to call for help. Pupils with SEND are supported to use toilet, washing and changing facilities in line with the school's Intimate Care Policy and Special Educational Needs and Disabilities (SEND) Policy. 			
Inadequate cleaning	Staff, pupils and visitors		<ul style="list-style-type: none"> The Trust Estate Manager is responsible for managing cleaning staff and ensuring that the school's facilities are maintained appropriately. The School Cleaning Policy and Cleaning Risk Assessment are adhered to at all times. 			
Poor safeguarding	Pupils		<ul style="list-style-type: none"> The DSL ensures adequate safeguarding measures are in place at all times, in line with the school's Child Protection and Safeguarding Policy and Procedures. 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> • Staff always change or shower privately in separate facilities to pupils. • Adequate arrangements are made for pupils who share certain protected characteristics, including pupils with SEND and pupils whose religions, beliefs, cultural backgrounds or gender identities, which pose potential risks to them being able to safely use toilet or washing facilities. • When a staff member needs to enter the facilities, a suitable and safe level of privacy is expected. • Where possible, male staff supervise male pupils and female staff supervise female pupils. • Pupils are made aware of the behaviour expected of them when unsupervised. • Any concerns expressed by a pupil about the behaviour of a member of staff is listened to and appropriate enquiries conducted by the Headteacher/Head of School and the DSL. 			
Inadequate changing rooms	Pupils		<ul style="list-style-type: none"> • The Headteacher/Head of School ensures changing rooms are designed to provide a suitable and safe level of privacy for all pupils. 			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> • Suitable changing rooms are provided for all pupils aged 11 and over who partake in PE. • Where PE is taken off site, the Headteacher/Head of School ensures access to suitable changing rooms and showers is available for all pupils. • Changing rooms provided off site are not used at the same time as members of the public unless a thorough risk assessment has been conducted. • Changing rooms are separated on the basis of sex; however, the school ensures that there are unisex toilets and changing facilities available on-site. • The Trust Estate Manager checks the changing rooms on a monthly basis. 			