

P-06-1545 Stop forcing school children to undress in front of staff peers in open communal rooms - Correspondence from the Petitioner to the Committee, 21 January 2025

Dear Members of the Petitions Committee,

Thank you for the opportunity to comment on the attached document ahead of the Committee's consideration of my petition on 26 January 2026.

I welcome the continued engagement with this petition. However, having reviewed the attached document, I do not believe it adequately addresses the core issues raised.

1. Overall view of the attached document

The document largely reiterates existing legislation and statutory guidance relating to safeguarding, well-being, and school premises. While it affirms that safeguarding and learner well-being are priorities, it does not introduce clear, enforceable requirements to ensure children can change with privacy and dignity.

The central concern of my petition remains unresolved: children in Wales can still be required, in practice, to undress in open communal spaces for compulsory education activities, with no guaranteed private alternative.

2. The document does not address the issues raised for the following reasons:

- No guaranteed right to privacy
The document does not require schools to provide a private changing option for pupils who request it. As a result, children's access to privacy remains discretionary rather than a protected right, undermining Article 16 UNCRC (right to privacy) and related protections under Articles 12, 19 and 23.
- Lack of enforceable standards
References to "appropriate", "sensitive" or "adequate" arrangements remain undefined. There are no minimum standards, ratios, or expectations for private changing facilities, nor any mechanism to ensure consistency across local authorities.
- Safeguarding risks remain unmitigated
The document does not directly address well-established risks associated with communal changing, including peer-on-peer abuse, bullying, body-shaming, harmful sexual behaviour, or the misuse of phones and cameras in changing areas.
- Disabled toilets continue to be treated as a substitute
There is no explicit prohibition on using disabled toilets as the primary private changing option, which creates access issues for disabled pupils and amounts to an inadequate and discriminatory workaround.

- No protection from punitive consequences
The document does not prevent pupils from being penalised or excluded from participation where they decline to change publicly due to privacy, religious, cultural, disability, or mental-health reasons.
 - Inclusion and privacy are not properly reconciled
While inclusion is emphasised, the document does not set out a clear policy framework that guarantees choice — allowing any pupil (including trans or gender-questioning pupils) to access private changing without creating safeguarding gaps or forcing others into shared undressing.
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3. Further questions for the Committee to consider

I respectfully ask the Committee to seek clarity from the Welsh Government on the following:

1. Will the Government commit to amending statutory guidance or regulations to require (not merely recommend) private changing options in secondary schools?
 2. What inspection or enforcement mechanism will ensure that children's privacy in changing areas is assessed and acted upon (for example, through Estyn)?
 3. Will clear national rules be issued on technology use in changing areas, including explicit device bans and supervision expectations?
 4. Will the Government prohibit the use of disabled toilets as the default private changing solution?
 5. Will schools be required to ensure that no pupil is punished or disadvantaged for declining to change in communal spaces?
 6. Will anonymised national data be collected on incidents, complaints, or safeguarding referrals linked to changing facilities?
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4. Additional points for the Committee's attention

- This petition has highlighted cross-generational, lived harm: adults reporting trauma from school experiences and children currently opting out of PE due to lack of privacy. This demonstrates the urgency of structural change, not reliance on discretionary practice.
- The issue is not opposition to inclusion. The petition calls for guaranteed choice, dignity, and safety for all pupils — aims that are compatible with inclusive education when properly implemented.
- Practical, low-cost mitigations (staggered changing, screens, cubicles, clear device policies) can be implemented immediately without waiting for major capital investment.

5. Conclusion

The attached document reassures the Committee that safeguarding and well-being are priorities, but it does not close the policy gap that allows children's privacy to be compromised in practice. Without explicit national direction and enforceable standards, pupils remain reliant on goodwill rather than guaranteed rights and are currently at immediate risk daily.

I therefore ask the Committee to continue to press the Welsh Government to bring forward concrete proposals to embed privacy, dignity, and safeguarding into school changing arrangements.

Thank you for your continued consideration of this petition.

Kind regards,
Louise Phillips
Petitioner, P-06-1545