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#### Introductory comments from Peter Clarke, Children's Commissioner for Wales

I visited many schools throughout Wales during my first year in office and spoke with and listened to lots of children and young people. During these visits, there were a number of recurring issues which children said were not being addressed despite their having informed relevant adults. One of these issues was the state of the school toilets. The importance of these facilities was voiced consistently.

## Listening to Children and Young People

Having listened to the views of children and young people I decided that my Office should have a closer look at the current situation. We did this by looking at legislation, relevant guidance and various research studies. I also received direct correspondence from individuals and organisations.

Clearly whilst listening to adults is important, I felt it was even more important to hear directly from children and young people about their experiences. In acknowledgement of the fact that it is often the complaints, rather than the statements of satisfaction, that will be drawn to my attention, I decided that we needed to gather wider evidence.

My team gathered quantitative and qualitative information from children and young people throughout Wales, and had useful discussions with staff, governors, policy makers and campaigners in the field. Our Backchat email group of children and young people were also involved.

It has been disappointing that many adult professionals have expressed the view that this is a relatively low priority matter. I take issue with this view, and hope this report will make it clear that this issue is an extremely important one and one which impacts daily on the physical and psychological well-being of children and young people. More than that, 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.

#### Respect, Value and Expectations

Teachers, governors and other adults often speak of the lack of respect some children and young people show for their environment. I question what level of respect is being conveyed to children and young people when they are expected to carry out private and intimate functions in the appalling environment many of them told us about.

This report aims to draw together the thoughts, feelings and experiences of many children and young people in schools in Wales today. It aims to set out simply and concisely the current policy context. It also examines the implications of research findings and those of other studies. It aims to present an informed overview of the current situation and make practical recommendations on priorities for action.

One of the most important findings is that the state of the nation's toilets is not all bad. The very fact that some are adequate – or even fantastic – proves the point that there is really no excuse for the nasty school loos I so regularly hear about. It's just a question of taking responsibility, making it a priority and involving children and young people.

Peter Clarke Children's Commissioner for Wales 2004

## Part 1 Setting the Scene: the current context

## School Toilets: Who is responsible?

There are a number of laws which relate to the responsibilities of those who manage all aspects of school premises. These laws have been created to ensure the health and safety of the children, young people and others who use those premises, including the use of school toilets.

#### **Welsh Assembly Government**

Our school buildings vary in age, design, size, condition and management. Welsh Assembly Government acknowledges this. In its vision for the future of the education system in Wales, outlined in *The Learning Country*<sup>1</sup> specific reference is made to addressing some of the above issues by taking action to:

"...establish a firm capital expenditure programme to transform the conditions in our schools".

A detail of this capital expenditure is outlined in the Better Wales Plan for Wales 2001<sup>2</sup> where the commitment is made to:

'Increase substantially the funding for school buildings (£100m a year for the next three years) to ensure progress to 2010 target of all buildings in good physical condition'.

The Education and Lifelong Learning Committee's 'School of the Future<sup>3</sup> Interim report' also acknowledges the importance of school building design

and the need for improvements in this process to achieve 'a stimulating and invigorating environment for teaching and learning.'

However no specific or detailed reference is made to toilets and sanitation facilities within any of these documents; the focus is mainly on the classrooms and access areas

Welsh Assembly Government has already announced its support for the expansion of the drinking water in school scheme. Their aim is to ensure that all schools in Wales will provide their pupils with access to clean drinking water throughout the school day.

The Welsh Assembly Government recognises the role of schools in promoting good health, for example through Healthy School initiatives.

## Local Education Authorities (LEAs)

The role of the Local Education Authority is one of strategic management. Most schools manage themselves with very specific functions being the responsibility of the LEA.

Their duties, legal and moral, which relate to the managements of school toilets, can be found in various pieces of legislation:

- The Health and Safety at Work Act 1974<sup>4</sup> makes clear the duties of the Local Authority as the employer, to ensure the health and safety of employees and non-employees i.e. pupils and visitors.
- The Management of Health and Safety at Work Regulations 1992<sup>5</sup> lays out the duties of LEAs, as strategic managers, to make sure that schools manage risk assessments of the premises. It also lays out their

<sup>&</sup>lt;sup>1</sup> The Learning Country, NAfW, 2001

<sup>&</sup>lt;sup>2</sup> Better Wales Plan, NAfW 2001

<sup>&</sup>lt;sup>3</sup> School of the Future Interim Report, NAfW 2002

<sup>&</sup>lt;sup>4</sup> The Health and Safety at Work Act 1974

<sup>&</sup>lt;sup>5</sup> The Management of Health and Safety at Work Regulations 1992

duty to look at how the health and safety measures are managed in **all areas** of the school buildings and environment. This includes how schools organise, control and review their health and safety arrangements.

The Education (School) Premises
Regulations 1999<sup>6</sup> states the
number of toilets and urinals that
should be provided to the number of
pupils in the school.

## Headteachers, Teachers and School Staff

Head teachers, teachers and other staff in schools have a duty under The Health and Safety at Work Act 1974 to address any health and safety issues as they arise or as they become aware of them. It is usually the responsibility of the employer i.e. the LEA or governing body to ensure this is done.

However, there is no specific reference to toilets or sanitation facilities.

#### **School Governing Body**

The role and responsibilities of school governors is extensive and various but can be described as one of strategic leadership.

Within that leadership role there is specific legislation which sets out the duties of the school governing body when considering the issue of school toilets.

These include the following:

 The Occupiers' Liability Act 1957' places a duty on the occupier of a building i.e. school and governors, to take reasonable care that any

<sup>6</sup> The Education (school premises) Regulations 1999

Occupiers' Liability Act 1957

visitor (including pupils) will be safe while on the premises.

 The Health and Safety at Work Act 1974 also applies to the school governing bodies. In fact LEAs may take legal action against them if they fail in their duty under this Act; but there is no specific reference to toilets.

#### Estyn

Her Majesty's Inspectorate for Schools plays an important role in monitoring all aspects of school life. A primary aim of the Inspectorate is to support the achievement of the highest standards of teaching and care of the children and young people attending school.

In the Framework for the Inspection of Schools<sup>8</sup> the responsibilities of the Inspectors are clearly laid out. In the section titled Code of Conduct for Inspectors it states that Inspectors have a duty to

'...act in the best interests of the pupils at the school' and to '...assess the evidence provided.'

Section 5.4 – Health and Safety, the inspection is to look at the effectiveness of schools'

"...procedures for promoting the wellbeing, health and safety of its pupils, including any matters which constitute a threat to health and safety."

Section 6 – Accommodation (6.3) specifies the inspector's duty to carry out an inspection...

"...of all available accommodation and facilities, including the condition, appearance..." of all areas within the school.

Final reports for the schools, following an inspection, highlight the key issues for

<sup>&</sup>lt;sup>8</sup> Framework for the Inspection of Schools, Estyn 2000

action and should include information about

"... non-compliance with statutory requirements where these ... are particularly significant in relation to health and safety issues."

Currently Estyn would expect a school to address the issues highlighted in the report. However, schools are not obliged to submit or show them any action plan, rather, they would be expected to liaise with the LEA to act on those issues. Where the issue was identified in a particular school Estyn would examine it on a monitoring visit and if it was found not to have been addressed would expect the school to account for the lack of action.

But – again – there is no specific reference to toilets.

#### The Impetus for Change

## United Nations Convention on the Rights of the Child (UNCRC)

The Welsh Assembly Government has outlined in its document *Children and Young People: Rights to Action*<sup>9</sup> its commitment to implementing the UNCRC:

'The Assembly Government has adopted the UN Convention on the Rights of the Child as the basis of all our work for children and young people in Wales.'

The following Articles have particular relevance when considering all the issues relating to school toilets

'State parties shall ensure that the institutions, services and facilities responsible for the care or protection of children shall conform to the standards established by competent authorities,

<sup>9</sup> Children and Young People: Rights to Action, WAG 2004

particularly in the areas of safety and health'.

Article 3

'Children have the right to good quality health care and to clean water, nutritious food and a clean environment so that they will stay healthy'.

Article 24

'Children have the right to express their opinions freely and to have their opinions taken into account in **any matter** or procedure affecting them'.

Article 12

#### **School Toilets Research**

A number of studies and research into the state of school toilets have been undertaken over the years (see Appendix 2).

There are common, consistent findings in many of them, that is that children and young people are having to use substandard toilet facilities during the school day and that this has a negative impact on their health and development. The most recent study, completed by Sue Vernon<sup>10</sup> at Newcastle in January 2003, found very similar problems

#### **Bog Standard Campaign**

The Bog Standard Campaign<sup>11</sup> was launched in the UK in April 2003, with a national survey undertaken with children and young people over the following months. This is a joint venture between the Enuresis Resource and Information Centre (ERIC), School Councils UK and the Community Practitioners and Health Visitors Association (CPHVA) and recently the British Toilets Association.

<sup>&</sup>lt;sup>10</sup> Vernon S, Lundblad B, Hellstrom AL. Journal of Childcare, Health and Development 2003; vol 29:p 35-45

http://www.wateriscoolinschool.org.uk/toilet\_c ampaign.html

These four bodies have teamed up to campaign for improvements to toilet and drinking water facilities for school pupils. They have very real concerns about the serious impact of current conditions in school toilets on children and young people's health.

## Conditions for Healthy Learning

'Please can I go to the toilet, when I need to, as it hurts my belly to Keep it in until playtime!!!'

(Boy, 7, Langstone)

The research undertaken over many years by now (Appendix 2) into babies', children's and adults' bladder and bowel actions and habits tell us the following:

- A good fluid intake is essential to maintaining optimal health, particularly in children
- Low fluid intake has been associated with a variety of health problems in children particularly excretory disorders such as constipation or kidney stones
- Children need to use toilets regularly during the day to encourage proper elimination
- The occurrence of Urinary Tract Infection (UTI) is a common problem in early childhood
- Avoidance of going to the toilet to defecate increases the likelihood of constipation
- The best position for emptying the bladder properly is to sit with support for the thighs and feet, bent slightly forward. If toilet seats are inadequate or unclean in schools there is a real danger that children using them will crouch. This means that they do not fully empty their bladder or bowel and increases the risk of UTI
- Going to the toilet is more than just a physical reflex. The whole environment must be comfortable in

- order to relax and allow the proper physical and psychological processes to take place
- Research shows that as many as one in eight girls start their periods while at primary school. The inadequate provision of facilities to dispense and dispose of sanitary towels seriously undermines their privacy and can impact negatively on their self-image and self-esteem.

There is no doubt that, for some children, their need to use the toilet and their reluctance to do so will impact at the very least on their short term physical comfort. It will also be a factor in their ability to concentrate and level of general irritability during the day.

#### **Transmitting Diseases**

Research indicates that school toilets have been identified as areas where certain infections or diseases may be picked up by individuals. This is done in a number of ways – via toilet seats, chain handles, water taps, drinking taps or fountains, soap and other dispensers. These infections include very serious ones such as Hepatitis A and a number of gastrointestinal infections. Where facilities for hand washing and drying are of a poor standard, or not even available, the likelihood of transmission is then extended throughout the school and beyond.

#### **Participation**

Welsh Assembly Government has outlined its commitment to promote the meaningful involvement and participation of children and young people. In Rights into Action it is stated:

'We want to listen to children and young people themselves...We are setting up arrangements to hear the voices of children and young people at three levels - nationally, locally and in schools.'

This includes the proposals for the establishment of pupil school councils<sup>12</sup> in all schools in Wales. Youth Forums are also in place in many Local Authority areas.

These structures are being developed to ensure the participation of children in decision making within their schools and their localities. In practice this means that they should have involvement in what might seem to be mundane matters such as toilet amenities, to strategies for economic development.

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<sup>&</sup>lt;sup>12</sup> Children and young people: Rights into Action, Welsh Assembly Government, 2004

# Part 2 The experiences and views of children and young people in Wales

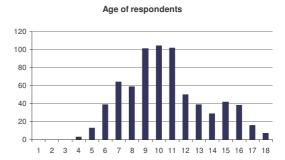
#### The survey

In May 2002 the Children's Commissioner for Wales launched a survey of children and young people's experiences and views. 708 children and young people completed the survey questionnaires (see Appendix 1). 69% were Primary School pupils, and 31% secondary. Overall 59% of respondents were female and 41% were male.

Following initial data gathering at festivals and events, gaps in geographical areas were identified and questionnaires then sent to schools in those areas. Children and young people from all 22 Local authority areas in Wales were involved. Individuals completed the questionnaires at venues across Wales - youth clubs, children and young people projects, festivals and in residential settings.

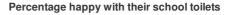
A section of the questionnaire allowed children and young people to make their own comments, and a significant number completed this section. We felt that this reinforced the strength of feeling many had around this aspect of school life.

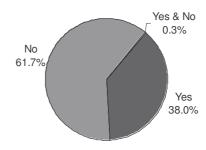
The survey was designed to provide a snapshot of the state of the nation's school toilets: to identify good facilities as well as the bad. It also allowed us to gather information about different pupil's viewpoints, since not all responses from the same school or local authority area expressed shared opinions.



## What Children and Young People said

## Q1 - Are you happy with the toilets in your school?





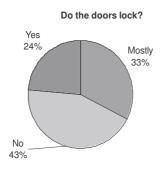
'The toilets in my school are horrible. There is no toilet paper, no soap, and no hand towels. There are no toilet seats to sit on and the toilets are dirty'

(Boy, 6, Newport)

'Hoffwn i cael (transformation) yn y toiledau mae graffiti ar y waliau a dŵr ar y llawr ar drychau yn frwnts' I'd like a transformation in the toilets there is graffiti on the walls and water on the floor and the mirrors are dirty (Girl, 12, Abertawe)

#### **Privacy**

## Q2 - Do all the doors close and lock properly?



'The toilets are nasty I wish the doors would lock everyone walks in without knocking. I would like you to put locks on the doors...'

(Girl, 7, Pontnewydd)

Many children said there were no locks on the toilet doors and that often those that were there were inadequate. In one school, children commented on the fact that the locks were on the outside!

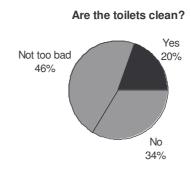
As well as this' many noted that the gaps at the top and bottom of the cubicles were too low or high which meant that other children often harassed them by peering over, or throwing or dropping objects at them when they were in there.

'Put the toilet wall hiregher because everyone like the ones are nasty look over'

(Girl, 9, Cwmbran)

#### Appearance and maintenance

## Q4 - Do you think that the toilets are clean?



'Mae gormod o graffiti os oedd y toiledau yn edrych yn neis bydd neb eisiau ei sboilo'

There's too much graffiti, if the toilets looked nice, nobody would want to spoil them.

(Girl, 12, Abertawe)

Many mentions of graffiti were made. The poor state of decoration was also commented on; paint peeling off walls and the state of the floors were mentioned; they were often slippery, wet and dirty.

'The toilets are disgusting! You slip everywhere'

(Boy, 11, Cardiff)

Cleaning arrangements or rather the lack of them, were also referred to, specifically the fact that this wasn't done properly. The terrible smell was noted by many and was said to be a key reason why many wouldn't use them.

#### Q5 - Do the toilets smell nice?

Nο

## 51 7% Not too bad

Do they smell nice?

12.7%

People don't flush loos and the cleaners don't clean them out. people also smoke in them' (Girl, 13, Swansea)

#### **Smoking**

Stop people from smoking in the toilets by putting smoke detectors in the toilets so that they notify someone about it'

(Girl, 11, Llandegfan, Anglesey)

Some young people used the toilets to smoke in and many others wanted this to stop. It was given as a reason why some children wouldn't use the toilets.

'Mae'r toiledau yn drewlyd dros pen, o fwg a sigarretts, phew!' The toilets are extremely smelly, of smoke and cigarettes, phew! (Girl, 12, Sir Benfro)

#### Vandalism

Many children commented on the persistent vandalism of locks, chains, and sinks etc by a minority of other pupils. What also came across from their comments is the fact that these incidents are often left unaddressed for lengthy periods of time.

#### **Fittings**

A high number of children highlighted conditions that few adults would tolerate

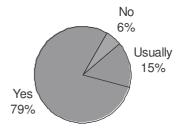
The toilets are too small we can not wash are hands because the water is to hot we don't have no soup (soap)." (Girl. 8. Cwmbran)

- Chains didn't flush or were broken.
- Toilet seats were cracked or missing.
- Sinks were cracked or broken; taps which didn't provide hot, or in some cases, cold, water. In one school pupils noted that the water was so hot that they couldn't use it.
- Taps which some children found difficult to use were also mentioned.

#### Soap and hand drying facilities

#### Q7 - Can you wash your hands in the school toilets?

#### Can you wash your hands?



Soap was not provided or looked and smelled horrible. Dispensers, if there were any, were often not kept filled.

Where there were dryers, they were often not working or blasted out cold air. A lack of paper towels was also mentioned.

'Flushing and taps don't work. Very smelly and unclean'

(Boy, 14, Swansea)

#### Child friendly size

'High chains mean toilets are hard to flush'

(Girl, 6, Newport, S Wales)

The chains or flushing mechanisms were too high.

The sizes of the toilets themselves were too small.

Sinks were also often placed too high or too low and there were not enough of them.

#### **Mirrors**

The lack of mirrors was raised by males and females in the survey.

'We need a mirror in the toilets'
(Boy, 16, Oswestry)

#### **Drinking Water**

A significant number said that their access to drinking water during the day was confined to a tap or fountain situated in the toilet area.

A number of children commented that they would like the water fountains moved from the toilets. In some cases they referred to the seriously unhygienic state of them. One child said

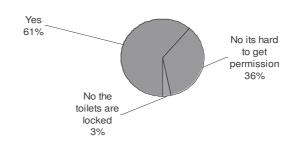
'The drinking fountain is horrible there's green stuff on it.'

(Girl, 11, Cwmbran)

#### Access to Toilets and Water

## Q6 - Are you able to go to the toilets in lesson time?

#### Percentage able to go during lesson time



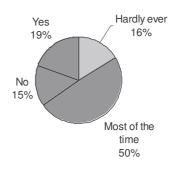
Other children said they wanted access to a drink from the taps more often. This expectation is likely to be based on their experience. However, it is our view that it is not desirable or acceptable for sources of drinking water to be located in toilet areas.

#### **Personal Sanitation**

A lack of waste bins in the toilets was referred to.

#### Q3 - Is toilet paper always available?

#### Is Toilet Paper always available?



'The toilet paper is tracing paper.'
(Boy, 9, Cwmbran)

Toilet paper raised some interesting comments: - some schools are still using 'tracing paper'. In one school, a child noted that the females got soft paper and the males got hard paper.

'There is no toilet paper'
(Boy, 6, Newport)

There was often none in the cubicles, or not enough, or it was used by some children to block the toilets or chewed up then spat out onto the ceiling or floor.

#### **Personal Needs**

Many girls noted their desire for tampon and sanitary towel dispensers to be available in the toilets.

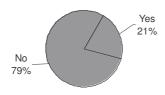
This provision must be available in some form in primary schools too as evidence is available which shows that girls begin menstruating at younger ages than previously. Facilities for the disposal of used sanitary products will also need to be provided.

Such facilities and provision must be organised in a way that will ensure easy access, privacy and higher standards of hygiene than currently exist.

#### **Bullying**

## Q8 - Is bullying a problem in your school toilets?

#### Is bullying a problem?



Depending on where in the building the toilets were located, there was a perception that it was a potentially unsafe area of the school. They expressed real fears that they would be vulnerable to being bullied there out of sight of school staff and other pupils.

#### Summary

The survey responses gave us the following picture:

- The majority (61%) of children and young people who responded were unhappy in some way about the state of the toilets in their schools
- Many children and young people had to endure a lack of privacy when using the toilets, with 45% stating that could not lock the doors properly. This was due to the design and location of the toilets in the building and inadequate locks on the doors
- For at least 20% of respondents, the inadequate provision of, or access to; toilet paper, soap, towels or other drying facilities was preventing many from using the toilets. This also affects the development of positive habits around personal hygiene
- The standard of cleanliness is unsatisfactory in many cases, with only 20% of respondents saying that their school toilets were clean.
- The restrictions on access to the school toilets are potentially creating health problems for children. 35% of respondents said that it was difficult to get permission to use the toilets during lesson time.

When we take all the above facts into account it is apparent that children and young people encounter major difficulties in trying to undertake a natural, essential, physical function.

#### Case Study - Getting it sorted

The final survey responses identified some schools which were managing this aspect of the school environment effectively.

The following case study offers one example of how pupils have been listened to and involved in creative solutions to improve the conditions of their school toilets.

#### Case Study

## Lewis Girls Comprehensive School, Ystrad Mynach

Pupils at the school canvassed teachers at a school council meeting about the inadequate standards of their toilets. The head teacher agreed to give the School Council £1000 towards their improvement. The Friends of the School raised and contributed £5000. Pupils and staff planned and arranged the work on them. The caretaker and volunteers transformed the former 1950s style toilets into bright, modern coloured suites in lime green, bright pink and lavender. The pupils then chose names for each block - Groovy Chick, Hunny Bunny and Winnie the Pooh! Mirrors have been provided in all suites as well as soap dispensers and sanitary provision.

The Deputy Head teacher, Cath Rogerson said the response from the pupils has been fantastic. The pupils monitor them informally and report any incidents of concern immediately to the teachers. Pupils have also requested that new toilet blocks get similar treatment and staff have also been prompted to make changes to their toilet facilities.

"The toilets are much better now they have been refurbished. They

used to be dull and boring and now they add colour to the school day"

Catherine Matthews Year 10, Member of the School Council

## Part 3 - Main Findings and Recommendations

- 1 United Nations Convention on the Rights of the Child. Our survey findings and the research we examined identify some serious cause for concern about the undermining of children and young people's rights and entitlements through the lack of suitable sanitation facilities within their schools.
- 2 It appears that adults are not looking at, or understanding, this issue from the viewpoint and needs of the child.
- 3 We find there may be potentially serious short and long term health effects for children using substandard school toilet facilities.
- 4 We envisage that some schools will find that immediate improvements are needed to comply with Health and Safety Regulations.
- 5 Children and young people expressed real fears and feelings of disgust and anxiety around having to use substandard toilets and facilities.
- 6 Children and young people in the survey referred to the fact that some other children were responsible for acts of vandalism, smoking and bullying in the toilet areas. As the case study above show, involving the pupils and dramatically raising standards will very quickly result in changed attitudes and behaviours from the minority who choose the toilets to 'hang out' or act out any of the above.
- 7 It is the **whole** school environment and the people who inhabit it that create the best conditions for learning.

- 8 The promotion of the drinking water in schools scheme must go hand in hand in addressing issues of access to and standards in toilets for children whose increased fluid intake should lead to the need to use the toilet more often or regularly.
- 9 There appears to be no strategic approach to improving the standards of school toilets involving the pupils, school, and governors, LEA, Estyn, HSE, WAG and the UK Government.

#### Recommendations

- Welsh Assembly Government should assist all schools and their associated governing bodies, to conduct an audit of the current condition of school toilets within the next 12 months.
- Welsh Assembly Government should consult with relevant bodies (LEAs, Health, Health and Safety Executive and campaigning bodies such as Bog Standard) and children and young people, in order to devise an auditing process that is based on Health and Safety regulations, health research and all relevant legislation. The structure and content of the audit must be child centred to ensure that children's questions and concerns are incorporated.
- For the purposes of this school toilets audit the current threshold of provision, as outlined in Health and Safety guidance should be reexamined to move away from a literal interpretation to a broader one that includes the need to provide for the psychological and physical well-being of the children who use them.
- Schools and their associated governing bodies should ensure that they creatively involve children and young people (i.e. pupils) in the conduct of the audit.

- Following the audit, schools and their governing bodies, with involvement from pupils, should develop an action plan to improve the conditions of their school toilets. This plan will need to identify any resource implications.
- Each school will work with the LEA to carry out the work identified in the plan linking it to their longer term capital expenditure programme to transform the conditions of their school.
- The role of Estyn and the Framework for Inspection in Schools needs to be reviewed in light of this report to clarify their role in the inspection of school toilets.
- We recommend that Welsh Assembly Government reflect on the issues learnt covered in this Report and the above auditing process and ensure that the future design and plans for major improvements of schools give a prominent profile to school toilets and the importance of the design and location of these facilities. This will include developing guidance and a clear set of standards for the improvement and monitoring of school toilets.

### Appendix1 - Copy of questionnaire

	Comisiynydd Plant Cymru Children's Commissioner for Wales
	Nice? or Nasty?
	Tell us the truth about the toilets in your school
	Are you a girl or a boy?
	How old are you? (please fill in the box)
10 20	What's the name of your school?
	Where are you from? (town and county if possible)
	Are you happy with the toilets in your school?
	Do all the doors close and lock properly? yes mostly no
	Is toilet paper always available? yes most of the time
	hardly ever \( \square\) no
	Do you think that the toilets are clean? yes not too bad no
	Do the toilets smell nice? yes not too bad no no
3) 19	Are you able to go to the toilets in lesson time?
2 18 22	yes no, the toilets are locked no, it's hard to get permission
	Can you wash your hands in your school toilets? yes usually no
	Is bullying a problem in your school toilets?
	Thank you for your help!! - If there's anything else you'd like to tell us about the toilets in your school, or if you have suggestions for improving things, please write in the box below. ❖
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Past	Please return to/Dychwelwch i: School Toilets Campaign, Children's Commissioner for Wales, Oystermouth
	House, Charter Court, Phoenix Way, Llansamlet, SWANSEA SA7 9FS Tel: 01792 765600 Fax: 01792 765601

#### Appendix 2 Research References

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