

Connect's response on the update to School Premises (General Requirements and Standards) (Scotland) Regulations 1967

Connect is a long-standing independent parents' organisation and the only Scottish charity which is dedicated to supporting parental engagement in education. We provide membership services to almost 2500 Parent Councils and PTAs, as well as offering advice and information to individual parents/carers about any aspect of the education of their child or the wider education system. Our evidence-based approaches reflect the recognised significant role of families in the learning of their children and young people, and in their expertise and knowledge of their own child.

We welcome the opportunity to respond to the Scottish Government's consultation on updates to the School Premises (General Requirements and Standards) (Scotland) Regulations 1967. Our recommendations draw on multiple surveys conducted by both Connect, and the Scottish Assembly of Parents and Carers and experiences shared with us by parents and carers in the course of our organisation's work:

Outdoor education and recreational areas

- The regulation states that external areas should include areas appropriate for social/dining, outdoor learning and active spaces. We agree that schools should be required to have a mix of outdoor environments, for recreation but also for education. While 80% of parents in our [Learning for Sustainability survey \(2024\)](#) recognised that outdoor learning opportunities were provided to their children, nearly half (47%) expressed a strong desire for more
- Retaining, updating and upgrading this regulation is necessary, as stated there is no other legislation prescribing recreational outdoor space around school buildings. It needs to be fully accessible, available in all weathers and inclusive for all children and young people for the sake of their health and wellbeing. This includes adequate resources for use of outdoor space, for example ensuring there are enough staff to accompany and supervise, and that there are plentiful, well-maintained, equipment for outdoor use

Sanitary Accommodation for Children

- We have heard from parents who report that toilet facilities in their children's schools are inadequate, and the update to regulation must reflect this and provide improvements. Parents cite that there are not enough toilets and washing facilities for children, that they are not adequately maintained, or that access to them is restricted to breaks and lunchtimes. Although the regulations make provision for the number of toilets, they must also include guidance on prompt and regular maintenance, and free



access for children throughout the school day. This is a health and dignity issue that is currently not addressed anywhere within regulations

- It is also crucial that accessible toilets are near to classrooms for pupils who need them, are easily available ie not locked, and in sufficient numbers to serve the number of children who require them. This includes appropriate changing facilities for older children in schools serving those who require this

Wellbeing spaces

- We agree that provision for wellbeing spaces should be included in the regulations. Parents cited need for these spaces in the Scottish Assembly of Parents and Carers' [Additional Support for Learning survey \(2025\)](#) and Connect's [Mental Health survey \(2025\)](#); it is well-established that many children, young people and adults need quieter spaces to concentrate and to thrive and such spaces should be available for all who need them. As noted in the Scottish Government's [Pupil and Teacher Characteristics 2025](#) report, secondary school rolls have increased in recent years, as has the number of children with additional support needs, and these wellbeing spaces provide a vital safe haven for them and other children who may struggle with the school environment
- Additional support for learning has a wide definition: bereavement, anxiety, family issues all sit within the legislation. As a result, many children may need access to peaceful school environments for a host of reasons; similarly, other children need spaces to 'let off steam' and run around or move, so they can concentrate. Outdoor spaces and those which enable free movement should be viewed through a wellbeing prism too. Wellbeing spaces provide benefits to all children and young people, helping them to learn better, and all deserve to experience the education environment that suits them best
- We would further recommend that the whole school environment should take wellbeing into consideration, with clear zoning and quiet areas away from busy communal spaces. Small, calm breakout spaces should be built into school design, and areas should prioritise flexible use rather than rigidly defined spaces. This would help to normalise children taking time to regulate without feeling isolated or punished, and relying on corridors or unsuitable rooms

Digital infrastructure and connectivity

- We agree that regulations should include requirements for digital infrastructure and connectivity, with caveats. Parents who responded to our Digital and Online Survey said improvements to digital resources and services should be a key priority (67%), and this should include whole family help to understand more about social media, digital safety and emerging technologies (77%) (Connect's [Digital and Online Learning Survey 2024](#))
- Digital infrastructure needs to be backed up with digital literacy education for all, and equal access to digital devices must be assured, with the appropriate education to accompany this. This must include a focus on connecting parents and carers and helping them to engage with the digital infrastructure that is part of their child's education. Through this the whole family benefits and the risk of a digital poverty gap can be lessened. There should be a focus on ensuring digital learning outside of school is available too, with greater awareness of high-quality, reliable places to access this
- Both in school and during at home learning, these systems should be secure, with passwords and access to the internet carefully managed in line with child safety, Data Protection legislation and requirements. This should be decided nationally, as 32 varieties of security and safeguarding is too variable at present

Sites for schools

- We agree that schools should be viewed as a central part of the community – this has been well-known and acknowledged, and the Scottish Government's [Commission on the Delivery of Rural Education report \(2011\)](#) recommended the use of 'community schools' in order to deliver facilities and opportunities that may not be available elsewhere in the community. However, any school decisions must be made jointly with the community; parents and others should have the opportunity to actively participate in site selection
- We believe that there should be national (and generous) baseline measures of space per pupil and these must still apply even when school site selection regulations are removed, otherwise we risk further sub-standard schools being built. There should be generous sports hall, dining hall and recreational outdoor space per pupil capita as in nationally set requirements
- Safe access of the site for children and young people to walk or cycle/wheel must also be a key part of considerations. Local authorities in some areas continue to place pupils in schools where the designated pupil capacity is being exceeded. School roll capacity should be adhered to and local authorities should not give planning permission for houses without fully addressing school sizes with developers' contributions. Local authority planning can and must look at possible future development and housing need when it selects a school site and must plan for space to increase capacity

Child rights and welfare:

- Our recommendations for improvements support children's wellbeing and rights. However, Child Rights and Wellbeing Impact Assessments must be a statutory requirement for decisions made by local authorities, as children's rights cannot be central to decision making without taking this step. Additionally, these changes must be examined individually to ensure children's rights and wellbeing are foremost in the decision-making process. Local authorities should consult the community, children and young people, parents and carers and school staff about their plans throughout the planning and design/detailed design process. Schools are essential parts of the community and should be planned, designed and consulted on with this in mind. Robust consultation procedures, with meaningful involvement, which go beyond those required by the planning process and consider design, local use and access should be compulsory for local authorities
- In addition to the above, we also wish to highlight that lack of staffing and unequal access to resources mean that implementation of policy is uneven, and that the impact of these changes on children's rights cannot be viewed at a national level. Assessment of the impact must be made at a local level to ensure that benefits are felt by all children, and that some groups are not negatively affected