

# Intimate Care Policy

Current from: December 2023 – November 2025



Every child. Every chance. Every day.

## Definitions

Assisting Adult(s)	any contracted teacher, teaching assistant or midday supervisor at Ysgol Pen Coch, or any class based supply staff member, adult apprentice or adult student at Ysgol Pen Coch leading or supporting the provision of intimate care to a pupil on roll at Ysgol Pen Coch
Child	a child who is a pupil of Ysgol Pen Coch
DBS	Disclosure and Barring Service
Head	the headteacher or acting headteacher employed on contract at Ysgol Pen Coch
Nurse	the school nurse employed by Betsi Cadwaladr University Health Board to support the health care needs of pupils on roll at Ysgol Pen Coch
Parent(s)	parents or guardians of a pupil on roll at Ysgol Pen Coch
Policy	the Intimate Care Policy of Ysgol Pen Coch
PPE	personal protective equipment
Pupil(s)	a pupil or pupils on roll at Ysgol Pen Coch
School	Ysgol Pen Coch
SMT	the senior management team at Ysgol Pen Coch
Staff	all teachers, teaching assistants of all grades and lunchtime supervisors employed on contract at Ysgol Pen Coch
Supply Staff	a teacher, teaching assistant of any grade or lunchtime supervisor working at Ysgol Pen Coch on a supply basis, either from an agency, ETeach or otherwise secured directly by Ysgol Pen Coch
Teacher(s)	a teacher or teachers employed on contract at Ysgol Pen Coch

## 1. Intimate Care

1.1 Intimate care in School refers to any bodily care procedure that entails direct or indirect contact with, or exposure of, a Pupil's genital or anal regions, or where a girl who is a Pupil has started to develop breasts direct or indirect contact with or exposure of her chest. Intimate care is most often associated with dressing and undressing, and with bodily functions, body products and personal hygiene. Toileting is overwhelmingly the most common intimate care procedure undertaken by Assisting Adults both in School or during off-site activities, but will also include menstrual management or situations where a Pupil needs a change of underwear for other reasons.

1.2 It is necessary for Assisting Adults to undertake intimate care for any given Pupil due to that Pupil's inability to perform such care independently or without assistance. It may need to be undertaken on a regular basis or during a one-off incident.

1.3 A Pupil may have an individual intimate care plan (Section 10). If such a plan includes procedures additional or at variance to those in this Policy, those procedures are to take precedence to the Policy and are to be followed by Assisting Adults. However in all

circumstances any such specific provisions remain informed by the aims (Section 2), legal guidance (Section 3) and key principles (Section 4) of the Policy.

1.4 The procedure for delivering intimate care is outlined in Section 6.

## **2. Aims**

This Policy aims to ensure that:

- intimate care is carried out properly by Assisting Adults, and in line with a Pupil's individual intimate care plan where such a plan exists,
- the dignity, rights and wellbeing of Pupils are secured and safeguarded,
- Pupils will be supported to achieve the highest level of autonomy that is possible given their abilities,
- Pupils with intimate care difficulties are not discriminated against, in line with the Equalities Act 2010,
- Parents are assured that Assisting Adults are knowledgeable about intimate care and that the needs of their Pupils are taken into account, and that
- Assisting Adults carry out intimate care within guidelines that protect both the Pupils and themselves, eg: safeguarding, manual handling, health and safety.

## **3. The Legal Context and Other Guidance**

3.1 The School is committed to embedding the principles and values of the United Nation Conventions for the Rights of the Pupil in its practices, which key Articles include:

- Article 1 Every Pupil under the age of 18 has all the rights in the Convention.
- Article 28 Every Pupil has the right to an education.
- Article 29 Education must develop every Pupil's personality, talents and abilities to the full.
- Article 42 Every Pupil has the right to know their rights.

3.2 The School will act in accordance with Welsh Government guidance *Supporting Learners with Healthcare Needs* (2017) alongside *Keeping Learners Safe* (2022) and the *Wales Safeguarding Procedures* (2020) to safeguard and promote the welfare of all Pupils and Assisting Adults.

3.3 The School also recognises its duties and responsibilities in relation to the Equalities Act (2010) and the need to treat all Pupils, regardless of their age, gender, disability, religion, ethnicity or sexual orientation with respect and dignity when intimate care is given.

3.4 The Policy should be read in conjunction with the following School documents:

- Safeguarding policy
- Child Protection policy
- Health and Safety policy
- Manual Handling policy
- Pupil's intimate care plan and/or manual handling plan if they have one

3.5 Assisting Adults should always undertake dynamic risk assessment in any intimate care situation, having regard to all relevant matters such as but not limited to facilities, equipment and the Pupil's emotional state

## **4. Key Principles**

4.1 Every Pupil has the right to be safe.

4.2 Every Pupil has the right to be valued as an individual, to be treated with dignity and respect.

4.3 Every Pupil has the right to personal privacy.

4.4 To the best of their abilities all Pupils have the right to be involved and consulted in their own intimate care, to express their views on their own intimate care and to have such views taken into account.

4.5 Every Pupil has the right to have levels of intimate care that are safe, appropriate and consistent and leave them fully clean and comfortable.

4.6 There may be times when Staff, or more rarely Supply Staff, deem it necessary to undertake an intimate care procedure for the safety, health and comfort of a Pupil even where that Pupil is communicating that they do not consent to the procedure. The deployed Assisting Adults will endeavour to secure the child's consent by waiting, persuasion or providing inducements through motivating activities. The Assisting Adults may carefully attempt to manage the situation such that the procedure can take place, including being appropriately directive of the Pupil. However it may be that dynamic risk assessment indicate the procedure cannot be safely undertaken and the Pupil remains soiled, sore or otherwise in an unsatisfactory condition. In such cases the Pupil's parents or carers must be called to assist or take their child home.

## **5. Roles and Responsibilities**

### **5.1 Head**

5.1.1 The Head will ensure that Assisting Adults providing intimate care:

- are made aware of and follow the provisions in this Policy,
- have been provided with any necessary training,
- are provided with enough suitable PPE and cleaning equipment and consumables to undertake intimate care safely (see Section 6.6), and
- are provided with suitably maintained equipment to enable them to provide intimate care safely (see Section 6.9).

5.1.2 The Head will ensure that Parents new to the School have suitable opportunities to discuss their Pupil's intimate care needs during planned admissions meetings.

5.1.3 The Head will ensure that discussion of a Pupil's intimate care needs forms part of the transition process when that Pupil moves class within School, or moves from the School to another education setting.

5.1.4 The Head will ensure that aprons, gloves and appropriate disposal/cleaning equipment, eg: plastic bags, disinfectant spray, paper towels, are readily available for use in School rooms and spaces anticipated to be used for intimate care procedures. Masks are available to all Assisting Adults in any classroom.

5.1.5 The Head will ensure that all Assisting Adults and those who may become one have the required DBS clearance to work, or otherwise be present, at the School.

5.1.6 The Head will put in place procedures to ensure toilets and rooms with facilities used for toileting are cleaned regularly.

## 5.2 Assisting Adults

5.2.1 Assisting Adults must conduct intimate care following all guidance in the Policy. They are directed in particular to Sections 1, 2, 3, 4 and 5.2 for key principles and procedure.

5.2.2 The Assisting Adults' attitude and approach to a Pupil's intimate care is of critical importance to ensure the experience is as relaxed and positive as possible, and the Pupil's dignity and privacy are respected throughout the procedure. Assisting Adults will:

- be sensitive to act on the Pupil's individual communication needs and preferences, eg: reassure with eye contact or avoid eye contact depending on the Pupil,
- use reassuring body language and tone of voice,
- use simple language to explain what is to happen, make requests and repeat if necessary,
- use correct names for body parts
- pause to give the Pupil time to process information and respond as needed,
- thank the Pupil for any help they are able to contribute, eg: raising legs, reaching for toilet paper etc,
- continue to explain to the Pupil what is happening even if they appear not to understand or respond,
- treat the Pupil as an individual with dignity and respect, eg: not rush the procedure, ensure the toilet door is closed, not speak over the Pupil as they carry out the procedure etc, and
- follow all good practice in providing intimate care as set out in this Policy.

5.2.3 All Staff of any sex or gender, or who identify as having no gender, are expected to be available to provide intimate care for any Pupil as necessary.

5.2.4 Staff may only decline to provide intimate care in exceptional circumstances, eg: they cannot leave other Pupils unsupervised, or where they have a relevant medical or physical reason that is not amenable to amelioration. Almost all concerns will be addressed by following procedure correctly, eg: using a hoist, minor cuts on Staff hands covered by plaster and gloves, face mask to be worn if concerned about droplet infection from a cold etc. If a Staff member is still unsure they can in almost all instances be the supporting Assisting Adult rather than the lead.

5.2.5 Intimate care will generate opportunities to teach self care skills to Pupils and learn correct names for body parts. Where such opportunities arise Staff or Supply Staff should teach and encourage each Pupil to do as much for themselves as they are able, eg: helping to take clothes off, washing hands at the end, or even stilling rather than wriggling etc, so long as such an approach does not distress the Pupil or otherwise contravene the principles set out in Sections 1, 4 and 5.2.1.

5.2.6 Once Supply Staff have been working with a Pupil for a suitable length of time and understand their needs and care procedures they may take the assistant/observer role in intimate care. What constitutes a suitable length of time will be decided by the Pupil's regular Teacher in consultation with regular class Staff and the Supply Staff member in question. Similarly Supply Staff should not take the lead role providing intimate care until such time

as the Pupil's regular Teacher deems it appropriate, eg: a Supply Staff member on long term deployment in the Pupil's class. If in any doubt the Supply Staff member should not be expected to take part in intimate care and in any case cannot be compelled to do so. A refusal by a Supply Staff member to fulfil an intimate care role once it is reasonably deemed appropriate for them to do so by a Pupil's regular Teacher is a reasonable consideration for SMT to take into account when deciding whether or not to re-engage that person should subsequent opportunities arise in School.

5.2.7 People working outside the descriptors set out in the definitions section of the Policy will not participate in intimate care, eg: support staff, supply staff in the office, servery staff, supply midday supervisors.

5.2.8 Assisting Adults must ensure that toilets and rooms with facilities used for toileting are left clean after carrying out toileting or intimate care.

### 5.3 Nurse

The Nurse will support School in securing good practice in intimate care for all Pupils, eg: providing training in using PPE, providing training for certain procedures within their remit, providing advice regarding intimate care to Assisting Adults or volunteers, sharing NHS good practice procedures, co-producing intimate care plans, offering advice and support to Parents regarding intimate care. The Nurse may deliver intimate care to Pupils, but in most circumstances it will be most appropriate for them to be the support/observer.

### 5.4 Parents

5.4.1 Parents are expected to provide School with nappies/ pads, wipes and spare clothes if their Child needs them in School. Topical creams may be sent in with instruction for use, preferably written or by Class Dojo messaging, but verbal instructions are acceptable prior to securing such consent. Medicated or prescription creams will require Parents to provide a completed, signed School consent form. Initial consent by written note, Class Dojo message or verbal instruction are acceptable but a completed, signed School consent form must be provided as soon as is practical.

5.4.2 Parents will work in partnership with their Child's Teacher and other professionals to share relevant information and provide continuity of care for their Child.

5.4.3 If an intimate care plan becomes required for any Pupil, eg: on the advice of a paediatrician or occupational therapist, Parents may be consulted by their Pupil's class Staff, SMT, the Nurse or any other professional involved in drafting it. Irrespective of their prior involvement Parents will be provided with a draft copy of their Pupil's proposed care plan for consideration and consent. Parents may withhold consent until such time as they are satisfied with their Pupil's proposed care plan. Their Pupil's Teacher, SMT, the Nurse and/or other professionals must make them aware of how withholding consent may impact on their Pupil's intimate care and work with Parents to secure their consent.

5.4.4 While on School premises a Child's Parents, or adults to whom Parents have reasonably delegated responsibility for their Pupil, eg: a Pupil minder, a grandparent etc, may perform intimate care procedures for that Pupil. School retains safeguarding responsibilities in relation to the Pupil and reserves the right to act as necessary to ensure that the Pupil is safe, irrespective of any provision in this Policy.

## 5.5 Other People in School

5.5.1 Once a student teacher or an adult apprentice has been working with a Pupil for a suitable length of time and understands their needs and care procedures they may take the supporting Assisting Adult role in intimate care. What constitutes a suitable length of time will be decided by the Pupil's regular Teacher in consultation with regular class Staff and the individual concerned. Apart from possible emergency situation such a student teacher or adult apprentice must only be a supporter Assisting Adult. If in any doubt the individual concerned should not take part in intimate care and in any case cannot be compelled to do so.

5.5.2 Unless it is the purpose of their attendance, eg: appropriate intimate examination with Parents' consent by a visiting paediatrician, it will be inappropriate for visiting professionals to become involved in a Pupil's intimate care. An exception to this provision is where a community children's nurse or health care support worker, or similarly employed professional, is with a Pupil frequently, whether in School or elsewhere, and has built up an appropriate relationship with that Pupil such that they may be the supporting Assisting Adult for that Pupil, and only that Pupil.

5.5.3 Where a visiting professional is appropriately providing intimate care for a Pupil while the School is in loco parentis of that Pupil, that visiting professional shall be treated for the purposes of this Policy as an Assisting Adult. All provisions pertaining to Assisting Adults will govern that individual's participation in the intimate care procedure in question. In particular School must ensure that a second Assisting Adult is present.

5.5.4 A volunteer supporting School activities who is a parent or Parent may undertake intimate care solely for their Child. Otherwise, unless in emergency situations volunteers should not undertake intimate care for Pupils. If an emergency situation arises, volunteers should be the supporter/observer. In all ordinary circumstances a volunteer should not take part in intimate care and in any case cannot be compelled to do so.

## 5.6 Who May Not Undertake Intimate Care

5.6.1 Apart from adults within the provisions of Section 5.4.4, under no circumstances will the following categories of people, who may be legitimately on School premises for the purposes of supporting Pupils or otherwise, be involved in intimate care for Pupils:

- anyone who does not have DBS clearance,
- anyone whose DBS clearance is greater than 3 years' old,
- volunteers, present in School in any capacity, or
- minors, present in School in any capacity, eg: a Pupil, a pupil of another education establishment, someone on work experience, an apprentice.

5.6.2 All staff working in any capacity in School have a safeguarding duty towards all Pupils. This duty includes the right to act as necessary to ensure that any Pupil is safe, irrespective of any provision in this Policy, eg: refusing permission for anyone of any status to deliver intimate care.

## 6. Toileting Procedure

6.1 For safeguarding, toileting involving intimate care of a Pupil must be conducted by two Assisting Adults, who both fulfill the eligibility criteria set out variously in Section 5. The lead Assisting Adult delivers the intimate care required and should know the Pupil well. The lead Assisting Adult is supported by a second adult. It is desirable but not necessary that the supporting Assisting Adult also know the child well. One of the Assisting Adults should be a member of the concerned Pupil's class Staff. While it is recognized there may be rare occasions when it is not possible to do so, all reasonable efforts should be made to secure this arrangement, which is for the benefit of the Pupil, eg: wait for a short time while such a Staff member becomes available.

6.2 Situations may develop where an Assisting Adult may be left on their own with a Pupil, eg: taking a Pupil who has soiled their clothes to a toilet or changing facility, before intimate care has started supervising a Pupil while the other Assisting Adult goes to get more PPE or collect something from the Pupil's classroom that has been forgotten or becomes necessary such as spare clothing. In these instances intimate care should not begin or continue until both Assisting Adults are once again present. The Pupil may need to be dressed again if the absence becomes necessary part way through a procedure. An additional Assisting Adult may be sought before the second leaves. This person may then leave once the other returns.

6.3 In School toileting will take place in a suitable toilet or appropriate changing facility, giving due consideration to the Pupil's safety and privacy.

6.4 Toileting off site may present obstacles to following all of these procedures. Assisting Adults must dynamically risk assess the options available to carry out toileting safely and in accordance with the principles in this Policy. It may be that the appropriate course of action is to suspend the activity the Pupils are doing to prioritise finding good enough toileting facilities to enable the intimate care necessary to take place.

6.5 Given the definition in Section 1.1, intimate care may occur while the Pupil stands at or sits on a toilet, uses a urinal, sits on a potty or commode, is having their nappy changed while standing up on the floor or while lying on a changing or shower bed, or by whatever other method they use to toilet.

6.6 The lead Assisting Adult, who of necessity is operating very close to the Pupil concerned, must wear the following items of disposable PPE, which will be provided by the School:

- gloves, and an
- apron.

Face masks or visors will also be made available but only need to be worn at an Assisting Adult's discretion, eg: they are concerned about droplet infection.

6.7 The supporting Assisting Adult should wear such PPE as dynamic risk assessment indicates is required by their role in the procedure, eg: if they are only observing and do not need to be in contact with the Pupil they may not need to wear any PPE at all, however if they need to be close to the Pupil such as holding their feet or legs they should wear PPE as per Section 6.6.

6.8 After toileting has been concluded Assisting Adults wearing PPE must dispose of all items in a sanitary manner in a PPE bin which in school will be identifiable by a yellow plastic

inner bag. Off-site the nearest suitable bin should be used and if possible the PPE bagged before binning. In these circumstances if a bin is not immediately to hand Assisting Adults may bag up used PPE for sanitary safety until a suitable bin is found.

6.9 Appropriate safely maintained and inspected equipment must be used to ensure toileting is carried out safely, efficiently, thoroughly and in comfort for the Pupil. Such equipment may include, but is not limited to:

- accessible toilet,
- hoist and sling,
- height adjustable changing bed, powered or manual,
- height adjustable washing bed, powered or manual,
- safety bars,
- changing mats, and
- waste disposal bins.

6.10 Assisting Adults must ensure the Pupil concerned is thoroughly clean by the end of the procedure. The Pupil's genital and anal areas, and any other areas necessary, must be wiped carefully to ensure the Pupil is fully cleaned, eg: no visible traces of urine, faeces or other intimate bodily fluids remain. This applies equally to a Pupils using pads, nappies or other sanitary products and those who are toilet training or fully toilet trained.

6.11 If Assisting Adults become concerned that cleaning a Pupil thoroughly may risk invasive actions they must seek assistance from the Pupil's Teacher or a member of SMT. It may be deemed necessary to ask Parents to assist in situ or to take their Pupil home to complete toileting there.

6.12 Toileting presents many self care teaching opportunities, including learning correct names for body parts. Pupils should be encouraged by Assisting Adults to participate in their own toileting to the extent they can, and taught how to do so, and if appropriate taught additional skills as next steps.

6.13 Any soiled clothing will be contained securely in a tied plastic bag or bags and returned discreetly to Parents at the end of the School day. School does not have a responsibility to wash soiled clothing.

6.14 Assisting Adults must ensure that toilets and rooms with facilities used for toileting are left clean after carrying out toileting or intimate care.

6.15 Some Pupils who are becoming independent for toileting self care may not require two Assisting Adults to be present. In consultation with relevant parties, eg: class Staff, Parents, Nurse, their Teacher will judge when they may need only one Assisting Adult for support. In these instances the Assisting Adult must be a Staff member. Where a Pupil only requires this level of support the Assisting Adult should be at a little distance from the Pupil but probably sighted on them, eg: at the doorway of the toilet room. As the Pupil manages their toilet they may inadvertently or absently publicly expose their genital or anal areas which may be seen by the Appropriate Adult. So long as the Assisting Adult is not required to assist the Pupil while these body areas remain exposed this situation does not constitute intimate care for the purposes of this Policy. The Assisting Adult will act appropriately to encourage the child to dress, eg: help pull up trousers while not coming into contact with genital or anal areas. A second Assisting Adult must be sought if required.



## **7. Medical Procedures**

7.1 It is sometimes necessary for Staff to deliver medical care procedures for a Pupil. Such procedures or support may fall within the definition of intimate care described in this Policy in Section 1, eg: changing a catheter tube will be intimate care, but although managing a colostomy bag once the person is catheterised is a toileting procedure it does not normally entail intimate care once the bag is safely in place.

7.2 Where a medical procedure in School does entail intimate care the Nurse will lead on providing that care, ensure that it is provided by appropriately trained medical staff in attendance for that purpose, or that Staff have the requisite training to deliver the care in question. Staff cannot be compelled to undertake such intimate medical procedures, eg: catheterisation.

7.3 It is not appropriate for Supply Staff, apprentices, volunteers or students to be involved in the provision of medical care procedures for Pupils.

## **8. Feeding Procedures**

Providing support for feeding may be an involved procedure, eg: where a Pupil has a MIC-KEY feeding tube. It does not fall within the definition of intimate care in Section 1.

## **9. Physical Education**

Supervision of and giving assistance to Pupils to change clothing for physical education, swimming or similar activities may be conducted by one Assisting Adult where other Staff or Assisting adults are on hand but not necessarily sighted, eg: in the hydro pool area. Changing for PE does not involve exposure or touching of genital or anal areas. Changing for swimming will involve brief exposure of genital and anal areas but only in a dressing and undressing context without direct contact. Drying with a towel after swimming may involve some brief contact. These situations do not constitute intimate care for the purposes of this Policy. The key principles outlined in Sections 1, 2, 3 and 4 remain operative in these situations.

## **10. Intimate Care Plans**

10.1 An intimate care plan sets out procedures for providing intimate care for a person, which may provide for measures additional to those found in this Policy, or supersede elements of it.

10.2 Any person or body with formal standing in relation to a Pupil, eg: Parent, School, physiotherapist, social workers etc, may request that an intimate care plan be established for that Pupil.

10.3 Working together the Pupil's Teacher and the Nurse will lead on producing the intimate care plan. They may use exemplar formats which may be taken from other organisations. They may need to draw on the expertise and knowledge of other professionals. The involvement of Parents should be regarded as good practice, but there may be

circumstances where this is not possible, or disallowed. There may also be circumstances where other bodies are in loco parentis and should be regarded as Parents for the purposes of Section 10 of the Policy.

10.4 The following people must sign and date an intimate care plan before it is deemed operational in School:

- the Pupil's Parents,
- the Nurse, and
- the Headteacher or their specifically authorised proxy.

## **11. Safeguarding**

11.1 All usual safeguarding rules and procedures apply to the provision of intimate care. Assisting Adults providing intimate care, or any other adult on site, must report anything of concern regarding the Pupil or intimate care procedure to the School's Designated Safeguarding Person immediately if there is an immediate concern for the safety of the Pupil or as soon as practical where there is no immediate risk factor. Having reported appropriately they must record their concern and consequent action on the School's CPOMS system where they have access to it, or request the Designated Safeguarding Person to whom they have reported their concern does so on their behalf. Concerns include but are not limited to:

- disclosures by the Pupil, verbal or otherwise,
- unexplained marks,
- suspicions of neglect or other abuse,
- out of character reactions, and
- concerns regarding the behaviour or practise of Assisting Adults, or any other person.

11.2 Assisting Adults must report to the Pupil's class Teacher or SMT any materially significant accident that occurs during the procedure to that Pupil or any Assisting Adult involved in the procedure, eg: it is materially significant if the Pupil is accidentally hurt or hurts themselves or if a piece of equipment is broken and such incidents should be reported, but it is not materially significant if a cleaning product is spilt but has been properly dealt with such that it no longer presents any hazard. Apart from the need to get additional PPE from the Nurse, Assisting Adults must similarly report any health and safety concern that arises, eg: equipment is discovered to be faulty.

11.3 If a Pupil makes an allegation of maltreatment against an Assisting Adult, in the context of intimate care or otherwise, that Assisting Adult will be investigated according to the School's safeguarding procedure. During any such investigation the Head will take action deemed necessary to protect both Pupils and the adult concerned, eg: the adult, if a staff member, may be removed from duties involving contact with Pupils or other children, or if not a staff member the adult concerned may be prohibited from entering School premises. Such precautions will be enforced according to the School's safeguarding policy until such time as safeguarding procedures deem that it is safe and appropriate for the adult to return to their normal School role. This provision is designed to protect all people involved in the disclosure situation.

## **12. Review**

12.1 This Policy has been approved by the Governors and is available for use to all Staff and Supply Staff.

12.2 The Policy will be reviewed by the Head every two years following the date set out in the Policy, or at such other times that the Governors or Head deem necessary.

12.3 The Policy will be reviewed in light of any statutory frameworks or guidance in place that pertain to schools in Wales and sector best practice current at the time.

**Signed:**

(Head Teacher)

**Date:**

**Signed:**

(Chair of Governors)

**Date:**

**Date of next scheduled review: November 2025**