



Intimate Care Policy

"Inspired to make a difference together — each child thrives from the moment they arrive."

Policy Title

Intimate Care Policy — Kingsway
Primary School

Term & Review

September 2026 | Review Cycle:
Every 2 years, or upon publication
of new statutory guidance

Status

Statutory — Local Authority:
Trafford

Policy Control Information

The table below sets out the key administrative details of this policy. This policy was re-written and updated in September 2026 by Kate Baskeyfield, Headteacher, based on the Trafford Local Authority model policy and current statutory guidance including the EYFS Statutory Framework effective 1 September 2026. It is subject to review every two years by the Full Governing Body, or sooner in the event of new statutory guidance being published.

Field	Detail
Policy Title	Intimate Care Policy
Headteacher	Kate Baskeyfield
Deputy Headteacher	Claire Lowe
Chair of Governors	Helen Johnson
Site Manager	Nazim Dervish
Designated Governor (Safeguarding / Additional Needs)	Helen Johnson (Chair of Governors)
Date Adopted	29 September 2026
Review Date	Every 2 years — next review by end of Summer Term 2028, or sooner in the event of new statutory guidance being published
Status	Statutory
Published on Website	Yes
Statutory Basis	Children Act 1989 s.3; Equality Act 2010; Health and Safety at Work etc. Act 1974; UK GDPR and Data Protection Act 2018; SEND Code of Practice 2015; Keeping Children Safe in Education (current edition); UN Convention on the Rights of the Child Articles 16 and 28; Care Act 2014; EYFS Statutory Framework for Group and School-Based Providers (effective 1 September 2026); Crime and Policing Act 2026
Related Policies	Supporting Pupils with Medical Needs Policy; Safeguarding and Child Protection Policy; SEND Policy; Health and Safety Policy; EYFS Policy; Behaviour Policy; Complaints Policy
Written By	Kate Baskeyfield (re-written and updated September 2026, based on Trafford LA model policy, current statutory guidance, and the EYFS Statutory Framework effective 1 September 2026)

 If you have any questions about this policy: **staff** should speak with their line manager or a member of the leadership team; **parents and carers** should contact the school office on **0161 748 1867**; **other interested parties** should also contact the school office on 0161 748 1867.

Our Vision and Values

At Kingsway Primary School, everything we do is shaped by our mission:

"Inspired to make a difference together — each child thrives from the moment they arrive."

This mission is at the heart of how we approach intimate care. We believe that every child deserves to feel safe, respected, and valued — and that the way we support children with their most personal needs is a direct expression of who we are as a school community. Our four core values guide our practice in this area.

Togetherness

We work in close partnership with families to ensure every child's intimate care needs are met with consistency and trust. No family should feel alone in navigating these needs at school.

Difference

We recognise that every child's intimate care needs are unique. We never apply a one-size-fits-all approach; instead, we listen, adapt, and respond to each child as an individual.

Passionate About Learning

We ensure that intimate care needs never become a barrier to a child's full participation in school life. Every child has the right to learn, play, and belong.

Inspired to Grow

We support children to develop independence and confidence in managing their own personal care needs, at a pace that is right for them — celebrating every step forward.

Introduction and Scope

What is Intimate Care?

Intimate care is any care that involves washing, touching, or carrying out a procedure to intimate personal areas of the body — areas that most people would usually manage themselves, but which some children are unable to manage independently because of their age, a physical difficulty, a medical condition, or another special need.

Examples of intimate care include, but are not limited to:

- Nappy changing and toileting support
- Assistance with washing and personal hygiene
- Support with dressing and undressing (including for PE and swimming)
- Continence management, including catheter care and colostomy bag management
- Menstrual management
- Supervision of pupils who are carrying out intimate self-care
- Assistance following a toileting accident

Who Does This Policy Apply To?

This policy applies to all pupils at Kingsway Primary School who require support with intimate care, including:

- Children in the Early Years Foundation Stage (EYFS), where nappy changing and toileting support is a routine part of provision
- Pupils with Special Educational Needs and Disabilities (SEND) who require ongoing intimate care support
- Pupils with medical conditions or physical difficulties that affect their ability to manage personal care independently
- Any pupil who requires temporary support following an illness, injury, or toileting accident

This policy applies to all staff, volunteers, and other adults who may be involved in the intimate care of pupils at Kingsway Primary School. It should be read alongside the school's Safeguarding and Child Protection Policy, Supporting Pupils with Medical Needs Policy, SEND Policy, Health and Safety Policy, EYFS Policy, and Behaviour Policy.

Our Commitment

At Kingsway Primary School, we are committed to ensuring that every child's experience of intimate care is safe, dignified, and respectful. We recognise that intimate care involves some of the most personal aspects of a child's school experience, and we take our responsibility in this area extremely seriously. The welfare and dignity of every child is our paramount concern.

This policy has been updated in Autumn 2025 to reflect the EYFS Statutory Framework for Group and School-Based Providers (effective 1 September 2026), which strengthens requirements in four key areas relevant to intimate care: the principle that children's privacy must be balanced with safeguarding and supervision needs (so that intimate care is always private but never isolated); the requirement that children are always within sight or hearing of a member of staff; rigorous and detailed record keeping for every episode of intimate care; and strengthened safeguarding standards, including a lower threshold for reporting allegations of harm.

We are equally committed to supporting the staff who carry out intimate care, ensuring they are well trained, properly supported, and never placed in a position that puts them or a child at risk.

Principles of Intimate Care

The following principles underpin all intimate care practice at Kingsway Primary School. They are non-negotiable and apply in every situation, for every child, every time.

Dignity and Respect at All Times

Every child has the right to be treated with dignity and respect during intimate care. Staff will always speak kindly, act gently, and ensure the child feels safe and valued throughout.

Consent and Communication

Before any intimate care procedure begins, staff will explain to the child — in language appropriate to their age and understanding — what is going to happen and why. Where a child is able to give or withhold consent, this will always be sought. No intimate care will be carried out in a way that causes distress or pain.

The Least Intrusive Approach

Staff will always use the least intrusive method possible to meet a child's intimate care needs. Children will be supported and encouraged to do as much for themselves as they are able, in order to promote independence and preserve dignity.

Same-Sex Care Where Possible and Preferred

Where a child or their family expresses a preference for same-sex intimate care, the school will make every reasonable effort to accommodate this. Cultural, religious, and personal preferences will always be taken into account and respected.

Never as a Punishment or Reward

Intimate care will never be withheld as a punishment, nor used as a reward or incentive. It is a fundamental aspect of a child's welfare and will always be provided promptly and without condition.

No Child Will Be Left in Soiled Clothing

No child will ever be left in soiled or wet clothing while waiting for a parent or carer to arrive. The school takes full responsibility for providing appropriate intimate care in a timely and dignified manner. Parents will never be routinely called into school to carry out intimate care on behalf of the school.

Private but Never Isolated

Every child's right to privacy and modesty will be respected at all times. Intimate care will always take place in an appropriate, private space — but it will never take place in a way that isolates the child from adult oversight. In line with the EYFS Statutory Framework 2026 (paragraph 3.88), children's privacy is always considered and balanced with safeguarding and supervision needs. A colleague must always be informed that care is taking place and must be nearby and available. Doors may be closed for privacy but must never be locked.

Correct Anatomical Language

Staff will use correct anatomical language with children in an age-appropriate way. This supports children's understanding of their own bodies, helps them communicate clearly if something is wrong, and is consistent with NSPCC guidance on body safety and the RSHE curriculum.

No Photography

Under no circumstances will any photographs or recordings be taken of a child during intimate care. No member of staff will carry a mobile phone, camera, or any similar device whilst providing intimate care. This requirement is explicitly referenced in the school's safeguarding policy in line with EYFS 2026 paragraph 3.6.

Consistency

Where possible, the same member of staff will provide intimate care for a particular child, in order to build trust and ensure consistency. Any changes to staffing arrangements will be communicated to the child and their family in advance wherever possible.

Visibility and Supervision

In line with EYFS 2026 paragraph 3.44, children must always be within sight or hearing of a member of staff. During intimate care, this means a second adult must be informed and available at all times. The member of staff providing care must never be entirely alone with a child in a space that cannot be accessed by another adult. This is a non-negotiable safeguarding requirement.

Key Roles and Responsibilities

Intimate care is a whole-school responsibility. The following sets out the specific duties of each named role. All staff who provide intimate care must have completed the required training before doing so, and have the right to raise concerns about intimate care arrangements.

Kate Baskeyfield — Headteacher

Overall responsibility for the implementation and review of this policy. Ensures all staff are appropriately trained and that intimate care is carried out safely and with dignity. Receives and acts on any concerns or allegations relating to intimate care. Liaises with Trafford Local Authority and external agencies as required.

Claire Lowe — Deputy Headteacher

Supports the Headteacher in the day-to-day oversight of intimate care practice. Acts as lead in the Headteacher's absence. Oversees the review and updating of Intimate Care Plans (ICPs) in liaison with families and health professionals.

Paul Walker — AHT for Inclusion

Leads on the development and review of Intimate Care Plans for pupils with SEND. Ensures that intimate care needs are fully integrated into EHCPs and IHCPs where relevant. Supports staff in adapting their practice to meet individual pupils' needs.

Elizabeth Dunstan — Pastoral Lead / SEND Family Liaison

Acts as the key point of contact for families regarding intimate care arrangements. Supports families in communicating their child's needs and preferences to school staff. Ensures that parental consent is obtained and recorded, and that families are kept informed.

Gareth Dale — Relational Behaviour Lead / Lunchtime Lead

Ensures that intimate care needs are appropriately managed during lunchtime and other non-classroom periods. Supports staff in responding calmly and sensitively to toileting accidents and other intimate care needs that arise during the school day.

Nazim Dervish — Site Manager

Ensures that all facilities used for intimate care (changing areas, toilets, nappy changing stations) are clean, safe, well-maintained, and appropriately stocked with necessary supplies. Reports any maintenance concerns promptly.

Governing Body, Local Authority, and Partners

Governing Body

The Governing Body, led by Chair of Governors **Helen Johnson**, holds strategic responsibility for ensuring that this policy is in place, fit for purpose, and reviewed annually. The Designated Governor for Safeguarding and Additional Needs (Helen Johnson) provides specific oversight of intimate care arrangements and receives an annual report from the Headteacher on the implementation of this policy.

Local Authority — Trafford

Kingsway Primary School works within the framework provided by Trafford Local Authority. The school follows Trafford LA guidance on intimate care and SEND, and will seek advice from the LA's SENAS team and other specialist services where needed. Any concerns that cannot be resolved internally will be escalated to the appropriate LA officer.

Parents and Carers

Parents and carers are essential partners in their child's intimate care. The school will always seek to work collaboratively with families, sharing information openly and respectfully. Parents and carers are asked to:

- Inform the school of their child's intimate care needs as early as possible
- Contribute to the development and review of their child's Intimate Care Plan
- Share any changes in their child's needs, preferences, or health with the school promptly
- Provide any specialist equipment or supplies agreed in the Intimate Care Plan

Pupils

Where a child is able to do so, their views and preferences regarding their own intimate care will always be sought and taken into account. Children will be supported to develop their own independence in personal care, and will always be treated as active participants in decisions about their own care — not passive recipients of it.

All Staff

All staff who provide intimate care must have completed the required training before doing so. Staff have the right to raise concerns about intimate care arrangements, and will never be required to carry out intimate care for which they have not been trained. Any member of staff who has concerns about a child's welfare, or about the conduct of a colleague, must report this immediately in line with the school's Safeguarding and Child Protection Policy.

Intimate Care Plans (ICPs)

When is an Intimate Care Plan Required?

An Intimate Care Plan (ICP) is required for any pupil who needs regular, ongoing support with intimate care. This includes pupils with SEND, medical conditions, or physical difficulties that mean they cannot manage intimate care independently. An ICP may also be appropriate for pupils who have specific preferences or requirements relating to their intimate care.

For pupils who require only occasional support (for example, following a one-off toileting accident), a full ICP is not required, but the episode must be recorded and parents informed on the same day.

Developing an Intimate Care Plan

ICPs are developed collaboratively, involving:

- The child's parents or carers
- The child themselves, wherever possible and appropriate
- Relevant school staff (including the class teacher, Paul Walker as AHT for Inclusion, and Elizabeth Dunstan as SEND Family Liaison)
- Health professionals involved in the child's care (e.g. school nurse, physiotherapist, continence nurse)

The ICP will set out clearly: the nature of the child's intimate care needs; the agreed procedures to be followed; the staff responsible; the equipment and supplies required; the child's preferences (including any preference for same-sex care); agreed terminology for body parts and functions; and any relevant safeguarding considerations, including any history of abuse or trauma.

Where a pupil has an Education, Health and Care Plan (EHCP) or an Individual Health Care Plan (IHCP), the ICP will be developed in conjunction with these documents and will be consistent with them. A template for the ICP is provided at Appendix 1.

Review and Storage

ICPs will be reviewed at least annually, and at any point when there is a significant change in the child's needs, health, or circumstances — including changes in staffing, residential trips, or the onset of puberty. ICPs are stored securely in the child's confidential records and are accessible only to those who need to know. Parents and carers may request to see their child's ICP at any time.

Safe Practice and Safeguarding

Safe Working Practice

The safety of both children and staff is paramount. The following safe practice requirements apply at all times:

Two-Adult Principle / Private but Not Isolated

Wherever possible, intimate care should not be carried out by a single member of staff working entirely alone. In line with the EYFS Statutory Framework 2026 (paragraph 3.88), children's privacy must always be balanced with safeguarding and supervision needs — intimate care must be private but never isolated. Where a second adult cannot be present in the room (for example, to preserve the child's privacy), a colleague must be informed that the care is taking place and must be nearby, available, and able to access the space if needed. The member of staff providing care must inform a colleague before going to assist a pupil, and must not begin care until this has been done.

No Locked Doors — Visibility Maintained

Intimate care must never take place behind a locked door. Doors may be closed for privacy, but must never be locked. In line with EYFS 2026 paragraph 3.44, children must always be within sight or hearing of a member of staff. The layout of changing facilities must allow a second adult to access the space promptly if needed.

No Photography

No photographs or recordings of any kind will be taken during intimate care. No mobile phones or cameras will be carried by staff during intimate care.

Appropriate Facilities

Intimate care will always take place in a designated, appropriate space — never in a classroom or other shared area. Facilities will be clean, private, and properly equipped.

Infection Control

Staff will follow appropriate infection control procedures at all times, including wearing disposable gloves and aprons where appropriate, and disposing of waste products in accordance with Health and Safety guidelines.

Recording

A written record must be kept every time a child receives intimate care. The EYFS Statutory Framework 2026 (paragraphs 3.95–3.98) strengthens the requirement for accurate, accessible, and confidential record keeping. Records must include, as a minimum: the date and time; the child's name; the nature of the care provided; the name(s) of staff present; the name of the colleague informed before care began; any observations (including any changes in the child's behaviour, physical presentation, or emotional state); and whether parents were informed, and how and when. The Intimate Care Record Sheet at Appendix 2 must be used for this purpose. Records are stored securely, retained for an appropriate period after the child leaves the school, and are available to parents on request. Providers must ensure records are easily accessible to authorised staff and held confidentially in line with UK GDPR and the Data Protection Act 2018.

Recognising and Responding to Concerns

Recognising Signs During Intimate Care

Intimate care can sometimes reveal signs of abuse or neglect. If a member of staff notices unexplained marks, bruises, or other physical changes during intimate care, or if a child makes a disclosure during or after intimate care, the member of staff must respond carefully and promptly.

01	02	03
Remain Calm	Reassure the Child	Report Immediately
Do not express shock or disbelief. Listen carefully and do not ask leading questions.	Reassure the child that they have done the right thing in telling someone.	Report the concern immediately to the Designated Safeguarding Lead (DSL) or, in their absence, the Deputy DSL.
04	05	
Record Accurately	Preserve Confidentiality	
Make a clear, written record of exactly what was observed or said, using the child's own words where possible.	Do not discuss the concern with any other member of staff or with the child's parents before speaking to the DSL.	

All concerns will be handled in accordance with the school's Safeguarding and Child Protection Policy and with reference to *Keeping Children Safe in Education* (current edition). A referral to MARAT (Multi-Agency Referral and Assessment Team) will be made where appropriate.

Strengthened Safeguarding Standards — EYFS 2026

The EYFS Statutory Framework 2026 introduces a strengthened safeguarding threshold. From 1 September 2026, providers must notify Ofsted of any allegation of **harm** (not just 'serious harm') by anyone living, working, or looking after children at the premises — including allegations arising from intimate care. 'Harm' is defined by section 31(9) of the Children Act 1989 and includes ill-treatment, impairment of physical or mental health, and impairment suffered from witnessing the ill-treatment of another. This lower threshold means that any concern arising from intimate care — however minor it may initially appear — must be taken seriously, recorded, and reported without delay. The school will notify Ofsted within 14 days of any such allegation being made, in line with EYFS 2026 paragraph 3.10.

Allegations Against Staff

If a pupil, parent, or any other person makes an allegation against a member of staff in relation to intimate care, this must be reported immediately to the Headteacher (**Kate Baskeyfield**). If the allegation concerns the Headteacher, it must be reported directly to the Chair of Governors (**Helen Johnson**). The Headteacher will consult the Local Authority Designated Officer (LADO) in accordance with the school's policy on allegations against staff. The matter will not be discussed with the member of staff concerned until the LADO has been consulted. From 1 September 2026, the threshold for notifiable allegations has been lowered from 'serious harm' to 'harm' in line with the EYFS Statutory Framework 2026. Any allegation meeting this threshold must be reported to Ofsted within 14 days.

Any member of staff who has concerns about the conduct of a colleague must report this to the Headteacher or Chair of Governors in accordance with the school's Safeguarding Policy and whistleblowing procedures.

Nappy Changing and Toileting Support

Procedure

Nappy changing and toileting support is a routine part of provision in our Early Years Foundation Stage (EYFS) and for pupils with SEND or medical needs throughout the school. The following nine-step procedure applies in all cases:

01	02	03
Inform a Colleague The member of staff informs a colleague that they are going to assist a pupil with nappy changing or toileting. Care must not begin until this has been done. The colleague must remain nearby and available throughout, in line with the EYFS 2026 requirement that intimate care is private but never isolated (paragraph 3.88).	Prepare the Changing Area The child is taken to the designated changing area. The area is checked to ensure it is clean, private, and properly equipped before the child enters. The door may be closed for privacy but must not be locked. The layout of the space must allow the nearby colleague to access it promptly if needed.	Explain to the Child The member of staff explains to the child what is going to happen, using language appropriate to the child's age and understanding.
04	05	06
PPE On The member of staff puts on disposable gloves and an apron before beginning.	Carry Out Care with Dignity The care is carried out gently, efficiently, and with full respect for the child's dignity. The child is encouraged to participate as much as they are able.	Dispose of Materials Soiled nappies and disposable materials are disposed of in accordance with Health and Safety guidelines. Reusable items are bagged and returned to the family.
07	08	09
PPE Off and Handwashing The member of staff removes and disposes of gloves and apron, and washes their hands thoroughly.	Record the Episode The episode is recorded on the Intimate Care Record Sheet (Appendix 2).	Inform Parents Parents are informed at the end of the school day, or sooner if there is any cause for concern.
10		
Record the Colleague's Name A record is made of the name of the colleague who was informed before care began, in addition to all other required information on the Intimate Care Record Sheet.		

Dignity and Communication

No child will ever be made to feel embarrassed, ashamed, or distressed about needing nappy changing or toileting support. Staff will always speak warmly and reassuringly, and will treat the child with the same care and respect they would wish for their own child. No child will be left in soiled or wet clothing while waiting for a parent to arrive — the school takes full responsibility for providing timely and dignified care. In line with EYFS 2026 paragraph 3.88, children's privacy is always considered and balanced with safeguarding and supervision needs. Privacy does not mean isolation — a second adult is always informed and available.

Parental Communication

Where a child does not have an ICP in place, parents will be informed on the same day if their child has needed help with intimate care. This information will be communicated sensitively — in person, by telephone, or by sealed letter — and will not be shared through the home-school diary or any other non-confidential channel.

Changing and Dressing Assistance

PE and Physical Activity

Some pupils may require assistance with changing for PE, swimming, or other physical activities. This is a normal and important part of ensuring that all pupils can participate fully in the curriculum. The following principles apply:

- Assistance with changing will always take place in a private, appropriate space — never in a shared changing area where other pupils are present, unless this has been specifically agreed with the child and their family.
- The child's dignity and modesty will be respected at all times. Only the minimum level of assistance necessary will be provided.
- Where a child or their family has expressed a preference for same-sex assistance, the school will make every reasonable effort to accommodate this.
- A colleague will always be informed before a member of staff goes to assist a pupil with changing.

Medical Needs

Where a pupil requires assistance with dressing or undressing as part of the management of a medical condition (for example, the application of a medical device or the management of a stoma), this will be set out in the child's IHCP or ICP and will only be carried out by staff who have received appropriate training.

Dignity

Staff will always explain what they are doing before they begin, and will encourage the child to do as much as they are able for themselves. No child will be rushed, and no child will be made to feel that their need for assistance is an inconvenience. The child's emotional comfort is as important as their physical care.

Managing Continence Needs

Working with Families and Health Professionals

Continence difficulties are common in primary-aged children and can have a significant impact on a child's confidence, wellbeing, and ability to participate fully in school life. Kingsway Primary School is committed to supporting children with continence needs in a way that is sensitive, non-judgmental, and effective.

Where a child has ongoing continence needs, the school will work closely with the child's family and, where appropriate, with health professionals such as the school nurse or a specialist continence nurse, to develop a continence plan as part of the child's ICP. This plan will set out the agreed approach to managing the child's continence needs at school, including the frequency of toileting support, the equipment and supplies required, and the arrangements for communicating with the family.

No Shame, No Blame

No child will ever be made to feel ashamed, embarrassed, or blamed for a continence difficulty or a toileting accident. Staff will respond to accidents calmly, matter-of-factly, and with kindness. The language used will always be neutral and non-judgmental. Other pupils will not be made aware of a child's continence needs unless the child and their family have agreed to this.

Supplies and Equipment

The school will ensure that appropriate supplies (including spare clothing, nappies, pads, and wipes) are available for pupils who need them. Families will be asked to provide any specialist supplies agreed in the ICP. The Site Manager (**Nazim Dervish**) is responsible for ensuring that changing facilities are always clean, well-stocked, and fit for purpose.

Promoting Independence

Where it is appropriate and safe to do so, staff will actively support children to develop greater independence in managing their own continence needs. This will always be done at the child's own pace, in partnership with the family, and with the guidance of any relevant health professionals.

Staff Training and Support

Mandatory Training

All staff who provide intimate care must complete appropriate training before doing so. The Headteacher (Kate Baskeyfield) is responsible for ensuring that training records are maintained and that all relevant staff have completed the required training. Mandatory training areas include:

- Safeguarding and child protection training (including specific awareness of the safeguarding risks associated with intimate care)
- Intimate care procedures training, covering safe practice, dignity, consent, and recording
- Moving and handling training, where relevant to the pupil's needs
- Infection control training
- Any specialist training required for a specific pupil's medical or physical needs (e.g. catheter care, stoma management), delivered by the relevant health professional

Training will be updated regularly to ensure that staff remain competent and confident.

Staff Wellbeing and Emotional Support

The school recognises that providing intimate care can be emotionally demanding, and that staff may sometimes find aspects of this work challenging. Staff are encouraged to speak openly with their line manager or a member of the leadership team if they have any concerns about their own wellbeing in relation to intimate care. No member of staff will be required to carry out intimate care for which they have not been trained, or which they have a genuine and reasonable objection to carrying out, unless this is a core part of their role as set out in their job description.

If a member of staff has concerns about their own wellbeing, or about the impact of intimate care duties on their mental health, they should raise this with their line manager in the first instance. The school will take all such concerns seriously and will seek to find a supportive and practical resolution.

Safer Recruitment

All staff who provide intimate care must be employees of the school and must have completed the full range of safer recruitment checks, including an enhanced DBS check and barred list check. From 1 September 2026, the Crime and Policing Act 2026 has amended the Safeguarding Vulnerable Groups Act 2006 to remove the previous exemption for supervised unpaid activity. Personal care — including helping a child with toileting, washing, bathing, and dressing — is now classified as regulated activity if carried out frequently, or on more than 3 days in a 30-day period, or overnight. This means that volunteers who provide personal care on a regular basis must now have an enhanced DBS check and barred list check before doing so. In line with EYFS 2026 paragraph 3.15, providers must not allow anyone whose suitability has not been checked to have unsupervised contact with children. Volunteers and students on placement will not carry out intimate care at Kingsway Primary School.

Supervision of Staff

In line with EYFS 2026 paragraph 3.35, the school puts appropriate arrangements in place for the supervision of all staff who have contact with children and families. Supervision provides support, coaching, and training, and promotes the interests of children. Staff who carry out intimate care will have regular opportunities within supervision to discuss any issues or concerns — including concerns about children's development or wellbeing, child protection concerns, or concerns about their own practice or wellbeing. Supervision fosters a culture of mutual support, teamwork, and continuous improvement, and encourages the confidential discussion of sensitive issues.

Parental Consent and Communication

Consent

Parental consent is required before any planned intimate care is provided. For pupils with an ICP, consent is obtained as part of the ICP development process and is reviewed at each annual review. For pupils who require occasional support (for example, following a toileting accident), consent is implied by the school's duty of care; however, parents will always be informed on the same day.

Where a child is able to give or withhold their own consent to intimate care, this will always be sought in addition to parental consent. The child's views will be taken seriously and will be reflected in their ICP.

Keeping Families Informed

Parents and carers will be informed after every episode of intimate care that falls outside the routine arrangements set out in a child's ICP. This information will be communicated sensitively and confidentially — in person, by telephone, or by sealed letter. It will never be shared through the home-school diary, a group communication, or any other non-confidential channel.

The school operates an open-door approach to communication about intimate care. Families are encouraged to share any changes in their child's needs, preferences, or health at any time, and to raise any concerns they may have about the care their child is receiving. **Elizabeth Dunstan** (Pastoral Lead / SEND Family Liaison) is the key point of contact for families in this regard.

Parents Will Not Be Routinely Called In

Parents will never be routinely called into school to carry out intimate care on behalf of the school. The school takes full responsibility for meeting pupils' intimate care needs during the school day. Parents may, of course, choose to come into school to support their child in specific circumstances (for example, during a period of transition or when a child is particularly anxious), and this will always be welcomed and facilitated.

Equality, Inclusion, and the SEND Code of Practice

Our Commitment to Equality

Kingsway Primary School is committed to ensuring that no child is disadvantaged, excluded, or treated less favourably because of their intimate care needs. Under the Equality Act 2010, the school has a duty to make reasonable adjustments to ensure that pupils with disabilities or medical conditions can access the full curriculum and all aspects of school life on an equal basis with their peers.

This means that no child will be excluded from any activity — including trips, sports days, performances, or any other school event — because of their intimate care needs. Where adjustments are needed to enable a child to participate, the school will make every effort to put these in place, working in partnership with the child's family and any relevant health professionals.

The SEND Code of Practice 2015

For pupils with Education, Health and Care Plans (EHCPs), intimate care needs will be addressed within the EHCP process and will be reflected in the child's ICP. **Paul Walker** (AHT for Inclusion) leads on ensuring that intimate care arrangements are fully integrated into the school's SEND provision and are consistent with the requirements of the SEND Code of Practice 2015 (0–25 years).

Dignity for All

Every child, regardless of their age, gender, disability, religion, ethnicity, or sexual orientation, will be treated with dignity and respect during intimate care. The school will take into account the cultural, religious, and personal values of children and their families, and will make every reasonable effort to accommodate preferences relating to the gender of the carer and the specific practices involved in intimate care.

Link to SEND Policy

This policy should be read alongside the school's SEND Policy, which sets out the school's broader approach to meeting the needs of pupils with SEND. Where there is any tension between the two policies, the Headteacher (Kate Baskeyfield) will make a decision in the best interests of the child.

Unacceptable Practice

The following practices are unacceptable at Kingsway Primary School and will be treated as a serious breach of this policy. Any member of staff found to have engaged in unacceptable practice will be subject to the school's disciplinary procedures and, where appropriate, a referral to the LADO and/or other statutory agencies.

Carrying Out Intimate Care Without Consent

Providing intimate care to a child without first explaining what is going to happen and, where appropriate, seeking the child's consent.

Locking Doors

Carrying out intimate care behind a locked door, or in any space that cannot be accessed by another adult if needed.

Shaming or Humiliating a Child

Using language, tone, or behaviour that makes a child feel embarrassed, ashamed, or blamed for their intimate care needs — including in relation to toileting accidents or continence difficulties.

Carrying Out Care Alone Without Informing a Colleague

Providing intimate care without first informing a colleague, or without ensuring that another adult is nearby and aware.

Refusing to Support a Child's Intimate Care Needs

Declining to provide necessary intimate care to a child, except where a member of staff has a genuine and reasonable objection that has been raised through the appropriate channels and an alternative arrangement has been made.

Photography or Recording

Taking or attempting to take any photograph, video, or audio recording of a child during intimate care, or carrying a mobile phone or camera during intimate care.

Using Intimate Care as a Punishment or Reward

Withholding intimate care as a punishment, or using it as a reward or incentive in any way.

Discussing a Child's Intimate Care Needs Inappropriately

Sharing information about a child's intimate care needs with anyone who does not need to know, or in any setting that is not appropriate and confidential.

Carrying Out Care Without Appropriate Training

Attempting to carry out specialist intimate care procedures (such as catheter care or stoma management) without having received appropriate training from the relevant health professional.

Confidentiality and Data Protection

Information about a child's intimate care needs is sensitive personal data and will be treated with the highest level of confidentiality at all times. The school processes this information in accordance with **UK GDPR** and the **Data Protection Act 2018**.

- Information about a child's intimate care needs will be shared only with those members of staff who need to know in order to provide appropriate care.
- Intimate Care Plans, Intimate Care Record Sheets, and any other records relating to a child's intimate care will be stored securely in the child's confidential records, accessible only to authorised staff.
- Parents and carers may request to see their child's intimate care records at any time. Requests will be handled in accordance with the school's Subject Access Request procedure.
- Information about a child's intimate care needs will not be shared with external agencies without parental consent, except where this is required by law or where there is a safeguarding concern.
- Staff will not discuss a child's intimate care needs in any public or semi-public setting, including in the staffroom, in corridors, or in any written communication that is not secure and confidential.
- The school's Privacy Notice sets out how personal data relating to pupils and families is collected, used, and stored. This is available on the school website and from the school office.

 The school's Data Protection Officer can be contacted through the school office for any queries relating to data protection and intimate care records.

Complaints

Kingsway Primary School is committed to resolving any concerns about intimate care quickly, sensitively, and fairly. Full details of how to make a complaint are set out in the Inspiring Learners Multi Academy Trust Complaints Policy, which is available on the school website and from the school office.

How to Raise a Concern (Informal Stage)

Most concerns can be resolved quickly and informally. If you have a concern about any aspect of intimate care, please follow the pathway below:

1. **Class Teacher**
2. **Key Stage Lead**
3. **Deputy Headteacher (Claire Lowe)**
4. **Headteacher (Kate Baskeyfield)**

Elizabeth Dunstan (Pastoral Lead / SEND Family Liaison) is also available to support families at any stage.

Formal Complaints

If a concern cannot be resolved informally, a formal complaint should be made in writing to the **Headteacher (Kate Baskeyfield)** using the Complaint Form in the Inspiring Learners Multi Academy Trust Complaints Policy. If the complaint concerns the Headteacher, it should be addressed to the **Chair of Governors (Helen Johnson)** via the school office, marked *'Private and Confidential.'*

Safeguarding Concerns

Where a complaint relates to a safeguarding concern, it will be handled under the school's Safeguarding and Child Protection Policy and referred to the **Local Authority Designated Officer (LADO)** without delay. The complaints procedure does not apply to safeguarding referrals.

Quick Reference Summary

This table provides a quick reference guide to key aspects of intimate care practice at Kingsway Primary School. It is intended as a reminder for staff and is not a substitute for reading the full policy.

Practice	Required / Permitted?
Explain to the child what is going to happen before beginning intimate care	✔ Always required
Inform a colleague before going to assist a pupil with intimate care	✔ Always required
Wear disposable gloves and apron during intimate care	✔ Always required
Complete an Intimate Care Record Sheet after each episode	✔ Always required
Inform parents on the same day if their child has needed intimate care outside their ICP	✔ Always required
Use correct anatomical language with children in an age-appropriate way	✔ Always required
Accommodate same-sex care preferences where possible	✔ Required where expressed
Carry out intimate care behind a locked door	✘ Never permitted
Carry a mobile phone or camera during intimate care	✘ Never permitted
Take photographs or recordings during intimate care	✘ Never permitted
Leave a child in soiled clothing while waiting for a parent	✘ Never permitted
Routinely call parents in to carry out intimate care	✘ Never permitted
Use intimate care as a punishment or reward	✘ Never permitted
Shame or humiliate a child about their intimate care needs	✘ Never permitted
Carry out specialist intimate care without appropriate training	✘ Never permitted
Discuss a child's intimate care needs in a non-confidential setting	✘ Never permitted
Volunteers or students on placement carry out intimate care	✘ Never permitted

Intimate Care Plan Template

This template should be completed for any pupil who requires regular, ongoing intimate care support. It should be developed collaboratively with the child's family and any relevant health professionals, and reviewed at least annually. Completed ICPs are stored securely in the child's confidential records.

Field	Details
Child's Name	
Date of Birth	
Class / Year Group	
Class Teacher	
Date ICP Completed	
Date of Next Review	
Nature of Intimate Care Needs	
Agreed Procedures to be Followed	
Staff Responsible for Providing Care	
Equipment and Supplies Required	
Child's Preferences (including same-sex care preference)	
Agreed Terminology for Body Parts and Functions	
Relevant Safeguarding Considerations (e.g. history of abuse or trauma)	
Link to EHCP / IHCP (if applicable)	
Arrangements for Educational Visits and Trips	
Arrangements for Residential Trips (if applicable)	
Health Professionals Involved	
Parental Consent Given	Yes / No / Date:
Parent / Carer Signature	
Headteacher / Deputy Headteacher Signature	
Date Signed	

Intimate Care Record Sheet

This record sheet must be completed after every episode of intimate care. Rigorous and detailed record keeping is a statutory requirement under the EYFS Statutory Framework 2026 (paragraphs 3.95–3.98). Records are stored securely in the child's confidential file, retained for an appropriate period after the child leaves the school, and are available to parents on request.

Child's Name	
Date of Birth	
Class / Year Group	

Complete one row per episode of intimate care. A new sheet should be started for each child each term, or sooner if the sheet is full.

Date & Time	Nature of Care Provided	Staff Present	Colleague Informed (Name)	Observations (any changes in behaviour, physical presentation, or emotional state — write "None" if none)	Parent/Carer Informed? (Yes / No — if Yes, note how and when)
					Yes / No
					Yes / No
					Yes / No
					Yes / No
					Yes / No
					Yes / No
					Yes / No
					Yes / No



If you have any concerns arising from an episode of intimate care — about the child's welfare, physical presentation, or behaviour — please report these immediately to the Designated Safeguarding Lead and record them separately on the school's safeguarding concern form.

Sources and References

This policy has been developed with reference to the following statutory legislation, statutory guidance, and professional guidance documents. All staff are advised to familiarise themselves with the key documents relevant to their role. This policy has been updated in Autumn 2025 to reflect the EYFS Statutory Framework for Group and School-Based Providers effective 1 September 2026 and the Crime and Policing Act 2026.

- Children Act 1989, s.3 — duty of care
- Equality Act 2010 — reasonable adjustments; protected characteristics
- Health and Safety at Work etc. Act 1974
- UK GDPR and Data Protection Act 2018
- SEND Code of Practice 2015 (0–25 years) — Department for Education and Department of Health
- Keeping Children Safe in Education (current edition) — Department for Education
- UN Convention on the Rights of the Child, Articles 16 (right to privacy) and 28 (right to education)
- Care Act 2014 (where relevant for older or more complex needs)
- NSPCC guidance on intimate care and body safety — [nspcc.org.uk](https://www.nspcc.org.uk)
- DfE guidance on safeguarding in schools — Keeping Children Safe in Education (current edition)
- Trafford Local Authority SENAS guidance on intimate care and SEND
- Trafford LA Model Intimate Care Policy and Procedure
- EYFS Statutory Framework for Group and School-Based Providers (effective 1 September 2026) — Department for Education, dated 13 July 2026. Key provisions: paragraph 3.10 (lowered harm threshold for Ofsted notification); paragraph 3.15 (enhanced DBS for all volunteers); paragraph 3.44 (children within sight or hearing of staff); paragraph 3.88 (toilets and intimate hygiene — privacy balanced with safeguarding); paragraphs 3.95–3.98 (information and record keeping); paragraph 3.35 (supervision of staff)
- Crime and Policing Act 2026 — amendment to the Safeguarding Vulnerable Groups Act 2006 removing the exemption for supervised unpaid activity in relation to personal care (including toileting, washing, bathing, and dressing)

Document Sign-Off and Review Record

This page forms the formal sign-off record for the Kingsway Primary School Intimate Care Policy. The policy is reviewed annually by the Full Governing Body, no later than the end of the Summer Term each year. The review record below should be updated following each review.

Field	Detail
Policy Title	Intimate Care Policy
Version	1.0 — Autumn 2025
Date Adopted	[To be completed at Full Governing Body meeting]
Headteacher	Kate Baskeyfield
Chair of Governors	Helen Johnson
Headteacher Signature	
Chair of Governors Signature	
Date Signed	
Next Review Due	September 2029

Review History

Review Date	Reviewed By	Changes Made	Approved By
November 2023	Kate Baskeyfield (Headteacher)	Policy first adopted. Based on Trafford LA Model Intimate Care Policy and Procedure. Approved by Elizabeth Dunstan (Chair of Governors) at Curriculum and Pupils Committee meeting 05/12/23. Review cycle set as triennial.	Elizabeth Dunstan (Chair of Governors) / Curriculum and Pupils Committee
Autumn 2025	Kate Baskeyfield (Headteacher)	Full redraft. Policy restructured and significantly expanded to reflect current statutory guidance (Keeping Children Safe in Education, SEND Code of Practice 2015, UK GDPR/DPA 2018). Named staff roles added. Sections added on: Principles; Key Roles and Responsibilities; ICPs; Safe Practice and Safeguarding; Nappy Changing; Changing and Dressing; Continence; Staff Training; Parental Consent; Equality and SEND; Unacceptable Practice; Confidentiality; Complaints. Quick Reference Summary and two appendices added. Review cycle changed from triennial to annual. School joined Inspiring Learners Multi Academy Trust September 2025.	Full Governing Body
September 2029	Kate Baskeyfield (Headteacher)	[To be completed]	[To be completed]