



Thornton Primary School

Love • Respect • Ambition

Intimate Care Policy

1. Policy Statement

Thornton Primary School is committed to safeguarding and promoting the welfare of every child. We believe that all pupils have the right to be treated with dignity, respect, compassion and privacy when receiving intimate care. Intimate care will always be provided in a manner that promotes each child's wellbeing, independence, self-esteem and personal dignity while ensuring their safety remains paramount.

The school recognises that some pupils may require support with intimate care due to their age, stage of development, medical needs, disability, special educational needs, temporary injury or emotional wellbeing. We are committed to ensuring that these pupils are able to access education safely and without discrimination.

Intimate care is regarded as a safeguarding activity. All members of staff providing intimate care have a responsibility to maintain the highest standards of professional conduct, safeguarding practice and confidentiality. Every episode of intimate care will be undertaken using child-centred, trauma-informed and inclusive approaches that respect the voice, wishes and individual needs of the child.

This policy should be read alongside the school's:

- Safeguarding and Child Protection Policy
- Behaviour Policy
- SEND Policy
- Supporting Pupils with Medical Conditions Policy
- Health and Safety Policy
- Staff Code of Conduct
- Whistleblowing Policy
- First Aid Policy
- Attendance Policy

2. Purpose



The purpose of this policy is to ensure that:

- every pupil requiring intimate care receives safe, respectful and consistent support;
- the welfare of the child remains the school's primary consideration at all times;
- staff understand their safeguarding responsibilities;
- pupils are protected from harm, abuse and avoidable distress;
- staff are protected through clear professional procedures;
- parents and carers understand the school's expectations and procedures;
- statutory safeguarding and equality duties are fulfilled.

3. Scope

This policy applies to all members of staff employed by Thornton Primary School, including:

- teachers;
- teaching assistants;
- higher level teaching assistants;
- learning mentors;
- pastoral staff;
- SEND staff;
- leaders;
- agency staff working regularly within the school;
- contractors where appropriate.

Students, volunteers and visitors must never undertake intimate care unless specifically authorised by the Headteacher, appropriately trained, risk assessed and supervised.

4. Legislative and Statutory Framework

This policy has been developed in accordance with current legislation and statutory guidance, including but not limited to:

- Keeping Children Safe in Education (latest statutory guidance)
- Working Together to Safeguard Children (2023)
- Children Act 1989
- Children Act 2004
- Education Act 2002 (Section 175)
- Equality Act 2010
- Human Rights Act 1998



- Special Educational Needs and Disability Code of Practice: 0–25 Years
- Early Years Foundation Stage Statutory Framework
- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Manual Handling Operations Regulations 1992
- Control of Substances Hazardous to Health (COSHH) Regulations 2002
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Lancashire Safeguarding Children Partnership procedures

5. Definition of Intimate Care

Intimate care refers to any care which involves washing, touching or carrying out an invasive procedure to intimate personal areas that most people usually carry out themselves.

This includes, but is not limited to:

- toileting support;
- changing nappies or pull-ups;
- cleaning a child following soiling;
- changing clothing following toileting accidents;
- assisting with menstrual hygiene;
- changing continence products;
- supporting personal hygiene following illness;
- supporting pupils with medical or physical needs requiring intimate assistance.

The school recognises that intimate care differs from ordinary personal care because of the increased need for privacy, dignity and safeguarding.

6. Principles

At Thornton Primary School we are committed to ensuring that intimate care is delivered according to the following principles.

Every child has the right to:

- be safe;
- be treated with dignity and respect;
- have their privacy protected;



- have their views listened to;
- receive support that promotes independence;
- receive care appropriate to their age and stage of development;
- receive care without discrimination;
- be protected from abuse or unnecessary distress.

Wherever possible, pupils will be encouraged and supported to undertake elements of self-care independently. Staff will promote independence sensitively without placing unrealistic expectations upon children.

Support will always be delivered in the least intrusive way possible.

7. Safeguarding

Safeguarding is central to all intimate care arrangements.

All staff undertaking intimate care must:

- hold an enhanced DBS clearance;
- receive appropriate safeguarding training;
- understand the school's Child Protection Policy;
- understand safer working practice expectations;
- maintain professional boundaries at all times.

Any member of staff who notices:

- unexplained bruising;
- injuries;
- soreness;
- burns;
- marks;
- changes in behaviour;
- disclosures;
- signs of neglect;
- unusual comments made by a child;
- any concern relating to abuse or exploitation,

must immediately report these concerns to the Designated Safeguarding Lead in accordance with the school's Safeguarding and Child Protection Policy.

Concerns will be recorded promptly and accurately using the school's safeguarding recording system (CPOMS).



No member of staff should investigate safeguarding concerns themselves.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, statutory safeguarding procedures will be followed without delay.

8. Professional Conduct During Intimate Care

All staff providing intimate care will:

- explain what they are doing before beginning;
- speak calmly and respectfully;
- preserve the child's dignity;
- encourage participation wherever possible;
- avoid unnecessary physical contact;
- maintain appropriate professional boundaries;
- ensure another member of staff knows intimate care is taking place;
- report and record any concerns immediately.

Staff will never:

- ridicule or embarrass a child;
- discuss a child's intimate care needs in front of others;
- leave a child unattended where this presents a risk;
- take photographs or make recordings;
- undertake unnecessary intimate contact.

9. Equality, Inclusion and Respect

Thornton Primary School is committed to ensuring that no child experiences discrimination because of disability, medical needs, continence difficulties, gender, race, religion, culture or special educational needs.

Reasonable adjustments will be made wherever necessary to ensure all pupils can access education safely and with dignity.

For pupils with Education, Health and Care Plans (EHCPs), intimate care arrangements will reflect the outcomes, provision and support identified within their plan and any associated Individual Intimate Care Plan.



Staff will recognise and respect family preferences, cultural beliefs and religious practices wherever these can be accommodated safely and lawfully.

10. Roles and Responsibilities

Governing Board

The Governing Board will:

- ensure statutory safeguarding duties are fulfilled;
- approve and review this policy annually;
- monitor implementation through safeguarding governance;
- ensure adequate staffing and training.

Headteacher

The Headteacher will:

- ensure effective implementation of this policy;
- provide appropriate staffing arrangements;
- ensure staff receive suitable training;
- oversee compliance with safeguarding legislation;
- monitor policy implementation.

Designated Safeguarding Lead (DSL)

The DSL will:

- oversee safeguarding arising from intimate care;
- ensure concerns are acted upon immediately;
- monitor safeguarding records;
- liaise with external agencies where appropriate;
- provide safeguarding advice to staff.

SENDCO

The SENDCO will:

- coordinate Individual Intimate Care Plans;
- ensure reasonable adjustments are implemented;



- liaise with parents and professionals;
- review arrangements for pupils with SEND and EHCPs.

Staff

Staff responsible for intimate care will:

- follow this policy;
- maintain dignity and privacy;
- seek consent where appropriate;
- promote independence;
- record concerns accurately;
- report safeguarding issues immediately.

Parents and Carers

Parents and carers are expected to:

- work in partnership with the school;
- provide necessary continence products where agreed;
- inform the school of medical changes;
- contribute to Individual Intimate Care Plans where required;
- maintain open communication regarding their child's needs.

11. Consent and the Child's Voice

Thornton Primary School recognises that children have the right to be involved in decisions about their own care, in accordance with their age, understanding and level of development.

Parents or carers will provide written consent for routine intimate care where this is regularly required. For pupils requiring ongoing support, consent will be documented within an Individual Intimate Care Plan.

Before providing intimate care, staff will:

- explain clearly and sensitively what support is required;
- seek the child's agreement wherever this is developmentally appropriate;
- respect the child's views, wishes and feelings;
- encourage the child to undertake any aspects of care independently where possible.

Where a child refuses intimate care, staff will seek to understand the reasons for the refusal and offer reassurance. Force will never be used unless there is an immediate risk to the child's health or safety. Where a child consistently refuses support, parents/carers will be informed and, where appropriate, the Individual Intimate Care Plan will be reviewed.



In emergency situations where immediate intimate care is required to protect a child's health, dignity or welfare, staff may provide necessary support without prior parental consent. Parents will be informed as soon as reasonably practicable following the incident.

12. Individual Intimate Care Plans

Any pupil requiring regular or ongoing intimate care will have an Individual Intimate Care Plan.

Plans will be developed collaboratively with:

- parents or carers;
- the pupil, where appropriate;
- the SENDCO;
- relevant health professionals;
- other agencies where required.

Each plan will include:

- the pupil's identified needs;
- the level of support required;
- agreed toileting routines;
- continence products required;
- moving and handling arrangements;
- medical information;
- communication needs;
- behavioural considerations;
- safeguarding considerations;
- emergency procedures;
- staff responsible for providing care;
- arrangements for maintaining dignity and privacy;
- review dates.

Plans will be reviewed at least annually or sooner if the pupil's needs change.

13. Pupils with SEND, Disabilities and EHCPs

Thornton Primary School is committed to ensuring that pupils with Special Educational Needs and Disabilities receive equitable access to education through appropriate intimate care arrangements.



Reasonable adjustments will be made in accordance with the Equality Act 2010.

For pupils with Education, Health and Care Plans (EHCPs), intimate care arrangements will reflect:

- identified outcomes;
- therapeutic recommendations;
- medical advice;
- sensory needs;
- communication needs;
- independence targets.

Staff will promote independence wherever appropriate while recognising that pupils may require varying levels of support depending upon their needs.

No pupil will be disadvantaged or excluded from educational activities because they require intimate care.

14. The Orchard SEMH Provision

Within The Orchard, Thornton Primary School's Key Stage 2 Specialist SEMH Provision, all pupils have an Education, Health and Care Plan and may require additional therapeutic support.

Staff recognise that intimate care may be affected by:

- sensory regulation needs;
- anxiety;
- trauma experiences;
- communication differences;
- emotional dysregulation;
- behavioural responses associated with SEND.

Staff working within The Orchard will adopt trauma-informed approaches by:

- building trusted relationships;
- preparing pupils before intimate care;
- using consistent routines;
- providing calm and predictable environments;
- allowing additional processing time;
- supporting emotional regulation before, during and after intimate care;
- working in accordance with therapeutic recommendations.

Positive behaviour support strategies will always be used in preference to restrictive practices.



15. Privacy, Dignity and Respect

Staff will ensure that all intimate care is undertaken in a manner which preserves each child's dignity.

Wherever possible:

- doors or privacy screens will be used appropriately;
- children will not be unnecessarily exposed;
- only clothing necessary for the procedure will be removed;
- conversations will remain respectful and reassuring;
- pupils will be encouraged to participate in their own care.

Staff will always communicate with pupils in a calm, respectful and age-appropriate manner.

16. Infection Prevention and Control

High standards of hygiene are essential in protecting both pupils and staff.

Staff providing intimate care will:

- wash hands before and after every procedure;
- wear appropriate disposable gloves and aprons;
- use additional PPE where required following risk assessment;
- safely dispose of clinical and personal waste;
- clean and disinfect changing areas after each use;
- follow COSHH procedures for cleaning products;
- ensure equipment is cleaned between pupils.

Each pupil requiring regular intimate care should have their own clearly labelled personal supplies where appropriate.

17. Manual Handling

Some pupils may require physical assistance during intimate care.

Where this is necessary:



- individual moving and handling risk assessments will be completed;
- only trained staff will undertake moving and handling procedures;
- appropriate equipment will be used where available;
- staff safety and pupil dignity will both be considered.

Where risk assessments identify that two adults are required to ensure safe moving and handling, this arrangement will be followed.

18. Intimate Care Procedures

Staff will ensure that intimate care is undertaken consistently and safely.

Before providing care staff will:

- gather all required equipment;
- check that the environment is clean and safe;
- explain the procedure to the pupil;
- encourage the pupil to participate independently where possible;
- wash hands and put on appropriate PPE.

During intimate care staff will:

- maintain the child's dignity;
- communicate throughout the procedure;
- minimise the amount of clothing removed;
- clean from front to back where appropriate;
- use only products supplied or authorised by parents;
- monitor for signs of soreness, injury or infection.

Following intimate care staff will:

- ensure the pupil is clean, comfortable and appropriately dressed;
- encourage handwashing;
- safely dispose of waste;
- clean all equipment and surfaces;
- remove PPE safely;
- wash hands thoroughly;
- record any significant observations.



19. Toileting Accidents

Toileting accidents are recognised as a normal part of child development and, in some cases, may arise from medical, emotional or additional needs.

Staff will respond sensitively and discreetly.

Children will never be embarrassed, criticised or made to feel ashamed following an accident.

Parents will normally be informed where:

- repeated accidents occur;
- medical concerns arise;
- replacement clothing has been used;
- safeguarding concerns are identified.

20. Recording and Record Keeping

Accurate records help safeguard both pupils and staff.

An Intimate Care Record should be completed where:

- a pupil has an Individual Intimate Care Plan;
- intimate care is routinely provided;
- there are significant observations;
- injuries or concerns are identified;
- parents need to be informed.

Records should include:

- pupil's name;
- date and time;
- staff member(s) present;
- reason for intimate care;
- support provided;
- observations made;
- action taken;
- parent communication;
- signature of the member of staff completing the record.



Records will be stored securely in accordance with the school's Data Protection Policy and UK GDPR using CPOMs.

21. Safeguarding Concerns Arising During Intimate Care

If a member of staff observes:

- unexplained injuries;
- unusual marks;
- soreness;
- signs of neglect;
- indicators of female genital mutilation (FGM);
- signs of sexual abuse;
- disclosures;
- concerning behaviour;
- any safeguarding concern,

they must:

1. ensure the immediate safety of the pupil;
2. report concerns immediately to the Designated Safeguarding Lead;
3. record factual observations on CPOMS without delay;
4. preserve evidence where appropriate;
5. not question the child beyond necessary clarification;
6. follow the school's Safeguarding and Child Protection Policy.

No member of staff should delay reporting concerns or assume someone else has already done so.

22. Partnership with Parents and Carers

Thornton Primary School values positive relationships with parents and carers.

The school will:

- work collaboratively to promote independence;
- seek parental views when developing Individual Intimate Care Plans;
- maintain open communication;



- inform parents of significant concerns or changes;
- review support arrangements regularly.

Parents are expected to:

- provide appropriate continence products where agreed;
- ensure spare clothing is available;
- notify the school of medical or developmental changes;
- attend review meetings where requested.

Working in partnership with families helps ensure pupils receive consistent, dignified and effective support across home and school.

23. Professional Boundaries and Safer Working Practice

Maintaining professional boundaries is essential to safeguarding pupils and protecting staff.

All members of staff providing intimate care will:

- adhere to the school's Staff Code of Conduct;
- follow the guidance contained within *Keeping Children Safe in Education*;
- always act in the best interests of the child;
- maintain appropriate professional relationships with pupils;
- explain all procedures before commencing intimate care;
- respect pupils' privacy, dignity and modesty;
- avoid unnecessary physical contact;
- use appropriate language at all times;
- ensure another member of staff is aware that intimate care is taking place.

Where possible, intimate care should be delivered by a member of staff who is known to the pupil and with whom the pupil has an established, trusting relationship.

Staff should avoid situations where they are completely isolated from colleagues. Where intimate care is provided by one member of staff, another member of staff should know where they are and be available if required.

Mobile phones, cameras, smart watches or personal recording devices must never be used during intimate care.



24. Volunteers, Students, Agency and Supply Staff

Volunteers, work experience students and visitors must not undertake intimate care.

Agency and supply staff will only provide intimate care where:

- they have received appropriate safeguarding training;
- they have been made familiar with this policy;
- they have an enhanced DBS clearance;
- they are working within the school for an extended period;
- they have been authorised by the Headteacher.

Whenever possible, intimate care should be provided by permanent members of staff who know the child well.

25. Allegations Against Staff

Any allegation, concern or complaint relating to intimate care involving a member of staff will be treated as a safeguarding matter.

Concerns will be managed in accordance with:

- Keeping Children Safe in Education;
- the school's Managing Allegations Against Staff Policy;
- Local Authority Designated Officer (LADO) procedures.

The welfare of the child will remain the paramount consideration.

Staff must immediately report any allegation or concern to the Headteacher.

Where the allegation concerns the Headteacher, it must be reported immediately to the Chair of Governors.

No member of staff should investigate allegations themselves.

26. Whistleblowing

Thornton Primary School promotes a culture of openness and accountability.



All staff have a professional duty to report concerns about:

- unsafe practice;
- poor professional conduct;
- breaches of safeguarding procedures;
- failure to follow this policy;
- behaviour which may place pupils at risk.

Staff raising concerns in good faith will be supported in accordance with the school's Whistleblowing Policy.

27. Confidentiality and Information Sharing

Information relating to a pupil's intimate care needs is confidential.

Information will only be shared where:

- it is necessary to safeguard the child;
- it supports the child's education or wellbeing;
- there is a lawful basis for sharing under UK GDPR;
- parental consent has been obtained where appropriate.

Records will be:

- factual;
- accurate;
- objective;
- securely stored;
- retained in accordance with the school's retention schedule.

28. Staff Training

All staff who may provide intimate care will receive appropriate training, including:

- safeguarding and child protection;
- Keeping Children Safe in Education;
- professional boundaries;
- infection prevention and control;
- use of personal protective equipment;



- manual handling (where appropriate);
- recording and CPOMS procedures.

All staff will undertake

Training will be refreshed regularly and whenever statutory guidance changes.

29. Monitoring and Quality Assurance

The Headteacher, Designated Safeguarding Lead and Governing Board will monitor the implementation of this policy through:

- safeguarding audits;
- monitoring of CPOMS records;
- review of Individual Intimate Care Plans;
- staff supervision;
- training records;
- parental feedback;
- incident monitoring;
- governor safeguarding visits.

Any recommendations arising from audits or safeguarding reviews will be implemented promptly.

30. Policy Review

This policy will be reviewed:

- annually;
- following changes to statutory guidance;
- following significant safeguarding incidents;
- following recommendations from safeguarding audits;
- where local safeguarding procedures change.

Appendix A



Individual Intimate Care Plan

Pupil Name:

Date of Birth:

Year Group:

Class:

Medical Diagnosis (if applicable):

SEND/EHCP Details:

Date Plan Commences:

Daily Care Requirements

- Toileting support required
- Continence products used
- Personal hygiene requirements
- Medication (if applicable)

Communication Needs

How should staff communicate during intimate care?

Independence Targets

What can the pupil do independently?

Moving and Handling Requirements

Equipment required:

Risk assessment completed:

Behaviour Support

Strategies to reduce anxiety or distress.

Emergency Procedures

Review Date



Signatures

Parent/Carer

Headteacher

SENDCO

Class Teacher

Appendix B

Parent Consent Form

I give permission for appropriately trained members of staff at Thornton Primary School to provide intimate care to my child in accordance with the school's Intimate Care Policy.

Child's Name:

Parent/Carer Name:

Signature:

Date:

Emergency Contact Number:

Preferred Continence Products:

Additional Information:



Appendix C

Intimate Care Record

Date Time Staff Member Reason Care Provided Observations Parent Informed Signature



Appendix D

Intimate Care Risk Assessment

Pupil Name

Hazards Identified

Control Measures

Staff Required

Equipment Required

Manual Handling Required

Emergency Procedures

Review Date

Assessor

Appendix E

Staff Checklist

Before providing intimate care:

- ✓ Explain the procedure.
- ✓ Seek the child's agreement where appropriate.
- ✓ Gather equipment.
- ✓ Wear PPE.
- ✓ Maintain dignity.
- ✓ Encourage independence.



- ✓ Dispose of waste safely.
- ✓ Wash hands.
- ✓ Record concerns.
- ✓ Inform parents where appropriate.
- ✓ Record safeguarding concerns on CPOMS immediately.

Appendix F

Safeguarding Flowchart

Concern identified during intimate care



Ensure the child is safe.



Record factual observations immediately.



Report immediately to the Designated Safeguarding Lead.



Record on CPOMS.



DSL considers threshold for referral.



Where appropriate:

- Children's Social Care



- Police
- Health Services
- Local Authority Designated Officer (LADO)



Continue to support the child and maintain confidentiality.

Equality Impact Statement

Thornton Primary School is committed to ensuring that this policy is implemented fairly and consistently. Reasonable adjustments will be made where necessary to meet the individual needs of pupils in accordance with the Equality Act 2010. No child will be disadvantaged because of disability, medical need, continence issues, race, religion, sex, gender reassignment, pregnancy or maternity, sexual orientation, age, marriage or civil partnership.

Linked Policies

This policy should be read alongside:

- Safeguarding and Child Protection Policy
- Behaviour Policy
- SEND Policy
- Supporting Pupils with Medical Conditions Policy
- Health and Safety Policy
- First Aid Policy
- Attendance Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Data Protection Policy
- Accessibility Plan

Date: September 2026

Review Date: September 2027

Signed: David Ashcroft, Headteacher. To be agreed by Full Governors on 24/11/2026