

# *Ysgol Hendrefelin*



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## Intimate Care Policy

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### MONITORING AND EVALUATION OF POLICY

<b>Policy Type:</b>	School
<b>Review Cycle:</b>	Annually
<b>Last Review Date:</b>	July 2026

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## **1. Introduction**

Ysgol Hendrefelin is committed to ensuring that all staff responsible for providing intimate care do so with professionalism, dignity and respect. Every learner has the right to feel safe, comfortable and valued during any form of intimate or personal care. No child or young person should ever experience distress, discomfort, pain or embarrassment. The school must remove any barriers that prevent learners with health needs from accessing activities, trips and residential stays away from the school site.

This policy is informed by the following legislation and guidance:

- Supporting Learners with Healthcare Needs (Welsh Government, 2017)
- Keeping Learners Safe (Welsh Government, 2022)
- Wales Safeguarding Procedures (2019)
- Single Unified Safeguarding Review (SUSR) Statutory Guidance (Welsh Government, 2024)
- The Additional Learning Needs and Education Tribunal (Wales) Act 2018
- The Social Services and Well-being (Wales) Act 2014
- The Equality Act 2010

The Governing Body of Ysgol Hendrefelin acknowledges its responsibilities under the Equality Act 2010, including the duty to make reasonable adjustments for disabled learners. No learner may be refused a school place, or treated less favourably, on the grounds of continence needs or the requirement for intimate care. Any admissions practice setting a blanket standard of continence would be discriminatory and unlawful. The learner's welfare is paramount, and intimate care must always be delivered sensitively, safely and in a child-centred manner.

## **2. Purpose of the Policy**

This policy establishes clear procedures that:

- Safeguard learners and staff through a consistent, safe working framework
- Promote dignity, privacy and independence
- Support staff in understanding their roles and responsibilities
- Ensure fair, respectful treatment of every learner
- Maintain dignity, privacy and consistency for all learners

Intimate care presents sensitive and complex issues. Risks must be always minimised. Decisions must always prioritise dignity, privacy, safety, consistency and partnership with parents and carers.

### **3. Definition of Intimate care**

Intimate care refers to any support that involves touching or attending to private areas of the body that individuals would normally manage independently. This may be required due to age, physical disability, medical need or developmental delay. Intimate care may require direct contact with, or in close proximity to (supervision), the body.

Examples include:

- Washing
- Dressing and undressing (including for swimming)
- Toileting and menstruation care
- Changing soiled clothing or nappies
- Providing supervision during intimate self-care

Learners will always be encouraged to undertake as much of their own personal care as possible to promote independence and life skills.

## **4. Principles of Best Practice**

### **4.1 Dignity and Respect**

- Intimate care is always delivered respectfully.
- Staff remain alert to the learner's verbal and non-verbal cues and respond sensitively.
- Privacy is maintained. The number of staff present is kept to the minimum necessary.

### **4.2 Promoting Independence**

- Learners are encouraged to complete aspects of care themselves where able.
- Independence targets may be set as part of personal development or Individual Healthcare Plans (HCPs).

### **4.3 Learner Voice and Communication**

For learners in a special education setting, the ability to communicate preferences, discomfort or refusal may rely on augmentative and alternative communication (AAC), Makaton, PECS, objects of reference or behavioural cues etc.

- Each learner's preferred communication method must be recorded in their care plan.
- Staff must understand and respond to the learner's communication before, during and after care.
- Learner preferences about the intimate care process must be respected and documented.
- Any change in the learner's communication or behaviour during care must be recorded and reported.

### **4.4 Individualised Support**

- Cultural, religious, medical and personal needs are considered and documented.
- Care arrangements are tailored to each learner and reviewed regularly.
- Care plans must be linked to the learner's Individual Development Plan (IDP) where applicable, in line with the ALN Act 2018.

### **4.5 Staffing**

- Where two staff are required, this must be documented clearly in the care plan.
- A rota system must be used to prevent over-familiar relationships forming between individual staff members and learners.
- Before beginning intimate care alone with a learner, the member of staff must inform a colleague of their location and the likely duration of the care.

### **4.6 Gender Considerations**

Both male and female staff of Ysgol Hendrefelin may undertake intimate care. Sensitivity to the learner's needs, preferences and cultural considerations must be prioritised and documented in the care plan.

## 4.7 Refusal of Care

A learner may refuse intimate care. The following steps apply:

- Do not force care. Step back and allow the learner time.
- Use the learner's preferred communication strategies to understand the reason for refusal.
- Record the refusal and the response taken on MyConcern the same working day.
- Notify parents or carers on the same day.
- Review the care plan and approach with the team. Adjust if needed.
- If refusal is persistent or distress is significant, seek advice from a relevant professional (e.g., occupational therapist, behaviour support).

**Intimate care must never be withheld as a sanction or consequence. Refusal must always be treated as communication.**

## 5. Mobile Phones and Personal Devices

Mobile phones and personal electronic devices must not be used or carried by staff in any room where intimate care is taking place. This always applies to all staff, with no exceptions.

Any breach of this rule must be reported immediately to the line manager, recorded on MyConcern and referred to the Designated Safeguarding Officer.

## 6. Personal Protective Equipment (PPE)

The school provides the following PPE:

- Disposable nitrile gloves
- Disposable aprons
- Waste bins and liners

Staff must always use PPE when dealing with blood, bodily fluids or soiled clothing.

If PPE is unavailable or stock is low, the member of staff must report this to their line manager immediately. Care should not proceed without appropriate PPE unless there is an immediate health risk to the learner.

Parents and carers must supply spare clothing, nappies or pads, wipes, creams and any other personal care items specific to their child.

## **6.1 Staff Attire and Hygiene**

Staff attire, grooming and personal hygiene must reflect best practice in safeguarding and infection control whenever intimate care is being delivered:

- Clothing and accessories: staff must avoid wearing jewellery or accessories that could be grabbed, cause scratching or pose an injury risk to the learner or to themselves.
- Nail care: fingernails must be kept short and clean to reduce the risk of accidental harm and to minimise infection risk.
- Hand hygiene: staff must wash their hands thoroughly with soap and water before and after providing intimate care. Alcohol-based hand sanitiser may be used where appropriate. Hands must be dried with disposable paper towels or an air dryer.
- Infection control: staff must follow all additional infection control procedures in place, including any specific guidance for learners with complex medical needs.

These standards safeguard learner dignity, maintain professionalism and support high-quality infection prevention in line with Welsh Government guidance.

# **7. Consent and Care Planning**

## **7.1 Parental Consent**

- Written parental or carer consent is required before intimate care is provided, except in emergencies.
- All staff supporting the learner must be aware that consent is in place before providing care.
- Consent is recorded using Appendix A: Intimate Care Agreement and Consent Form.

## **7.2 Individual Healthcare Plans (HCPs)**

Some learners require a healthcare plan. This may include:

- Supported eating
- Medication administration

- Physiotherapy or occupational therapy programmes
- Manual handling
- Medical procedures such as gastrostomy feeding

**Nasal gastric feeding must only be carried out by a qualified healthcare professional.**

Where a learner has both an HCP and an IDP, care arrangements must be consistent across both documents. Any discrepancy must be resolved with the ALNCo and relevant professionals.

## **8. Safeguarding and Protecting Learners**

All intimate care must follow the Wales Safeguarding Procedures (2019) and the school's Safeguarding and Child Protection Policy.

Staff must immediately report any of the following to the Designated Safeguarding Officer and record the concern on MyConcern the same working day. DSOs are alerted automatically when a record is submitted.

- Unexplained marks or bruising (complete a body map record at the time of discovery)
- Changes in behaviour before, during or after care
- Signs of distress during care
- Any allegation made by a learner

Concerns must be reported to the Designated Safeguarding Officers:

- Mr P. Thomas, Designated Safeguarding Officer (Bryncoch Site)
- Mr N. Lloyd, Designated Safeguarding Officer (Port Talbot Sites)

### **8.1 Allegation Management**

If an allegation is made against a member of Ysgol Hendrefelin staff during or following intimate care, the following steps apply immediately:

- Remove the member of staff from the situation calmly and without delay.
- Contact the Designated Safeguarding Officer straight away.
- The DSO contacts the Local Authority Designated Officer (LADO).

- Parents or carers are informed as soon as is appropriate and safe to do so.
- The incident is recorded in full on MyConcern.
- No member of staff under investigation should have unsupervised contact with any learner until the matter is resolved.

**If the concern involves a DSO or senior leader, staff must contact the LADO directly without going through the school's internal structure.**

## 8.2 Learner Distress with a Specific Staff Member

If a learner becomes upset with a specific member of staff providing care:

- Stop the care session if safe to do so.
- Review the situation and record it on MyConcern the same working day.
- Inform parents or carers.
- Adjust staffing arrangements until the situation is fully resolved.
- Do not return the same member of staff to that learner's care until a formal review has taken place.

## 9. Roles and Responsibilities

### All Staff

- Follow this policy and all safeguarding procedures.
- Always maintain appropriate professional boundaries.
- Always protect confidentiality and dignity.
- Record routine intimate care accurately using Appendix C after every care session. Any concern, distress, refusal, mark, bruise or change in behaviour identified during care must also be recorded on MyConcern the same working day.
- Do not carry or use mobile phones or personal devices during intimate care.
- Inform a colleague of your location before undertaking lone intimate care.

### Leadership Team

- Ensure all staff of Ysgol Hendrefelin are trained and competent before undertaking intimate care.
- Ensure facilities and equipment are suitable, safe and regularly checked.

- Review care plans and consent documentation regularly.
- Maintain oversight of the rota system to prevent over-familiar relationships.
- Ensure PPE stock is always maintained.

## Parents and Carers

- Provide required personal care items.
- Inform the school promptly of any changes in the learner's needs, preferences or health.
- Participate actively in reviewing care arrangements.

## 10. Record Keeping

Routine intimate care must be recorded after every session using:

- Appendix B: Toileting/Intimate Care Plan
- Appendix C: Intimate Care Record

Any safeguarding concern, allegation, refusal of care, mark, bruise, distress or change in behaviour arising during or following intimate care must be recorded on MyConcern the same working day. MyConcern is the school's secure digital platform for recording, reporting and managing all safeguarding concerns, incidents and learner wellbeing concerns. Designated Safeguarding Officers are alerted automatically when a record is submitted. Routine intimate care records on Appendix C must be stored securely and treated as confidential information.

In line with GDPR and the school's data retention policy, intimate care records are retained for a minimum of seven years or until the learner reaches the age of 25, whichever is later. Access is restricted to staff directly involved in the learner's care and to senior leaders with a safeguarding responsibility.

## 11. Training

Staff of Ysgol Hendrefelin must receive appropriate training before undertaking intimate care.

Training includes:

- Safeguarding and child protection, including the use of MyConcern
- Manual handling
- Infection control
- Medical or therapeutic training as required

- Communication and behaviour support, including AAC and sensory needs as appropriate

Training records must be kept up to date. The Leadership Team is responsible for ensuring no member of staff provides intimate care without the appropriate and current training in place.

## **12. Appendices**

- Appendix A: Intimate Care Agreement and Consent Form
- Appendix B: Toileting/Intimate Care Plan
- Appendix C: Intimate Care Record

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## Intimate Care Agreement and Consent Form

### Appendix A

This form records agreement between school and parent/carer about the intimate care to be provided. All named staff must have received appropriate training. Both parties must sign and retain a copy. A copy is stored on the learner's file in school.

Learner's Full Name	Date of Birth	Date Agreed

<b>Reasons why intimate care is required (e.g. development delay, medical need, lack of training) If toileting, note the</b>	
<b>Named staff who will provide this care (names and roles)</b>	
<b>Details of care to be provided</b>	

### Section 1: Parental / Carer Consent

<b>Parent / Carer Name (please print)</b>	
<b>Relationship to Learner</b>	

<b>Parent / Carer Signature</b>	
<b>Date</b>	

**Section 2: School Agreement**

<b>School</b>	
<b>Name of Staff Member</b>	
<b>Role</b>	
<b>Signature</b>	
<b>Date</b>	

**Section 3: Agreement Review Log**

This agreement must be reviewed at least annually or when the learner's needs change.

Review Date	Outcome of Review	Initials

Review Date	Outcome of Review	Initials

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*Intimate care must never be withheld as a sanction or consequence. Refusal must always be treated as communication*

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## Toileting/Intimate Care Plan

### Appendix B

Complete this plan in collaboration with the parent/carer. Review whenever the learner's needs change and at least annually. This plan must align with the learner's Intimate Care Agreement (Appendix A) and Individual Development Plan where applicable.

Learner's Full Name	Date of Birth	Date Agreed

Area	Details	Action / Strategy
<b>Working Towards Independence e.g. timed toilet visits, sign or symbol prompts, reward strategies used</b>		
<b>Arrangements for Nappy / Pad Changing e.g. who, where, when, privacy arrangements</b>		
<b>Staffing Requirements e.g. number of staff required, named staff, timing</b>		
<b>Level of Assistance Needed e.g. undressing,</b>		

Area	Details	Action / Strategy
dressing, hand washing, verbal or signed prompting		
Infection Control e.g. disposable gloves, apron use, nappy / pad disposal arrangements  Resources Needed e.g. specialist seating, nappies / pull-ups / pads, creams, sacks, spare clothing, toilet step		
Sharing Information e.g. nappy rash, marks, birthmarks, cultural or family customs to be aware of		

Date of Plan	Parent / Carer Name	Parent / Carer Signature	Staff Signature

**Review Log**

Review Date	Outcome / Changes Made	Initials

Review Date	Outcome / Changes Made	Initials

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*Learners must always be encouraged to undertake as much of their own personal care as possible.  
Independence targets should be reviewed regularly.*

# Bristol Stool Chart

[gutscharity.org.uk](http://gutscharity.org.uk)



Type 1



Separate hard lumps, like nuts

Type 2



Sausage shaped but lumpy

Type 3



Like a sausage but with cracks on the surface

Type 4



Like a sausage or snake, smooth and soft

Type 5



Soft blobs with clear-cut edges

Type 6



Fluffy pieces with ragged edges, a mushy stool

Type 7



Watery, no solid pieces

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## Record of Intimate Care Provided

### Appendix C

Complete this record after every intimate care session. Store securely. Records are confidential and retained for a minimum of seven years or until the learner reaches the age of 25, whichever is later.

Learner's Full Name	Date of Birth	Date of IC Agreement

Date	Time	Care Provided	Staff Involved	Signature	Comments / Concerns

Date	Time	Care Provided	Staff Involved	Signature	Comments / Concerns

***Any concern identified during care must be recorded on TES MyConcern the same working day and reported to the Designated Safeguarding Officer.***

## 14. UNCRC: Key Related Articles

The United Nations Convention on the Rights of the Child (UNCRC) is embedded in Welsh law through the Rights of Children and Young Persons (Wales) Measure 2011. The Welsh Government must have due regard to the UNCRC when making decisions. The articles below are directly relevant to the delivery of intimate care in a special education setting.

Article	Title	Relevance to this policy
Article 2	Non-discrimination	Intimate care must be delivered equitably to all learners regardless of disability, gender, ethnicity or cultural background. No learner should receive inferior care based on any protected characteristic.
Article 3	Best interests of the child	Every decision made during intimate care must prioritise the learner's best interests. This is the foundation of all care planning, staffing decisions and safeguarding responses within this policy.
Article 12	Respect for the views of the child	Learners must be supported to express their preferences, consent and discomfort using whatever communication method works for them. Staff must listen and respond to the learner's voice before, during and after care.
Article 16	Right to privacy	Learners have the right to privacy during intimate care. This policy limits the number of staff present, prohibits mobile phones in care settings and requires care to be carried out in appropriate, private facilities.
Article 19	Protection from violence, abuse and neglect	All safeguarding procedures within this policy exist to protect learners from harm, including harm that could occur during intimate care. Reporting duties, allegation management and body mapping directly uphold this article.
Article 23	Children with disabilities	Learners with disabilities have the right to support that enables them to live with dignity and participate fully. This policy ensures that intimate care is delivered in a way that promotes independence, dignity and active participation in daily life.
Article 28	Right to education	Learners cannot access education if their healthcare and personal care needs are not met. This policy ensures those needs are met safely and consistently, removing a barrier to full participation in school life.
Article 34	Protection from sexual exploitation	The safeguarding procedures, PPE requirements, lone working guidance and mobile phone prohibition

		within this policy all serve to protect learners from any form of exploitation or inappropriate conduct during intimate care.
Article 36	Protection from other forms of exploitation	Care must never be used as a means of control, punishment or reward. The explicit statement in this policy that intimate care must never be withheld as a sanction directly upholds this article.
Article 39	Recovery from trauma and reintegration	For learners who have experienced trauma, intimate care must be delivered in a way that avoids re-traumatisation. Staff must be alert to behavioural cues and adapt their approach sensitively and responsively.

Wales is the first country in the UK to embed the UNCRC in domestic law. This policy actively upholds that commitment by placing learner rights at the centre of every intimate care decision

**Policy Review Record:**

Policy Adoption and Review Dates		Signature	Signature
Date approved by Governors	25/05/2021	Mr R. Blank (Chair of Governors)	Mr L. Lewis (Headteacher)
Reviewed	28/03/2023	Mr R. Blank (Chair of Governors)	Mr L. Lewis (Headteacher)
Reviewed	15/07/2025	Mr R. Blank (Chair of Governors)	Mr L. Lewis (Headteacher)
Reviewed	07/07/2026	Mr R. Blank (Chair of Governors)	Mr R. Duford (Headteacher)

