

# Personal & Intimate Care Policy

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PERSONAL & INTIMATE CARE POLICY

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**Introduction** This Personal and Intimate Care Policy exists to ensure that all young people receiving support are cared for safely, respectfully, and in a manner that upholds dignity, privacy, and wellbeing.

Nudge Education is a non-school, interim alternative provision service. Personal and intimate care may therefore occur in a range of community, home-based or transitional environments rather than a fixed site. This requires additional emphasis on dynamic risk assessment, safeguarding oversight, and ensuring that privacy is balanced with safety in all settings

The policy provides clear procedures for staff and safeguards young people and practitioners during any care activities that require physical contact.

**Scope** This policy applies to:

- All staff
- Professionals providing 1:1, 2:1, or 3:1 support
- Senior leaders and the safeguarding team

**Relevant UK Legislation & Guidance** This policy is informed by:

- Children Act 1989 & 2004
- Working Together to Safeguard Children 2023

- Keeping Children Safe in Education (KCSIE, 2026)
- Equality Act 2010
- UK GDPR & Data Protection Act 2018
- Education Act 2002 (Safeguarding duties)
- Health and Safety at Work Act 1974
- Manual Handling Operations Regulations 1992
- Human Rights Act 1998 (Articles 3, 8)
- NICE Guidance – Personal care, continence care, and dignity in care
- Non-school Alternative Provision: Voluntary National Standards

Guiding Principles All personal and intimate care must be delivered according to the following values:

- Dignity and Respect: Young people are to be treated with unconditional positive regard.
- Privacy: Care should take place in a private, safe environment.
- Child-centred Practice: Care is tailored to each young person's developmental stage, preferences, and needs.
- Independence: Young people will be supported to do as much as they can for themselves.
- Least Intrusive Methods: Only the minimum necessary level of support should be provided.
- Consent and Choice: Young people must be involved and informed at every stage.
- Cultural Sensitivity: Cultural, religious, gender, and family preferences must be respected.
- Safety and Safeguarding: All care must minimise risk and protect both young people and staff.

## Roles, Responsibilities & Staff Conduct

### Senior Leadership, National DSL, Regional DSLs & Intervention Safety Team

- Provide oversight of policy implementation.
- Ensure all incidents or concerns are escalated.
- Maintain safeguarding standards and liaison with external agencies, for example: Local Authority Designated Officer (LADO) and Social Care.

### Assistant Regional Leads (ARLs)

- Ensure staff are trained and offered support when needed.
- Ensure personal/intimate care risk assessments are completed and up-to-date.
- A consent form is sent to the young person's parent/carer for them to complete which highlights a young person's preferences along with consent for practitioners to complete personal/intimate care. It also includes how we can encourage independence with personal care.
- Records are kept for each intervention that requires personal care by the ARL using Asana.

### Education Intervention Coordinators (EICs)

- Monitor staff practice and review personal care plans or risk assessments.
- Ensure record-keeping is accurate and secure.
- Monitor entries on the Personal Care Asana board. Every time personal/intimate care is carried out by a practitioner, they complete a form which populates the board.

### Practitioners

- Deliver care professionally and sensitively.
- Maintain appropriate boundaries at all times.
- Follow care plans and risk assessments.
- Report concerns immediately to the Education Intervention Coordinator(EIC) or Regional Designated Safeguarding Lead (RDSL).

### Staff Conduct Requirements

- Maintain professional boundaries at all times, including avoiding any inappropriate conversation, language or physical contact.
- Personal or intimate care must never be used as a reward, consequence, or behaviour management tool; it should only be provided based on need and safety.
- Practitioners must not carry out personal or intimate care in isolation if a safer arrangement is reasonably available; this may include ensuring a second practitioner, or a parent/carer is nearby, or choosing a safer space where privacy and safety can both be upheld.
- Practitioners must not use mobile phones or personal electronic devices at any point while providing personal or intimate care, and such devices must remain out of sight during the activity.

## Consent, Communication & Involvement of the Young Person

- Practitioners must explain every action step-by-step, in simple, accessible language.
- Verbal consent must be sought and recorded where appropriate.
- If a young person refuses care, practitioners must:
  - Stop immediately
  - Offer alternatives and reassurance
  - Inform Education Intervention Coordinator (EIC) who will then inform parent/carer
- Follow safeguarding and escalation procedures if refusal presents risk
- Encourage young people to lead their care where possible (e.g. holding wipes, adjusting clothing).

## Intimate Care Plans & Personal Care Risk Assessments

Every young person requiring intimate or personal care must have a documented, individual plan detailing:

- Specific care needs and routines
- Personal preferences, precipitating factors, and sensory needs
- Medical or behavioural risks
- Required equipment or adaptations
- Gender or cultural considerations
- Parent/carer consent
- Emergency procedures

Plans must be:

- Developed collaboratively with the young person, parents/carers and professionals where appropriate
- Reviewed termly or after any significant change
- Stored securely and accessible only to relevant staff

Staff Training and Competence All staff delivering personal or intimate care must be trained in:

- Safeguarding & Child Protection (including up to date Keeping Children Safe in Education — currently the 2026 edition)
- Intimate Care for Children and Young People with Complex Needs

All staff delivering personal or intimate care must have awareness of:

- Consent, communication, and child-centred approaches
- Record-keeping and confidentiality
- Professional boundaries and Code of Conduct

Safeguarding and Reporting Procedures Personal and intimate care is a safeguarding-sensitive activity. Any safeguarding concerns identified during intimate care (e.g. unexplained injuries, disclosures) must be reported to the Regional Designated Safeguarding Lead (RDSL) by informing the Education Intervention Coordinator (EIC) immediately and completing a safeguarding form which is located on the front of every intervention pack.

Practitioners must report a concern immediately if a young person:

- Appears distressed or fearful
- Refuses care in a way that raises concern
- Makes a disclosure
- Has unexplained marks, bruises, or injuries
- Displays concerning behaviour before, during, or after care

Reports must be made to the Education Intervention Coordinator (EIC) and Regional Designated Safeguarding Lead (RDSL) the same day using safeguarding reporting systems and in line with the Safeguarding Policy.

Practitioners must never:

- Work outside care plans or risk assessments.
- Be alone with a young person if safer procedures are available.
- Use personal care as a reward, consequence, or behaviour management tool. Personal/intimate care should only be provided when responding to an individual's need or safety.
- Carry out any personal care act if unsafe to do so. If the young person becomes dysregulated, the practitioner should perform a dynamic risk assessment in line with training.
- Photograph or record a young person during care.
- Continue care if a young person says "stop" unless there is an immediate medical risk or risk of harm.

Privacy, Environment & Safety Care must take place in an environment that protects the young person's dignity while ensuring robust safeguarding.

Because personal and intimate care may occur in home, community or transitional environments, practitioners must ensure that privacy is provided in a way that does not compromise safety.

- Doors may be closed for privacy but should not be fully secured, unless a risk assessment confirms that this is safe and appropriate.
- Young people should remain covered wherever possible, with only the minimum area exposed required to complete the care safely.
- PPE must be used appropriately, following infection-control guidance and any individual care requirements.
- Where possible, gender-appropriate staffing should be considered, taking into account the young person's preferences, cultural background and dignity.
- All equipment must be age-appropriate, safe, and well maintained, with any concerns reported and addressed immediately.

Emergency Situations, Smearing & Immediate Response In emergency situations, such as unexpected soiling in the community, sudden illness, injury, smearing or environmental risks, practitioners must prioritise immediate safety. Dynamic risk assessment should be used at all times, and practitioners should only provide the minimum necessary assistance required to prevent harm. The Education Intervention Coordinator (EIC) must be informed as soon as possible, and a safeguarding or incident report should be completed if the circumstances meet reporting thresholds. Parents/carers and commissioning partners should be updated promptly where relevant.

Where a young person is known to, or has smeared in the past, a specific risk assessment and protocols should be arranged with the EIC, parents/carers and any other relevant professionals.

Record-Keeping and Reporting Practitioners must record:

- All intimate or personal care tasks completed
- Any necessary deviations from the care plan or risk assessment
- Any incidents, accidents, concerns, or disclosures
- Emotional responses or distress
- Refusal of care
- Any physical assistance provided

Reports must always be written factually and objectively, avoiding assumptions or subjective language, and completed as soon as possible after the personal or intimate care activity. All records must be stored securely in accordance with GDPR and the organisation's data protection procedures, ensuring that only authorised staff can access them. These records must be available to the Regional Designated Safeguarding Lead (RDSL) and safeguarding oversight teams to support ongoing monitoring, safeguarding, and quality assurance.

**Managing Allegations & Complaints** Any allegation regarding inappropriate conduct during personal/intimate care should be:

- Reported immediately to the Regional Designated Safeguarding Lead (RDSL)
- Investigated following statutory safeguarding procedures
- Referred to the Local Authority Designated Officer (LADO) if required
- Documented thoroughly
- Handled with transparency and protection for all parties in accordance with the Complaints Policy

**Monitoring and Review** This policy will be reviewed annually or when there are significant changes in legislation, guidance, or organisational needs. Parent, carer, and staff feedback will inform improvements to ensure high standards of care and safeguarding.

This policy has been signed off by the Nudge Education Directorate. Charlotte Noutch Director of Partnerships & Services 5 Dec 2025

## Aligned Policies

Equality, Diversity and Inclusion Policy

Complaints Procedure and Policy

Information Security and Data Protection Policy

Child Protection and Safeguarding Policy

Health and Safety Policy

All Policies can be found [here](#).

Resources Personal Care Process Map

**Appendix: Glossary of Terms**

**Personal Care** Support with daily living tasks such as washing hands or face, assisting with clothing, supporting continence needs, or helping a young person maintain hygiene and comfort. Personal care does not involve intimate contact except where required for safe continence care.

**Intimate Care** Any care activity that involves direct or indirect contact with a young person's private areas (genital, anal, or breast areas) for health or hygiene reasons, such as changing pads, assisting with toileting, or supporting menstrual care. Intimate care requires clear consent, accurate recording, and adherence to a care plan.

**Safer Arrangement** A practice or environmental setup that increases safety during personal or intimate care. This may include ensuring a parent/carer is aware or nearby, informing the Education Intervention Coordinator of when and where care will take place, or selecting a location where privacy and safety are both maintained.

**Dynamic Risk Assessment** A continuous, real-time assessment carried out by practitioners before and during personal or intimate care. Practitioners consider environment, behaviour, safety, and wellbeing, and adapt their approach to minimise harm.

**Care Plan (Personal/Intimate Care Plan)** A written document outlining the young person's specific needs, routines, preferences, risks, cultural considerations, consent arrangements, and emergency procedures. Care plans promote consistency and safe practice.

**Emergency Assistance** Immediate support provided when a young person experiences unexpected soiling, sudden illness, injury, or environmental danger. Help should be limited to what is necessary to prevent harm, and must be reported promptly.

**Reasonably Available** Indicates that a safer option or arrangement may exist depending on the setting (e.g. home, community, outdoor environment). Practitioners must consider what is feasible and safe without delaying essential care.

**Local Authority Designated Officer (LADO)** The statutory officer who oversees and manages allegations made against adults who work with children.

Concerns about staff conduct during personal or intimate care must be referred if thresholds are met.

**Minimum Necessary Assistance** The least intrusive level of help required to keep the young person safe. Practitioners should support autonomy and reduce contact to what is essential for wellbeing.

**Community or Transitional Environment** Any non-school setting where Nudge interventions occur, including homes, community venues, outdoor spaces, or locations used while travelling between activities.

**Safeguarding-Sensitive Activity** An activity where the nature of support increases a young person's vulnerability and therefore requires heightened awareness of boundaries, consent, and reporting responsibilities.

## Applicability to NEO

This policy is **inactive for NEO online provision** — NEO is fully online and this policy applies only to face-to-face provision operated by Nudge Education Ltd. It is retained in the vault tagged `inactive-neo` so commissioners and staff can see explicitly that the policy does not apply to online placements.

## Document control

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