

# Physical Education Changing and Privacy Policy

## Bonneygrove and Millbrook Primary School Federation



<b>Subject:</b>	PE Changing and Privacy Policy
<b>Approval date:</b>	May 2026
<b>Review date:</b>	March 2027
<b>Approved by:</b>	Shen Hasekilerden (Chair of Governors) Jane Acreman (Vice Chair of Governors)



## **Physical Education Changing and Privacy Policy**

**Linked policies: Child Protection and Safeguarding Policy, Staff Code of Conduct, Low-Level Concerns Policy, Behaviour Policy, Intimate Care Policy, Equality Policy, Complaints Policy**

**Review date: Annually, or sooner following any safeguarding concern, complaint, statutory update or change in guidance**

### **1. Purpose of this policy**

**The purpose of this policy is to ensure that all pupils are able to change for PE, swimming, sports clubs, performances or other school activities in a way that protects their dignity, privacy, safety and wellbeing.**

**The school recognises that changing arrangements can feel sensitive for some children. Staff must therefore ensure that arrangements are clear, age-appropriate, properly supervised and respectful of children's privacy.**

**This policy is written in line with Keeping Children Safe in Education 2025, which states that schools must have regard to statutory safeguarding guidance when carrying out their duties to safeguard and promote children's welfare. It should also be read alongside wider government safeguarding guidance, including Working Together to Safeguard Children, which applies to education providers and childcare settings.**

### **2. Core principles**

**The school will ensure that:**

- 1. Children's privacy, dignity and personal space are respected at all times.**
- 2. Changing arrangements are clear, consistent and age-appropriate.**
- 3. Pupils are supervised appropriately without staff being unnecessarily present in areas where children are undressed.**
- 4. Staff understand and follow professional boundaries.**
- 5. Any physical support with clothing is only provided where necessary, appropriate and, wherever possible, requested by the child.**
- 6. Pupils are encouraged to speak to a trusted adult if they feel worried, embarrassed or uncomfortable.**
- 7. Concerns raised by pupils or parents are listened to, taken seriously, recorded and followed up.**
- 8. Any safeguarding concern or allegation about an adult, including staff, volunteers, contractors, visitors or coaches, is managed in line with the school's safeguarding procedures, low-level concerns procedures and KCSIE 2025. KCSIE states that schools should have procedures for managing any safeguarding concern or allegation about staff, volunteers or contractors, no matter how small.**

### **3. Scope**

**This policy applies to:**

- all pupils;**
  - teaching staff;**
  - support staff;**
  - PE staff;**
  - supply staff;**
  - volunteers;**
  - external coaches;**
  - visitors;**
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- contractors working with pupils;
- before-school and after-school sports provision arranged by the school.

External coaches and visitors must follow this policy. School staff remain responsible for safeguarding, supervision and pupil welfare when external providers are working with pupils on site.

#### 4. General changing arrangements

Children will be given clear instructions about where and when to change.

Staff will ensure that pupils have enough time to change without feeling rushed or exposed.

Children must hand in all mobile phones, cameras, smart watches or recording devices and must not use any of these devices in the changing areas.

Staff must not take photographs or videos in changing areas.

Staff should position themselves so that they can maintain appropriate supervision and respond to behaviour or safety concerns, without directly observing children while they are changing.

Staff should not enter a changing space while children are undressed unless there is an immediate safeguarding, medical, safety or behaviour concern that requires adult intervention.

Where staff need to enter a changing area, they should knock, announce themselves, allow pupils time to respond where possible, and only enter for the shortest time necessary.

#### 5. Year Five and Year Six arrangements

Year Six pupils will change in separate areas where appropriate.

Year Five pupils will also change in separate areas where this is appropriate, taking account of the age, maturity, needs and wishes of the cohort.

Separate areas may include separate classrooms, screened spaces, designated rooms or other suitable spaces identified by the school.

The arrangements will be decided by the class teacher, PE lead and/or senior leadership team, with safeguarding and pupil dignity as the primary considerations.

Supervision will remain in place, but staff will supervise from an appropriate distance so that pupils' privacy is protected.

#### 6. Arrangements for earlier year groups

In earlier year groups, pupils will usually change in the classroom or another suitable space under appropriate staff supervision.

Where a child in an earlier year group would like additional privacy, this should be raised with the class teacher.

The class teacher will listen to the child and, where appropriate, discuss the matter with parents/carers and the Designated Safeguarding Lead.

Alternative arrangements can then be sought and agreed. These may include:

- changing in a nearby private space;
- using a toilet or designated area for privacy;
- changing at a slightly different time;
- having a trusted adult positioned nearby but not inside the changing space;
- agreeing a short-term or longer-term individual arrangement.

Any agreed arrangement should be proportionate, respectful of the child's dignity, and should avoid making the child feel singled out.

Where the arrangement is ongoing or linked to a concern, it should be recorded appropriately.

## **7. Use of toilets for changing**

Toilets may be used as an alternative changing space where this supports a child's privacy, dignity or comfort.

Where toilets are used, staff must supervise from an appropriate distance and must not enter toilet cubicles or areas where a child is undressed unless there is an immediate safeguarding, medical or safety concern.

Children using toilets to change should still be supervised in a way that allows staff to know where they are and respond if support is needed.

## **8. Staff conduct and professional boundaries**

Staff must maintain clear professional boundaries at all times.

Staff must not:

- remain in areas where children are changing without a clear safeguarding or safety reason;
- watch children changing;
- enter toilet cubicles unless there is an emergency or specific agreed care need;
- make comments about a child's body, underwear, clothing or physical development;
- touch clothing or assist with changing unless this is necessary, appropriate and requested or clearly needed;
- be alone with a child in a secluded changing area unless this is part of an agreed, risk-assessed arrangement;
- dismiss or minimise a child's concern about feeling uncomfortable.

Staff should encourage independence wherever possible.

Any physical support with clothing must be appropriate, proportionate, sensitive to the child's wishes and in line with the school's safeguarding and intimate care expectations.

KCSIE 2025 makes clear that low-level concerns may include behaviour that is inconsistent with the staff code of conduct and that all low-level concerns should be shared, recorded and dealt with appropriately.

## **9. External coaches, visitors and volunteers**

External coaches, visitors and volunteers must not supervise children changing unless this has been explicitly agreed by the school and is consistent with safeguarding expectations.

Where external coaches are delivering PE or sports activities, school staff retain responsibility for safeguarding, supervision and pupil welfare.

External adults must not be present in changing areas unless there is a clear, agreed and necessary safeguarding or safety reason.

Any concern about the conduct of an external coach, visitor, volunteer or contractor must be reported immediately to the Headteacher or DSL and managed in line with safeguarding procedures.

## **10. Responding to pupil concerns**

If a pupil says they feel uncomfortable about changing arrangements, staff must:

1. listen calmly and respectfully;
2. reassure the child that they have done the right thing by speaking up;
3. avoid dismissing or minimising the concern;
4. consider whether immediate alternative arrangements are needed;

5. inform the class teacher and DSL where appropriate;
6. record the concern in line with school safeguarding procedures;
7. speak to parents/carers where appropriate, unless doing so would increase risk to the child.

KCSIE 2025 emphasises a child-centred approach to safeguarding, meaning practitioners should consider at all times what is in the best interests of the child.

## 11. Safeguarding concerns and allegations

Any concern about an adult's behaviour during changing, toileting, PE or personal care must be reported immediately.

Concerns about staff, supply staff, volunteers, visitors, contractors or external coaches must be reported to the Headteacher.

Concerns about the Headteacher must be reported to the Chair of Governors.

Where a concern may meet the harm threshold, the school will seek advice from the Local Authority Designated Officer.

Where a concern does not meet the harm threshold, it will be managed under the school's low-level concerns procedure.

All concerns must be recorded, including:

- the nature of the concern;
- who raised it;
- when it was raised;
- who was spoken to;
- what action was taken;
- the rationale for decisions;
- any follow-up actions or changes to practice.

KCSIE 2025 states that low-level concerns should be recorded in writing, including details of the concern, the context and the action taken.

## 12. Inclusion and individual needs

The school will consider individual changing arrangements where needed, including for pupils with:

- SEND;
- medical needs;
- personal care needs;
- anxiety or emotional needs;
- previous safeguarding concerns;
- religious or cultural considerations;
- privacy concerns;
- disability-related needs;
- trauma-related needs.

Arrangements will be made sensitively and, where appropriate, in discussion with the pupil, parents/carers, class teacher, SENDCo and DSL.

The aim will always be to protect the child's dignity while ensuring appropriate supervision and safeguarding.

### **13. Communication with parents and carers**

Parents and carers may raise concerns about changing arrangements with the class teacher, Headteacher or DSL.

Where a parent requests alternative changing arrangements for their child, the school will consider the request carefully and seek to agree a reasonable, proportionate and safe arrangement.

The school will explain how the arrangement will work, who will supervise, where the child will change, and how privacy will be protected.

### **14. Monitoring and review**

The Headteacher, DSL and PE lead will monitor the effectiveness of changing arrangements.

This policy will be reviewed annually, or sooner if:

- a safeguarding concern is raised;
- a complaint identifies a weakness in practice;
- statutory guidance changes;
- the school's facilities or staffing arrangements change;
- pupil voice suggests that arrangements need to be reviewed.

Governors will have oversight of this policy through the school's safeguarding monitoring arrangements.

### **15. Summary of expectations**

The school expects all adults to ensure that changing arrangements are safe, respectful and properly supervised.

Year Six pupils, and Year Five pupils where appropriate, will change in separate areas.

Children in earlier year groups who would like additional privacy should speak to their class teacher, or parents/carers may raise this on their behalf. Alternative arrangements can then be sought and agreed.

Children's privacy and dignity must be respected at all times.

Any concern raised by a child or parent must be taken seriously, recorded and followed up in line with safeguarding procedures.