

Killoughteen National School Bí Cineálta Policy to Prevent and Address Bullying Behaviour

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The Board of Management of Killoughteen National School has adopted the following policy to prevent and address bullying behaviour.

This policy fully complies with the requirements of *Bí Cineálta: Procedures to Prevent and Address Bullying Behaviour for Primary and Post-Primary Schools* 2024.

The board of management acknowledges that bullying behaviour interferes with the rights of the child as set out in the United Nations Convention on the Rights of the Child. We all, as a school community, have a responsibility to work together to prevent and address bullying behaviour and to deal with the negative impact of bullying behaviour.

We are committed to ensuring that all students who attend our school are kept safe from harm and that the wellbeing of our students is at the forefront of everything that we do. We recognise the negative impact that bullying behaviour can have on the lives of our students and we are fully committed to preventing and addressing bullying behaviour.

We confirm that we will, in accordance with our obligations under equality legislation, take all such steps that are reasonably practicable to prevent the harassment of students or staff on any of the nine grounds specified: gender, civil status, family status, sexual orientation, religion, age, disability, race and membership of the Traveller community.

Definition of bullying

Bullying is defined in *Cineáltas: Action Plan on Bullying* and *Bí Cineálta: Procedures to Prevent and Address Bullying Behaviour for Primary and Post-Primary Schools* as targeted behaviour, online or offline that causes harm. The harm caused can be physical, social and/or emotional in nature. Bullying behaviour is repeated over time and involves an imbalance of power in relationships between two people or groups of people in society. The detailed definition is provided in Chapter 2 of the Bí Cineálta procedures.

Each school is required to develop and implement a Bí Cineálta policy that sets out how the school community prevents and addresses bullying behaviour. Strategies to deal with inappropriate behaviour that is not bullying behaviour are provided for within the school's Code of Behaviour.

Section A: Development/review of our Bí Cineálta policy to prevent and address bullying behaviour

All members of our school community were provided with the opportunity to input into the development/review of this policy.

| | Date consulted | Method of consultation | | |
|---|--------------------|---|--|--|
| School Staff | January - February | Croke Park Hours – 6 hrs | | |
| Students | March | Assemblies and classroom discussions | | |
| Parents | March | Sent home a draft policy and asked to submit any suggestions and or amendments to the draft policy | | |
| Board of Management | April | Sent the draft Policy to look at it following the input of suggested amendments from parent / pupil body. | | |
| Wider school community as appropriate, for example, bus drivers | | | | |
| Date policy was approved: | | | | |
| Date policy was last reviewed: | | | | |

Section B: Preventing Bullying Behaviour

This section sets out the prevention strategies that will be used by the school. These include strategies specifically aimed at preventing online bullying behaviour, homophobic and transphobic bullying behaviour, racist bullying behaviour, sexist bullying behaviour and sexual harassment as appropriate (Chapter 5 of the Bí Cineálta procedures):

The Wellbeing Policy Statement and Framework for Practice provides the following four key areas that are essential for a holistic, whole school approach to wellbeing promotion: Culture and Environment; Curriculum (Teaching and Learning); Policy and Planning; and Relationships and Partnerships. These four areas have been considered by our school when developing measures to prevent bullying behaviour.

Culture and environment

A positive and inclusive school culture and environment is essential to prevent and address bullying behaviour. The school environment should be a space where students and school staff experience a sense of belonging and feel safe, connected and supported.

Relationships between all members of the school community should be based on respect, care, integrity and trust. Open communication between the patron, boards of management, school staff, students and their parents help to foster a collaborative approach and shared responsibilities in relation to preventing and addressing bullying

behaviour. The school leadership team influences the school culture and set the standards and expectations for the school community when preventing and addressing bullying behaviour. Each member of school staff has a responsibility to develop and maintain a school culture where bullying behaviour is unacceptable and to take a consistent approach to addressing bullying behaviour. Students shape the school culture by promoting kindness and inclusion within their peer group and maintain a positive and supportive school environment for all. Parents, as active partners in their child's education, can help foster an environment where bullying behaviour is not tolerated through promoting empathy and respect.

A Telling Environment

It is important that the school community supports a 'telling' environment. Students should feel comfortable to talk about concerns regarding bullying behaviour. The reasons why students may not report include the following:

- fear of retaliation from the student displaying the bullying behaviour or their friendship group
- concerns about being seen as a "telltale" for reporting bullying behaviour
- fear that the adult may make the situation worse
- fear that the adult doesn't have the knowledge and skills to deal appropriately with the bullying behaviour
- fear that the adult may deny access to their smart phone
- not knowing what will happen when they report bullying behaviour
- fear that they will not be believed
- concerns about "getting into trouble" for reporting bullying behaviour
- not having evidence to back up the allegation of bullying behaviour, this can be seen particularly with relational bullying behaviour.

As a school, we will have been mindful of these when developing the strategies below to prevent and address bullying behaviour.

- In our school reporting of bullying behaviour is encouraged. This is repeated daily to our pupils.
- A Trusted Adult The concept of "a trusted adult" can be an effective strategy to
 encourage students to report if they or another student is experiencing bullying
 behaviour. This strategy is taught by all staff during Stay Safe lessons at the
 beginning of each school year. Staff support this strategy by letting students know
 that they can talk to them.
- Students who witness bullying behaviour are supported and encouraged to report the behaviour to a trusted adult in the school so that the behaviour can be addressed.
- Students who witness bullying behaviour on social media are taught that they
 have an important role in helping to address the behaviour by reporting the
 witnessed behaviour to a trusted adult.
- The trusted adult should reassure the student that they have done the right thing by reporting the behaviour. The trusted adult is usually the class teacher but it can be the Principal or Deputy Principal.

Creating safe physical spaces in schools

The creation of safe physical spaces supports psychological safety and is an important measure to prevent bullying behaviour. Spaces that have a clear line of sight make it easier for school staff to supervise students. Hidden spaces in hallways and in the schoolyard can be areas where there is a greater risk for bullying behaviour to occur.

In Killoughteen NS we;

- remove visual barriers from windows such as posters
- improve the visibility of school staff who are supervising at break times including during yard duty
- have erected artwork and signage to promote the school's values such as equality, diversity, inclusion and respect.

Students feel a greater sense of belonging to a school community when they are given ownership of their own space through art and creativity. This helps students to identify and to feel a sense of responsibility for their school environment. Our school grounds are well maintained to promote a sense of ownership and respect in the school community.

Curriculum (Teaching and Learning)

Teaching and learning that is collaborative and respectful is promoted. Students have regular opportunities to work in small groups with their peers, which can help build sense of connection, belonging and empathy among students.

The curricular subjects offered to students provide opportunities to foster inclusion and respect for diversity. We provide opportunities for students to develop a sense of selfworth through both curricular and extracurricular programmes. The Social Personal and Health Education (SPHE) and Relationships and Sexuality Education (RSE) curricula aim to foster students' wellbeing, self-confidence and sense of belonging. They help to develop students' sense of personal responsibility for their own behaviour and actions. Students' social and emotional learning (SEL) skills are improved through the SPHE curriculum.

All resources listed in the booklet 'Children's Resources for Wellbeing' published by the PDST may be used by the staff when teaching lessons on Bí Cinéalta.

Policy and planning

The wellbeing of the school community is at the heart of school policies and plans. There are a range of other policies such as the school's acceptable use policy, supervision policy, special education teaching policy and Code of Behaviour that support the implementation of our school's Bí Cineálta policy.

Our pupils discuss with school staff the development of our school policies. This increases awareness and ensure effective implementation. Our school staff participate in a range of training available for schools annually which relates to promoting inclusion and diversity in schools.

Relationships and partnerships

Strong interpersonal connections are a vital part of effectively preventing and addressing bullying behaviour. These interpersonal connections are supported through a range of formal and informal structures in our school such as our student council, green schools committee, parents' associations and sport teams etc.

The school organises a number of age-appropriate awareness initiatives that look at the causes and impacts of bullying behaviour including those dealing with navigating friendships, identity-based bullying, racist bullying, homophobic/transphobic bullying, sexism and sexual harassment

- supporting the active participation of students in school life
- supporting the active participation of parents in school life, including those who
 may find it difficult or daunting to engage with the school due to being unfamiliar
 with the education system or due to language or cultural barriers
- conducting workshops and seminars for students, school staff and parents to raise awareness of the impact of bullving

- supporting activities that build empathy, respect and resilience
- encouraging peer support such as peer mentoring
- promoting acts of kindness
- teaching problem solving

Cineáltas Action Plan on Bullying recognises the importance of positive relationships across the whole education community to promote empathy, understanding and respect. The meaningful involvement of the board of management, staff, students and their parents in the development, implementation and review of their school's Bí Cineálta policy and student friendly version is essential to effectively prevent and address bullying behaviour.

Preventing specific types of bullying behaviour

There is a variety of prevention strategies that can be implemented.

Our pupils (Student Council) can support the development, implementation and review of the school's strategies to prevent bullying behaviour. When implementing a prevention strategy schools should consider engaging with members of the wider school community who are in regular contact with students, such as the following, which is not an exhaustive list:

- school bus escort
- education welfare officers

These members of the wider school community can be encouraged to report any bullying behaviour to the school as appropriate.

Preventing cyberbullying behaviour

Technology and social media have provided many positive opportunities for entertainment.

social engagement and education. Technology is a part of life that can impact even the youngest members of society. However, the increase in the use of technology has led to students becoming increasingly vulnerable to cyberbullying or unacceptable online behaviour.

Killoughteen National School will proactively address these challenges by promoting digital literacy, digital citizenship, and fostering safe online environments. Strategies to prevent cyberbullying behaviour in our school include the following, which is not an exhaustive list:

- implementing the SPHE curriculum
- implementing the Digital Media Literacy curriculum which teaches students about responsible online behaviour and digital citizenship
- having regular conversations with students about developing respectful and kind relationships online
 - developing, reviewing and communicating an acceptable use policy for technology
 - referring to appropriate online behaviour as part of the standards of behaviour in the Code of Behaviour
- promoting or hosting online safety events for parents who are responsible for overseeing their children's activities online
- holding an Internet safety day to reinforce awareness around appropriate online behaviour

The digital age of consent is the minimum age a user must be before a social media or internet company can collect, process and store their data. In Ireland the digital age of consent is 16.

For the purposes of data collection, students between the age of 13 and 16 years old must have parental permission to sign up to social media services where companies use the legal basis of consent to collect process and store users' data. Most social media platforms and services have a minimum age requirement and for the majority of these

services it is 13 years' old. Therefore technically, children under the age of 13 should not have a social media account. It is important for their child's safety, that parents are aware of their children's use of technology including smartphones and gaming consoles.

Preventing homophobic/transphobic bullying behaviour

All students including gay, lesbian, bisexual and transgender students, have a right to feel safe and supported at school. Strategies to prevent homophobic and transphobic bullying behaviour include the following, which is not an exhaustive list:

- maintaining an inclusive physical environment such as by displaying relevant posters
- encouraging peer support such as peer mentoring and empathy building activities
- challenging gender stereotypes
- conducting workshops and seminars for students, school staff and parents to raise awareness of the impact of homophobic bullying behaviour
- encouraging students to speak up when they witness homophobic behaviour

Preventing racist bullying behaviour

Our school became much more culturally diverse over the last decade. Students attending come from many different cultures and backgrounds. Students from diverse backgrounds may face discrimination and prejudice and may be subject to racist bullying behaviour.

Strategies to prevent racist bullying behaviour include the following, which is not an exhaustive list:

- fostering a school culture where diversity is celebrated and where students "see themselves" in their school environment
- having the cultural diversity of the school visible and on display
- conducting workshops and seminars for students, school staff and parents to raise awareness of racism
- encouraging peer support such as peer mentoring and empathy building activities
- encouraging bystanders to report when they witness racist behaviour.
- Become an upstander not a bystander
- providing supports to school staff to respond to the needs of students for whom English is an additional language and for communicating with their parents
- providing supports to school staff to support students from ethnic minorities, and to encourage communication with their parents
- inviting speakers from diverse ethnic backgrounds or celebrating multi-cultural day in association with friendship week

Preventing sexist bullying behaviour

We will create and nurture an environment which promotes gender equality.

Strategies to prevent sexist bullying behaviour include the following, which is not an exhaustive list:

- ensuring members of staff model respectful behaviour and treat students equally irrespective of their sex
- ensuring all students have the same opportunities to engage in school activities irrespective of their sex
- celebrating diversity at school and acknowledging the contributions of all students
- organising awareness campaigns, workshops and presentations on gender

equality and respect

encouraging parents to reinforce these values of respect at home

Preventing sexual harassment

Preventing sexual harassment requires an approach that focuses on education, awareness and clear enforceable policies.

In Killoughteen National School there is a zero tolerance approach to sexual harassment. Sexual harassment should never be dismissed as teasing or banter.

Strategies to prevent sexual harassment include the following, which is not an exhaustive list:

- promoting positive role models within the school community
- challenging gender stereotypes that can contribute to sexual harassment

The school has the following supervision and monitoring policies in place to prevent and address bullying behaviour (see Chapter 5 of the Bí Cineálta procedures):

Supervision

Appropriate supervision is an important measure to help prevent and address bullying behaviour.

Children are met by staff at the pedestrian crossing each morning and brought safely into the school. They get to walk and talk with their peers for 15 minutes before class begins. SNA's and teachers are on duty at this time daily.

In Killoughteen NS all of our pupils are monitored by 4 teachers and all numerous SNA's during play and break times at school. We will take all reasonable measures to ensure the safety of our students when they are attending school or attending school activities. We will organise a mix of activities and resources during breaktimes. This is with a view to accommodating a range of preferences and interests of our pupils.

Class teachers always remain with their classes when visiting coaches/ and other personnel come / are invited into the school/ classroom.

Children are assisted by staff to cross safely into the carpark daily after school. All pupils are monitored until their transport has arrived for them.

Section C: Addressing Bullying Behaviour

The teacher(s) with responsibility for addressing bullying behaviour is (are) as follows:

When bullying behaviour occurs, the school will:

- > ensure that the student experiencing bullying behaviour is heard and reassured
- > seek to ensure the privacy of those involved
- > conduct all conversations with sensitivity
- consider the age and ability of those involved
- > listen to the views of the student who is experiencing the bullying behaviour as to how best to address the situation
- > take action in a timely manner
- > inform parents of those involved

The steps that will be taken by the school to determine if bullying behaviour has occurred, the approaches taken to address the bullying behaviour and to review progress are as follows (see Chapter 6 of the Bí Cineálta procedures):

Identifying if bullying behaviour has occurred

When identifying if bullying behaviour has occurred the teacher should consider the following: what, where, when and why? If a group of students is involved, each student should be engaged with **individually** at first. Thereafter, all students involved should be met as a group.

At the group meeting, each student should be asked for their account of what happened to ensure that everyone in the group is clear about each other's views. Each student should be supported, as appropriate, following the group meeting. It may also be helpful to ask the students involved to write down their account of the incident.

Core definition of Bullying Behaviour (Chapter 2 of Cineáltas Action Plan on Bullying) Bullying is targeted behaviour, online or offline that causes harm. The harm caused can be physical, social and/or emotional in nature. Bullying behaviour is repeated over time and involves an imbalance of power in relationships between two people or groups of people in society.

Incidents can occur where behaviour is unacceptable and hurtful but the behaviour is not bullying behaviour. Strategies that deal with inappropriate behaviour are provided for within the school's Code of Behaviour.

Where bullying behaviour has been reported to or witnessed by School staff, they should follow the school's Bí Cineálta policy.

The school's Bí Cineálta policy to prevent and address bullying behaviour and the student friendly policy clearly explain what actions will be taken when bullying behaviour is reported.

A school is not expected to deal with bullying behaviour that occurs when students are not under the care or responsibility of the school. However, where this bullying behaviour has an impact in school, schools are required to support the students involved. Where the bullying behaviour continues in school, schools should deal with it in accordance with their Bí Cineálta policy.

Where the student displaying the bullying behaviour is not a student in the school, but the student who is experiencing the bullying behaviour is a student in the school, the school should support the student who is experiencing the bullying behaviour as appropriate and engage with them and their parents to determine what steps can be taken.

It is important for school staff to be fair and consistent in their approach to address bullying behaviour. Both the student who is experiencing bullying behaviour and the student who is displaying bullying behaviour need support. It is important that the student who is experiencing bullying behaviour is engaged with without delay so that they feel listened to, supported and reassured.

School staff should identify the supports needed for the student who is displaying bullying behaviour to better manage relational difficulties and ensure that their needs are met. A student's agency or sense of power can be decreased when they experience or witness bullying behaviour. When a student tells an adult that they feel that they are experiencing bullying behaviour they may feel that they are taking back some control over what is happening to them. It is very important that a student's agency is not decreased further by adults deciding what will happen next without listening to the student and involving them in deciding on the actions that will be taken.

The following principles must be adhered to when addressing bullying behaviour:

- ensure that the student experiencing bullying behaviour feels listened to and reassured
- seek to ensure the privacy of those involved
- conduct all conversations with sensitivity
- consider the age and ability of those involved
- listen to the views of the student who is experiencing the bullying behaviour as to how best to address the situation
- take action in a timely manner
- inform parents of those involved

In Killoughteen NS we recognise that parents are an integral part of the school community and play an important role in addressing bullying behaviour. Where bullying behaviour has occurred, the parents of the parties involved will be contacted at an early stage to inform them of the matter and to consult with them on the actions to be taken to address the behaviour as outlined in the school's Bí Cineálta policy.

In circumstances where student expresses concern about their parents being informed, the school should develop an appropriate plan to support the student and for how their parents will be informed. Schools should consider communication barriers that may exist when communicating with parents, for example, literacy, digital literacy or language barriers

Given the complexity of bullying behaviour it is generally acknowledged that that no one approach works in all situations. International and national research also continues to evolve in this area and the effectiveness of particular approaches continues to be reviewed.

In our school we will invite the relevant parents into the school and discuss the behaviour that has been brought to our attention/ witnessed by staff as soon as is possible. The goal for all parties must be to reconcile friendships and move forward positively.

Requests to take no action

A student reporting bullying behaviour may ask that a member of staff does nothing about the behaviour other than "look out" for them. The student may not want to be identified as having told someone about the bullying behaviour. They may feel that telling someone might make things more difficult for them. Where this occurs, it is important that the member of staff shows empathy to the student, deals with the matter sensitively and speaks with the student to work out together what steps can be taken to address the matter and how their parents will be informed of the situation. It is important that the student who has experienced bullying behaviour feels safe. Parents may also make the school aware of bullying behaviour that has occurred and specifically request that the school take no action. Parents should put this request in writing to the school or be facilitated to do so where there are literacy, digital literacy or language barriers. However, while acknowledging the parent's request, Killoughteen NS may decide that, based on the circumstances, it is appropriate to address the bullying behaviour.

Determining if bullying behaviour has ceased

The teacher must engage with the students and parents involved no more than 20 school days after the initial discussion to review progress following the initial intervention. Important factors to consider as part of the review are the nature of the bullying behaviour, the effectiveness of the strategies used to address the bullying behaviour and the relationship between the students involved. Even though the bullying behaviour may have ceased, ongoing supervision and support may be required for both the student who has experienced the bullying behaviour as well as the student who has displayed the behaviour.

It can take time for relationships to settle and for supports to take effect. In some cases, relationships may never be restored to how they were before the bullying behaviour occurred. If the bullying behaviour has not ceased, the teacher should review the strategies used in consultation with the students and parents and agree to meet again over an agreed timeframe until the bullying behaviour has ceased. Where it becomes clear that the student who is displaying the bullying behaviour is continuing to display the behaviour, then the school should consider using the strategies to deal with inappropriate behaviour as provided for within the school's Code of Behaviour. If disciplinary sanctions are considered, this is a matter between the relevant student, their parents and the school.

Recording bullying behaviour All incidents of bullying behaviour should be recorded. The record should document the form (Section 2.5) and type (See Section 2.7) of bullying behaviour, if known, where and when it took place and the date of the initial engagement with the students and their parents. The record should include the views of the students and their parents regarding the actions to be taken to address the bullying behaviour. It should document the review with students and their parents to determine if the bullying behaviour has ceased and the views of students and their parents in relation to this. It is important to document the date of each of these engagements and the date that it has been determined that the bullying behaviour Procedures to Prevent and Address Bullying Behaviour for Primary and Post Primary Schools 46 has ceased. Any engagement with external services/supports should also be noted. These records will be retained in accordance with the school's record keeping policy and in line with data protection regulations.

Where a Student Support File exists for a student, it will be student's support file. This will assist the school's student support team, in providing a consistent and holistic response to support the wellbeing of the students involved.

Complaint process

If a parent is not satisfied with how bullying behaviour has been addressed by the school, in accordance with these procedures, they will be referred to the school's complaints procedure. Additional Information relating to schools' complaint procedures are available at the following link: parental complaints procedure

In the event that a student and/or parent is dissatisfied with how a complaint has been handled, a student and/or parent may make a complaint to the Ombudsman for Children if they believe that the school's actions have had a negative effect on the student. The Office of the Ombudsman for Children can be contacted at occomplaint@oco.ie.

Supports are available to help prevent and address bullying behaviour. These include the following:

National Educational Psychological Service (NEPS)

The National Educational Psychological Service (NEPS) of the Department of Education provides a comprehensive, school based psychological service to all primary and post primary schools to support the wellbeing, academic, social and emotional development of all students. The NEPS model of service is a consultative, capacity building model, in which there is a balance between casework and support and development work. The psychological services which NEPS provides for students are differentiated in terms of whether the service involves the psychologist's direct involvement with the student, known as Direct Casework, or involves the psychologist working through teachers or teachers/parents to provide a psychological service for a student, known as Indirect Casework. NEPS staff can support schools with issues around bullying through this direct or indirect case work service. In relation to bullying, NEPS psychologists often advise schools on best practice to prevent and address bullying when issues arise in schools and/or provide training in preventative initiatives, such as developing social and emotional skills, social skills, executive function skills, promoting resilience and skills in relationship repair between peers as appropriate.

Oide

Oide is the Department of Education's support service for schools, and it supports professional learning for primary and post primary school leaders and teachers in recognised schools and centres for education. Oide fosters a culture of continuing professional learning among school leaders and teachers encouraging lifelong learning, reflective and enquiry based practices. The work of Oide contributes to school improvement by providing high quality professional learning experiences, supports and resources relating to curricular developments, broader educational goals and national priorities, such as wellbeing which includes preventing and addressing bullying. Oide provides continuing professional learning support to schools to support implementation of these procedures. More information on the supports provided by Oide is included in the Resources Guide which accompanies these procedures. Webwise

Webwise is the online safety initiative of the Department of Education and is cofunded by the European Commission. Webwise promotes safer, better internet use through awareness raising and education initiatives targeting teachers, students and parents. Webwise develops and disseminates resources that help teachers integrate digital citizenship and online safety into teaching and learning in their schools. Webwise also provides information, advice, and tools to parents to support their engagement in their children's online lives. With the help of the Webwise Youth Advisory Panel, Webwise develops youth-oriented awareness raising resources and training programmes that promote digital citizenship and address topics such as online wellbeing and cyberbullying. More information on the supports provided by Webwise is included in the Resources Guide which accompanies these procedures.

National Parents Council

The National Parents Council (NPC) is the representative organisation for parents of children in early years, primary and post primary education. NPC was established as a charitable organisation in 1985, under the programme for Government, as the representative organisation for parents of children attending school. It received statutory recognition in the Education Act 1998. The NPC works to ensure that all parents are supported and empowered to become effective partners in their children's education. NPC seeks to achieve true partnership and deliver better outcomes for all students. The NPC delivers online and in person courses to support parents of both primary and post-primary students to prevent and address bullying behaviour.

Tusla

Schools should contact Tusla directly for advice in cases where it is considered that bullying behaviour is a child protection concern.

All bullying behaviour will be recorded. This will include the type of behaviour, where and when it took place, and the date of the engagement with students and parents. The actions and supports agreed to address bullying behaviour will be documented. If the bullying behaviour is a child protection concern the matter will be addressed without delay in accordance with *Child Protection Procedures for Primary and Post-Primary Schools*.

Section D: Oversight

The principal will present an update on bullying behaviour at each board of management meeting. This update will include the number of incidents of bullying behaviour that have been reported since the last meeting, the number of ongoing incidents and the total number of incidents since the beginning of the school year. Where incidents of bullying behaviour have occurred, the principal will also provide a verbal update which will include where relevant, information relating to trends and patterns identified, strategies used to address the bullying behaviour and any wider strategies to prevent and address bullying behaviour where relevant. This update does not contain personal or identifying information. See Chapter 7 of the Bí Cineálta procedures.

This policy is available to our school community on the school's website and in hard copy on request. A student friendly version of this policy is displayed in the school and is also available on our website and in hard copy on request.

This policy and its implementation will be reviewed, following input from our school community, each calendar year or as soon as practicable after there has been a material change in any matter to which this policy refers.

| Signed: | Date: | |
|--------------------------------------|-------|--|
| (Chairperson of board of management) | | |
| Signed: | Date: | |
| (Principal) | | |