

Bí Cineálta Policy

Policy to Prevent & Address Bullying Behaviour



St Joseph's Secondary School
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St. Joseph's Secondary School Spanish Point is a Catholic School in the trusteeship of CEIST and thus its ethos is shaped on the vision of CEIST. It is committed to providing a holistic education which recognises, respects, and develops the potential of each individual, and does so in the context of the whole school community.

Introduction

“All that is needed for the triumph of evil is that good men do nothing”

(Edmund Burke).

CEIST Charter

The core values of CEIST are intended to support and nourish the lives of the people at the heart of our school: students, staff, and parents. Its key principles focus on:

- Promoting spiritual and human development
- Achieving quality in teaching and learning
- Showing respect for every person
- Creating community
- Being just and responsible

Philosophy and Context of this Policy

Our approach to bullying is based on our school's Mission Statement and the core values of the CEIST Charter. St. Joseph's Secondary School Spanish Point is a Catholic Voluntary Secondary School, is a wconsiderate and caring community, which fosters the full potential of all staff and students. It promotes a positive partnership between all members of the school and wider community and the highest standards of teaching, learning and performance. As members of a caring community, pupils, parents, and staff treat each other fairly and with respect. Bullying behaviour will not be tolerated. We believe that each student has the right to an education free from fear and intimidation. As a CEIST school we seek to act justly and responsibly in all our relationships. Our school respects the unique and intrinsic value of every person. It seeks to promote the well-being of all its members.

Rationale

Our Bí Cineálta Policy is a whole school policy. Its purpose is to help counteract bullying behaviour in our school and to emphasise the traumatic and devastating effect of bullying on the individual and on the school as an organisation.

Scope

The Board of Management recognises the very serious nature of bullying and the negative impact that it can have on the lives of pupils and is therefore fully committed to ensuring that policy and practice in the school is guided by the four key principles of Cineáltas:

1. Prevention
2. Support
3. Oversight
4. Community

The Board of Management of St Joseph's Secondary School Spanish Point 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 of St. Joseph's Secondary School 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 2022. Together, 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 behavior on our students.

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 under 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

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. 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.

The core elements of the definition are further described below:

➤ Targeted Behaviour

Bullying is deliberate, unwanted behaviour that causes harm to others, and where the student displaying bullying behaviour knows that their behaviour is or will be perceived as harmful by the child or young person experiencing the behaviour. Bullying is not accidental or reckless behaviour. The harm can be physical (for example, personal injury, damage to or loss of property), social (for example, withdrawal, loneliness, exclusion) and/or emotional (for example, low self-esteem, depression, anxiety) and can have a serious and long-term negative impact on the student experiencing the bullying behaviour. If the repeated harm is real for the student experiencing the behaviour but unintended by the other student, this is not bullying but, importantly, must still be addressed under the school's code of behaviour.

➤ Repeated Behaviour

Bullying takes the form of a systematic pattern of behaviour which is repeated over time. Single offline incidents of intentional negative behaviour involving an imbalance of power are not considered bullying but must still be addressed under the school's code of behaviour. Posting a single harmful message/image/video online, and which is highly likely to be reposted or shared with others can therefore be seen as bullying behaviour.

➤ Imbalance of Power

In incidents of bullying, the student experiencing the bullying behaviour finds it hard to defend themselves as a result of the abuse of a real or perceived imbalance of power. This imbalance of power may manifest itself through differences in size, strength, age, ability, peer group power, economic status, social status, religion, race, ethnic origin including membership of the Traveller and/or Roma communities, sexual orientation, family circumstances, gender, gender identity, gender expression, experience of the care system, disability or the receipt of special education. In incidents of online (or cyber) bullying, the imbalance of power may relate to online anonymity, technical proficiency and possession of information/images/video, and the inability of the targeted student to remove offensive online material or escape the bullying.

Behaviour that is not Bullying Behaviour

A one-off instance of negative behaviour towards another student is not bullying behaviour. However, a single hurtful message posted on social media can be considered bullying behaviour as it may be visible to a wide audience and has a high likelihood of being shared multiple times and so becomes a repeated behaviour.

Disagreement between students, or instances where students don't want to be friends or to remain friends, is not considered bullying behaviour unless it involves deliberate and repeated attempts to cause distress, exclude or create dislike by others including deliberate manipulation of friendship groups.

Some students with special educational needs may have social communication difficulties which may make them communicate their needs through behaviours that can hurt themselves or others. It is important to note that these behaviours are not deliberate or planned but, in certain situations, they are an automatic response which they can't control.

Bullying is not accidental or reckless behaviour. If the repeated harm is real for the student experiencing the behaviour but unintended by the other student, this is not bullying.

These behaviours, while not defined as bullying, can be distressing. Strategies to deal with inappropriate behaviour are provided for within the school's Code of Behaviour.

Criminal Behaviour

Bullying behaviour can be considered criminal behaviour under certain circumstances and legal consequences can apply. The age of criminal responsibility in Ireland is 12 years.

Some online behaviour may be illegal, and students need to be aware of the far-reaching consequences of posting inappropriate or harmful content online. In cases of intimate imagery, the Harassment, Harmful Communications and Related Offences Act 2020, also known as Coco's Law, **criminalises the non-consensual sharing of intimate images and also criminalises threatening to share these images.**

If bullying behaviour **involves physical violence or threats of violence**, it may be considered **assault**.

If bullying behaviour involves **discrimination or hate speech** targeting a student based on their race, religion, nationality, ethnicity, sexual orientation or membership of the Traveller community, it may be **considered a hate crime** under the Prohibition of Incitement to Hatred Act 1989¹¹, and those engaging in such behaviour may face criminal charges.

If bullying behaviour **involves sexual harassment or sexual assault**, this may also be **considered criminal behaviour**.

An Garda Síochána is the appropriate authority to investigate alleged criminal behaviour.

Types of Bullying Behaviour deemed to be inappropriate:

List is not exhaustive

General behaviours which apply to all	➤ Harassment based on any of the nine grounds in the equality legislation e.g., sexual harassment, homophobic bullying, racist bullying etc. ➤ Physical aggression ➤ Damage to property ➤ Name calling ➤ Slagging ➤ The production, display or circulation of written words, pictures or other materials aimed at intimidating another person ➤ Offensive graffiti ➤ Extortion ➤ Intimidation ➤ Insulting or offensive gestures ➤ The “look” ➤ Invasion of personal space ➤ A combination of any of the types listed.
Cyber	➤ Denigration: Spreading rumours, lies or gossip to hurt a person’s reputation ➤ Harassment: Continually sending vicious, mean, or disturbing messages to an individual ➤ Impersonation: Posting offensive or aggressive messages under another person’s name ➤ Using inflammatory or vulgar words to provoke an online fight ➤ Fooling someone into sharing personal information which you then post online ➤ Posting or sharing confidential or compromising information or images ➤ Exclusion: Purposefully excluding someone from an online group ➤ Cyber stalking: Ongoing harassment and denigration that causes a person considerable fear for his/her safety ➤ Silent or anonymous telephone/mobile phone calls ➤ Abusive telephone/mobile phone calls ➤ Abusive text messages ➤ Abusive emails ➤ Abusive posts communication on social media
Identity Based Behaviours	➤ Including any of the nine discriminatory grounds mentioned in Equality Legislation (Gender including transgender, civil status, family status, sexual orientation, religion, age, disability, race, and membership of the Traveller community). ➤ Discrimination, prejudice, comments or insults about colour, nationality, culture, social class, religious beliefs, ethnic or traveller background ➤ Exclusion on the basis of any of the above
Homophobic	➤ Spreading rumours about a person’s sexual orientation

and Transgender	➤ Taunting a person of a different sexual orientation ➤ Name calling e.g., Gay, queer, lesbian...used in a derogatory manner ➤ Physical intimidation or attacks ➤ Threats
Special Educational Needs, Disability	➤ Name calling ➤ Taunting others because of their disability or learning needs ➤ Taking advantage of some students' vulnerabilities and limited capacity to recognise and defend themselves against bullying ➤ Taking advantage of some students' vulnerabilities and limited capacity to understand social situations and social cues. ➤ Mimicking a person's disability ➤ Setting others up for ridicule
Relational	This involves manipulating relationships as a means of bullying. Behaviours include: ➤ Malicious gossip ➤ Isolation & exclusion ➤ Ignoring ➤ Excluding from the group ➤ Taking someone's friends away • "Bitching" ➤ Spreading rumours ➤ Breaking confidence ➤ Talking loud enough so that the victim can hear ➤ The "look" ➤ Use of terminology such as "nerd" in a derogatory way
Sexual	➤ Unwelcome or inappropriate sexual comments or touching ➤ Harassment ➤ Sharing or threatening to share intimate photos

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	October 2024	Focus Group to develop – Wellbeing Committee
	March 2024	Survey all Teachers/SNA’S/Ancillary Staff
	April 2024	Cineáltas Half Day Closure
	April 2024	Focus Group Meeting to develop – Wellbeing Committee
	May 2024	Emailed draft policy for feedback with wider staff
	September 2025	Emailed policy for feedback with wider staff
	September 2026	Emailed draft policy for feedback with wider staff
Students	Sept 2024 / April 2024	Survey sent to all Students
	April 2024	Focus Group
	April 2024	Class Tutor Time consultation about hots spots & hot times for bullying
	May 2024	Emailed draft policy for feedback with all students
	September 2025	Emailed policy for feedback with wider students
	September 2026	Emailed policy for feedback with wider students
Parents	March 2024	Survey sent to all Parents
	April 2024	Focus Group –Parents
	May 2024	Emailed draft policy for feedback with all parents
	September 2025	Emailed policy for feedback with all parents
	September 2026	Emailed policy for feedback with all parents
Board of Management	Sept 2024	Notification of review
	April 2024	Policy Review Committee
	May 2024	Bom Ratification

	September 2025	BOM Ratification
Wider school community as appropriate, for example, bus drivers	March 2024 September 2026	Survey sent to all Bus Driver Policy sent to all Bus Drivers
Date policy was approved: 14/09/2026		
Date policy was last reviewed: 14/09/26		

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 (see Chapter 5 of the Bí Cineálta procedures):

Bullying prevention aligned with Key Areas of Wellbeing Promotion

Culture and Environment:

- ✓ Promotion of a positive school climate and culture where RESPECT is key
- ✓ Effective Leadership – Open Door Policy
- ✓ Whole-school approach
- ✓ Seating Plans
- ✓ Establishment of Say Stop Slogan/Campaign
- ✓ Pupils who observe incidents of bullying behaviour are encouraged to discuss them with teachers.
- ✓ Promotion of awareness of who to refer bullying to & of designated email address for school community to use to report bullying and/or concerns for themselves or other students.
- ✓ Cineáltas Awards
- ✓ School staff model respectful behaviour to all members of our school community
- ✓ All staff actively watch out for signs of bullying behaviour
- ✓ Events organized throughout the year to promote Bí Cinealta Policy
- ✓ Cineáltas is an item to be discussed in every staff meeting agenda

Curriculum

- ✓ Cairdeas Mentoring Program - 5th year students act as mentors to incoming 1st year students.
- ✓ Google Classroom page - “Cairde le Chéile”. The aim of this page is to promote positivity and provide a platform for students and teachers to share in each other’s achievements.
- ✓ Anti-Bullying Class survey form – Google form conducted in SPHE Classes but also available at any time on the “Cairde le Chéile” page.
- ✓ The fostering and enhancing of the self-esteem of all our students through both curricular and extracurricular activities. The provision for students of opportunities to develop a positive sense of self-worth through formal and informal interactions.
- ✓ The full implementation of the 400 hours of Wellbeing for Junior Cycle
- ✓ SPHE, CSPE, RSE Programmes and Guidance Related Learning promote awareness of bullying and its effects.
- ✓ FUSE PROGRAMME
- ✓ Wellbeing Indicators embedded across curriculum
- ✓ CPD for teachers through OIDE and Education Centres.
- ✓ Anti-bullying Awareness Week, strengthened by having a designated Cyber Bullying Awareness Day
- ✓ Stand Up Week and/or One Day Events - celebrating and raising awareness of the LGBT+

- ✓ Random Act of Kindness Month - Students encouraged to act more kindly during the month of December - acts of kindness noted by teachers
- ✓ Wellbeing Week – Activities to promote mental health, wellbeing and relationships.

Relationships & Partnerships:

- ✓ Regular communication with parents
- ✓ Acknowledging and promoting positive behaviour through Tyro
- ✓ Class Tutor System - Every base class has a Tutor with whom they meet every morning for roll call and check-in.
- ✓ Student Support Team in place / Pastoral Care Star System
- ✓ Support of Student Council
- ✓ Mock support pack - distributed to exam students prior to the mocks
- ✓ Community Garda Visit
- ✓ Guest Speakers
- ✓ Linking with external agencies NEPS/ CAMHS/ TUSLA/ GARDAÍ

Policy and Planning:

- ✓ Fair and transparent Code of Positive Behaviour
- ✓ Strong Acceptable Use Policy
- ✓ Digital Device Program Policy
- ✓ Digital Awareness- the appropriate use of social media.
- ✓ Social media sites are blocked on school network
- ✓ Senso is used in our Digital Device Program
- ✓ “Anti-bullying Charter” displayed in classrooms. This Anti- Bullying Charter/ Agreement is included in our school journal and is reviewed regularly and signed during Tutor Time.
- ✓ Wellbeing poster on how to ask for help or support.
- ✓ Bí Cineálta Student friendly policy displayed in school
- ✓ Adequate supervision through S&S
- ✓ Review of bullying “hot spots” and “hot times”
- ✓ Consistent recording, investigation and follow-up of bullying behavior
- ✓ On going evaluation of the effectiveness of the Cineáltas Procedure

Promoting a Telling Environment & Trusted Adult Model

All reports, including anonymous reports of bullying will be investigated and dealt with, that way pupils will gain confidence in ‘telling’. This confidence factor is of vital importance. It should be made clear to all pupils that when they report incidents of bullying, they are not considered to be telling tales but are behaving responsibly which is part of our culture here at St. Joseph’s Spanish Point. Our Tutor System builds and tries to facilitate a trusted adult strategy.

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 Measures:

- Adequate supervision through S&S –school split into zones
 - Boys Toilets
 - Circulating outside
 - New building/ Lockers
 - Arás
 - Atrium
 - Pitch
 - Back of Hall
 - Main Gate

Monitoring Measures:

- Bí Cineálta added as Agenda Item in every staff meeting
- Significant investment into CCTV
- Anti-Bullying Class survey form – Google form conducted in SPHE Classes but also available at any time on the “Cairde le Chéile” page.
- Class tutor time
- Non-teaching staff such as secretaries, special needs assistants (SNAs), bus drivers/escorts, caretakers, cleaners are encouraged to report to school management any incidents of bullying behaviour witnessed by them, or mentioned to 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
- > Listen to all students involved and document each student's account of the bullying behaviour
- > take action in a timely manner
- > inform parents of those involved

Section C: Addressing Bullying Behaviour

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

The primary aim in investigating and dealing with bullying is to resolve any issues and to restore, as far as is practicable, the relationships of the parties involved (rather than to apportion blame).

In investigating and dealing with bullying, the teacher will determine whether the behaviour reported is bullying behaviour one will consider the following questions:

- 1) Is the behaviour targeted at a specific student or group of students?
- 2) Is the behaviour intended to cause physical, social or emotional harm?
- 3) Is the behaviour repeated?

If the answer to each of the questions above is Yes, then the behaviour is bullying behaviour and the behaviour should be addressed using the Bí Cineálta Procedures



Source: Dept of Education

Please note: One off incidents may be considered bullying in certain circumstances. A single hurtful message posted on social media can be considered bullying behaviour as it has a high likelihood of being shared multiple times and thus becomes a repeated behaviour.

If the answer to any of these questions is No, then the behaviour is not bullying behaviour. Strategies to deal with inappropriate behaviour are provided for within the school's Code of Behaviour.

When identifying if bullying behaviour has occurred teachers should consider 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
- ✓ students involved may be asked to write down their account of the incident(s)

Where Bullying Behaviour has Occurred

- ✓ parents are an integral part of our school community and play an important role, in partnership with our school, in addressing bullying behaviour. Where bullying behaviour has occurred, the parents of the students 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
- ✓ A student who is experiencing bullying behavior views will be listened to as to how best to address the situation. This will also ensure that the student experiencing bullying behavior feels listened to and reassured.
- ✓ Teachers should take a calm, unemotional problem-solving approach when dealing with incidents of alleged bullying behaviour reported by pupils, staff or parents and report to school management.
- ✓ Incidents will generally be investigated outside the classroom situation to ensure the privacy of all involved.
- ✓ All interviews will be conducted with sensitivity and with due regard to the rights of all pupils concerned. Pupils who are not directly involved may be interviewed as they can also provide very useful information in this way.

Reporting

- ✓ In cases where it has been determined that bullying behaviour has occurred, the parents of the parties involved will be contacted at an early stage to inform them of the matter and explain the actions being taken (by reference to the school policy). The school should

give parents an opportunity to discuss ways in which they can reinforce or support the actions being taken by the school and the supports for their pupils.

- ✓ Where school management has determined that a pupil has been engaged in bullying behaviour, it will be made clear to him/her how he/she is in breach of the school's Bí Cineálta policy and efforts should be made to try to get him/her to see the situation from the perspective of the pupil being bullied;
- ✓ A record will be kept of the engagement with all involved
- ✓ This record will document the form and type of bullying behaviour, if known (see Section 2.5 and 2.7 of the Bi Cineálta procedures), where and when it took place and the date of the initial engagement with the students involved and their parents
- ✓ The record will include the views of the students and their parents regarding the actions to be taken to address the bullying behaviour
- ✓ It must also be made clear to all involved (both pupils and parents) that in any situation where disciplinary sanctions are required, this is a private matter between the pupil being disciplined, his or her parents and the school.

Follow-Up Where Bullying Behaviour has Occurred

- ✓ The teacher will engage with the students involved and their parents again no more than 20 school days after the initial engagement
- ✓ The following important factors will be discussed as part of this engagement
 - The nature of the bullying behaviour,
 - The effectiveness of the strategies used to address the bullying behavior
 - The relationship between the students involved
- ✓ The teacher will 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.
- ✓ If bullying behavior has ceased the date that it has been determined that the bullying behaviour has ceased should be recorded
- ✓ Any engagement with external services/supports will also be noted
- ✓ Ongoing supervision and support may be needed for the students involved even where bullying behaviour has ceased
- ✓ If the bullying behaviour has not ceased the teacher will review the strategies used in consultation with the students involved and their parents. A timeframe should be agreed for further engagement until the bullying behaviour has ceased
- ✓ If it becomes clear that the student who is displaying the bullying behaviour is continuing to display the behaviour, then the school consideration should be given to 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
- ✓ If a parent(s) is not satisfied with how the bullying behaviour has been addressed by the school, in accordance with the Bí Cineálta Procedures to Prevent and Address Bullying Behaviour for Primary and Post-Primary Schools. They should be referred to the school's complaints procedures
- ✓ If a parent is dissatisfied with how a complaint has been handled, they 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

Supports

The school will use the following approaches to support those who experience, witness and display bullying behaviour (see Chapter 6 of the Bí Cineálta procedures):

Student Bullying:

A programme of support for pupils who have bullied is in place.

- ✓ Supportive Pastoral Care Team
 - Guidance Counsellor
 - Class tutor
 - Year Head
- ✓ Cooperation with Parents
- ✓ Work on developing why,
- ✓ Identifying root causes,
- ✓ Developing their empathy, so student realises pain caused,
- ✓ Work on developing their self-esteem, social skills, interests, and hobbies
- ✓ Student referral for counselling if needed.

Student being bullied:

A programme of support for pupils who have been bullied is in place.

- ✓ Validation of the hurt caused – student is listened to
- ✓ Supportive Pastoral Care Team
 - Guidance Counsellor
 - Class tutor
 - Year Head
- ✓ Cairdeas Mentor
- ✓ Cooperation with Parents
- ✓ Student is consulted (where feasible) with as to which member of pastoral care team to link in with
- ✓ Work on building self-esteem, friendships, extra-curricular, social skills resilience
- ✓ Referral for counselling if needed
- ✓ Referral to outside agencies (if necessary) eg NEPS/ TUSLA

Record Keeping

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*.

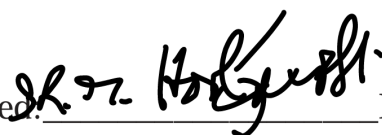
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Section D: Oversight

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: 14/09/26
(Chairperson of board of management)

Signed:  Date: 14/09/26
(Principal)