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Bí Cineálta Policy to Prevent and Address Bullying Behaviour

The Board of Management of Saint Michael's 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.

The harm can be :

- Physical (eg: personal injury, damage to or loss of property)
- Social: (eg: withdrawal, loneliness, exclusion)
- Emotional: (eg: low self esteem, depression, anxiety)

A one-off instance of negative behaviour towards a 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.

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Saint Michael's National School, 11 Barrington Street, Limerick V94 A0K7

Behaviour that is not 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 be addressed under the school's code of behaviour.
- 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 cannot control.
- Disagreement between students is not considered bullying unless it involves deliberate and repeated attempts to cause distress, exclude or create dislike by others

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.

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.

Types of Bullying:

There are many different types of bullying behaviour. These can include directing bullying at someone focused on the following: disability, exceptional ability, gender identity, LGBTQ+ , physical appearance, racism, poverty status, religious identity, sexism and sexual harassment. This is not an exhaustive list.

Bullying can be direct:

Physical: pushing, shoving, punching, kicking, poking and tripping students. Physical assault. Destruction of personal property.

- Verbal: continual name calling which insults, humiliates the student – this may refer to physical appearance, size, clothes, gender, accent, academic ability, race or ethnic origin.
- Written: Writing insulting remarks in public places, passing notes or drawings about the student.
- Extortion: where something is obtained through force or threats

Bullying can be indirect:

- Exclusion: where a student is deliberately and repeatedly isolated, excluded or ignored by a student or group of students.
- Relational: Where a student's attempts to form friendships with peers are repeatedly rejected or undermined, threats, non-verbal gesturing, malicious gossip, spreading rumours, silent treatment and manipulation of friend groups etc can all form relational bullying for a student.

Online bullying behaviour:

Cyber bullying is carried out via text, direct messaging/instant messaging, social media platforms, email, apps, digital gaming sites, gaming consoles, chatrooms and other online technologies. This can include:

- Sending or sharing of insulting and offensive or intimidating messages or images via online means as mentioned above.
- Posting information which is personal, private or sensitive without consent.
- Making and/or participating in fake profiles on a social network to impersonate and/or humiliate other students.
- Exclude/disrupt access to a student on purpose on online chat groups/access to accounts/from an online game.

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	Questionnaire Feb 2025 10th March half day closure Working groups met April/May 2025 Discussion at staff meetings March -June	Questionnaire, half day school closure for training, working groups met to develop different areas. Regular discussion at staff meetings throughout the process.
Students	Questionnaire April / May 2025 Pupil friendly version consultation and slogan competition May 2025	Pupil questionnaire, class and curricular work, discussion and feedback sought on pupil friendly version. Slogan competition.
Parents	Information sent Questionnaire 13th February Information sent May 8th Policy circulated May 2025	Parent questionnaire, policy circulated for comment, information on Bí Cineálta sent out
Board of Management	Updates given on 24th September 2024 3rd December 21st January 24th March June 18th	Updates at Board meetings on progress throughout the year, feedback on pupil, staff and parent surveys. Policy reviewed in full at Board meeting.
Wider school community as appropriate, for example, bus drivers		Policy shared with After School provider
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 (see Chapter 5 of the Bí Cineálta procedures):

Culture and Environment:

We strive to:

- Support the idea that our school is a telling environment.
- Promote the concept of a trusted adult, linked with the Stay Safe curriculum. Agreed procedures / methods on how to tell in each class supported by the Student Friendly Policy developed.
- Ensure all areas of the school, inside and out, are supervised.
- Incorporate artwork and signs to promote our school values
- Encourage a sense of belonging with ownership over their own space through art and creativity.
- Create a positive school culture and climate which:
 - is welcoming of difference and diversity and is based on inclusivity;
 - encourages pupils to disclose and discuss incidents of bullying behaviour in a non-threatening environment
 - promotes respectful relationships across the school community

Ways in which we work to achieve these goals are as follows:

- Explicitly teaching the pupils strategies and approaches when dealing with unwanted behavior.
- Encouraging pupils to listen when another pupil highlights that they may feel hurt or left out.
- Engaging and intervening to promote positive relationships in the classroom and on yard.
- A living school Ethos - staff discuss, model and explicitly teach the positive values and expectations that promote positive relationships between pupils.
- Staff take a uniform approach when dealing with reports of bullying behaviour – this is discussed at staff meetings and a copy is displayed in the Staff Room for ease of access also.
- Celebrating differences through promotion weeks such as neurodiversity, Friendship, Cyber Safety, whole school Acts of Kindness jars/ homework, Poster making, slogan making, 'Be the I in Kind' etc.
- Introducing interventions for pupils who may find unstructured playtime challenging- this may involve the inclusion of playground helpers on yard to support with games and positive interactions, explicit teaching of playground games to support interactions.
- Student Friendly Bí Cineálta Policy developed with pupil and parent input and is distributed to parents, children and staff to discuss encouraging the school community to report / tell
- Keeping the school community (parents, students, Parent/Teacher Association receive information at times regarding useful information on Anti-Bullying.
- Stay safe and SPHE lessons focusing on positive behaviour form part of curricular content in all classes.
- Effective supervision and monitoring of pupils at all times such as on arrival, dismissal, yard supervision, school tours,

Policy and planning

The aim of Saint Michael's National School's Bí Cineálta policy is

- To raise awareness of bullying as a form of unacceptable behaviour with school management, teachers, pupils, parents/guardians.

- To promote a culture which encourages children to disclose and discuss incidents of bullying behaviour.
- To ensure appropriate supervision and monitoring measures through which all areas of school activity are kept under observation.
- To develop procedures for noting, investigating and dealing with incidents of bullying behaviour.
- To implement a programme of support for those affected by bullying behaviour and for those involved in bullying behaviour.
- To work with appropriate agencies in countering all forms of bullying and promoting anti bullying behaviour.
- Student Friendly Version of the policy, which is regularly discussed and visible in each classroom, the corridor and the playground(see Appendix A)

The Acceptable Use Policy, Supervision policy, Special Education Policy, SPHE, RSE and Code of Behaviour as well as the Voluntary No Phone Code all support the implementation of the Bí Cineálta policy. Effective leadership is a key component with Principal, Deputy Principal, DLP, DDLP, and the In School Management (ISM) team focused on supporting the implementation of this policy.

Relationships and Partnerships

- Interpersonal connections are supported through a range of formal and informal structures such as our Parents' Association, Board of Management and pupil committees and groups.
- Age and stage appropriate awareness initiatives that engage the pupils in looking at their own behaviour – promoting acts of kindness and friendship, being an active help to others and looking at the causes of and impact of bullying during SPHE lessons.
- Conducting workshops and seminars for students, staff and parents to raise awareness of the impact of bullying.
- Encouraging peer mentoring and peer support
- Supporting active participation of students in school life and active participation of parents in school life also.
- Engaging parents and students in actively contributing to the formation of a Student Friendly Bí Cineálta Policy to promote and discuss ways to identify, prevent and deal with bullying behaviour

Preventing Cyber-Bullying Behaviour:

- 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 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

A school is not expected to deal with bullying behaviour that occurs when students are not under the care or responsibility of the school. This includes when pupils are online outside of 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.

Preventing homophobic / transphobic bullying behaviour:

- Create a safe and inclusive environment for all pupils, regardless of their sexual orientation or gender identity.

- Educate pupils about the importance of respecting all people, regardless of their sexual orientation or gender identity
- Encourage peer support, such as peer mentoring and empathy building activities.
- Use available resources such as 'Same Families, Different Love' to explicitly teach the above in an age-appropriate way.
- Encouraging students to speak up when they witness homophobic behaviour

Preventing racist bullying behaviour

- Teach pupils about the history and impact of racism e.g. Show Racism the Red Card
- Promote and celebrate diversity and inclusion in the classroom
- Provide support for pupils who have been targeted by racist bullying
- Ensure that school resources and books represent the appropriate lived experiences of pupils and adults from different national, ethnic and cultural backgrounds.

Preventing sexist bullying behaviour

- Teach pupils about the importance of gender equality e.g. Gender Equality Matters
- Challenge gender stereotyping when encountered
- Celebrate diversity at school and acknowledge contributions of all pupils
- Encourage the school community to reinforce these values of respect both in school and outside of the school.

In addition to above mentioned strategies, the school has the following in place to prevent and address bullying:

- Staff at all times endeavour to encourage pupils to show respect for each other.
- Implementation of the SPHE curriculum.
- Positive self-esteem is fostered among the pupils by celebrating individual differences, by acknowledging good behaviour and by providing opportunities for success.
- Learning about responsible online behaviour and digital citizenship. Acceptable Usage Policy also developed for technology in our school.
- The school's Bí Cineálta (Anti-Bullying) policy is discussed regularly with the pupils.
- Staff are particularly vigilant in monitoring pupils who are considered at risk of engaging or experiencing bullying behaviour.
- All disclosed incidents of bullying behaviour are investigated thoroughly and consistently by following the correct procedure as outlined to staff and recorded on Aladdin using the template for this.
- School wide awareness raising on all aspects of bullying behaviour, supervision and monitoring of classrooms, corridors, school grounds, school tours and extracurricular activities.
- Involvement of pupils in contributing to a safe school environment e.g. Kindness/ anti-bullying week, and other activities that can help to pupils and encourage a culture of peer respect and support
- Ensuring that pupils know who to tell and how to tell.
- Ensure pupils who witness bullying behaviour understand the importance of telling
- Refer to appropriate online behaviour when using devices and in SPHE lessons.
- Promote online safety events or material for parents
- The listing of supports currently being used in the school and the identification of other supports available to the school e.g. www.tacklebullying.ie, www.antibullyingcentre.ie, Fuse, www.webwise.ie
- Shared folder of resources to support the teaching of Bí Cineálta procedures including lessons from above websites – shared Google drive folder for all teachers to access.
- Challenge gender stereotypes – equal participation of all. Equal recognition.
- Raise awareness of the impact of homophobic bullying behaviour and encourage students to speak up when they witness homophobic bullying behaviour.
- Foster a culture where diversity is celebrated and students "see themselves" in the school

environment.

- Ensuring the library has material that reflects our diverse school population from different national, ethnic and cultural backgrounds.
- Modelling of respectful behaviour by staff
- Ensuring all students have the same opportunities to engage in school activities
- Making clear that our school has a zero tolerance approach to sexual harassment of any kind with enforceable policy - See Code of Behaviour.

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):

- All staff members have a responsibility in ensuring that supervision of pupils is consistent and effective in the classroom, corridors, on arrival and dismissal times, walking to and from the yard.
- One teacher must always be on supervision duty at yard times. They will be supported by one or two SNAs, whose primary responsibility is supervising and ensuring the safety of the pupils with the highest level of need.
- Regular review of supervision policy and practices, to include discussions with pupils.
- Staff should remain extra vigilant supervising areas that are less visible in the yard e.g. the shelter, quiet area, near PE shed and during busier times e.g. arrival at school and at the end of the day
- All staff including secretary, caretaker etc. should be made aware of who to speak to if they witness behaviour that may be bullying behaviour.
- Where staff or parents indicate a particular concern about a child, all staff members on supervision duty will be made aware of this so they can remain vigilant to potential bullying behaviour
- Class teachers to 'check in' with pupils before or after break time to monitor ongoing situations and allow for opportunities to tell.
- The Principal provides the Board with an update of any bullying behaviour identified at each Board meeting (see Appendix D)
- The Principal, in conjunction with the staff and the Board of Management complete an Annual Review each year and this is notified to the Parent's Association and uploaded to the website (see Appendix E & F)

Section C: Addressing Bullying Behaviour

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

- The class teacher will oversee recording of bullying behaviour reports for students in their class – this includes using the procedure 'Guidelines to Investigate Reports of Bullying Behaviour' and recording alleged bullying behaviour on the correct form on Aladdin (see Appendix B and C)
- The Principal will follow up after twenty days to investigate if bullying has ceased.
- All staff will be vigilant to bullying behaviour.
- Principal will inform the Board of Management of incidents of Bullying.
- Member of the In School Management team is available to provide up to date information and supports if needed to assist class teacher in addressing concern

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):

a. While all reports, including anonymous reports of bullying must be investigated and dealt with by the 'Relevant Teacher(s)', the 'Relevant Teacher(s)' will use his/her/their professional judgement in relation to the records to be kept of these reports, the actions taken and any discussions with those involved regarding same.

b. If it is established by the 'Relevant Teacher(s)' that bullying has occurred, the 'Relevant Teacher(s)' must keep appropriate written records which will assist his/her efforts to resolve the issues and restore, as far as practicable, the relationships of the parties involved.

c. The 'Relevant Teacher(s)' must record the bullying incident on the school information management system (Aladdin) by adding an Alleged Bullying Behaviour Report to the relevant pupil's file which will be visible on files on all other pupils named. The 'Relevant Teacher' must inform the Principal.

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). With this in mind the school's procedures are as follows:

- In investigating and dealing with bullying the teacher(s) will exercise his/her/their judgement to determine whether bullying has occurred, what type if it has and how best the situation might be resolved.
- All reports, including anonymous reports of bullying must be investigated and dealt with by the

'Relevant Teacher(s)'. In that way pupils will gain confidence in 'telling'. It should be made clear to all pupils that when they report instances of bullying they are not considered to be telling tales but are behaving responsibly.

- Non-teaching staff such as secretaries, SNAs, caretakers and cleaners are encouraged to report any incidences of bullying behaviour witnessed by them or mentioned to them to the Class Teacher.
- Teachers should take a calm, objective problem-solving approach when dealing with incidents of alleged bullying behaviour reported by pupils, staff or parents.
- On being informed of an alleged incident of bullying, the teacher dealing with the report will first interview the pupil(s) experiencing bullying behaviour and discuss the feelings which they experienced because of the bullying behaviour.
- Initial investigations of bullying behaviour will be done in class where possible but some incidents might be best investigated outside the classroom situation to ensure the privacy of all involved.
- When analysing incidents of bullying behaviour the 'Relevant Teacher(s)' should seek answers to questions of what, where, who, when and why. This should be done in a calm manner, setting an example in dealing effectively with a conflict in a calm, solution-focused manner.
- If a group is involved each member should be interviewed individually at first. Thereafter, all those involved should be met as a group. At the group meeting, each member should be asked for his/her account of what happened to ensure that everyone in the group is clear about the other's statements.
- Group members will receive appropriate support to address any potential pressure or undue influence from other group members following their interview with the teacher.
- "To determine whether the behaviour reported is bullying behaviour, The following questions will be considered:
 - Is the behaviour targeted at a specific student or group of students?
 - Is the behaviour intended to cause physical, social or emotional harm?
 - 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. If the answer to any of these questions is No, then the behaviour is not bullying behaviour but should be dealt with under the school's Code of Behaviour.

Note: One off incidents may be considered bullying in certain circumstances e.g. 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.

- Where the 'Relevant Teacher(s)' has/have determined that a pupil has been engaged in bullying behaviour, it should 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 perspective of the pupil experiencing the bullying.
- The "Relevant Teacher" emphasises that the focus is guiding and supporting the pupil engaging in bullying behaviour to understand the impact of their actions. Through open and respectful dialogue, the aim is to raise awareness about the harm caused by bullying behaviour and to encourage a genuine commitment to positive behaviour. If the student takes responsibility and upholds this commitment, no further action will be necessary, and the matter will be considered resolved.
- Parent(s) / guardian(s) of all parties will be informed as soon as possible.
- When an investigation is completed and/or a bullying situation is resolved the "Relevant Teacher" will complete a report, to include the findings of the investigation, the strategy adopted and the outcome of the intervention, as well as any other relevant information. This may be recorded on Aladdin under the Bi Cinealta tab, and uploading a 'Record of Alleged Bullying

Behaviour' (Appendix C).

- If a pupil chooses to continue engaging in bullying behaviour, parent(s)/guardian(s) will be contacted again. The school should give parents an opportunity to discuss an approach in which they can reinforce or support the actions being taken by the school to stop the bullying behaviour.
- Follow-up meetings with the relevant parties involved may be arranged as needed.
- Depending on the seriousness of the bullying, further supportive interventions may be utilized
- Further repeated incidents of bullying behaviour involving the same pupils will result in additional actions, including sanctions, being taken to support and restore relationships between the parties involved. Such sanctions will be proportionate to the seriousness of the bullying behaviour. It must be made clear to all involved (each set of pupils and parents) that in any situation where disciplinary sanctions are required that this is a private matter between the pupil being disciplined, his or her parents and the school.
- Where a parent is not satisfied that the school has dealt with a bullying case in accordance with these procedures, the parent must be referred to the school's complaints procedure.
- In the event that a parent has exhausted the school's complaints procedures and is still not satisfied, the school must advise the parents of their rights to make a complaint to the Ombudsman for Children.
- The school will maintain care for the victim over time. This will be done by regularly checking in with the pupil for a number of weeks after the incident to check on their continuing welfare. The child's parents will also be consulted.
- If a child makes a report of bullying, but asks that nothing is to be done about it, the relevant teacher will support the child appropriately to explore how it will be handled sensitively and how parents may be notified. If a parent requests that no action be taken in relation to a report of bullying, they must submit in writing that they require no further action to be taken. However, while acknowledging the parent's request, the school may decide that, based on the circumstances, it is appropriate to address the bullying behaviour.

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)

The school's programme of support for working with pupils affected by bullying involves a whole school approach. Given the complexity of bullying behaviour, no one intervention/support programme works in all situations.

- Supporting pupils experiencing bullying behaviour:
- Supporting pupils experiencing bullying behaviour:
- Ensure that the students experiencing bullying behaviour feel listened to and reassured
- Ensure privacy of all of those involved
- Conduct all conversations with sensitivity
- Consider the age and ability of all involved
- Listen to the views of the child who is experiencing the bullying behaviour as to how to best address the situation
- Take action in a timely manner
- Inform parents of those involved.

The aim is to:

- End the targeted, repeated behaviour that has caused physical, social and/ emotional harm over time which also involved an imbalance of power in the relationship.
- Foster respect for pupils experiencing bullying and all pupils,
- Fostering greater empathy towards and support for pupils experiencing bullying
- Indicating clearly that the bullying behaviour is not the fault of the targeted pupil through

- ongoing and explicit discussions during SPHE lessons, as well as explicitly stating this in specific circumstances
- Helping pupils experiencing bullying to raise their self-esteem by encouraging them to become involved in activities that help develop friendships and social skills (e.g. participation in group work in class and in extra-curricular group or team activities during or after school).
- Supporting pupils engaging in bullying behaviour: Using same strategies as above including
 - Support and interventions will be used to support the pupils engaging in bullying behaviour,
 - Dealing with unwanted behaviour using age appropriate strategies.
 - Working with relevant adults such as parent(s), guardian(s), class teacher, support teacher to support the pupil engaging in bullying behaviour to develop positive relationships with others
 - Using learning strategies throughout the school and the curriculum to help enhance pupils' feelings of self-worth,


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 pupils 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*.

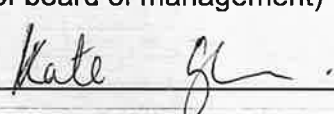
Section D: Oversight

The principal will present an update on bullying behaviour at each Board of Management meeting (see Appendix D). 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: 11/6/25.
(Chairperson of board of management)

Signed:  Date: 11/6/2025.
(Principal)

