



Ghyll Royd School and Pre-School
A foundation for life

Safeguarding Policy

Policy Leader: Mr David Martin

Policy review completed by the Headteacher on

September 2018

Name of Headteacher

David Martin

Date to be reviewed

Autumn 2019

PROVIDING
EXCEPTIONAL
EDUCATION
FOR OVER

125
Years

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CONTENTS

1. SAFEGUARDING COMMITMENT
2. KEY CONTACTS
3. PROVIDING A SAFE ENVIRONMENT
4. WORKING WITH OTHERS TO PROTECT CHILDREN
5. RESPONSIBILITIES
6. LINKED SCHOOL POLICIES
7. PROCEDURES
 - What to do if you are concerned about a child
 - Making a referral
 - Flowchart of in-school procedures
 - What to do if a child makes a disclosure
 - What to do in the event of an allegation of peer on peer abuse
 - What to do in the event of an allegation about a member of staff or volunteer
 - What to do in the event of an allegation about the headteacher
8. RECOGNISING TYPES OF ABUSE AND NEGLECT
9. WIDER SAFEGUARDING ISSUES AND DUTIES
- 10 APPENDICES

1. SAFEGUARDING COMMITMENT

Ghyll Royd School and the Pre-School (Early Years Foundation Stage) is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. Safeguarding at Ghyll Royd School and in the Pre-School is everyone's responsibility and everybody is able to make a referral to children's social care if needed.

The school operates safeguarding procedures and referrals in line with locally agreed inter-agency procedures of the Bradford Safeguarding Children Board.

In the event a child has suffered, or is at risk of suffering, serious harm the school will inform Bradford Children's Social Care immediately. When a cause for concern occurs, the flowchart procedure on page 16 will be followed.

2. KEY CONTACTS

If you have reason to believe that a child is at immediate risk of harm, contact the police on 999

DESIGNATED CHILD PROTECTION LEAD (DSL)

Designated Safeguarding Lead (Headteacher):	David Martin
Deputy Designated Lead (in absence of DSL):	Helen Hudson
Nominated Governor for Safeguarding	Sarah Williamson
EYFS Safeguarding Lead Practitioner	Helen Hudson
Deputy Safeguarding Lead Practitioner	Jennifer Johnson
Chair of Governors	Phil Stephenson

To contact any of the above call 01943 865575 or out of school hours email information@ghyllroyschool.co.uk.

BRADFORD SOCIAL CARE

To make a referral, contact: Bradford Children's Social Care
All queries should go through: Initial Contact Point on 01274 437500

Emergency Duty Team 01274 431010 or emergency.duty.team@bradford.gov.uk

For general enquiries contact Children's Specialist Services on 01274 435600

BRADFORD SAFEGUARDING CHILDREN BOARD (BSCB)

Inter-Agency Safeguarding Procedures: www.bradford-scb.org.uk
01274 434361 or info@bradford-scb.org.uk (NB: not an emergency email address)

LOCAL AREA DESIGNATED OFFICER (LADO)

LADO Frank Hand, Service Manager, Children's Safeguarding & Reviewing Unit
Tel: 01274 437915 Email: frank.hand@bradford.gov.uk

EARLY HELP

Call the Early Help Gateway on 01274 432121
If you use secure email then you can email: earlyhelpgateway@bradford.gcsx.gov.uk
If you do not have a secure email account, please call 01274 432121

Bradford Multi-Agency Assessment Service: 01274 437070

ATTENDANCE

Education Social Work Service (ESWS) 01274 439651
<https://bso.bradford.gov.uk/Schools/CMSPage.aspx?mid=374>

HEALTH

Ilkley School Nursing Team: 01274 221203

POLICE CHILD PROTECTION UNIT

Javelin House, Bradford 01274 376061

CHILD SEX EXPLOITATION HUB

01274 435049

PREVENT

Danielle King, Prevent Education Officer, Margaret McMillan Tower, Prince's Way, Bradford, BD1 1NN

01274 437770 or 07870 991647

The DfE dedicated telephone and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk

WHISTLEBLOWING

The NSPCC Whistleblowing Advice Line is available for staff who do not feel able to raise concerns regarding child protection internally: 0800 028 0285 or help@nspcc.org.uk

3. PROVIDING A SAFE ENVIRONMENT

We believe:

- Schools can contribute to the prevention of abuse.
- All children have the right to be protected from harm.
- Children need support which matches their individual needs, including those who may have experienced abuse.
- Children need to be safe and feel safe in pre-school and school.

Ghyll Royd School and Pre-School fulfils local and national responsibilities as laid out in the following documents:

- Working Together to Safeguard Children (2018)
- Guidance for Safer Working Practice for those working with children and young people in education settings (Safer Recruitment Consortium, October 2015)
- West Yorkshire Consortium Online Safeguarding Children Procedures (May 2018)
<http://westyorkscb.proceduresonline.com/chapters/contents.html>
- Keeping Children Safe in Education Guidance (DfE 2018)
- Prevent (2015)

Overall Aims

To contribute to the prevention of abuse by:

- Clarifying standards of behaviour for staff and pupils
- Introducing appropriate work within the curriculum
- Developing staff awareness of the causes and signs of abuse

- Encouraging pupil and parental participation in practice
- Addressing concerns at the earliest possible stage

To contribute to the protection of our pupils by:

- Including appropriate work within the curriculum to raise their awareness and teach them how to keep themselves safe
- Implementing child protection policies and procedures
- Working in partnership with pupils, parents and agencies

To contribute to supporting our pupils in the following ways:

- Identifying individual needs where possible
- Designing plans to meet needs
- Recognising where pupils would benefit from Early Help

4. WORKING WITH OTHERS TO PROTECT CHILDREN

Supporting children

- We will identify and provide opportunities for children to develop skills, concepts, attitudes and knowledge to promote their own safety and well-being
- We listen to the concerns of children, raised through a variety of means, including House Buddies and Worry Boxes positioned throughout the school
- We signpost sources of support for children, including Childline
- We will identify children who would benefit from early help and intervention
- We will offer appropriate support to individual children who have experienced abuse or who have abused others
- An individual support plan will be devised, implemented and reviewed regularly for these children. This plan will detail areas of support, who will be involved, and the child's wishes and feelings. A written outline of the individual support plan will be kept in the child's child protection record.
- Where children and young people have exhibited sexually inappropriate/harmful behaviour and/or abused others, there will be a co-ordinated multi-agency approach to respond to their needs, which will include children's social care, health and youth justice (where appropriate),
- We will ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.
- Children and young people that abuse others will be responded to in a way that meets their needs as well as protecting others within the school community through a multi-agency risk assessment.
- We will ensure the school works in partnership with parents / carers and other agencies as appropriate.

Involving parents / carers

The school shares a common purpose with parents to keep children safe from harm and to promote their welfare. We are committed to working openly and honestly with them and always aim to maintain a positive partnership with parents. We encourage parents to discuss any concerns they may have with the DSL at the earliest opportunity.

- The DSL is the main school contact for parents regarding a child's welfare
- In general, the DSL will discuss concerns with parents/carers at the earliest opportunity, before approaching other agencies and will seek their consent to making a referral to another agency if possible.
- The school will ensure it obtains a minimum of two Emergency Contact numbers for each pupil.
- In certain circumstances the school will contact another agency before informing parents / carers, for example if the school decides that contacting them may increase the risk of significant harm to the child.

Multi-agency work

- We work in partnership with other agencies in the best interests of the children. Therefore, school will, where necessary, liaise with the school nursing team, police and make referrals to Social Care.
- We will work with the targeted early help team to provide a co-ordinated offer of early help when additional needs of children are identified and contribute to inter-agency plans to provide additional support to children subject to child protection plans.
- We will co-operate with Children and Young People's Social Care where they are conducting child protection enquiries. Furthermore, school will endeavour to attend appropriate inter-agency meetings such as Initial and Review Child Protection Conferences, and Planning and Core Group meetings, as well as Family Support Meetings.
- We will provide reports as required for these meetings. If school is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents / carers at least 24 hours prior to the meeting.
- Where a child in school is subject to an inter-agency child protection plan or a Multi-agency Risk Assessment Conference (MARAC) meeting, school will contribute to the preparation, implementation and review of the plan as appropriate.
- Where there is possible abuse by one or more children against another child (peer on peer abuse) the DSL will then refer such abuse to the Bradford Safeguarding Children's Board.

Supporting Staff

- We recognise the stressful and traumatic nature of child protection work. Support is available for any member of staff from Ghyll Royd's DSL. The Children's Services Education Child Protection team are also available for advice and support (Tel: 01274 434343).
- The DSL is responsible for ensuring that all designated staff have access to regular safeguarding case supervision.
- The supervision of the DSL is provided by the deputies and the nominated Safeguarding Governor.

5. RESPONSIBILITIES

All Staff and Volunteers will:

- Be familiar with the school's safeguarding policy, including issues of confidentiality, via induction training.
- Raise any concerns immediately with the DSL
- Follow the Staff Code of Conduct, which includes acceptable use of technologies, staff/pupil relationships and communication, including the use of social media.
- Self-refer any concerns or questions they have in regard to the professional boundaries contained in the Staff Code of Conduct.
- Refer any concerns about another member of staff or volunteer to the Headteacher
- Refer any concerns about the Headteacher to the Chair of Governors
- Be alert to signs and indicators of possible abuse (see pgs 26 & 27 and Appendix 1 for current definitions of abuse and possible indicators of harm as well as Part 1 of KCSIE (2018)).
- Record concerns on a "Cause for Concern" form (see Appendix 2) which, once completed, must be handed to the Designated Safeguarding Lead (DSL).
- Deal with a disclosure of abuse from a child in line with the procedures in this policy (a disclosure must be passed to the DSL immediately, followed by a written record).
- Receive a copy of this Safeguarding Policy and [Keeping Children Safe in Education \(2018\) Part 1 and Annex A](#) to read and sign to say that they have read and understood the guidance and procedures.
- Have due regard to the duty to prevent people from being drawn into terrorism; report suspected or known cases of female genital mutilation; and follow procedures for when a child goes missing from education
- Inform the DSL if they become aware a pupil may be in a private fostering arrangement
- Raise concerns about poor or unsafe practice using the school's whistleblowing procedures
- Receive regular safeguarding training and updates in line with the Bradford Safeguarding Board, as well as online safety training, so they are equipped with the knowledge and skills to keep children safe.
- Be involved in ongoing monitoring and recording to support the implementation of individual education plans and interagency child protection and child support plans.
- Be subject to Safer Recruitment Pre-Employment Check processes (see Safer Recruitment Policy).

Visitors

Visitors, when they sign in at Reception, will be made aware of:

- the identity of the designated lead
- the duty to report any safeguarding concerns immediately
- key elements of safeguarding practice at the school by reading a safeguarding leaflet.

The Designated Safeguarding Lead (DSL)

The role of the DSL is to promote an open safeguarding culture in school by raising awareness, working with others and managing referrals.

- The DSL has lead responsibility and management oversight of, and accountability for child protection and safeguarding, including responsibility for auditing and developing safeguarding provision.
- Where the school has concerns about a child, the DSL decides what steps should be taken (see pg 16 for flowchart of in-school procedures).
- During term time the DSL and or a deputy is always available (during school hours) for staff in the school to discuss any safeguarding concerns. For any safeguarding concerns arising out of hours/out of term, staff will contact the DSL by emailing information@ghyllroydschool.co.uk
- The DSL ensures appropriate filters and appropriate monitoring systems are in place so children are safeguarded from potentially harmful and inappropriate online material
- The DSL has a working knowledge of how local authorities conduct a child protection case from attending Child Protection Decision Making Training and using the Safeguarding Children Assessment and Analysis Framework.
- The DSL arranges regular safeguarding training for staff and makes them aware of training opportunities and regular updates.
- The DSL ensures all staff and volunteers have access to the Safeguarding policy and procedures and all other relevant policies during induction .
- The DSL will initiate early help and intervention with processes such as early help assessments and thresholds of need from the West Yorkshire Consortium Procedures Manual.
- Where there is relevant information to share, the DSL will make contact with the DSL at a receiving school during the admissions, transfer or transition process and ensure that any files are transferred in accordance with relevant guidance.
- The DSL and any deputies liaise with the local authority and work with other agencies in line with Working Together to Safeguard Children.

To ensure supervision of the DSL, Ghyll Royd School has a safeguarding team who meet once a month. The current Safeguarding Team is David Martin the Headteacher, Helen Hudson and Jennifer Johnson

The Deputy Designated Safeguarding Lead

- Deputies for the DSL

Governors

Will read [Keeping Children Safe in Education \(2018\) Parts 1 & 3 and Annex A](#) (and future iterations) and sign to say they have read and understood the guidance and their responsibilities.

Monitor and review the work of the DSL and Deputies and the way in which the school carries out its safeguarding responsibilities through an annual safeguarding report. Safeguarding is a standing agenda item for Governors meetings.

Review the school's Safeguarding policies/procedures and the efficiency with which the related duties have been carried out annually and will remedy any deficiencies or weaknesses brought to its attention without delay.

Appoint a nominated Governor for Safeguarding to take board level responsibility for the organisation's safeguarding arrangements.

The Chair of Governors is responsible for liaising with the LA/partner agencies in the event of allegations of abuse being made against the Headteacher.

The governing body ensures:

- The school has appropriate policies and procedures in place in accordance with the latest government and national guidance and in line with locally agreed inter-agency procedures put in place by the Bradford Safeguarding Children Board. This includes an effective Safeguarding (child protection) policy; and a staff behaviour policy (the Staff Code of Conduct).
- The school reviews such policies at least annually and makes them available on the school's website.
- The school has at least one DSL who is a senior member of the school's leadership team to take the lead on Child Protection issues and that there is at least one Deputy Designated Lead.
- The DSL and Deputy DSL(s) have appropriate refresher inter-agency training in line with BSCB guidance at least every two years.
- Staff and the DSL take appropriate action in a timely manner to safeguard and promote children's welfare.
- The DSL and Deputies have sufficient time and resources to carry out their responsibilities and to keep up-to-date with training and developments in safeguarding.
- The Headteacher (where they are not the DSL) and all other staff who work with children undertake training at regular intervals. Also that temporary staff, visitors and volunteers are made aware of the school's arrangements for Child Protection and their responsibilities.
- The school operates safer recruitment procedures and that appropriate checks are carried out on all new staff and relevant volunteers in line with the latest guidance (see Safer Recruitment Policy) by monitoring the work of the Headteacher in keeping the single central register of appointments
- Has procedures for dealing with allegations of abuse against staff/volunteers

The Nominated Governor for Safeguarding

- Liaises with the DSL and deputies over all safeguarding and child protection matters.
- The role is strategic rather than operational – they are not involved in concerns about individual pupils.
- The nominated governor works with the DSL to initially review an annual safeguarding report (at the end of the school year) to the governors.

Record Keeping

- Child Protection information is dealt with in a confidential manner. A written record is made of what information and action has been shared or taken with whom, and when. Staff are informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual child and / or family.
- Child Protection records are stored securely in the Headteacher's office separate from academic records. Individual files are kept for each child; school will not keep family files.
- Files are kept and transferred in accordance with KCSIE guidance.

Confidentiality

- Access to child protection records by staff other than the DSL and Deputy is restricted, and a written record is kept of who has had access to them and when.
- If a pupil moves from our school, child protection records are forwarded onto the named designated child protection lead at the new school, with due regard to their confidential nature. A signature will be obtained for transfer of files and information.
- Contact between schools may be necessary, especially during the admissions process, to ensure appropriate planning can be put in place to meet the needs of a child on transfer.
- We will record where and to whom the records have been passed and the date.
- If sending by post pupil records will be sent, "Special/Recorded Delivery". For audit purposes a note of all pupil records transferred or received should be kept in either paper or electronic format. This includes the child's name, date of birth, where and to whom the records have been sent and the date sent and/or received.
- If a pupil is permanently excluded and moves to a Pupil Referral Unit, child protection records will be forwarded onto the relevant organisation.
- When a designated member of staff resigns their post/no longer has child protection responsibility, there should be a full face-to-face handover/exchange of information with the new post holder.
- In exceptional circumstances when a face-to-face handover is unfeasible, it is the responsibility of the Headteacher to ensure that the new post holder is fully conversant with all procedures and case files.
- In the event a child goes missing from education, or will be home schooled, records will be transferred to the relevant person named in the Local Authority procedure.

Training and Induction

- All new staff members undertake an induction course which includes training in the school's Safeguarding procedures (in line with the LSCB guidelines) by the DSL. This covers related policies and procedures such as:
 - Safeguarding Policy and Procedures (including child protection, missing from education, Prevent and handling peer on peer abuse)
 - KCSIE (2018) Part 1 and Annex A
 - Staff Code of Conduct

- Positive Behaviour Policy (pupils)
- Online safety and Acceptable Use of IT
- Anti-bullying policy
- Whistleblowing policy

Copies of these policies are given to staff.

- Staff are required to read or refresh their knowledge and understanding of the information contained in Part 1 of the KCSIE and Annex A and subsequent updates.
- Staff are given regular update training on safeguarding matters through internal and external courses, weekly staff briefings and email bulletins/updates.
- All staff sign a copy of the Staff Code of Conduct and any other subsequent amendments.
- Temporary staff, visitors and volunteers who work with children are made aware of the school's child protection arrangements by information provided at the signing in desk and on the reverse of visitor passes.
- The DSL, Deputy DSL and Lead Practitioner update their level 3 training at least every 2 years in line with the Bradford Safeguarding Children Board.
- In addition to formal training the DSL and deputy's knowledge and skills are regularly updated by attending the designated safeguarding lead course, multi-agency courses and via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments to keep up with any developments relevant to their role.
- Governors, including the Nominated Governor, undergo specific training on their role, updated at least every three years.

Records of staff training are kept in the School Secretary's office.

6. LINKED SCHOOL POLICIES

School policies are in place to ensure there is a consistent approach to safeguarding practice throughout the school adhered to by staff, governors and volunteers. Adults have a tremendous impact on young children and with this in mind, they should:

- understand their duty to safeguard children and report any concerns immediately
- be good role models for children
- enjoy their work and working with children
- be conscientious and hard-working
- welcome and support visitors to school
- recognise and value strengths in each other and use these to support everyone
- work within the agreed policies of the school
- promote a happy, caring and safe school
- encourage children to think for themselves, ask questions and find answers
- challenge and support children in their learning.

This **Safeguarding policy** is available to current and prospective parents on the school's website.

The following linked policies are in place to safeguard our children:

Admissions and Attendance – the school follows the Bradford Children Missing Education Guidance for Schools which can be viewed at <https://bso.bradford.gov.uk/Schools/CMSPage.aspx?mid=50> and reports to the LA whenever a child of compulsory school age leaves before completing the school's final year.

Attendance at school is monitored daily and notable absences or patterns of absences are followed up by the Headteacher. The school prides itself on its very good attendance figures but in the event where absence meets the threshold for reporting (10 unauthorised sessions) or persistent absence (below 90%) it will be reported to Bradford Educational Social Work Service.

Positive Behaviour Policy – high standards of behaviour are expected in school. At times bullying behaviour can occur, when this is the case it is dealt with in accordance with the school's Anti-Bullying policy. Children are regularly reminded about our school rules and understand we have them for everyone to be safe.

Anti-Bullying - In dealing with bullying incidents the school will:

- Not ignore bullying
- Not make premature assumptions
- Listen fairly to accounts of incidents
- Make every effort to adopt a problem-solving approach which encourages pupils to find solutions
- Follow up regularly to check bullying has not resumed
- Keep records of all incidents and the school's response in a bullying log
- Support the bully and the victim
- Recognise that bullying may be a child protection concern and report and record it accordingly

Complaints – should parents have any concerns they should speak in the first instance to their child's Key Worker or Form Tutor, who will listen and follow up any issues. There is a clear 3-stage procedure in place. The school is committed to working closely with parents / carers for the benefit of the children and if concerns cannot be resolved informally at an early stage, the Headteacher will meet with parents to help resolve any concerns. If parents continue to feel an issue has not been resolved, they can follow the formal stages of the complaints policy available on the website to resolve any outstanding concerns.

Curriculum – we ensure topics which promote pupil welfare are taught within the PHSCE curriculum, for example healthy eating; physical exercise; safety, including online safety; and emotional wellbeing. Other relevant issues covered include self-esteem, emotional literacy, assertiveness, power, sex and relationship education and bullying.

The PHSCE programme is enhanced in other areas of the curriculum: Circle Time, English, History, Drama, RE, Art and by the many visitors to school who talk to the children about issues such as road safety, sources of support (NSPCC) and drugs

awareness. Whole school assemblies and circle time discussions are used to focus on particular themes arising throughout the school year, such as Anti-bullying, or issues raised through the children's Worry Box.

Mobile Phone Policy – we have a clear policy on the acceptable use of mobile phones/devices and cameras that is understood and must be adhered to by all parties. It aims to provide an environment in which children, parents and staff are safe from images being taken/recorded and inappropriately used. Failure to adhere to this policy will lead to disciplinary procedures. The Acceptable Use Policy for Mobile Phones, Devices and Cameras is available on the school's website. Children are not allowed to bring their own mobile technology to school. Mobile phones and cameras (other than school devices) may not be used in the EYFS.

Health and Safety – all staff have a responsibility to ensure children and adults are able to work in a healthy and safe environment both inside school and on educational visits and have a duty to report and follow up any concerns. The school has the appropriate number of staff trained in paediatric and basic first aid and these staff deal with accidents should they occur.

Security of the Premises – the main gates are securely locked at night. There are two side entrances, one for deliveries and one for playground access, both are controlled by a key pad system. The external doors to Pre-School, Reception and the Main School are controlled by a key pad system. Visitors sign in and out of the school office, wear a badge and are supervised when in contact with the children.

Safer Recruitment – Governors and the school ensure all new staff and volunteers who work in school are subject to an enhanced DBS check and all other checks relevant to their role are carried out before a person takes up a post. The school's safer recruitment checks follow up to date guidance and are recorded on the single central register.

Staff Code of Conduct – outlines how staff promote a positive, caring and professional relationship with children. Staff are required to read and sign they have understood the code of conduct and subsequent amendments prior to taking up/and during their role. Our code of conduct can be viewed on our website at <https://www.ghyllroydschool.co.uk/about-us/policies/>

Whistleblowing – The school has a Whistleblowing Policy to enable members of staff to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations, inappropriate behaviour or unethical conduct.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Further details can be found at <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

7. PROCEDURES

WHAT TO DO IF YOU ARE CONCERNED ABOUT A CHILD

All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Indicators of abuse and neglect, and examples of safeguarding issues are described in Appendix 1 of this Safeguarding Policy (pgs 26 and 27).

Staff working with children are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. If staff are unsure, they should always speak to the DSL (or deputy) as soon as possible.

If staff have any concerns about a child's welfare, they should act on them immediately. See pg 16 for the flowchart of procedures.

Options will then include:

- managing any support for the child internally via the school's own pastoral support processes;
- an early help assessment; or
- a referral for statutory services if the child is in need or suffering or likely to suffer harm.

Early Help

Any child may benefit from early help. If early help is appropriate, the DSL (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate.

Staff may be required to support other agencies and professionals in an early help assessment. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has SEN (whether or not they have a statutory EHC plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

Children in need (section 17 of the Children Act 1989)

A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare.

Child at risk - suffering or likely to suffer significant harm (section 47 of the Children Act 1989)

The LA, with the help of other organisations as appropriate, has a duty to make enquiries under section 47 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

The LA should make a decision, within one working day of a referral being made, about the type of response required and should let the referrer know the outcome.

This includes determining whether:

- the child requires immediate protection and urgent action is required;
- whether the child is in need, and should be assessed under section 17;
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47;
- any services are required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

The referrer should follow up if this information is not forthcoming.

Children with additional needs

Ghyll Royd School and Pre-School recognises that while all children have a right to be safe, some children *may* be more vulnerable to abuse e.g. those with a disability or special educational need, those living with domestic violence or drug/alcohol abusing parents, etc.

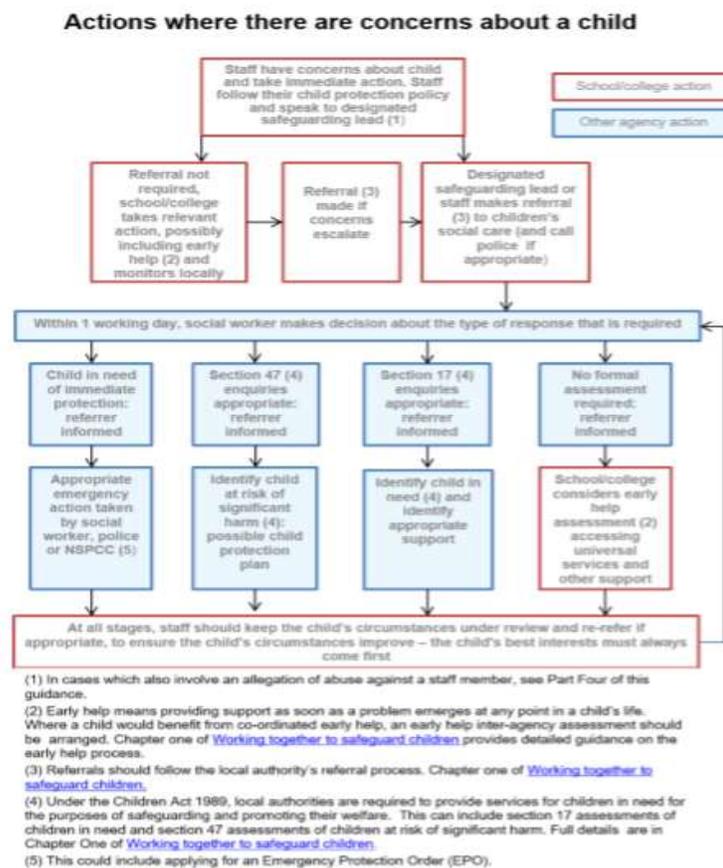
When the school is considering excluding, fixed term or permanently, a vulnerable pupil and/or a pupil who is either subject to a S47 or S17 Child Protection plan or there is an existing child protection file, we will call a multi-agency risk-assessment

meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment must be completed prior to convening a meeting of the Governing body.

MAKING A REFERRAL

- Referrals should be made by telephone, by the DSL to Children’s Social Care; however, anyone can make a referral.
- Parental consent is not required to make a referral.
- If a crime has been committed this should also be reported to the police immediately.
- The telephone referral must be followed up within 24 hours using the [Common Referral Form](#) available online on the Bradford SCB website.
- Where a child already has a social worker, the referral should indicate that fact and the social worker should also be informed.
- If social workers decide to carry out a statutory assessment, staff, supported by the DSL (or deputy) should do everything they can to support that as required.
- If, after a referral, the child’s situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child’s situation improves.

FLOWCHART OF IN-SCHOOL PROCEDURES (Updated from KCSIE 2018)



WHAT TO DO IF A CHILD MAKES A DISCLOSURE

It is not education staff's role to seek disclosures. Their role is to observe something may be wrong, ask about it, listen, be available and try to make time to talk.

- Stay calm
- Assess whether there are any immediate medical needs and address them.
- Listen and remember.
- Reassure the child.
- Do not transmit shock, anger or embarrassment.
- Never promise confidentiality or enter into a pact of secrecy with the child.
- Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Align with her/him. Children very rarely lie about abuse; but she/he may have tried to tell others and not been heard or believed.
- Encourage the child to talk but do not ask "leading questions" or press for information.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that she/he has a right to be safe and protected.
- Do not tell the child that what she/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what she/he has told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- Make sure the child is taken to a place of safety
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

Immediately afterwards

You must not deal with this yourself. Clear indications or disclosure of abuse must be reported to social services without delay, by the DSL using the correct procedures as stated in these guidelines.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your DSL

WHAT TO DO IN THE EVENT OF AN ALLEGATION OF PEER ON PEER ABUSE

Staff should recognise that children are capable of abusing their peers. Our anti-bullying and good behaviour strategies seek to minimise the risk of peer on peer abuse.

Peer on peer abuse can take different forms. Abuse is abuse and should never be tolerated or passed off as "banter", "having a laugh" or "part of growing up".

Peer on peer abuse can manifest itself in many ways, not just through physical abuse or bullying (including online bullying) or online sexting/imagery, such as controlling behaviour, sexual harassment and violence, coercive behaviour, so-called honour-based violence or 'stalking'.

Different race and gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation, hazing or ritual type violence. Currently it is more likely that girls will be the victims and boys the perpetrators; however, all abuse is unacceptable.

Any pupil against whom an allegation of abuse has been made may be suspended from school during the subsequent investigation.

- If a pupil makes an allegation of abuse against one or more pupil(s) the member of staff or volunteer concerned should take this information immediately to the DSL.
- The person relaying this information should make a written record of any disclosure as soon as possible, and certainly within 24 hours. This record is passed to the DSL, who will maintain a chronology of events and include the record in it.
- When information is brought to the DSL 'what is known' will be considered and the DSL will make judgments regarding:
 - a) the seriousness of the allegation
 - b) whether it needs to be investigated, and if so by whom.
- The DSL will contact Bradford Children's Social Care to seek advice about how to proceed.
- Where there is reasonable cause to suspect that a child is suffering, or likely suffer significant harm from abuse by another child or group of children, then such abuse will be notified immediately to Children's Social Care through a written referral.

All children involved, whether perpetrator or victim, are to be treated as being "at risk". Victims will be supported initially by Helen Hudson, Deputy DSL, who is responsible for pastoral care, and as appropriate by more expert professionals as advised by Children's Social Care or other appropriate advisory channels, such as the Police.

Following guidance from the duty team at Bradford Children's Social Care, the DSL will make contact with the parents of both victim and perpetrator.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Staff should be aware of the importance of:

- making clear sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should follow the referral process above.

WHAT TO DO IN THE EVENT OF AN ALLEGATION ABOUT A MEMBER OF STAFF OR VOLUNTEER

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff or volunteers in school to abuse children.

When handling an allegation against a member of staff the school will refer to the most up to date procedures from:

http://westyorkscb.proceduresonline.com/chapters/p_alleg_staff.html

Inappropriate behaviour by a member of staff, visitor/volunteer and Headteacher could take the following forms:

- **Physical** includes, for example, intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.
- **Emotional** includes, for example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children’s rights, and attitudes which discriminate on the grounds of race, gender, disability or sexuality.
- **Sexual** includes, for example, sexualised behaviour towards pupils, sexual harassment, sexual assault and rape.
- **Neglect** may include failing to act to protect a child or children, failing to seek medical attention or failure to carry out appropriate/proper risk assessment.

If an allegation is made against a member of staff, visitor or volunteer the Headteacher should be informed immediately. The allegation **MUST** be reported to the LADO within 1 working day of the allegation being made.

An urgent initial assessment should be carried out in order to establish whether there is substance to the allegation. The Headteacher should not carry out the investigation itself or interview pupils. As part of this initial consideration, the Headteacher should contact the Local Authority Designated Officer (LADO)

(see contact details pg 3) or in the more serious cases the Police. If the Designated Safeguarding Lead is not the Headteacher, it is usual practice for the Headteacher to liaise with the Designated Safeguarding Lead on matters such as this.

The consultation between the DSL and LADO will determine the need for further investigation. Only if the allegation is demonstrably false or trivial would further investigation not be warranted. A Strategy Meeting is usually held to determine the mechanics of the investigation, and to address such issues as who will interview the child/ren, informing the staff member, informing parents, the need or not for suspension, and to what extent disciplinary or criminal procedures need to be invoked alongside any child protection procedures (where more than one set of procedures is invoked, child protection procedures take precedence, to ensure the best interests of the child are catered for).

Duty to Report and Refer

A referral to the Teaching Regulation Agency (TRA) will be made where a teacher is dismissed (or would have been dismissed had they not resigned) and a prohibition order may be appropriate, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

If an allegation of serious harm or abuse by any living person, working or looking after children at the premises or elsewhere or any other abuse on the premises a report must be made to Ofsted within 14 days of the allegation

The school will report to the Disclosure and Barring Service (DBS) within 1 month of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used because she/he is considered unsuitable to work with children.

WHAT TO DO IN THE EVENT OF AN ALLEGATION ABOUT THE HEADTEACHER

If an allegation is made against the Headteacher/DSL, then the Chair of Governors should be informed immediately **without informing** the Headteacher/DSL. An urgent initial assessment should be carried out in order to establish whether there is substance to the allegation.

Where the allegation has been made against the Headteacher/DSL, then the Chair of the Governors will take on the role of liaising with the Local Authority Designated Officer in determining the appropriate way forward and follow the procedures above for dealing with an allegation against a member of staff.

8. RECOGNISING TYPES OF ABUSE AND NEGLECT

(updated from KCSIE September 2018)

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see pgs 17,18 and 19).

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance

abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Sexual Violence and Harassment:

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. Some groups are potentially more at risk e.g. girls, children with SEND and LGBT children.

Sexual violence relates to sexual offences under the Sexual Offences Act, such as rape; assault by penetration; and sexual assault.

Sexual harassment, in the context of child on child sexual harassment, is 'unwanted conduct of a sexual nature' that can occur online and offline and is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes

Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats.

9. WIDER SAFEGUARDING ISSUES AND DUTIES

Online Safety

The school puts measures in place to protect children from harmful online activities including cyber bullying, pornography and the risk of radicalisation. These measures include appropriate filters and monitoring systems, so that no child can access harmful content via the school's IT systems to keep them safe from exploitation or radicalisation.

Children are taught about safeguarding, including online safety using CEOP materials. The lessons ensure children know how to use the internet responsibly and how to report any concerns they may have.

So-called Honour Based Violence (HBV) and Female Genital Mutilation (FGM)
FGM, forced marriages and practices such as breast ironing are all forms of HBV. HBV is abuse (regardless of motivation).

Staff have a duty to report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police. If there are suspicions that a girl under the age of 18 years may have undergone FGM or is at risk of FGM, staff must still report the issue by following the school and pre-schools safeguarding procedures. Staff must share the information about their concerns, potential risk and/or the actions which are to be taken with the DSL and if necessary a social care referral made. Teachers are legally required to report cases of female genital mutilation (FGM) to the police. Failure to do so will result in disciplinary measures and could ultimately lead to being barred from working.

If in any doubt staff should speak to the DSL. The DSL will then decide if of professionals in all agencies, and individuals and groups in relevant communities need to be alerted to the possibility of a child being at risk of HBV or already having suffered HBV.

If staff have a concern regarding children that may be of risk of HBV, they should activate local safeguarding procedures, using external national and local protocols for multi-agency liaison with police and children's social care.

For more detail, please refer to the government guidance

at <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

And <https://www.gov.uk/female-genital-mutilation-help-advice>

Preventing Radicalisation

Protecting children from the risk of radicalisation is seen as part of the school's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The school encourages all employees to report any racist or extremist views displayed by the children; come forward, in line with the School's Whistleblowing Policy; report any employee who displays racist or extremist behaviour and report any racist behaviour to the DSL who will then decide what, if any, action should be taken. The School will discuss any concerns in relation to possible radicalisation with a child's parents in line with the school's safeguarding policies and procedures unless we have specific reason to believe that to do so would put the child at risk. As a minimum the DSL and staff will undertake Prevent awareness training.

Missing Child

A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. Staff should follow the procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the

risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage. Further information about children at risk of missing education can be found in the Children Missing Education guidance

The school has appropriate safeguarding policies and admission procedures and responses for children who go missing from education, particularly on repeat occasions. Further information is available in our admissions policy on the school website.

Other specific Safeguarding Issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues.

Hyperlinks to advice on a wide-range of safeguarding issues can be found in Annex A of KCSIE (2018) Part 1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/707688/Keeping_Children_Safe_in_Education_-_Part_1_-_September_2018.pdf

The NSPCC offers information for schools on its website www.nspcc.org.uk.

Schools can also access broad government guidance on the issues listed below via the GOV.UK website:

- child sexual exploitation (CSE)

<https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>

- bullying including cyberbullying

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

- domestic violence

<https://www.gov.uk/domestic-violence-and-abuse>

- drugs

<https://www.gov.uk/government/publications/drugs-advice-for-schools>

- fabricated or induced illness

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

- faith abuse

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

- female genital mutilation (FGM) – see also below

<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

- forced marriage

<https://www.gov.uk/forced-marriage>

- gangs and youth violence

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/226293/Advice_to_Schools_and_Colleges_on_Gangs.pdf

- gender-based violence/violence against women and girls (VAWG)
<https://www.gov.uk/government/policies/ending-violence-against-women-and-girls-in-the-uk>
- mental health
<https://www.gov.uk/government/publications/the-mental-health-strategy-for-england>
- private fostering
<https://www.gov.uk/government/publications/children-act-1989-private-fostering>
- radicalisation
<https://www.gov.uk/government/publications/channel-guidance>
- sexting
<http://ceop.police.uk/>
- teenage relationship abuse
<https://www.gov.uk/government/collections/this-is-abuse-campaign>
- trafficking
<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

10. APPENDICES

Appendix 1: POSSIBLE INDICATORS OF ABUSE

NEGLECT	PHYSICAL ABUSE
<p>Hunger</p> <p>Tiredness</p> <p>Child dirty or unkempt</p> <p>Poorly or inappropriately clad for the weather</p> <p>Poor school attendance or often late for school</p> <p>Affection or attention- seeking behaviour</p> <p>Untreated illness/injuries</p> <p>Pallid complexion</p> <p>Stealing or scavenging compulsively</p> <p>Failure to achieve developmental milestones, for example, growth, weight</p> <p>Failure to develop intellectually or socially</p> <p>Neurotic behaviour</p>	<p>Patterns of bruising inconsistent account of how bruising or injuries occurred</p> <p>Finger, hand or nail marks, black eyes</p> <p>Round burn marks, burns and scalds</p> <p>Lacerations, wealds</p> <p>Fractures</p> <p>Bruises on soft tissue areas of the body</p> <p>Bald patches</p> <p>Symptoms of drug or alcohol intoxication or poisoning</p> <p>Unaccountable covering of limbs, even in hot weather</p> <p>Fear of going home or parents being contacted</p> <p>Fear of medical help</p> <p>Fear of changing for PE</p> <p>Inexplicable fear of adults or over-compliance</p> <p>Violence or aggression towards others including bullying</p> <p>Isolation from peers</p>
SEXUAL ABUSE	EMOTIONAL ABUSE
<p>Sexually explicit play or behaviour or age-inappropriate knowledge</p> <p>Anal or vaginal discharge, soreness or scratching</p> <p>Reluctance to go home</p> <p>Inability to concentrate, tiredness</p> <p>Refusal to communicate, selective mutism</p> <p>Thrush, persistent complaints of stomach pains</p> <p>Eating disorders, eg anorexia nervosa, bulimia</p> <p>Attention seeking behaviour including sexual harassment or molestation</p> <p>Unusually compliant</p> <p>Regressive behaviour</p> <p>Enuresis, soiling</p> <p>Frequent or open masturbation, touching others inappropriately</p> <p>Depression, withdrawal, isolation from peer group</p> <p>Reluctance to undress for PE</p> <p>Bruises, scratches in genital area</p>	<p>Over-reaction to mistakes, continual self-deprecation</p> <p>Delayed physical, mental, emotional development</p> <p>Sudden speech or sensory disorders</p> <p>Inappropriate emotional responses, fantasies</p> <p>Neurotic behaviour: rocking, banging head</p> <p>regression, tics and twitches</p> <p>Self-harming, drug or solvent abuse</p> <p>Fear of parents being contacted</p> <p>Running away</p> <p>Compulsive stealing</p> <p>Masturbation</p> <p>Appetite disorders – anorexia nervosa, bulimia</p> <p>Soiling, smearing faeces, enuresis</p>

The following responses from parents may suggest a cause for concern across four categories:

- An unexpected delay in seeking treatment that is obviously needed
- An unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Frequent presentation of minor injuries
- Unrealistic expectations or constant complaints about the child
- Alcohol, drug/substance misuse
- Parents request removal of child from the home
- Violence between adults in the household.

Disabled Children

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification e.g. deprivation of liquid medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment e.g. callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child's finances
- Invasive procedure

Appendix 2: CONFIDENTIAL CAUSE FOR CONCERN FORM (page 1 of 2)

For: All Staff

Note: Please do not interpret what is seen or heard; simply record the facts. After completing the form, pass it immediately to the Designated Safeguarding Lead.

Name of child..... Form

Name of staff member completing form.....

Day..... Date..... Time..... Place.....
(of observed behavior / discussion / disclosure)

Nature of incident / concern including relevant background (Record child's word verbatim)

Signed:

Action/passed to

Appendix 2: CONFIDENTIAL CAUSE FOR CONCERN FORM (page 2 of 2)

For: Designated Safeguarding Lead Use Only

Name: Date: Time.....

Action Taken	By whom	Outcome
Discuss with child <i>Ensure the child's wishes and feelings are ascertained where appropriate.</i>		
Monitoring sheet		
Check behavior database		
Contact parents Please tick Telephone Call ____ Meeting: ____		
Check SEN Register		
Refer to Social Care		
Other (Please specify)		

Appendix 4: GOOD DISCIPLINE AND SANCTIONS

Click on the link to be directed to Ghyll Royd School's Good Discipline and Sanctions procedure: <https://www.ghyllroydschool.co.uk/wp-content/uploads/2018/09/A4-Appendix-Good-Discipline-Sanctions-Sept-2018.pdf>