



### **SAFEGUARDING AND CHILD PROTECTION POLICY**

<b>Owner(s)</b>	Director of Junior School & Director of Pastoral Care
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## **Introduction: Statement of Intent**

At Queen's Gate, the safety and welfare of pupils is our highest priority, as we believe that children who are unwell or unhappy will be less able to make progress and thrive fully. All staff have a responsibility for safeguarding and promoting the welfare of all children in our care. We are mindful that no school, regardless of the sector to which it belongs, is immune to safeguarding concerns, and therefore we maintain a vigilant attitude of 'it could happen here'. This means remaining constantly alert to signs that a child may be at risk, and ensuring all staff have the knowledge and understanding to act promptly and robustly should a concern arise. At all times, we promote a culture of listening to children and understand that we must act in the best interests of each child in our care. This means that we seek to listen to their views and take these into account when making decisions. However, we are also mindful that this may not always be possible if we are to ensure the best outcome for the child. For the sake of clarity, this policy applies to all pupils under the age of 18. Some pupils in the 6<sup>th</sup> Form at Queen's Gate are aged 18 and above and whilst this guidance may still apply, advice should be sought from the Designated Safeguarding Leads. The safety and welfare of our pupils should always be the priority regardless of their age.

In all matters relating to child protection the school will follow the procedures laid down by the Bi-Borough of Kensington and Chelsea/Westminster Safeguarding Partnership, unless the child lives in a different borough, in which case the relevant local agency will be consulted, together with DfE guidance contained in Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2025). This policy is applicable to the whole school community).

All staff must therefore:

- familiarise themselves and comply at all times with this policy;
- must read Part 1 of Keeping Children Safe in Education 2025:
- be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns.

All staff should also be mindful of the difference in terminology used in Keeping Children Safe in Education 2025 between 'must' (they are legally required to do something) and 'should' (the advice set out should be followed unless there is good reason not to).

This policy is written in relation to the specific context of Queen's Gate, and staff training takes into account our distinctiveness, including emphasising areas of potentially greater concern/vulnerability, while still referencing issues and incidents found less commonly here.

We recognise that the School plays a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. Parents and guardians have an important role in supporting the school, and we hope that parents and guardians and other members of the local community will always feel able to raise any issues or worries that they may have, especially those that may concern the safety or welfare of any pupil in our care. A copy of this policy, together with our other policies relating to issues of child protection, is on our website, and also available on request. Allegations of child abuse or concerns about the welfare of any child will be dealt with sensitively, rigorously and consistently, in accordance with this policy.

This policy is updated annually as well as being reviewed as the need arises, for example if new safeguarding issues emerge, or the local context changes. If any individual reading this policy has questions arising in response, they are welcome to contact the Designated Safeguarding Leads detailed below, who will be happy to provide clarification and/or further guidance. Staff are always welcome to share their feedback, or any suggestions that they may have in relation to safeguarding arrangements at Queen's Gate and the Safeguarding and Child Protection Policy. Feedback may be sent to [safeguarding@queensgate.org.uk](mailto:safeguarding@queensgate.org.uk).

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## **Section 1: The management of safeguarding at Queen's Gate**

### **Key Staff**

Charlotte de la Pena is the Designated Safeguarding Lead (DSL) for the Senior School and Mrs Charlotte Makhlof is the DSL for the Junior School (including EYFS). Miss Amy Wallace, Principal of Queen's Gate has oversight of safeguarding structure and provision for the whole school. There are Deputy Designated Safeguarding Leads (DDSLs) in both the Senior School and the Junior School

Miss Lorraine Sleator, and Miss Kate Eastwood are the Deputy Designated Safeguarding Leads (DDSL) for the Senior School.

Mrs Lydia Kyle and Miss Poppy Shingles are the Deputy Designated Safeguarding Leads (DDSL) for the Junior School .

Charlotte de la Pena is the Designated Teacher for Looked After Children. Charlotte de la Pena (DSL) is a member of Queen's Gate School's Senior Management Team and Charlotte Makhlof (DSL) is a member of the Junior School's Senior Management Team. All of the Deputy DSLs have completed the required training in line with the requirements of Keeping Children Safe in Education 2025, including undertaking refresher training every two years and additional relevant training for their accompanying responsibilities. Mrs Charlotte Makhlof (DSL for the Junior School) has completed additional training to support her as the DSL responsible for EYFS. She also attends the training and update sessions organised by the local LSCP. The DSLs have an opportunity to review and discuss their practice with the Principal, the Safeguarding Governor, and colleagues at other schools through the wider local and national networks of which the school is a member. These, along with e-bulletins from a range of organisations, keep their knowledge and understanding up to date.

The DSL role is to ensure that each member of staff has access to, is aware of, and understands the School's safeguarding policy and procedures, and the relevant job descriptions can be found in Appendix 4 of this policy. The

work diaries of both DSLs and their deputies are reviewed on a weekly basis to ensure there is always at least one member of the safeguarding team present and available during the school day to discuss safeguarding concerns. Where there are out-of-hours or out-of-term activities, arrangements are made to ensure a DSL is available onsite or via telephone.

Although the School received exemption from the Statutory Framework for the Early Years Foundation Stage (EYFS) from 2021, it is not exempt from the safeguarding and welfare requirements of the Framework which still apply. Details in this policy are therefore relevant to pupils in non-compulsory age education (Preliminary). While the responsibilities of each DSL can be delegated to a Deputy DSL, it is noted that they maintain ultimate lead responsibility for child protection, and that this responsibility cannot be delegated.

The DSLs will liaise with the local authority when necessary and work with other agencies in line with Working Together to Safeguard Children (2023) and attend strategy meetings. They will work with partner agencies to seek advice, support and guidance, drawing on multi-agency expertise, knowledge and experience to support pupils at risk of harm.

The emails of the safeguarding leads are as follows:

- Mrs Charlotte Makhoulf - [cmakhoulf@queensgate.org.uk](mailto:cmakhoulf@queensgate.org.uk)
- Ms Charlotte de la Pena - [cdelapena@queensgate.org.uk](mailto:cdelapena@queensgate.org.uk)
- Mrs Lydia Kyle - [lkyle@queensgate.org.uk](mailto:lkyle@queensgate.org.uk)
- Miss Poppy Shingles – [pshingles@queensgate.org.uk](mailto:pshingles@queensgate.org.uk)
  
- Ms L Sleator - [LSleator@queensgate.org.uk](mailto:LSleator@queensgate.org.uk)
  
- Miss K Eastwood - [KEastwood@queensgate.org.uk](mailto:KEastwood@queensgate.org.uk)

All Designated Safeguarding Leads and Deputy Designated Safeguarding Leads can be contacted on the email address:

[Safeguarding@queensgate.org.uk](mailto:Safeguarding@queensgate.org.uk)

\* DSLs do not have permanent direct lines, but will be contactable via Reception.

## Governance

All governors receive annual safeguarding training. A nominated governor with appropriate experience and qualifications is appointed with a specific brief for safeguarding and child protection and will liaise with the Principal and DSLs. The role is strategic rather than operational – they are not required to be involved in concerns about individual pupils. However, the school bears in mind that safeguarding duties remain the responsibility of the governing body as a whole. The governors carry out an annual review of the School's safeguarding policy and procedures with day-to-day issues being delegated to the Safeguarding Committee, which both the Principal and the Designated Safeguarding Leads for both the Junior School and the Senior School attend. The governing body is responsible for:

- ensuring there is a whole-school approach to safeguarding, and that all systems, process and policies operate with safeguarding in mind, and with the best interests of the children taken into account;
- reviewing the procedures for and the efficiency with which the safeguarding duties have been discharged;
- ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay;

- approving amendments to safeguarding arrangements in the light of changing regulations or recommended best practice;
- ensuring staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children;
- creating an environment where staff feel supported in their safeguarding role and able to raise concerns;
- creating an environment where children feel able to report concerns, and feel that their views and wishes will be taken seriously;
- ensuring 'practitioners' (such as those who work directly with children) have regular reviews of their own practice so that they have knowledge, skills and experience which improve over time.

Although governors will not be notified of all individual referrals, they will be made aware whenever a referral meets the relevant agency's threshold for Child Protection measures and/or where a child has suffered significant harm, or is believed to be at risk of significant harm.

The nominated governor for safeguarding is Mrs Clare Lenterman. Mrs Lenterman can be contacted via the Bursar using the email [bursar@queensgate.org.uk](mailto:bursar@queensgate.org.uk).

### **Training arrangements**

In addition to the training undertaken by the DSLs detailed above, the Principal, governors and all staff receive annual child protection training and updates as appropriate throughout the year. Training is extended to visiting staff, external contractors and volunteers, at a level proportionate to their involvement with the pupils. New staff are given additional training as part of their induction to the school, which takes into account the needs of those individuals who may not have worked in the education sector previously, and who therefore may be less familiar with safeguarding practice.

The induction and annual training provided to staff includes:

- the identities and roles of the Designated Safeguarding Leads and their Deputies;
- key definitions of abuse, safeguarding and the various categories of abuse and their indicators;
- their responsibilities in being alert to the signs of abuse, bullying or children at risk of radicalisation;
- how to respond to a verbal disclosure from a pupil;
- the procedures for recording and referring any concerns to the DSLs or the Principal;
- the procedures for taking attendance registers if this is applicable to their role.
- raising awareness of pupils at greater risk of abuse, such as those with SEND or who identify as LGBTQ or are perceived to be LGBTQ;
- child-on-child abuse;
- children at risk of CSE, involvement in violent crime, honour-based violence, forced marriage and/or female genital mutilation;
- other pupils may be considered in need of safeguarding, for example, those who are self-harming or those with poor mental or emotional health;
- that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online and that exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation;
- the Prevent strategy how to identify children at risk of being drawn into radicalisation;
- that they are able to contact Bi-Borough of Kensington and Chelsea/ Westminster Safeguarding Children Partnership directly themselves if they wish, including the LADO;
- circumstances when the police should be contacted;
- the Staff Code of Conduct, including the whistleblowing procedure;
- the Acceptable Use of Technologies Policy;
- the Behaviour Policy;

- the school's safeguarding response to children who go missing from education;
- online safety;
- receiving a copy of KCISE 2025 Part 1 and a copy of the school's Safeguarding and Child Protection Policy, and confirming that they have read them. ;
- an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring and know how to escalate concerns when identified.
- training for all staff includes material on EYFS where appropriate to their role.

Staff receive further training throughout the year, via email updates, notices in staff briefings and presentations at Professional Development Days . Staff knowledge and understanding of the safeguarding policy and procedures is tested via quizzes, with follow-up training as required. Online safety training is a key part of staff Professional Development as part of the overarching safeguarding approach and is regularly reviewed to ensure it is meeting current needs. Staff are trained by the Prevent Officer on a bi-annual basis the training is delivered via a Workshop to Raise Awareness About Prevent. The Workshop to Raise Awareness About Prevent includes training on recognising Prevent issues in younger pupils including EYFS. Staff are asked to give feedback on training and safeguarding arrangements to enable staff to contribute to and shape safeguarding arrangements and the child protection policy at Queen's Gate.

Pupils are taught about safeguarding at a level appropriate to their age through the PSHE and RSE programme, and through specialist sessions focusing on what safeguarding is. The Sixth Form, as school leaders, are given enhanced training so that, should they observe a worrying behaviour or receive a disclosure from another pupil, they know to refer it to a member of staff.

### **Record keeping**

The DSLs understand the need to keep detailed written records of any issues relating to safeguarding and child protection. Records include details of all concerns, discussions and decisions made, and the reasons for those discussions. They should also include details of how a concern was followed up and resolved, and any actions taken, including the outcome and the rationale behind any decisions. If a decision is taken not to refer to an external agency the reason will be recorded. The School's records on child protection are kept securely on the ISAMS wellbeing manager system It should be noted that the sharing of information for safeguarding purposes is exempt from GDPR restrictions (detailed in Section 5). Records regarding pupils moving from the Junior School to the Senior School are discussed and forwarded in an annual meeting between Safeguarding Leads and documents regarding pupils changing schools are forwarded. From October 2018, safeguarding records have been saved in a secure database (ISAMS Wellbeing Manager) where access is restricted to the DSL and pastoral staff. Those concerns of a more sensitive nature are restricted in view to DSLs and Principal. All existing paper records are kept alongside the electronic files securely in the office of the Director of Pastoral Care and the office of the Director of Junior School.

### **Relevant documentation and related policies**

This policy is based on:

- DfE Keeping Children Safe in Education (2025);
- DfE Working Together to Safeguard Children (2023);
- DfE Prevent Duty Guidance: for England and Wales (2023);
- DfE The Prevent Duty: Departmental Advice for Schools and Childminders (2023);
- DfE The use of Social Media for On-line Radicalisation (2015);
- DfE Children Missing Education (2016);
- DfE Working together to Improve School Attendance (2024);
- DfE Multi-Agency Guidance on FGM (2016);
- DfE Data protection: a toolkit for schools (2018);
- DfE Meeting Digital and Technology Standards in Schools and Colleges (2022);
- DfE Information Sharing (2018);

- DfE Relationships Education, Relationships and Sex Education (RSE) and Health Education (2025);
- Education (Pupil Registration) (England) Regulations 2006;
- ISI Commentary on the Regulatory Requirements (2025);
- Kinship Care: statutory guidance for local authorities (2024);
- NPCC When to call the Police: Guidance for Schools and Colleges (2020);
- Statutory framework for the early years foundation stage (2023);
- Safeguarding Children and Protecting Professionals in Early Years Settings (2019)

Related policies include:

- Anti-Bullying Policy;
- Attendance Policy;
- Promoting Positive Behaviour and relationships Policy;
- Trips and Visits Policy;
- Use of Reasonable Force to Restrain Pupils Policy;
- Health and Safety Policy;
- IT Acceptable Use Policy;
- Safer Recruitment Policy;
- Remote Learning and safeguarding Policy;
- Relationships Education and Relationships and Sex Education Policy;
- Visitors and Visiting g Speakers Policy;
- Staff Code of Conduct;
- Mental Health and Wellbeing Policy;
- Exclusions Policy;
- Fundamental British Values (FBV) Policy;
- Prevention of Sexual Harassment Policy

This policy is reviewed on an annual basis, and more frequently if additional guidance is received or if there is learning to take forward from a specific incident or case. The school monitors and evaluates its safeguarding policy and procedures through the following activities:

- Annual review of the Safeguarding Policy  
Annual audit of safeguarding<sup>1</sup>
- Governing body visits to the School
- DSL reviews of safeguarding cases
- SMT discussion sessions with children and staff
- Pupil questionnaires
- Frequent scrutiny of attendance data
- Regular analysis of a range of risk assessments
- Frequent scrutiny of governing body meeting minutes
- Logs of bullying incidents are reviewed regularly by the SMT and the governing body
- Regular review of parental concerns and parental questionnaires
- Regular checks on pupils' online activities through the filtering and monitoring systems

### **Staff obligations**

Staff are regularly reminded through training of the principle that 'safeguarding and promoting the welfare of children is everyone's responsibility'. Every member of staff, including part-timers, temporary, visiting, contract and volunteer

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<sup>1</sup> In accordance with section 157 of The Education Act. A multi-agency audit is also required by as stipulated by the Children Act and WTSO



staff working in School, is required to report instances of actual or suspected child abuse or neglect to the DSL, and all staff are encouraged to discuss any concern they have, however minor it may seem, with a DSL. This includes alleged abuse by one or more pupils against another pupil. Reference will be made to an external agency if there is risk of significant harm.

All staff have a duty to consider at all times the best interests of the child and take action to enable all children to have the best outcomes. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Furthermore, staff should not hold back from sharing information for fear of compliance with GDPR regulations (detailed in Section 5), as these do not apply to safeguarding concerns.

All staff have the right to make a referral directly to children's social care if there is an emergency or if they are concerned that appropriate action is not being taken. To do this, they should contact the Safeguarding Children's Partnership for that pupil's borough; there is a link at the end of this policy which staff can follow to find the relevant contact details.

Any staff member should speak to a DSL if they have concerns that a pupil is at risk of, or has undergone, female genital mutilation. If a teacher discovers that an act of FGM has taken place, there is a specific legal duty which requires them to notify the police. For the purposes of this duty, a teacher is someone who undertakes teaching work as follows (including through distance learning or computer aided techniques):

- planning and preparing lessons and courses for pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Principal to provide such direction. The mandatory reporting duty will not therefore apply to supervised teaching assistants.

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable children and young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

All staff and volunteers should raise concerns about perceived poor or unsafe practice and/or potential failures in the school's safeguarding regime. Any concerns raised will be taken seriously by the Senior Management Team and, if appropriate, the governing body. If a member of staff feels that their concerns have not been addressed, they may also consult the Whistleblowing section in the Employment Policies and Procedures Handbook, call the NSPCC Whistleblowing hotline which is detailed at the end of this policy or contact Ofsted directly, for whom contact details are also at the end of this policy.

## **The sharing of information**

In general, we believe that parents and guardians should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents and guardians. However, concerns of this nature must be referred to the DSL or the Principal who will decide on the appropriate response. In very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation,

or place the child at further risk. In such cases, advice will be sought from the relevant Safeguarding Children Partnership.

Decisions on how much information to share with staff following the raising of a concern or the making of a referral will be based on a number of factors, with the privacy and dignity of those involved being of paramount importance, in line with the school's vision and mission statement. After that there will be consideration of which staff need what information, with the pupil's views, and where appropriate, those of their parents and guardians, being taken into account wherever possible. However, it may be decided it is in the child's best interests for the information to be shared more widely than they wish. In this situation, the matter will be explained to the child, and they will be told who will be informed, when, and by what means.

When a report has been made to the police, the school or college should consult the police and agree what information can be disclosed to staff and others, including any alleged perpetrator and their parents and guardians/carers. There will also be a discussion of how to protect the alleged victim and their anonymity.

If staff are aware a pupil is subject to safeguarding procedures, whether that is an Early Help assessment, Child in Need plan or Child Protection plan, they should be mindful of not visibly treating the child any differently to other pupils, unless notified otherwise by the relevant DSL or pastoral lead. Staff should be mindful that, in these cases, school is often a source of much-needed 'normality' for the child, and that these children are frequently nervous of being singled out/treated differently.

Staff should also be mindful of these concerns when choosing how and with whom to share any information they may have received via a disclosure, or where they have observed an indicator of abuse.

Where a member of staff has concerns about whether a safeguarding case is being processed appropriately, they are welcome to consult the relevant DSL, who will seek to share as much information as they can, notwithstanding the principles outlined above.

Where a safeguarding case may have an impact on other pupils, the school will look to provide appropriate pastoral care, while maintaining the confidentiality of the pupil and/or family involved.

### **Use of Queen's Gate premises by outside organisations**

Where the school hires out its facilities or premises, it will ensure that appropriate arrangements are in place to keep children safe, for example, by appropriate safeguarding policies and procedures. Outside agencies are encouraged to liaise directly with the school over any safeguarding matters that might arise.

If the School receives an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), as with any safeguarding allegation, we follow the safeguarding policies and procedures, including informing the LADO.

## **Section 2: Knowledge and understanding of safeguarding**

### **Key terminology**

*Safeguarding* is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health and development; ensuring they are growing up in circumstances consistent with the provision of safe and effective care; taking action to enable all children to have the best life chances.

*Child abuse* is defined as any form of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm or by failing 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. Children may be abused by an adult or adults, or by another child or children. More widely, abuse may be considered anything that impairs the normal development of a child. Finally, it should be noted that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label, and it is likely that multiple issues will overlap with one another.

*Child Protection* is the activity undertaken to protect a specific child or children who are suffering, or likely to suffer, significant harm.

*Significant harm* (s47 of the Children Act 1989) is the threshold that justifies compulsory intervention in family life in the best interests of children and gives LAs a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child. There are no absolute criteria on which to rely when judging what constitutes significant harm. Consideration will include degree and extent, duration and frequency, extent of premeditation and the presence/degree of threat, coercion, sadism and bizarre or unusual elements. Significant harm may refer to a single traumatic event, but more often it is a compilation of significant events.

### **Categories of abuse**

There are four main categories of abuse, and these are detailed below. All staff should be aware that 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. If staff members are unsure, they should always speak to the DSL.

*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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment, or experiencing its effects, and so may be an issue where there is domestic abuse in the home. 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 (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate abuse offline. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

*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 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.

*Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE):* Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. While age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Indicators of these categories of abuse are detailed in Appendix 1 of this policy. In addition, safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the Designated Safeguarding Lead (or deputy) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Furthermore, members of staff should be aware of the added vulnerability of children and young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children.

Further categorisation and issues, such as forced marriage and child-on-child abuse, are detailed in Section 5 of this policy.

### **Vulnerable categories of pupil**

Staff are trained to be mindful that certain categories of pupil may be at greater risk of harm. These categories include:

- those with SEND who may be more vulnerable to manipulation, and who may be more prone to peer group isolation;
- those who identify as LGBTQ or are perceived to be LGBTQ; A child or young person being lesbian, gay, bisexual, or gender questioning is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who are.
- those who have a social worker due to safeguarding or welfare needs; in these cases, the local authorities will share the information that a pupil has a social worker with the school, and the DSL will use this information to guide decisions about the pupil's safety, welfare and educational outcomes;
- pupils with mental health problems (see more information in Section 5, below).

## **Section 3: How we protect pupils and staff**

### **Safer Recruitment**

Queen's Gate School follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations. The

Director of Pastoral Care, The Director of the Junior School and the Principal have received Safer Recruitment training. Further information can be found in the Queen's Gate School Safer Recruitment policy.

In line with Part 3 of the DfE's guidance Keeping Children Safe in Education 2025, the governing body prevents people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised.

The School works with external agencies where appropriate including inter-agency working on the part of the DSL and attendance at strategy meetings.

As part of carrying out safe recruitment procedures under Keeping Children Safe in Education 2025 members of the teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, are subject to the necessary statutory child protection checks before starting work, including verification of their identity and, for most appointments, an enhanced DBS check with 'barred list' information. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Those undertaking significant management posts, will be subject to prohibition from management of independent schools checks (section 128). Shortlisted candidates applying for roles are informed that online searches will be carried out.

Individuals who have lived or worked outside the UK will undergo the same checks as all other staff in schools or colleges. In addition, the School will check for information about any teacher sanction or restriction that an EEA or other professional regulating authority has imposed. Although restrictions imposed by another EEA regulating authority do not prevent a person from taking up teaching positions in England, the School will consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment.

For those staff involved in childcare provision, the school will carry out the appropriate checks to ensure that they are not disqualified under the Childcare (Disqualification) Regulations 2018.

The School will conduct risk assessments for volunteers to determine whether they require an enhanced DBS check. All governors, volunteers and contractors working regularly during term-time (such as contract catering staff) are also subject to the statutory DBS checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils at school or on another site.

We take our responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the School immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings s/he may receive.

Should the School develop concerns about an existing staff member's suitability to work with children, it will carry out all relevant checks as if the individual were a new member of staff.

## **Pupil knowledge, understanding and expectations**

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our anti-bullying policy.

The school's PSHE programme supports our safeguarding approach in a number of ways:

- specially-designed sessions at the start of the academic year to teach pupils about safeguarding in a sensitive and age-appropriate fashion;
- lessons and sessions with external facilitators are tailored to the specific needs and vulnerabilities of individual pupils, including pupils who are victims of abuse, and pupils with special educational needs and/or disabilities (SEND).
- lessons on personal safety and healthy living, both in terms of physical and mental/emotional well-being;
- time to discuss concepts of right and wrong, bullying, tolerance, respect and what constitutes appropriate behaviour;
- how pupils can take action when observing inappropriate behaviour, or they are worried about a friend or family member;
- regular lessons to pupils on e-safety and ensure that all pupils understand the risks and adhere to the school's guidelines in this area. This includes guidance on educating pupils to stay safe, including e-safety and online protection (see IT Acceptable Use Policy). For more details on cyber-bullying please refer to the School's Anti-bullying Policy;
- lessons on Relationship and Sex Education, including sessions on gender identity and sexuality, and an emphasis on the importance of tolerance in relation to these;
- enhanced sessions from external providers on topics such as drug and alcohol use;

Assemblies are also used to promote fundamental British Values (FBV), including tolerance and mutual respect and understanding, and a large number of subjects promote these through their curriculum content delivery.

All pupils are told that there are adults to whom they can turn to if they are worried, and the school promotes a culture of listening. Each form in the Senior School has a pair of Co-tutors and each year group has a Head of Year. In the Junior School, each Form has a Form Teacher who encourages pupils to share their concerns with them. Our support to pupils includes the following:

- Two trained school counsellors who keep the contents of their sessions confidential, unless they feel there is a safeguarding concern, in which case details would be referred to one of the DSLs or a Deputy DSL;
- all Form Rooms in the Senior School include a poster listing the key staff/individuals pupils can approach if they are worried about something, and their attention is regularly drawn to this by Form Tutors;
- posters giving contact details for ChildLine are displayed in strategic points around the School;
- in assembly, the Director of the Junior School explains to all Junior pupils the system of support and listening within the Junior School.
- There is a dedicated page in the Senior School pupil planner that gives contact details for Childline and other external agencies, as well as the details of the internal support structures.
- At the start of each school year, pupils in the Senior School are given an introduction to safeguarding as part of their induction to their new year group.

Pupils are regularly reminded about the school's expectations surrounding, and approach to, bullying and a clear Anti-bullying Policy is in place, which includes reference to cyber-bullying. Expectations regarding pupil conduct towards each other is also included in the pupil planners and as themes for assembly.

#### **Policies on mobile devices and the use of images**

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential, and this is particularly important in relation to the use of mobile and other digital devices, including wearable technology, and the use of images taken on any device. Staff are reminded to be cautious regarding contact with pupils online and via email.

When images are taken, they should not be used for anything other than the agreed purposes unless additional consent is obtained. Photographs must be appropriately disposed of should they be no longer required, in the presence of another member of staff. Staff should refer to the Taking, Storing and Using of Images Policy, The IT Acceptable Use Policy for Pupils, the School's Employee Manual and the Staff Handbook.

This advice is also relevant to EYFS and reflects the EYFS Framework, updated January 2024.

### **Physical contact**

There are occasional circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. Full details of the school's policy in this respect are contained in the Use of Reasonable Force to Restrain Pupils Policy.

The adoption of a 'no contact' policy at a school or college can leave staff unable to fully support and protect their pupils and pupils. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances. Keeping Children Safe in Education 2025 para 167]. Furthermore, it may be appropriate and/or necessary for staff to have physical contact in certain contexts, including:

- instruction in a practical subject, such as Drama or P.E.;
- when administering First Aid;
- when comforting a pupil in distress.

A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection. Physical contact should never be secretive, for the gratification of the adult, or represent a misuse of authority.

If a member of staff is unsure about whether physical contact is appropriate, they should err on the side of caution. If they feel an incident of physical contact could have been misconstrued, they should inform the DSL. Staff are advised to avoid physical contact in any situation where they are alone with a pupil.

### **Safeguarding of pupils at weekends and during holidays**

Pupils who are onsite at weekends and during the holidays must be supervised by a teacher at all times when in the building. Both pupils and staff are aware of this need for out of hours supervision. The bathroom that pupils use should be specified by the teacher and should be close to the rooms being used. These arrangements are to allow contractors to work on the site unsupervised where necessary.

A duty DSL or DDSL is available by phone during holidays or weekends when pupils may be onsite or on trips. They may be contacted if a safeguarding need arises and the email address, [safeguarding@queensgate.org](mailto:safeguarding@queensgate.org) can also be used, which is checked intermittently during these times Further information can be found in the Trips and Visits Policy.

### **Arrangements for 1:1 lessons**

Pupils at Queen's Gate may be engaged in close one-to-one tuition or contact with staff, such as during specialist music or sports tuition, additional tutoring/support provided by staff, private pastoral/mentoring conversations (including with the school counsellor or lessons with low class sizes. Here the following safeguarding arrangements apply:

- Most teaching rooms throughout the School, and most meeting rooms have glass panels in the doors, as well as windows which have line of sight from other areas of the school. Staff are also encouraged to consider leaving the room door open when seeing a pupil alone, or to consider more public areas of the School (Dining Rooms, Libraries).
- All staff, including visiting peripatetic staff, are subject to safer recruitment checks and receive annual safeguarding training, which includes guidance on expectations for one-to-one teaching/meetings.
- Staff avoid seeing pupils on a one-to-one basis at times of the day when the overall staff presence is lower (i.e. before 8am or after 5pm).
- Timetabled lessons are recorded centrally.
- Staff are advised to let an appropriate line manager know if they are regularly seeing a pupil on a one-to-one basis.
- Staff are not permitted to share their personal phone numbers, email addresses or social media details with pupils, unless in exceptional circumstances and with the express permission of the Principal.

### **Filtering, monitoring and online safety**

All staff know to report concerns about pupils' online activities to the DSLs.

Those with specific responsibility for ensuring that the filtering and monitoring standards are met are the governor with responsibility for safeguarding (Mrs Clare Lenterman) and the two DSLs, Ms Charlotte de la Pena and Mrs Charlotte Makhoulf. The Network Manager, Mr Hardish Hirani, is responsible for procuring, implementing and maintaining the filtering and monitoring systems and producing weekly reports. But these are checked by the safeguarding leads.

The School follows the DfE guidance in [meeting digital and technology standards in schools and colleges](#).

Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective.

The School seeks to protect pupils from encountering harmful material online through the use of robust internet filtering and monitoring, while remaining mindful of the need not to 'over-block' and thereby prevent pupils from accessing information which might be helpful to them. On an annual basis, the governor responsible for safeguarding, the DSLs for the Junior and Senior Schools and the Network Manager meet to review settings in order to ensure our provision remains relevant and proportionate. The results of the online safety review are recorded. Additional reviews will be undertaken at any time throughout the year if required. Staff can request for specific websites to be 'unblocked' where they feel there is valid reason to do so, and that there is no risk to pupils.

Pupil and staff behaviour online are monitored, and anything relating to the following categories is flagged to the Network Manager:

- abuse
- adult content
- bullying
- criminal behaviour
- radicalisation
- substance abuse
- suicide and mental health

Should a pupil or staff search be flagged as coming under one of these categories, the DSL or Network Manager will investigate further and, if he feels necessary, report it to the relevant DSL. The DSL and DDSs review reports weekly to check for further safeguarding concerns and to follow up as appropriate. In doing so, they are mindful of the risk profile of individual students, including those with SEND and EAL.



Further safeguards to protect pupils online are included in the IT Acceptable Use Policy for Pupils which includes a section prohibiting pupils from bypassing IT safeguards such as content filters.

Pupils are taught about online safety through their PSHE and Computing lessons, alongside presentations from specialist providers. Teaching about online safety focuses on four objectives (the four Cs):

- minimising the risk that they may be exposed to harmful **content**, e.g. pornography and extremist material, it is also made clear in teaching and staff safeguarding training that exposure to some content , including pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories are safeguarding harms.
- minimising the risk that they may come into **contact** with those who could cause them harm;
- guiding them away from **conduct** online that could cause harm to themselves (e.g. sending self-generated explicit images) or others (e.g. bullying);
- providing them with information about, and protecting them from, risks in relation to **commerce** such as online gambling, inappropriate advertising, phishing and/or financial scams.

Queen's Gate is aware that some pupils may have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) and that such access may allow pupils to sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually. Such activities contravene the Pupil ICT Acceptable Use Policy and the School requires that pupils in Remove, LIV, Form IV and Form V place their phones in a locked YONDR pouch during the school day. Queen's Gate also takes action if the Pupil ICT Acceptable Use Policy is breached outside of school hours and off of the School premises. This aspect of the policy is made clear in the policy document which is shared with pupils and parents and signed by both parties at the start of each academic year. Occasional joiners sign the policy upon arrival at Queen's Gate.

A number of aspects of online safety are covered within the RSE curriculum (see school policies on PSHE and Relationships Education and Relationship Sex Education Policy).

#### **Arrangements for Exchange and Homestay Visits.**

At Queen's Gate, the French Department operate a successful and popular exchange trip. Pupils from a French school stay with Queen's Gate families in the UK and this is reciprocated when French families host Queen's Gate pupils in return. In accordance with Keeping Children Safe in Education 2025 Queen's Gate obtains DBS enhanced certificate with children's barred list information for all adults in a household where French Exchange pupils are staying. In the rare cases where a DBS has not been received prior to the exchange, a risk assessment is created with the family to ensure the safety of the visiting pupil. The Director of Pastoral Care and the French Department work with the partner school in France to oversee arrangements in France and pupils are briefed on what to do if they feel uncomfortable with a host family. Staff from Queen's Gate are present in France throughout the trip and see Queen's Gate pupils frequently throughout the exchange which allows them to monitor pupil welfare. Further details can be found in the section entitled 'Exchange visits including hosting families and homestays' in the Trips and Visits Policy.

#### **Professional boundaries**

The professional boundaries we expect staff to observe in their dealings with pupils are covered in the Staff Code of Conduct. If a member of staff is concerned about a pupil's behaviour towards them, including excessively affectionate behaviour, they should alert their Line Manager, the HR Manager or a member of the SMT.

### **Section 4: What we do when we have a concern about a pupil**

#### **Responding to a disclosure**

Our pupils are aware that they can approach any member of staff if they wish to talk about something that is troubling them. Therefore, all staff (including the School Counsellors) should understand the following procedure and be ready to follow it if a pupil makes a verbal disclosure that they, or someone they know, is at risk of harm:

- take what is said seriously;
- do not promise confidentiality;
- listen without expressing shock or judgement;
- acknowledge the information and explain what they are going to do with it;
- keep notes: either at the time or as soon as possible afterwards (but be conscious of the need to remain fully engaged with the child and not be distracted by note-taking);
- seek a second member of staff to be present during the disclosure, if possible
- only record the facts as the child presents them;
- record the incident by sending an email to [safeguarding@queensgate.org.uk](mailto:safeguarding@queensgate.org.uk)
- remain calm and reassure the child they were right to speak, and have not created any kind of problem by making the disclosure;
- limit questions to those required for clarification (no leading questions);
- do not present opinions;
- do not investigate;
- pass to relevant DSL without delay;
- do not criticise the alleged perpetrator.

In all disclosures it is essential that the victim is reassured that they are being taken seriously and that they will be supported and kept safe. They should never be given the impression that they are creating a problem by making a disclosure, or made to feel ashamed. This reassurance, along with consideration of the pupils' confidentiality and anonymity, is particularly important in reports of sexual violence or harassment.

Where an allegation involves illegal images of a child, or where staff have concerns relating to illegal images of a child, staff should not request to see, or be sent, these.

In some circumstances, staff may see non-illegal images and/or screenshots on pupils' devices for the purposes of safeguarding young people. In these instances, further guidance can be found in the Searches section in the Exclusions policy.

### **Observing an indicator of abuse, or that a pupil is at risk of abuse**

All staff should be familiar with the indicators of abuse detailed in Appendix 1 of this policy, including child-on-child abuse. If staff have **any concerns** about a child's welfare, they should follow the procedure below:

- make a written record of their concern and send this to [safeguarding@queensgate.org.uk](mailto:safeguarding@queensgate.org.uk) as soon as possible.
- do not carry out any investigation;
- pass to the relevant DSL without delay.

### **Making referrals**

A DSL is always available to receive or discuss concerns, either on the school site or via telephone. Wherever a disclosure or concern is shared with a DSL, they will decide on a suitable course of action. This could include:

- monitoring the child;

- supporting the child through the school's pastoral systems, including, where appropriate, liaising with parents and guardians;
- contacting the relevant Safeguarding Children Partnership for advice;
- contacting the relevant Safeguarding Children Partnership for an Early Help referral;
- making a referral to the relevant Safeguarding Children Partnership;
- contacting the police.

The DSLs will report all safeguarding concerns to the Principal. Where there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm, a referral to Children's Social Care will be made immediately, or where there is fear that the pupil is in immediate danger, the police.

Referrals to specialist statutory services (including where interagency working may be required) should be made in accordance with The Bi-Borough of Kensington and Chelsea/Westminster Safeguarding Partnership Threshold of Needs Document. However, all referrals should be made to the relevant Safeguarding Children Partnership for the pupil's home address, and the school will then follow their procedures for any interagency working. Contact details for Bi-Borough of Kensington and Chelsea/Westminster Safeguarding Partnership are included in this policy, along with a web link for contact details for all other London Borough Safeguarding Children Partnerships. These referral processes should also be used where there is a fear that a pupil is at risk of being radicalised or drawn into terrorism.

At all stages, written records should be kept, wherever possible using ISAMS Wellbeing Manager and should be passed to the relevant DSL. The Safeguarding Leads will keep detailed notes, including reasons for decisions made/actions taken, which will be held on the pupil's safeguarding file. Whenever a referral or assessment is made, the whole 'social sphere' of that pupil will be taken into consideration.

Decisions to seek support for a child about whom we have concerns will normally be taken in consultation with the pupil and her parents and guardians or guardians. However, consent is not required for a referral if there are reasonable grounds to believe a pupil is at risk of immediate or significant harm, or if there are reasonable grounds to believe that consulting the pupil and/or her parents and guardians may put her at greater risk or hinder an investigation.

The wishes of the pupil should be taken into account when determining what action to take and what services to provide, especially in the context of sexual violence and sexual harassment (see further section below). However, at all times staff should act in the best interests of the child, and in exceptional cases this may mean going against their expressed wishes. Appropriate pastoral support will be made available to the pupil and any other affected individuals. The DSLs will be mindful that safeguarding disclosures can be emotionally demanding for staff, and will provide them with support where needed.

Where a referral has been made, or there are concerns regarding a pupil which are being managed internally, the DSL will ensure that pupil has a named member of staff they feel they can approach if they wish to express further views or give feedback.

Staff are themselves allowed to make a referral to the relevant Safeguarding Children Partnership if they feel it is necessary and are reminded of this in annual training and other updates.

If a parent wishes to make a complaint, Ofsted can be contacted on 0300 123 1231 or via the DfE on 0370 000 2288. The Ofsted complaints procedure can be consulted, and complaints will be dealt with within 28 days: <https://www.gov.uk/government/organisations/ofsted/about/complaints-procedure>

### **Early Help assessment process**

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Early Help assessment means providing support as soon as a problem emerges from

Foundation Stage to the teenage years. It is more effective in promoting the welfare of children at an early stage and can prevent more serious problems from arising later. All staff are reminded of the importance of listening to any concerns pupils might have, and passing these on, so that Early Help assessments can be put into place if needed. Pupils are regularly reminded of to whom they can turn for help in Form Time, assembly and via their pupil planners and posters in their Form Rooms. This, along with the provision of the School Counsellors, helps promote our culture of listening to children.

Effective Early Help assessment relies on local agencies working together to:

- identify children and families who would benefit from an Early Help assessment
- provide targeted Early Help services for children and their families which focuses on activity to significantly improve the outcome for children.

Pupils who may benefit from an Early Help assessment and who may be in need of safeguarding support include someone who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- 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 or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse, such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.
- Early help can also be useful to address non-violent HSB and may prevent escalation of sexual violence.

If a member of staff feels a pupil may benefit from an Early Help assessment, they should consult one of the DSLs, who will contact the relevant Safeguarding Children's Partnership for that child.

Where a pupil is referred for Early Help or other support (for example, CAMHS), their welfare and well-being will be continually reviewed and, should the situation not seem to be improving, a referral to children's social care will be made.

### **Allegations against members of staff**

Allegations of abuse may be made against a member of staff (including supply staff), a volunteer, a governor, contractor, a Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead, or other person connected to the School. Staff should be clear on the school's policy and procedures in relation to these possible categories of alleged perpetrator. Wherever staff have concerns about a colleague's behaviour towards a child, they should refer it to the Principal. If there are concerns about the Principal directly, these should be referred to the Chair of Governors.

Allegations of abuse against teachers and other staff will be dealt with according to the statutory guidance set out in parts two and four of Keeping Children Safe in Education 2025, including differentiated action depending on whether the allegation meets the harms test., i.e. whether the individual has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he/she may pose a risk of harm to children and/or;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

### **Low Level Concerns**

Allegations which do not meet the harms test may be considered 'low level' but are still subject to follow-up as outlined in Keeping Children Safe in Education 2025 part four. Low level concerns are defined by Keeping Children Safe in Education 2025 as when a member of staff or other adult working on behalf of the school may have:

- behaved in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;
- does not meet the allegations threshold or is not otherwise considered serious enough for referral to the LADO.

Examples of low-level concerns might include, but are not limited to:

- being over-friendly with children;
- having favourites;
- taking photographs of children on their personal mobile phone;
- engaging with children on a one-to-one basis in a secluded context, such as behind a closed door\*;
- using inappropriately sexualised, intimidating or offensive language.

\*Staff may use their professional judgement to decide whether a one-to-one conversation is appropriate, particularly to ensure we provide a safe and supportive context in which pupils can share more sensitive concerns, such as a safeguarding disclosure or when visiting the School Counsellor. Staff are trained as to how to manage such scenarios in an appropriate fashion, for example, by letting a line manager or other colleague know when a one-to-one conversation has been or will be required, or by selecting a room where the door has a glass panel.

Staff who have a low-level concern regarding a colleague should refer it to the Principal in the first instance, who will assess by consulting with the LADO whether it should be escalated to be treated as a formal allegation (see procedures below), whether it can be addressed through the line management structure, with reference to the staff code of conduct and procedures laid out in Keeping Children Safe in Education 2025 (paragraphs 433-439), or whether no action is required. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted.

## Allegations of Abuse

Where an allegation of abuse is made against a member of staff, it should be referred directly to the Principal, or in her absence, the Chair of Governors. Should the allegation be against the Principal, the member of staff should immediately inform the Chair of Governors, or the LADO without the Principal being informed first. The member of staff is not necessarily required to inform the DSL.

While the School is not the employer of any supply teacher, it will ensure that any safeguarding concern regarding a supply teacher is properly investigated, in line with the procedures below and the guidance detailed in sections 285-288 of Keeping Children Safe in Education 2025 , including liaising with the LADO. At all stages, the supply teacher's agency will be kept fully informed and involved.

In line with Keeping Children Safe in Education 2025 , the Principal (or the Chair of Governors, if the allegation is about the Principal) may decide, based on the information provided, and without investigation, whether an allegation meets the following threshold criteria:

- that the alleged perpetrator has behaved in a way that has harmed a child, or may harm a child;
- that the alleged perpetrator has possibly committed a criminal offence against or related to a child;
- that the alleged perpetrator has behaved towards a child or children in a way that indicates he/she may pose a risk of harm to a child;
- that the alleged perpetrator has behaved in a way that indicates they may not be suitable to work with children.

If the Principal or Chair of Governors feels the allegation does not meet the above criteria, they may choose how to resolve the case, which should be done without delay. All allegations that do not meet the above criteria will still be investigated internally and recorded in the low-level concern log with the outcome of the investigation.

Wherever the Principal or Chair of Governors feels the allegation does meet the above criteria, they will refer it to the Local Authority Designated Officer (LADO) immediately, or at least within one working day. Where the allegation is against the Principal, she should not be informed of the allegation prior to contact with the LADO. Allegations concerning a teacher who is no longer teaching and/or historical allegations should be referred to the police. There may be cases where the case manager chooses to involve the police immediately, for example, if there is a risk that a criminal offence has been committed.

Borderline cases may be discussed with the LADO without identifying individuals in the first instance and, following discussions, the LADO will judge whether or not an allegation or concern meets the relevant threshold. The LADO and the Principal/Chair of Governors will decide in the circumstances what further steps should be taken. The parents and guardians/carers of the child or children involved should be informed as soon as possible, with the agreement of the LADO and following consultation with the police or children's social care if applicable. Any such discussions should be recorded in writing.

The member of staff or volunteer named as the perpetrator in the allegation should normally be informed as soon as possible and given an explanation of the likely course of action. Advice will always be sought from the LADO first, however, and, where applicable, children's social care and/or the police. The school will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case and will consider what other support may be appropriate for the individual.

All allegations which meet the threshold for referral to the LADO will be investigated as a priority to avoid any delay. Any discussions with the individual will be recorded in writing, any communication agreed with the LADO. Careful consideration will be given as to whether the member of staff should be suspended during the investigation, or whether other arrangements should be put in place. If the member of staff is suspended, they should be notified at the point of suspension of who their named contact is within the school, and provided with their contact details.

The outcome of investigation of an allegation will record one of the following outcomes:

- substantiated (sufficient evidence either to prove or disprove it);
- unsubstantiated (insufficient evidence either to prove or disprove it);
- false (sufficient evidence to disprove it);
- malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive);
- unfounded (no evidence or proper basis which supports the allegation being made).

If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. In all other circumstances, a written record will be made of the decision and retained on the individual's personnel file indefinitely, in accordance with advice from the DfE and Charities Commission.

In any cases where the allegation is found to be malicious, any details of the investigation will be removed from that member of staff's personnel files. In such cases, consideration will be given to whether disciplinary action should be taken against whoever made the allegation, including whether to involve the police. Where the allegation has been made by a pupil, it should be kept in mind that the pupil may have unmet needs that have prompted this behaviour, and appropriate pastoral support should be considered.

During the course of the investigation, the School, in consultation with the LADO, will decide what information should be given to parents and guardians, staff and other pupils, and how press enquiries are to be dealt with. In reaching their decision, due consideration will be given to the provisions in the Education Act 2011 and in Keeping Children Safe in Education 2025 relating to reporting restrictions identifying teachers who are the subject of allegations from pupils. Above all, the School should be mindful of the dignity and privacy of all individuals involved, and guard against unwanted publicity during the course of an investigation.

At the close of the investigation, the LADO will discuss with the case manager and Principal whether the school should make a referral to the DBS and/or whether to refer the matter to the TRA, as per our legal obligations under Disclosure and Barring Service (DBS) guidance and procedures and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. These require that schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) at the School, or would have been removed had they not left.

Queen's Gate School will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a pupil) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed-term contract, no longer using the supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

Furthermore, a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). The School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

Where the School ceases to use the services of a teacher because of serious misconduct, or would have dismissed them had they not resigned, it will consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

In any case, where an allegation has been found to be substantiated, the school will consult the LADO as to whether there are any lessons to be learned in terms of the School's practice or procedures, in order to avoid similar events in

the future. For all other allegations, a clear and comprehensive summary of the allegation, including how it was investigated and resolved, and any action taken/decisions reached, will be kept on the member of staff's confidential personnel file. Copies of these records will be provided to the member of staff concerned. Any records containing information regarding allegations of sexual abuse will be kept for 10 years, or until the accused has reached pension age (whichever is longer). False, unsubstantiated or malicious cases should not be mentioned in employee references.

Throughout any allegation against a member of staff, any pupils involved will be provided with appropriate pastoral care.

## **Section 5: Key issues relating to safeguarding**

### **Affluent neglect**

Affluent neglect refers to children from higher-income families who may not be receiving sufficient parental care and attention. This can also refer to pupils who are left unsupervised at any inappropriate age and/or time because of their parents and guardians' other commitments. Pupils from affluent families may also be vulnerable to certain harms, particularly online blackmail and staff and pupils are warned to be alert to this risk.

### **Child Criminal Exploitation (CCE)**

CCE is where an individual or group take advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for either some kind of financial gain (or other advantage), for the gain of the perpetrator or facilitator, or through violence or the threat of violence. The activity can appear consensual, and it can occur both through physical contact and online.

Indicators include:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss school or education, or do not take part in education.

Children involved in CCE often commit crimes themselves, and therefore they are not always recognised and treated as victims. It should be noted that the experience of girls who are criminally exploited can be very different to that of boys, but professionals should maintain an awareness that girls are still at risk of this type of abuse. Children being criminally exploited may also be at higher risk of sexual exploitation. Signs of CCE may also indicate that the child is at risk of modern slavery.

If a member of staff fears a pupil may have been a victim, or is at risk of becoming a victim, of CCE, they should refer the matter to the relevant DSL, following the processes outlined in Section 4.

### **Child Sexual Exploitation (CSE)**

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults, and can be conducted in person or using technology. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Exploitation may have occurred even if the sexual activity appears consensual. It should be noted that CSE can affect 16 and 17 year-olds, even though they can legally consent to engage in sexual activity. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are



victims of sexual exploitation go missing from home, care and education at some point. Children who are victims of sexual exploitation may also be victims of CCE. In addition to the CCE indicators above, some of the following signs may be indicators of CSE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or don't take part in education

Signs of CSE may also indicate the child is at risk of modern slavery.

If a member of staff fears a pupil may have been a victim, or is at risk of becoming a victim, of CSE, he/she should refer the matter to the relevant DSL, following the processes outlined in Section 4.

### **Children absent from education**

Children being absent from education for prolonged periods and/or on repeat occasions, which is defined in Keeping Children Safe in Education 2025 paragraph 177, as unexplainable and/or persistent absence from school for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation. The school monitors all pupil absences from school and promptly addresses concerns about irregular attendance with the parent/carers. As standard, we seek to hold at least two emergency contact numbers for each pupil.

- **Children missing education** Where deemed appropriate, and whenever a pupil is absent without leave for more than 10 school days (continuous), a referral regarding a pupil missing school will be made to the relevant Safeguarding Children Partnership or local Education Welfare services. For further details, please see the Missing Pupils Procedure document. The local authority will be kept updated regarding any pupil who is added to or deleted from the admissions register at a non-standard admission point, in line with the requirements laid out in the DfE guidance 'Children missing education', September 2016, Children missing education: statutory guidance for local authorities, August 2024, and Education (Pupil Registration) (England) Regulations 2006.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more areas of the UK, using dedicated mobile phone lines or another form of 'deal line'. Exploitation is an integral part of county lines, with children exploited to move drugs and/or money. Offenders will use coercion, intimidation, violence and weapons to ensure compliance of victims. Children are often recruited for county lines activity, and can easily become trapped in this type of exploitation. Indicators a child may be involved in county lines include missing episodes from school (and home). If a member of staff fears a pupil may have become involved in county lines, they should refer the matter to the relevant DSL, following the processes outlined in Section 4.

### **Cybercrime**

Some children may be drawn into cybercrime (whether inadvertently or deliberately), which includes but is not limited to:

- unauthorised access to computer networks ('hacking');
- making, supplying or obtaining malware.

Should concerns of this nature arise regarding a pupil, the DSL team will consider appropriate support, including whether to refer them to the Cyber Choices programme led by the National Crime Agency,

### **Domestic abuse**

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children in their own right, if they hear, see or are experiencing the effects of such abuse. Domestic abuse can be classified as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality.

The abuse can include, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Exposure to domestic abuse and/or violence, whether as a victim or as a witness, can have a serious, long-lasting impact on children. Any suspicions that a child is being exposed to domestic abuse should be reported to the relevant DSL as a safeguarding concern using the procedures detailed in Section 4.

### **Female Genital Mutilation**

FGM is when a female's genitals are deliberately altered or removed for non-medical reasons. It is also known as 'female circumcision' or 'cutting' but can be referred to by other names. It can be carried out at any stage of a female's life. It is a criminal offence in the UK.

Signs a pupil may be at risk of FGM include:

- Being taken home "to visit family";
- A special occasion "to become a woman";
- An older female relative visiting the country.

Signs a pupil may have undergone FGM include:

- Difficulty walking, sitting or standing;
- Spending longer than normal in the bathroom or toilet;
- Unusual behaviour after an absence from school;
- Particular reluctance to undergo normal medical examinations;
- Asking for help, but without being explicit about the problem due to embarrassment or fear.

From October 2015, all teachers (along with social workers and healthcare professionals) have had a statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. However, unless the teacher has good reason not to, they should still consider and discuss the case with the relevant DSL and involve children's social care if appropriate. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

### **Forced Marriage**

Forced Marriage is defined as a situation where one or both people do not (in the case of pupils with learning difficulties, cannot) consent to a marriage and pressure or abuse is used. Threats can be physical, emotional or

psychological. It is recognised as violence against women/men or domestic/child abuse, and is a serious abuse of human rights.

## **GDPR**

Queen's Gate has appropriate regard to data protection/GDPR requirements and all staff are made aware that these do not prevent the processing, storing and sharing of information, including special category personal data for the purpose of safeguarding children and individuals at risk. Furthermore, the school is conscious that it is permitted to withhold sharing data where the serious harm test is met, i.e. if they believe that by sharing the data the child may be put at risk of serious harm.

More information and guidance on how GDPR applies to schools can be found in the DfE document [Data protection: a toolkit for schools](#).

## **Health concerns – mental and physical**

Both mental and physical health concerns can be considered a safeguarding issue as they may impair a pupil's normal development. Furthermore, if a pupil is in need of medical help which the parent is failing to provide, this can be classified as neglect, while a mental health problem can be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Information on this can be found in the Mental Health and Wellbeing Policy.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff are well placed to observe changes in a child's day-to-day behaviour that may indicate that they are experiencing a mental health problem, or at risk of developing one. Likewise, School Counsellors may observe indicators that a pupil is experiencing issues with their health; these will be flagged to a DSL or DDSL.

Where children have suffered abuse or neglect, exploitation or other potentially traumatic adverse childhood experiences, this can have a lasting effect through childhood, adolescence and into adulthood. Wherever provided by parents and guardians, information about childhood trauma will be shared with staff so that they are aware of how these experiences may affect their mental health, behaviour and education. Where necessary, adapted behaviour management strategies will be identified and used to support these pupils.

If a member of staff has concerns about any aspect of a pupil's health (whether mental or physical), they should report this to the relevant DSL (as that section's mental health lead) using the procedures detailed in Section 4. The DSL will decide how to respond based on the individual characteristics of the case, taking into account factors such as the severity of the harm or disorder, the age of the pupil and any knowledge regarding the pupil's home life. The matter may be discussed with the pupil, and their wishes will be acknowledged; however, at all times the school is mindful of its responsibility to safeguard the pupil and, if necessary, their parents and guardians will be notified and/or a referral to children's services may be made without their knowledge. If the pupil is in immediate danger, emergency medical help may be sought and/or the police may be contacted.

## **Gender Questioning Pupils**

For more information on the School's support for gender-questioning pupils, please see the Mental Health and Wellbeing Policy.

## **Honour-Based Abuse**

Honour-based abuse is a violent crime or incident which may have been committed to protect or defend the honour of the family or community, and includes FGM, forced marriage and breast ironing.

## **Kinship Care**

Queen's Gate has a number of pupils in Kinship Care. "Kinship care" is any situation in which a child is being raised in the care of a friend or family member who is not their parent. The arrangement may be temporary or longer term. Most of the pupils living in Kinship Care arrangements at Queen's Gate are living with family members for the purpose of attending school whilst their families are overseas. Kinship Carers may want and need support to enable them to meet the needs of the children they care for. Staff at Queen's Gate are regularly reminded of the identities of pupils living in kinship care and that they may have particular safeguarding vulnerabilities.

### **Multi-agency working**

The safeguarding partners for our borough comprise: Children's Services for Royal Borough of Kensington and Chelsea, Children's Services for Westminster City Council, Metropolitan Police and North West London Integrated Care Board.

The DSLs engage with the Bi-Borough for Kensington and Chelsea/Westminster Local Children's Safeguarding partnership in a range of ways, including:

- Attendance at regional cluster meetings to share good practice and receive updates and training;
- receiving and reading regular email communications, and drawing on these to inform DSL practice and wider staff training;
- completion of statutory training courses provided by the Bi-Borough for Kensington and Chelsea /Westminster Local Children's Safeguarding partnership;
- completion of additional training courses provided by Bi-Borough for Kensington and Chelsea/Westminster Safeguarding Children's Partnerships and dissemination of learning to relevant staff.

Any allegations against members of staff will be referred to the Bi-Borough for Kensington and Chelsea/ Westminster LADO. Referrals regarding children we believe are suffering, or at risk of suffering harm will be made to the organisation for that child's home borough.

### **Parental health and substance misuse**

A parent's ability to care for and supervise their child safely and effectively may be affected by ill-health, whether that is mental and/or physical.

Parental substance misuse, whether that refers to alcohol or drugs, can present a safeguarding risk, as it may impair the ability of the parent to supervise children in their care in a safe and responsible fashion.

If a member of staff has concerns about the parent(s) of a child at the school, they should report this to the relevant DSL using the procedures detailed in Section 4. The DSL will decide how to respond based on severity, duration, age of the child, their knowledge of the home life and extended family, and any observed impact on the child. It may be that a referral to children's social care will be necessary to safeguard the child, or that an Early Help assessment will enable support to be put in place to help the family.

### **Child-on-child abuse**

All staff should recognise that children are capable of abusing their peers. There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgement. However, staff should be wary of developing high thresholds before taking action, and should consult the relevant DSL if they are unsure as to whether an incident should be considered abusive and dealt with accordingly. All staff should make it clear that any abusive behaviour should not be considered normal, will not be tolerated and should not regard it as banter or growing up.

Even where there are no reported cases of child-on-child abuse, this does not mean that it is not happening.

The school seeks to minimise incidences of child-on-child abuse through both the promotion of appropriate conduct (Pupil Code of Conduct, Form Time discussions, assemblies) and clear strategies against bullying (Anti-bullying Policy, Rewards and Sanctions Policy). Pupils are given a range of methods through which they can raise concerns. Pupils are supervised throughout the school day, with particular attention given to areas where child-on-child abuse may be more likely to arise (toilets, coaches).

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator.

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive, whether or not severe harm was actually caused.

Children are vulnerable to abuse by their peers, and it should be noted that children with SEND can be more prone to child-on-child abuse. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. Any allegation of child-on-child abuse will be referred to the DSL, who will, in consultation with the Principal, decide on an appropriate course of action. In most cases an internal investigation will be the first step; however, it may be appropriate to consult the Safeguarding Children's Partnership for guidance or, where there is reasonable cause to suspect a pupil is suffering, or is likely to suffer, significant harm, to make an immediate referral. At all stages, records will be kept of steps taken, any disclosures received/interviews conducted and decisions taken.

Child-on-child abuse can take a number of forms, including:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence such as rape, assault by penetration and sexual assault, or causing someone to engage in sexual activity without consent;
- sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- consensual and non-consensual sharing of nudes and semi-nude images or videos (also known as youth produced sexual imagery or sexting);
- initiation/hazing type violence and rituals.

It is important that staff challenge inappropriate behaviours between peers, using the school's Behaviour Policy and Anti-Bullying Policy. Staff should escalate promptly any behaviour that causes them particular concern, either to the relevant Pastoral Head or to a member of the DSL team. There should be a zero-tolerance approach to child-on-child abuse, and staff should be wary of passing off such behaviour as 'banter' or 'having a laugh'.

Sexual violence and harassment, and harmful sexual behaviour, which can all be forms of child-on-child abuse, are covered in a section below. It should be remembered that child-on-child abuse may include sexting and banter; full details of child-on-child abuse and its characteristics are included in Appendix 1 of this policy. Where there is a concern involving sexting, the school will follow the guidance outlined in the DfE guidance 'Searching, screening and confiscation' [January 2018] and the UK Council for Internet Safety (UKCIS).

All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse, and therefore should be mindful that the alleged perpetrator of child-on-child abuse is likely to have considerable unmet needs as well as posing a significant risk of harm to other children and, as such, both they and the victim will be treated as being 'at risk'. Evidence suggests that such children may have suffered considerable disruption in their lives, may have witnessed or been subjected to physical or sexual abuse, may have problems in their educational development and may have committed other offences. They may therefore be suffering, or at risk of suffering, significant harm and in need of protection. Any long-term plan to reduce the risk posed by the alleged perpetrator must address their needs.

Victims of child-on-child abuse will be supported by measures appropriate to the specific context, such as separating the two pupils for teaching purposes. In extreme cases, exclusion of the perpetrator will be considered.

All pupils involved in a case of child-on-child abuse will also be supported through the school's normal pastoral structures.

Cases of child-on-child abuse, or cases where there are related concerns, will be subject to ongoing review by the relevant pastoral leads to ensure the well-being of all pupils involved.

### **Police involvement**

As referenced within this policy, there are a range of scenarios under which the police should be contacted, or where taking advice from the police may be helpful. The DSLs and DDSs will be mindful of when this is relevant, with reference to the NPCC guidance 'When to call the police' (2020). This document is linked in Section 6 of this policy. If a pupil is subject to a police investigation the DSL and/or Principal will ensure the pupil has an appropriate adult assigned to them. This is outlined in the PACE code (2019) and is linked in Section 6 of this policy.

### **Preventing radicalisation (the Prevent Duty)<sup>2</sup>**

We recognise that it is a key role of the School to support children and that school may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others, and it is our responsibility as outlined in the Counter Terrorism and Security Act 2015, specifically Section 26, and the Prevent Strategy to safeguard pupils who are at risk of radicalisation by identifying and risk assessing individuals who may be drawn into terrorism, violent or non-violent extremism.

Key terminology in relation to this area of safeguarding includes extremism, radicalisation and terrorism. Full definitions of these terms can be found in Keeping Children Safe in Education 2025 , Annex B, and staff should be familiar with these.

Our first priority is to avoid pupils coming into contact with, or being susceptible to, indoctrination, and therefore online safety, and the danger posed by those they might meet online, is covered within the PSHE curriculum. Furthermore, there are clear protocols for inviting and supervising visiting speakers to protect our pupils from coming into contact with radical or extremist influences (see Visiting Speaker Policy). Finally, we build resilience to radicalisation by promoting fundamental British values through the PSHE curriculum and our assembly programme.

Staff will be alert to the signs of vulnerability and/or susceptibility to any extremist indoctrination, and are aware of the risk posed by other pupils and adults who may have been radicalised and the impact of radicalisation via social media.

Staff acknowledge the need for a culture of vigilance to be present in the School to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils which may indicate they are at risk of radicalisation.

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<sup>2</sup> The preventing radicalisation section of KEEPING CHILDREN SAFE IN EDUCATION 2024 remains under review, following the publication of a new definition of extremism on the 14 March 2024.

Staff will consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care. Contact details for support and advice on the Prevent Duty can be found below.

All staff are required to complete relevant online training regarding the Prevent Duty and the use of Channel, and are asked to repeat this training every two years to ensure their knowledge is kept up to date.

The School maintains a Prevent Risk Assessment which is available to all staff, and which can be supplied to parents/visitors on request.

### **Self-harm, including eating disorders**

Issues of self-harm, including eating disorders, will be managed as per a mental health concern (see section above).

### **Serious Violent Crime**

Staff should be alert to the signs that a child is, or is at risk of, becoming involved in serious violent crime and/or involved in County Lines activity. These signs include absence from school, changes in friendships, relationships with older individuals or groups, decline in performance, signs of assault or other unexplained injuries, and unexplained gifts or possessions. Further risk factors that increase the likelihood of being involved in serious violence include unexplainable and persistent absence or previous exclusion from school, having experienced maltreatment, having been involved in offending, and/or being male. While these are factors that apply less frequently to pupils at Queen's Gate, staff should remain mindful of them, as they may apply to pupils' social circles outside of school. If staff have a concern regarding a child in relation to this issue, they should raise it with the relevant DSL.

### **Upskirting**

Upskirting is where someone takes an image under a person's clothing without their permission or knowledge. It is a criminal offence under the Voyeurism (Offences) Act [2019]. If a member of staff believes a pupil has been a victim of upskirting, they should refer the matter to the relevant DSL, using the procedures outlined in Section 4. If a member of staff believes a pupil has committed an act of upskirting, this should also be referred to the DSL, both in order to protect the target and to identify reasons for the perpetrator's behaviour, which could in and of themselves indicate a safeguarding issue.

### **Sexual Violence**

Detailed guidance on sexual violence and harassment, and harmful sexual behaviours, can be found in the DfE guidance 'Sexual violence and sexual harassment between children in schools and colleges' (September 2021). It is recognised that there is a gendered dimension to child-on-child abuse, whereby girls are more commonly the victims and boys more commonly the perpetrators. However, staff should not allow their judgement to be clouded by assumptions based on stereotypes, and should always act based on the specific information they have. In particular, staff should be mindful of the risk of a pupil experiencing sexual violence outside of the school context, or of the possibility of sexual violence being perpetrated by a pupil of the same sex as them.

It should be noted that pupils may find sexual violence or abuse particularly hard to report to a member of staff, and so it is particularly important that staff create an atmosphere of safety and openness so as to facilitate disclosures. When a disclosure of sexual violence is made, it will be taken seriously, in line with the school's zero-tolerance approach to any behaviour of this type. Sexual violence or other harmful sexual behaviour should not be passed off as 'banter' and immediate consideration should be given to how to support both the victim and the alleged perpetrator, if they are a member of the school community. The School should also be mindful that the response to any allegation of this nature could affect whether pupils feel safe to make allegations in the future, and have an impact on the wider sense of safety within the community.

Any investigation into an allegation of sexual violence or harmful sexual behaviour will be managed by two members of staff. In investigating an allegation, careful consideration will be given to the pupil's age, and it may be appropriate to liaise with external organisations, which may include but are not limited to:

- local safeguarding agencies, including any referral for Early Help;
- the police;
- health professionals (particularly as a victim may require prompt medical attention);
- the parents and guardians of the pupil(s) involved.

Wherever there is a report of rape, assault by penetration or sexual assault, the case will be immediately passed to the police. In addition to this, the DSL will carry out a risk and needs assessment, as per the guidance in Keeping Children Safe in Education 2025, para 487-489. It may be the case that, if the alleged perpetrator is a member of the school community, that they may be subject to a temporary suspension during the investigation (in line with the school's Discipline and Exclusion Policy) or systems may be put in place to keep them separated from the victim.

The outcome of the investigation will determine any further actions, decisions about which will be taken with reference to the school's Behaviour Policy and Discipline and Exclusion Policy. Where an allegation is found to be unsubstantiated, unfounded, false or malicious, it will be recognised that the pupil who made the disclosure may have unmet pastoral needs and/or other vulnerabilities. Nevertheless, it will also be considered whether that pupil should receive some form of disciplinary sanction.

After any allegation, whether substantiated or otherwise, the DSL team will conduct a review as to whether there are any lessons to be learned to inform developments of practice in school, for example, the RSE Policy. Where an allegation is substantiated, the victim will receive ongoing pastoral support and monitoring.

### **Youth-produced sexual images**

Any nude or semi-nude image of a person under the age of 18 may be subject to laws surrounding indecent images of children, regardless of by whom it was produced. This means that a pupil who creates a nude or semi-nude image of themselves has broken the law, and the same is true of anyone in possession of that image, or who transmits that image. Where it is suspected that a pupil may have been involved in the production or transmission of a sexual image, this will be approached as a safeguarding matter, as outlined above ('sexting') and in line with Keeping Children Safe in Education 2025. Particular caution will be applied in terms of emphasising the criminality, so as not to impede open and honest communication with pupils, and to protect their long-term reputations where appropriate. The School maintains a good relationship with the local police liaison officer, who is able to provide advice if required.

### **Section 6: Local contacts and other sources of information**

The School's points of contact for children who are the focus of concern are as follows:

*Bi Borough Safeguarding Children Partnership*

<https://www.rbkc.gov.uk/lscp/>

Bi-Borough Initial Contact and Advice Team (ICAT)

Tel: 020 8753 6610

(Out of hours – 020 8748 8588)

The Local Prevent Officer is Simone Torry.



Torry Simone: H&F [Simone.Torry@lbhf.gov.uk](mailto:Simone.Torry@lbhf.gov.uk)

#### *Local Area Designated Officer (LADO)*

Aqualma Daniel (Safer Organisations Manager & Local Authority Designated Officer )

Telephone: 020 7361 3013 or 07870 481 712

KCLADO.Enquiries@rbkc.gov.uk

[Aqualma.Daniel@rbkc.gov.uk](mailto:Aqualma.Daniel@rbkc.gov.uk)

A full list of safeguarding partnership contact details for other London Boroughs can be found at:

<https://www.londonscb.gov.uk/london-scb-contacts/>

#### *Police*

Emergency – 999

Non-emergency – 101

Additional guidance on when to call the police can be found [here](#)

Guidance about an appropriate adult for pupils subject to a police investigation can be found in paragraph 1.7 [here](#).

#### *Whistleblowing*

##### *OFSTED Safeguarding Children*

08456 404046 (Monday to Friday from 8am to 6pm)

[Whistleblowing@ofsted.gov.uk](mailto:Whistleblowing@ofsted.gov.uk)

##### *NSPCC Whistleblowing Advice Line*

0800 028 0285

[help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Further guidance can be found in the Staff Employment Handbook.

#### *Extremism*

Any concerns regarding radicalisation should be referred to **the** LBHF/ RBKC Prevent team on:

- Telephone: 020 8753 5727
- Email: [prevent@lbhf.gov.uk](mailto:prevent@lbhf.gov.uk)

In addition, the DfE provides the following dedicated helpline for staff and governors, and an email point of contact:

020 7340 7264

[counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

#### *Disclosure and Barring Service*

PO Box 181, Darlington, DL1 9FA  
Tel: 01325 953795

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**Policy reviewed:      September 2025**

**Next review:    September 2026**

## **Section 7: Appendices**

### **1: Indicators of abuse**

**The indicators of abuse, neglect and exploitation are listed below. It is important to note that neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.**

#### **Typical signs of neglect are:**

- Poor hygiene
- Dirty clothes
- Poor skin condition
- Dirty teeth and halitosis
- Underweight or obesity – not fed properly
- Inadequately clothed
- Failure to provide glasses
- Shoes too small
- Anaemia
- Poor hair quality, infestations
- Protuberant abdomen
- Frequent bouts of gastro-enteritis
- Prominent joints
- Hands red, swollen, poor nails
- Generally any signs that a condition is not improving, without good reason.
- An example of parental neglect could be unsupervised access to the internet.
- It is very difficult to prove physical neglect unless it is extreme and additionally there is a danger of taking any of the above categories out of context and assuming neglect when this may not be the case.

#### **Typical behaviour indicators of neglect are:**

- Frequently hungry and preoccupied with food
- Stealing food
- Gains weight when away from home or loses weight during school holidays
- Overly tired – e.g. using the computer or Playstation all night unsupervised.
- Unable to concentrate on school work – not properly nourished
- Poor language skills
- Lack of ability to play
- Poor motor development
- Poor school attendance
- Is unusually 'hard' or 'detached' when told off
- Is unable to make normal friendships

The pupil:	Looks extra-thin and poorly Complains of hunger, lacking energy Has repeated accidents, especially burns Is left alone at home inappropriately Is repeatedly unwashed, smelly Is kept away from school medicals Is reluctant to go home, especially at weekends
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**Typical signs of physical abuse are as follows:**

(P.E. staff are often in the best position to notice injuries and should have a system of recording and reporting marks/bruises and repeated absence from games lessons.)

- Unaccounted for injuries
- Injuries getting progressively worse or occurring in a time pattern (e.g. every Monday morning)
- Repeated injuries
- Bruises – especially around the face, head, genitals. Bruising either side of the mouth, bruising on both sides of the ear, black eyes; bruised eyes, especially if both at once; gripping bruises on arms or trunk. Current bruising/injury with a long history of bruises and accidents. Bruising on both sides of the ear. Any symmetrical bruising is suspicious
- Constant attention-seeking behaviour; over-pleasing/compliant behaviour
- 'Grip' marks on arms or 'slap' marks (cheeks, arms, legs)
- Long marks which could be from a belt or cane; stub marks from a cigarette
- Bite marks
- Fractures
- Burns / Scalds
- Cut lips

**Typical behaviour indicators of physical abuse:**

- Wary of physical contact
  - Does not look to parents and guardians for comfort
  - Does not expect to be comforted
  - Seems less afraid than other children
  - Seek information about what is going to happen to them – anxious – 'Please don't tell my parents and guardians.'
- Kept away from school – are they regularly away on Monday/Tuesday? What is happening at the weekend? Patterns of attendance can be telling. A reluctance to go home, especially weekends

**Typical behaviour indicators of sexual abuse or other family difficulty:**

- Regressive behaviour/attainment – doing well and then suddenly progress stops or things appear to be going wrong.
- (Pupil progress tracking helps identify problems with non-attainment quickly).
- Secrets/fantasies
- Emotionally isolated; may appear unhappy or isolated
- Lack of peer relationships
- Poor self-image
- School refusal
- Suicide attempts
- Acute anxiety/fear
- Sleep disturbances; may have persistent problems with sleeping, nightmares, bedwetting
- Eating disorder; may struggle with anorexia, bulimia, or excessive 'comfort eating'
- May run away from home; may be reluctant to go home
- May have aggressive eruptions
- May be kept away from school medicals
- Inappropriate interaction with other children
- May behave in a precocious sexually provocative way
- May have aggressive eruptions or display extreme passivity

**Possible behavioural indicators of sexual abuse, although now considered grey areas for the given reasons; staff should remain alert to these:**

- Detailed sexual knowledge inappropriate to their age: Internet access; Satellite TV; magazines; other children - all provide possible sources of information without the child necessarily having been abused
- Excessively affectionate or sexual – some children are
- Fear of being alone – may be many reasons
- Make sexual approaches to other children – some children are unduly tactile
- Promiscuous – again not necessarily due to abuse having taken place
- Urinary tract infection and STD – difficult to find out about these things
- Drawing sexually explicit pictures – depends on the type of picture – why does the person know about what they are drawing and want to replicate it?
- Sharing of nude or semi-nude images and/or videos, whether consensual or non-consensual
- Bruising to lower part of abdomen, genital or anal areas and/or discomfort in these areas (health professionals – not school medical staff – are trained to correctly identify if there is anything indicating abuse here).
- Children can be ‘groomed’ by adults, not usually parents and guardians, for sexual exploitation at a future date. A child can be in the grooming process for two, three, four or more years. It is important to pick up from a child’s conversation any undue interest shown by other adults - male or female - over a regular period of time. This can include unexpected or extravagant gifts, trips out - anything where the child is moving towards trusting this person or feeling obligated or flattered by the attention without there being an obvious reason. It is particularly tricky to pick up when the parent has a new partner.
- Abuse by other children - again, difficult to detect but some signs may be present.

**Typical behaviour indicators of emotional abuse:**

- Poor behaviour
- Habit disorder e.g. sucking thumb, rocking, biting
- Overly adaptive behaviour
- Role reversal
- Sleep disorders
- Overly compliant/passive behaviour
- Overly aggressive / demanding behaviour
- Hyperactive
- Development lag
- Frozen watchfulness

**2: What all staff should know**

All staff should know the following:

1. the Senior School’s DSL and the Junior School DSL who are members of the SMT and are responsible for safeguarding and their role;
2. the School’s Safeguarding Policy;
3. what they should do if they suspect, or have disclosed to them, that a child may need protection from abuse;
4. the possible signs and symptoms of abuse;
5. the procedure in the event of an allegation of abuse being made by a pupil against a teacher;
6. Part 1 of the most recent statutory guidance Keeping Children Safe in Education 2025;
7. the role of the DSL
8. how the school implements an effective filtering and monitoring system.

The Principal and DSLs need to ensure that:

1. the school's policy is in line with local procedures;
2. they have knowledge of local procedures;
3. they know who to contact in the event of a suspected case of abuse;
4. all new staff are informed about the necessary procedures as part of their induction training;
5. pupils receive education on abuse.

### **3: Notes on Child Protection Records**

1. If we keep manual records they should 'be kept securely locked.' (Coroner's Section 6, p. 128, February 2003).
2. All records, whether kept on computer or paper, are exempt from the disclosure provisions of the Data Protection Act 2018.
3. Parents and guardians are not entitled to see any records pertaining to abuse (Education Regulations 1989).
4. If an alleged case of abuse goes to court, the court may require the school to provide the Child Protection Records (Coroner's Section 6, p. 128, February 2003).

All safeguarding records are filed separately to the pupil's record file and kept securely. The Principal and Designated Safeguarding Leads have sole access to these records.

### **4: Job descriptions of the Designated Safeguarding Leads and Nominated Safeguarding Governor(s)**

#### **Designated Safeguarding Lead role**

The DSLs are senior members of staff, who undertake lead responsibility for safeguarding and child protection within the school. Details of the DSLs and their deputies are available on the school's website and on noticeboards around the school. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSLs.

The broad areas of responsibility for the DSLs are to liaise with local authority and agencies along with the duties detailed below.

- Ensure a whole-school approach to safeguarding, and that safeguarding and child protection is taken into account when planning any development, process or policy;
- Ensure safeguarding and child protection takes a child-centric approach, and create a safe, supportive culture for the sharing of concerns, both by pupils and by adults;
- Manage referrals to other agencies including the local authority children's social care in cases of suspected abuse; the Police Counter Terrorism Unit where there is a radicalisation concern; the Disclosure and Barring Service in cases where a person is dismissed or left due to risk/harm to a child and the Police in cases where a crime may have been committed in relation to safeguarding. The DSL will also support and advise other staff in making referrals to other agencies
- Work with others to fulfil statutory responsibilities in relation to children and young people subject to a child protection plan by attending child protection conferences and implementing the multi-agency child protection plan; and liaise with the LADO as required. The DSL will also liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENCOs) on matters of safety and safeguarding (including on-line and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- Ensure any referrals provide as much information as possible, including any knowledge of the pupil's life outside of school;

- Take the lead on mental health issues, including developing whole-school strategy and being the first point of contact for staff who have a concern that a child may have, or is at risk of, a mental health problem;
- Help promote the educational outcomes of pupils by ensuring staff have the relevant information about any welfare, safeguarding and child protection issues that children are experiencing, or have experienced; this will not necessarily mean sharing all details relating to a child with all staff - rather, information will be provided on a 'need to know' basis, remaining mindful of the child's personal dignity, privacy and wishes;
- Undertake training to ensure DSL (and DDSLs) has the knowledge and skills required to carry out the role (updated every two years). Further knowledge and skills should be updated at regular intervals and shared with relevant parties as appropriate;
- Raise Awareness to ensure the School's safeguarding and child protection policies are known, understood and used appropriately. The DSL will also provide an annual report to the Governing Body on safeguarding and child protection activity within the School.
- Take the lead on monitoring online safety, both in terms of teaching children about staying safe online and having oversight of the school's systems for monitoring online behaviour.
- Manage safeguarding information through the collection, monitoring, reviewing, safe storage and transfer of safeguarding and child protection files in line with the Safeguarding Policy.
- When a pupil moves to a new school, proactively share any relevant information to ensure that pupil's needs continue to be met, as well as arranging for the secure transmission of any safeguarding files relating to that child as soon as possible.
- Report to the governors on a termly basis and liaise with the Safeguarding Governor on a regular basis.

The full description of the role of the DSL can be found in Annex C of Keeping Children Safe in Education 2025. The DDSLs are trained to the same level as the DSL and are coordinated in their work to support the DSL.

### **Safeguarding Governor(s) role**

Responsibility for safeguarding is shared by all governors. Their responsibility is to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a whole-school approach to safeguarding. The Safeguarding Governor visits the school at least once per term, chairs the termly Safeguarding committee meeting and provides a report for the Full Governors' Meeting. The full role is outlined in Part 2 of Keeping Children Safe in Education 2025 but includes the following elements:

- Ensure that safeguarding and child protection practice, process and policy (including online safety) is effective and is compliant with legislation, statutory guidance and local safeguarding arrangements;
- liaise with the Principal and the DSLs to produce an annual report for governors;
- ensure that the DSL is an appropriate senior member of the school's senior leadership team and ensure that they have adequate time, funding, training, resources and support to carry out their role effectively;
- ensure that the training and learning for the school community is robust and effective;
- ensure that pupils are taught about safeguarding including online safety in compliance with statutory guidance Relationships and sex education (RSE) and health education;
- to ensure that teachers, including supply teachers, other staff, volunteers, and contractors have appropriate checks carried out in line with statutory guidance Keeping Children Safe In Education (2025, Part 3);
- ensure that there are procedures in place to manage safeguarding concerns or allegations against staff, volunteers and contractors who may not be suitable to work with or pose a risk to pupils, this includes having a process to manage low level concerns;
- ensure that systems are in place for pupils to effectively share a concern about a safeguarding issue they are experiencing, express their views and give feedback;
- ensure that the School has systems in place to prevent, identify and respond to child-on-child abuse (including sexual abuse and sexual harassment) and mental health concerns, and review the effectiveness of the setting's online safety practices;
- ensure that there is a designated teacher to promote the educational achievement for children in care and other care arrangements.





## **5. Safeguarding Arrangements for Occasional Home learning and Staff Teaching from Home.**

In exceptional circumstances it may be necessary for a member of staff to teach from home, or for a pupil to learn remotely via zoom. An example may be when a pupil is an inpatient in hospital but is deemed fit to attend lessons. For absences longer than a half term separate welfare check ins may be arranged with a Head of Year or Form Tutor.

When learning remotely pupils and staff are reminded of the following:

- Unless authorised by the Principal, the session must not be recorded or photographed or its contents distributed to anyone.
- The IT Acceptable Use Policy as well as The Safeguarding Policy must be followed at all times.
- You must be in a family room with a neutral background wearing appropriate dress.
- Write briefly but formally if using the chat function. If anything that concerns you happens please report this as soon as possible in accordance with the safeguarding policy. Pupils should tell an adult nearby as well as emailing [safeguarding@queensgate.org.uk](mailto:safeguarding@queensgate.org.uk).

## **6: Safeguarding Arrangements for whole School Remote Learning.**

The following arrangements will apply for any periods of remote learning

This appendix to the Safeguarding and Child Protection Policy contains details of our individual safeguarding arrangements for this period of remote learning.

### **Key People**

During remote learning, the same named individuals remain in place as DSL, DDSL and Safeguarding Governor; their contact details are listed above. Additionally, the DSLs and DDSL can be contacted collectively via

[safeguarding@queensgate.org.uk](mailto:safeguarding@queensgate.org.uk)

There will be a DSL or DDSL available via telephone at all times during remote learning. There will always be a DSL or DDSL onsite during the hours that any pupils are onsite, and one will be available via email/telephone before and after the normal school day.

Staff have been notified of the arrangements for reporting any safeguarding concerns via the Remote Learning Policy, and are all required to read this appendix to the Safeguarding Policy.

The DSLs will continue to engage with social workers and other organisations, and attend multi-agency meetings, as required throughout any period of remote schooling. The lead individual for overseeing this will be Charlotte de la Pena.

### **Vulnerable pupils**

In the weeks preceding the transition of the school to remote learning, the DSLs, aided by the SENCO, drew up a list of pupils who might be considered particularly vulnerable. This included pupils who have an EHCP, any pupils with a social worker, pupils who were under Child Protection or Child in Need arrangements, and other pupils about whom there were significant pastoral concerns.

Each of these families was contacted individually to discuss whether their daughter wished to work in school during the period of closure, and were asked to contact the school if they required any additional support. Where applicable, social workers were also consulted. The decisions reached during these discussions will be reviewed if the relevant DSL comes to feel that the pupil concerned would be safer studying in school. Where appropriate, adapted work has been provided for these pupils, along with additional remote support from teaching staff.

A register of these pupils was drawn up to confirm the latest arrangements for each pupil. This register also includes records of ongoing monitoring arrangements, and details of the location of any relevant files/paperwork in case a second member of staff needs to take over the leadership of that individual pupil's case. Where appropriate, internal safety plans have been compiled to give clear criteria by which that pupil's wellbeing can be assessed remotely.

The above process will be repeated for all further phases of remote learning.

### **Attendance monitoring**

A daily list is kept of which pupils are expected in school, and this is checked by the member of SMT on-duty, who will arrange communication with the parents and guardians if their daughter is missing.

For pupils learning remotely, all Form Tutors are expected to conduct an online register each morning. Teachers should follow the guidance given by school in relation to actions when a pupil is missing from a lesson or registration.

If a pupil is consistently missing from both registration and subject lessons, the DSL will make further attempts to contact the parents and guardians. If concerns remain, a referral to Children's Services will be made.

### **Contacting parents and guardians**

Contact details for all parents and guardians were audited at the start of the 2019/20 academic year, and checks were made to ensure at least two numbers were held for each pupil.

In addition, the Senior School DSL wrote to all parents and guardians in the week commencing 30th March 2020 requesting that they update the school regarding any changes to their contact numbers. This request will be repeated at the commencement of any further periods of remote learning.

### **Reporting a concern**

Any individual who has a concern regarding the safety of a child should contact a DSL by emailing [safeguarding@queensgate.org.uk](mailto:safeguarding@queensgate.org.uk)

Members of staff should apply the usual protocol detailed in this policy in relation to record-keeping and how to respond to any disclosure. All notes should be forwarded on to the DSL; if handwritten, these should be photographed or scanned and forwarded via email to the DSL. These should then be deleted from any personal devices.

If staff or parents and guardians have any concerns regarding the conduct of a member of staff towards a pupil, they should follow the usual procedures outlined in Section 4 of this policy and report the matter to the Principal.

If the allegation concerns the Principal the matter should be reported to the Chair of Governors Reica Gray via the Bursar by emailing [bursar@queensgate.org.uk](mailto:bursar@queensgate.org.uk)

Records of any disclosures or concerns regarding an allegation against a member of staff, including supply staff, volunteers, contractors and the Designated Safeguarding Leads or Deputy Designated Safeguarding Leads should be kept as detailed above.

### **Child-on-Child Abuse**

Queen's Gate staff will remain alert to signs of bullying and any other kind of abuse between pupils during the period of remote schooling. Any concerns of this nature should be reported according to a DSL, in line with the guidance detailed in Section 5 of this policy.

### **Training**

If any new staff or volunteers are recruited to Queen's Gate during a period of remote learning, or if staff are deployed from another educational setting, they will receive online safeguarding training from TES Develop as well as a zoom call with the DSL. Upon commencing work they will also be required to read our Safeguarding Policy and Part 1 and Annex A of Keeping Children Safe in Education 2025 and will be given guidance on local processes and confirmation of the DSL arrangements.

### **Safer Recruitment**

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children.

When recruiting new staff or volunteers, the school will follow all the usual safer recruitment procedures detailed in Section 3 of this policy, Part 3 of Keeping Children Safe in Education 2025 and in the Safer Recruitment Policy.

Where a member of staff was deployed from another educational setting, we took into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and accepted portability as long as the current employer confirmed in writing that:

- the individual has been subject to an enhanced DBS and children's barred list check;
- there are no known concerns about the individual's suitability to work with children;
- There is no ongoing disciplinary investigation relating to that individual.

If volunteers are utilised, we will follow the usual checking and risk assessment process set out in Keeping Children Safe in Education 2025 and within our Safer Recruitment Policy. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Queen's Gate will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

### **Online safety: of pupils within school**

The school's internet filtering and monitoring systems remain operational to safeguarding pupils operating on the school's network. These are overseen by the Network Manager Mr Hardish Hirani, who will report and discuss any items with the Designated Safeguarding Lead .

Where pupils are using computers in school, appropriate supervision will be in place, and the IT Acceptable Use Policy will still apply.

### **Online safety: of pupils studying remotely**

It is important that all staff who interact with children continue to look out for signs a child may be at risk. Any such concerns should be reported to a DSL immediately, who will assess whether a referral to children's social care and/or the police is warranted.

The Remote Learning Policy and Pupil Code of Conduct for Remote Learning set out in detail the arrangements in place to safeguard both children and staff during remote schooling, particularly in relation to any 1:1 interactions and the setting of work using online resources. These are in addition to, not in place of, the Acceptable Use Policy and Staff Code of Conduct. In particular, staff should note the continued requirement that they use only school email accounts, not personal ones, and that they do not disclose their mobile phone number to a pupil without prior permission from the Principal.

Parents and guardians of all pupils have been reminded of the importance of online safety, and their role in scrutinising their daughters' interactions and conduct online. Parents and guardians have been provided with guidance of where to find further information and support for this.

### **GDPR**

Queen's Gate will ensure the use of any online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Queen's Gate continues to have appropriate regard to data protection/GDPR requirements and remains fully aware that these do not prevent the processing, storing and sharing of information, including special category personal data for the purpose of safeguarding children and individuals at risk. Rather, as stated by Keeping Children Safe in Education 2025, Queen's Gate recognises the importance of information sharing for identifying and tackling all forms of abuse and neglect, and for promoting children's welfare. Furthermore, the school is permitted to withhold sharing data where the serious harm test is met, i.e. if they believe that by sharing the data the child may be put at risk of serious harm.

More information and guidance on how GDPR applies to schools can be found in the DfE document [Data protection: a toolkit for schools](#).

### **Pastoral support for pupils**

Queen's Gate remains committed to ensuring the wellbeing of all its pupils during any period of remote schooling. Regular contact will continue with Form Tutors and other pastoral staff.

Where staff have any concerns regarding a pupil, however low-level, they are encouraged to share them with the relevant Pastoral Head and/or a DSL.

### **Safety measures for children in school**

Queen's Gate will refer to the government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spreading COVID-19.

### **Children moving schools**

If any pupils are temporarily attending other schools or transfer to another school, Queen's Gate will ensure the appropriate transfer of any files pertaining to that pupil's welfare, including any Child Protection information as soon as possible.