



SAFEGUARDING AND CHILD PROTECTION POLICY

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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, including supply staff, temporary staff and trainee teachers, 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, including supply staff, temporary staff and trainee teachers, 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 6th 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.

Throughout this policy, the term "parent" should be taken to include any person with parental responsibility for a child, including parents, legal guardians and carers, unless otherwise stated.

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 (2026)* and *Keeping Children Safe in Education (2026)*.

This policy applies to all staff and includes supply staff, temporary staff and trainee teachers, governors, volunteers, and contractors and visitors to the school.

All staff, including supply staff, temporary staff and trainee teachers, must therefore:

- familiarise themselves and comply at all times with this policy;
- must read Part 1 of *Keeping Children Safe in Education (2026)* in full;
- be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns.
- Be aware of Queen's Gate Promoting Positive Behaviour Policy (which includes measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying). Queen's Gate Staff Code of Conduct which includes include low-level concerns, allegations against staff and whistleblowing, the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods, and the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and deputies).
- All staff, including supply staff, temporary staff and trainee teachers, should also be mindful of the difference in terminology used in *Keeping Children Safe in Education (2026)* 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 and is also gathered in annual surveys,

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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 Makhoulf is the DSL for the Junior School (including EYFS).

Miss Lydia Kyle 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, Miss Kate Eastwood and Mr Dimitrios Daneas are the Deputy Designated Safeguarding Leads (DDSL) for the Senior School. Miss Poppy Shingles is the Deputy Designated Safeguarding Leads (DDSL) for the Junior School.

The Designated Safeguarding Leads for the Senior School and the Junior School and Deputy Designated Safeguarding Lead can be contacted by emailing safeguarding@queensgate.org.uk This secure and confidential inbox is monitored during office hours during term time and holidays but should not be used for emergencies.

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 Makhoulf (DSL) is a member of the Junior School's Senior Management Team. All of the Deputy DSLs and DDSLs have completed the required training in line with the requirements of Keeping Children Safe in Education (2026), including undertaking refresher training every two years and additional relevant training for their accompanying responsibilities.

Mrs Charlotte Makhoulf (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 LCSP. The DSLs have an opportunity to review and discuss their practice with the Principal, the Safeguarding Governor, at the LCSP DSL forum, at RBKC Reflective Practice Forum, with 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 and DDSLs liaise with the local authority and other relevant agencies where necessary, in accordance with *Working Together to Safeguard Children* (2026). They attend strategy meetings and work collaboratively with partner agencies to seek advice, guidance and support. In doing so, they draw upon multi-agency expertise, knowledge and experience to promote the welfare of pupils and provide effective support for children who may be vulnerable to harm.

The emails of the safeguarding leads are as follows:

- Mrs Charlotte Makhoulf - cmakhoulf@queensgate.org.uk
- Ms Charlotte de la Pena - cdepena@queensgate.org.uk
- Miss Poppy Shingles – pshingles@queensgate.org.uk
- Ms L Sleator - LSleator@queensgate.org.uk
- Miss K Eastwood - KEastwood@queensgate.org.uk
- Mr D Daneas – Ddaneas@queensgate.org.uk

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

Safeguarding@queensgate.org.uk

* DSLs do not have permanent direct lines, but are contactable via Reception.

Governance

All governors receive annual safeguarding training. A nominated governor with appropriate experience is appointed to take particular responsibility for safeguarding and child protection and to liaise with the Principal and the Designated Safeguarding Leads (DSLs). This role is strategic rather than operational and does not involve dealing with individual safeguarding cases. However, safeguarding remains the responsibility of the governing body as a whole.

The governing body undertakes an annual review of the School's safeguarding arrangements. Day-to-day oversight is delegated to the Safeguarding Committee, which is attended by the Principal and the Designated Safeguarding Leads for both the Junior and Senior Schools.

The governing body is responsible for:

- Ensuring that there is a whole-school approach to safeguarding and that all systems, processes and policies operate with safeguarding and the best interests of children at their centre.

- Reviewing the effectiveness of safeguarding arrangements and the manner in which safeguarding responsibilities have been discharged.
- Ensuring that any deficiencies or weaknesses in safeguarding arrangements are identified and remedied without delay.
- Approving amendments to safeguarding arrangements in response to changes in legislation, statutory guidance or best practice.
- Ensuring that staff are appropriately trained, supported and competent to carry out their safeguarding responsibilities.
- Creating a culture in which staff feel supported in their safeguarding role and able to raise concerns.
- Creating an environment in which pupils feel safe, able to report concerns and confident that their views and wishes will be listened to and taken seriously.
- Ensuring that staff who work directly with children have opportunities for reflection and professional development so that their safeguarding knowledge, skills and experience continue to develop.
- Ensuring that appropriate measures are in place to protect pupils' personal information and that the School maintains effective cyber security arrangements.

Although governors are not routinely informed of individual safeguarding referrals, they will be notified where a case meets the threshold for child protection intervention and/or where a child has suffered, or is suspected to be at risk of suffering, significant harm.

The nominated governor for safeguarding is **Mrs Clare Lenterman**. Mrs Lenterman may be contacted via the Bursar at **bursar@queensgate.org.uk**.

Training arrangements

In addition to the training undertaken by the DSLs detailed above, the Principal, governors and all staff, including supply staff, temporary staff and trainee teachers, 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 may therefore 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;
- procedures for cases relating to abuse, neglect and exploitation and disabled children.
- the procedures for recording and referring any concerns to the DSLs or the Principal;
- the criteria for referral for targeted early help from universal Family Help, statutory services, delivered under Section 17 of the Children Act, the threshold and level of need for referral to children's social care under section 47 of the Children Act, the duty to accommodate a child under section 20 of the Children Act, care orders and Section 20 of the Children Act and the safeguarding rights of children in the youth secure estate;
- 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 (including harassment and violence);

- children at risk of CSE, involvement in violent crime, honour-based violence, forced marriage and/or female genital mutilation;
- that 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 school, inside and outside the 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;
- that staff are aware of the scope and nature of online risks including those posed by unhealthy behaviours with phones, social media and generative AI.
- the Prevent strategy and how to identify children at risk of being drawn into radicalisation;
- that they are able to contact the 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 Promotion of Positive Behaviour Policy;
- the School's safeguarding response to children absent from education, particularly where absence is prolonged or repeated;
- online safety;
- receiving a copy of *Keeping Children Safe in Education (2026)* Part One, together with the School's Safeguarding and Child Protection Policy and Staff Code of Conduct, and confirming that they have read them;
- an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and how to escalate concerns when identified; and
- 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 safeguarding policy and procedures is tested through quizzes, with follow-up training provided as required. Online safety training is a key part of staff professional development as part of the School's overarching safeguarding approach and is regularly reviewed to ensure that it meets current needs.

Staff are trained by the borough Prevent Officer on a biannual basis through a Workshop to Raise Awareness of Prevent. This training includes recognising Prevent-related concerns in younger pupils, including those in the EYFS.

Staff are encouraged to provide feedback on training and safeguarding arrangements to enable them to contribute to and help 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 safeguarding. The Sixth Form, as school leaders, receive enhanced training so that, should they observe concerning behaviour or receive a disclosure from another pupil, they know to refer it promptly 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 CPOMS 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 either via the CPOMS transfer system or via encrypted email.

From October 2018, safeguarding records were saved in a secure database (ISAMS Wellbeing Manager) where access was restricted to the DSL and pastoral staff. Queen's Gate moved to use of CPOMS Pupil Safe in January 2026. 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

- Department for Education (DfE), *Keeping Children Safe in Education* (2026).
- Department for Education (DfE), *Working Together to Safeguard Children* (2026).
- Department for Education (DfE), *Prevent Duty Guidance: England and Wales* (2023).
- Department for Education (DfE), *The Prevent Duty: Departmental Advice for Schools and Childminders* (2023).
- Department for Education (DfE), *Children Missing Education: Statutory Guidance for Local Authorities* (2016).
- Department for Education (DfE), *Working Together to Improve School Attendance* (2024).
- Department for Education (DfE), *Multi-Agency Statutory Guidance on Female Genital Mutilation* (2016).
- Department for Education (DfE), *Data Protection: A Toolkit for Schools* (2018).
- Department for Education (DfE), *Meeting Digital and Technology Standards in Schools and Colleges*.
- Department for Education (DfE), *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* (2024).
- Department for Education (DfE), *Relationships Education, Relationships and Sex Education (RSE) and Health Education* (2026).
- Department for Education (DfE), *Searching, Screening and Confiscation: Advice for Schools* (2022).
- Department for Education (DfE), *Mobile Phones in Schools: Guidance for Schools* (June 2026).
- UK Council for Internet Safety (UKCIS), *Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People*.
- UK Council for Internet Safety (UKCIS), *Education for a Connected World*.
- Home Office, *Modern Slavery: Statutory Guidance for England and Wales (under section 49 of the Modern Slavery Act 2015)*.
- Home Office, *Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance* (2023).
- Department for Education (DfE), *The Equality Act 2010 and Schools: Departmental Advice* (updated 2024).
- Department for Education (DfE), *Behaviour in Schools: Advice for Headteachers and School Staff* (2024).
- Department for Education (DfE), *Cyber Security Standards for Schools and Colleges* (2024).
- Department for Education (DfE), *Supporting Pupils at School with Medical Conditions* (2015).
- Department for Education (DfE), *Allergy Safety in Schools*.
- National Police Chiefs' Council (NPCC), *When to Call the Police: Guidance for Schools and Colleges* (2020).
- *Education (Pupil Registration) (England) Regulations 2006* (as amended).

- Independent Schools Inspectorate (ISI), *Commentary on the Regulatory Requirements* (2026).
- Department for Education (DfE), *Kinship Care: Statutory Guidance for Local Authorities* (2024).
- Department for Education (DfE), *Statutory Framework for the Early Years Foundation Stage* (2024).
- *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 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
- Governing body visits to the School
- DSL reviews of safeguarding cases
- SMT discussion sessions with children and staff
- Pupil questionnaires
- The Prevent Risk Assessment
- 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 – including the mandatory reporting duty for FGM

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 staff working in School, is required to report instances of actual or suspected child abuse or neglect to the DSL, and all staff, including supply staff, temporary staff and trainee teachers, 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, including supply staff, temporary staff and trainee teachers, 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.

Any member of staff should speak to a DSL if they have concerns that a pupil is at risk of, or has undergone, female genital mutilation (FGM). If a teacher discovers that an act of FGM appears to have been carried out on a girl under the age of 18, they have a legal duty to report this to the police.

For the purposes of this duty, a teacher is a person who undertakes teaching work, including through distance learning or computer-aided techniques, and includes those who:

- 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.

Staff should not assume that a colleague or another professional will take action or share information that may be critical to keeping a child safe. Staff should be mindful that early information sharing is essential for the effective identification, assessment and provision of appropriate support. Furthermore, staff should not withhold information because of concerns about data protection legislation. Data protection and UK GDPR requirements do not prevent the sharing of information where this is necessary to safeguard and promote the welfare of children.

All staff, including supply staff, temporary staff and trainee teachers, 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 so, they should contact the Safeguarding Children Partnership for the pupil's local authority area. Details of local safeguarding partnerships can be found via the links provided at the end of this policy.

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, including supply staff, temporary staff, trainee teachers and volunteers, have a responsibility to raise concerns about poor or unsafe practice and/or potential weaknesses in the School's safeguarding arrangements. Any such concerns will be taken seriously and addressed appropriately by the Senior Leadership Team and, where necessary, the governing body.

If a member of staff feels unable to raise a concern internally or believes that a concern has not been properly addressed, they should refer to the Whistleblowing section of the Employment Policies and Procedures Handbook. Staff may also contact the NSPCC Whistleblowing Advice Line, the contact details for which are provided at the end of this policy. Where appropriate, concerns may also be raised directly with Ofsted, whose contact details are also included at the end of this policy.

The sharing of information

In general, the School believes that parents and guardians should be informed of safeguarding concerns relating to their child. Open, honest and constructive communication with families is an important part of the School's approach to safeguarding. However, all safeguarding concerns must first be referred to a Designated Safeguarding Lead (DSL) or the Principal, who will determine the most appropriate course of action. In a small number of cases, it may not be appropriate to inform parents or guardians immediately, for example where doing so could place a child at increased risk of harm or prejudice a safeguarding investigation. In such circumstances, advice will be sought from Children's Social Care and/or the relevant Safeguarding Children Partnership.

Decisions about information sharing following a safeguarding concern or referral will be made on a case-by-case basis. The School will always seek to protect the privacy, dignity and welfare of those involved. Consideration will be given to which members of staff need to know particular information in order to safeguard and support the child effectively. The views of the child and, where appropriate, their parents or guardians, will be taken into account wherever possible. However, where it is considered to be in a child's best interests, information may need to be shared more widely than the child or their family would wish. In such circumstances, the reasons for this decision will be explained to the child or family wherever appropriate, including who will be informed and why.

Where a report has been made to the police, the School will work closely with the police to determine what information can be shared with staff, pupils, parents, guardians, the alleged perpetrator and others. Consideration will also be given to protecting the identity and welfare of the alleged victim.

Where staff are aware that a pupil is receiving support through universal services, community-based Early Help, Family Help, a Child in Need Plan, a Child Protection Plan, or other safeguarding arrangements, they should take care not to treat the pupil differently from their peers unless advised to do so by the DSL or a pastoral lead. Staff should recognise that school often provides an important source of stability and normality for children who are experiencing difficulties, and that many pupils are understandably anxious about being singled out or identified as receiving safeguarding support.

Staff should also exercise care and professional judgement when sharing information arising from a disclosure or safeguarding concern, ensuring that information is only shared with those who need to know in order to safeguard and support the child.

Staff should be aware of emerging statutory requirements relating to information sharing and should share safeguarding information proactively, lawfully and proportionately where doing so promotes the welfare and safety of children.

Any member of staff who has concerns about the management of a safeguarding case is encouraged to discuss those concerns with a DSL. The DSL will seek to share appropriate information wherever possible, whilst maintaining confidentiality and complying with safeguarding and information-sharing requirements.

Where a safeguarding matter may affect other pupils, the School will provide appropriate pastoral support while maintaining the confidentiality of the child, young person and 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 exploitation and modern slavery as well as other 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 (Section 47 of the Children Act 1989) is the threshold that justifies compulsory intervention in family life in the best interests of a child and places a duty on local authorities to make enquiries where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

There are no absolute criteria for determining what constitutes significant harm. Consideration will depend on the individual circumstances of the case and may include factors such as the degree and extent of the harm, its duration and frequency, the level of premeditation involved, and the presence of intimidation, coercion, threats, sadism or other unusual features. Significant harm may arise from a single traumatic event but is more commonly the result of a combination of events, both acute and longstanding, which have a serious impact on a child's health, development or welfare.

Categories of abuse

There are four main categories of abuse, and these are detailed below. All staff, including supply staff, temporary staff and trainee teachers, 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.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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, including supply staff, temporary staff and trainee teachers, but especially the DSL and DDSL, 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.

All staff should be aware of safeguarding issues that may intersect and increase a child's vulnerability to harm. Staff should recognise that children may experience multiple risk factors simultaneously and should remain vigilant to signs and indicators that may suggest a child requires additional support, protection or intervention.

Such indicators may include, but are not limited to:

- Drug and substance misuse;
- Alcohol misuse;
- Unexplained, repeated or persistent absence from education;
- Serious violence;
- Criminal exploitation, including exploitation associated with county lines activity;
- Radicalisation and exposure to extremism; and
- The consensual or non-consensual creation, possession or sharing of nude or semi-nude images or videos.

Further safeguarding issues and categories of abuse, including forced marriage and child-on-child abuse (including harassment and violence), are addressed elsewhere within 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, exploitation or abuse, and who may be more likely to experience peer group isolation.
- **Those who identify as LGBTQ+ or are perceived to be LGBTQ+.** Being lesbian, gay, bisexual or gender questioning is not, in itself, an inherent risk factor for harm. However, these pupils may be vulnerable to bullying, harassment, discrimination or abuse. In some cases, a child

who is perceived by others to be lesbian, gay, bisexual or gender questioning, whether they are or not, may be as vulnerable as a child who identifies in this way.

- **Those who have a social worker** due to safeguarding or welfare needs. In such cases, local authorities will share this information with the School, and the DSL will use it to inform decisions relating to the pupil's safety, welfare and educational outcomes.
- Pupils experiencing mental health difficulties (see Section 5 for further information).
- Pupils with significant medical or physical health conditions may also face additional safeguarding vulnerabilities and staff should remain alert to indicators of abuse, neglect or exploitation.

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 (2026)*, 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 safer recruitment procedures in accordance with *Keeping Children Safe in Education (2026)*, 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 appropriate statutory safeguarding and recruitment checks before commencing work. These checks include verification of identity and, for most appointments, an enhanced Disclosure and Barring Service (DBS) check, including a check of the children's barred list where required.

A DBS certificate will be obtained before appointment or as soon as practicable thereafter. Alternatively, where an applicant has subscribed to the DBS Update Service and provides consent, the School may undertake an online status check through that service.

In addition to the DBS check, any individual appointed to undertake teaching work will be subject to a prohibition from teaching check. Individuals appointed to relevant leadership and management positions will also be subject to a Section 128 direction check to confirm that they are not prohibited from participating in the management of an independent school. Shortlisted candidates are informed that online searches may be undertaken as part of the recruitment process.

Individuals who have lived or worked outside the United Kingdom will be subject to the same checks as all other staff. In addition, the School will carry out any further checks considered appropriate, including obtaining information about any sanctions or restrictions imposed by overseas or

professional regulatory authorities. Where restrictions or sanctions have been imposed by an overseas regulator, the School will consider the circumstances of the case when assessing the candidate's suitability for employment.

For staff involved in childcare provision, the School will carry out the checks necessary to ensure that they are not disqualified from working in childcare under the Childcare (Disqualification) Regulations 2018.

The School conducts risk assessments for volunteers to determine whether an enhanced DBS check is required. Governors, regular volunteers and contractors who work frequently on-site during term time, such as catering staff, are also subject to the appropriate safeguarding checks. Where staff employed by another organisation work with the School's pupils, whether on the School site or elsewhere, the School will obtain confirmation that appropriate safeguarding checks and procedures are in place.

The School takes its responsibility to safeguard and promote the welfare of children extremely seriously. Any member of staff who becomes aware of information that may affect their suitability to work with children must inform the School immediately. This includes any convictions, cautions, reprimands, warnings, court orders or other relevant matters.

Should concerns arise regarding the suitability of an existing member of staff to work with children, the School will undertake any appropriate safeguarding and suitability checks and take action in accordance with statutory guidance and the School's safeguarding procedures.

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 pupils. All teaching staff, as well as supply teachers and trainee teachers, play a vital role in this process, helping to ensure that pupils relate well to one another and feel safe, valued and supported within the School. We expect all staff to lead by example and to play a full part in promoting age-appropriate awareness of issues relating to health, safety and wellbeing. All staff, including non-teaching staff, have an important role in ensuring that pupils adhere to the standards of behaviour set out in the School's Behaviour Policy and in supporting the implementation of the School's Anti-Bullying Policy.

The School recognises the important role that education plays in safeguarding and promoting the welfare of pupils. Through a whole-school approach, Queen's Gate seeks to foster pupils' spiritual, moral, social and cultural development, prepare them for life in modern Britain, and promote a culture of respect, inclusion and zero tolerance for bullying, discrimination, harassment, abuse and violence in any form.

The School's clear values and expectations are upheld throughout all aspects of school life and are underpinned by the Promoting Positive Behaviour Policy, pastoral support systems, and a planned programme of PSHE and RSE education delivered through regularly timetabled lessons, assemblies, form time activities and the wider curriculum. This provision is designed to be inclusive, age and stage appropriate, and responsive to the needs of all pupils, including those with SEND and other vulnerabilities.

Through the curriculum and wider pastoral programme, pupils are supported to develop the knowledge, skills and understanding necessary to build positive and respectful relationships, recognise and manage risk, understand personal boundaries and consent, challenge prejudice and stereotypes, develop confidence and self-esteem, and know how and when to seek help for

themselves or others. Pupils are also taught about online safety, healthy relationships, sexual harassment and sexual violence, the risks associated with harmful online content and influences, and the importance of reporting concerns.

All staff, including supply staff, temporary staff, trainee teachers, volunteers and non-teaching staff, have a responsibility to contribute to this whole-school safeguarding culture. Staff are expected to lead by example, uphold the School's values, promote pupil wellbeing, and reinforce the standards of behaviour set out in the School's policies. All staff play an important role in identifying concerns, challenging inappropriate behaviour, promoting respectful relationships, and ensuring that pupils feel safe, listened to and supported.

The School's planned and progressive PSHE and RSE curriculum, tailored to the specific needs, experiences and context of Queen's Gate pupils and delivered in accordance with the Department for Education's statutory guidance on Relationships Education, Relationships and Sex Education (RSE), and Health Education, supports the School's safeguarding approach and is supplemented in a number of ways:

- Materials, support and staff training from the PSHE Association.
- Specially designed sessions at the start of the academic year to teach pupils about safeguarding in a sensitive and age-appropriate manner.
- Lessons and sessions with external facilitators 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, including physical, mental and emotional wellbeing.
- Opportunities to discuss concepts of right and wrong, bullying, tolerance, respect and appropriate behaviour.
- Guidance on how pupils can take action when observing inappropriate behaviour or when they are worried about a friend or family member.
- Regular lessons on online safety to ensure that all pupils understand risks and adhere to the School's expectations in this area. This includes education about staying safe online and digital resilience (see the IT Acceptable Use Policy). Further details on cyberbullying can be found in the School's Anti-Bullying Policy.
- Relationships and Sex Education lessons, including consideration of gender identity and sexuality, with an emphasis on tolerance and respect.
- Enhanced sessions from external providers on topics such as drug and alcohol awareness and Relationships and Sex Education.
- Assemblies and form time activities to support pupils in understanding the rationale for the School's approach to mobile phone use during the school day.
- Sessions for pupils and parents on the risks associated with mobile phone use, including reduced concentration, classroom disruption and increased opportunities for bullying.
- A parent workshop programme designed to support parents in understanding and supporting their daughters on a range of issues, e.g. mental health, online safety, eating disorders, neurodivergence, festival and party safety, and allergies.

Assemblies are also used to promote Fundamental British Values, including tolerance, mutual respect and understanding. These themes are further reinforced across a wide range of curriculum subjects.

Pupils are regularly reminded that there are trusted adults to whom they can turn if they are worried, and the School actively promotes a culture of listening. In the Senior School, each form has a pair of Co-Tutors and each year group is supported by a Head of Year or Head of Section, as well as

Deputy Heads of Year. In the Junior School, each class has a Form Teacher who encourages pupils to share any concerns they may have.

Support available to pupils includes:

- Two trained School Counsellors who maintain confidentiality unless a safeguarding concern arises, in which case information will be shared with a DSL or Deputy DSL.
- Posters displayed in all Senior School form rooms identifying key members of staff whom pupils can approach if they are worried about something. Form Tutors regularly draw pupils' attention to these resources.
- Childline contact details displayed in prominent locations around the School.
- Assemblies in which the Director of the Junior School explains the systems of support and listening available within the Junior School.
- A dedicated page in the Senior School pupil planner containing contact details for Childline and other external agencies, together with information about the School's internal support structures.
- An introduction to safeguarding for all Senior School pupils at the beginning of each academic year as part of their year group induction.
- A peer mentoring system and pupil voice forms and forums such as school council.

Pupils are regularly reminded of the School's expectations regarding behaviour and relationships, including the importance of treating others with respect. A clear Anti-Bullying Policy is in place, which includes specific reference to cyberbullying. Expectations regarding pupil conduct are also reinforced through pupil planners, assemblies and the wider pastoral programme.

Policy on mobile devices and the use of images

Queen's Gate School is a mobile phone-free site for all pupils. Sixth Form pupils, who may use their phones for work organisation, are permitted to use them only within the Sixth Form area, including Rooms 2.6 and 2.7, the Work Room and the Sixth Form Kitchen, and only outside lesson times. Sixth Form pupils must keep their phones out of sight at all other times and in all other areas of the School. Sixth Form pupils are regularly reminded of the importance of modelling healthy technology use for younger pupils and, in particular, of not using mobile phones in areas where younger pupils may observe them.

Pupils may not bring any device that functions as a mobile phone, including smart watches, into school. Pupils in Remove, LIV, Form IV, Form V and UV must secure their phones in a Yondr pouch on arrival at School and may not remove them from the pouch until they leave the School site at the end of the day. Pupils in the Junior School may not bring mobile phones to School. Where there is an exceptional reason for a Junior School pupil to have a mobile phone, it must be handed to the School Office on arrival.

Pupils are reminded that, should they need to contact a parent or guardian during the school day, for example to change collection arrangements, they should do so via the School Office.

Pupils leaving the School site at lunchtime, or using their phones to make payments at the Tuck Shop, may temporarily remove their phones from their Yondr pouches for this purpose. Phones must be returned to the pouch immediately after payment has been made or, where a pupil has left the School site, immediately upon their return.

During off-site activities taking place within the school day, including sporting fixtures and educational visits, phones must remain secured in Yondr pouches unless alternative arrangements have been approved and documented in the relevant risk assessment. Staff leading off-site visits or

residential trips may permit access to phones in specific circumstances where this has been identified as appropriate.

Pupils using School devices or participating in the Bring Your Own Device (BYOD) programme are subject to the Pupil Acceptable Use Policy and the Promoting Positive Behaviour Policy. These policies set out the expectations for appropriate use of technology. Sanctions, including more serious sanctions, may be applied where pupils fail to comply with the School's mobile phone requirements or Pupil Acceptable Use Policy.

Staff Use of Mobile Phones and Digital Devices

Staff should not use personal mobile phones for personal purposes in the presence of pupils during the school day unless there is a legitimate medical need, such as the management of diabetes or the use of hearing aid technology. Adhering to this expectation enables staff to model appropriate behaviours, reinforces the School's mobile phone-free environment and supports the consistent implementation of the School's expectations for pupils.

There may be occasions when it is appropriate for staff to use a mobile phone or similar device for professional purposes, including issuing homework, recording rewards and sanctions, accessing school systems, or using multi-factor authentication.

Staff should avoid any conduct that could be misunderstood or misinterpreted by others and should report and record any incident that may give rise to concern. This is particularly important in relation to the use of mobile phones, digital devices, wearable technology and the taking or sharing of images. Staff are reminded to exercise caution in all online communications and when communicating with pupils electronically.

Where photographs or other images are taken, they must only be used for the purpose for which consent has been obtained. Images must not be used for any additional purpose without further appropriate consent. When images are no longer required, they should be securely deleted or disposed of in accordance with the School's procedures and, where appropriate, in the presence of another member of staff.

Staff should also refer to the School's **Taking, Storing and Using Images Policy**, **IT Acceptable Use Policy**, **Employee Manual** and **Staff Handbook** for further guidance.

This guidance applies equally within the Early Years Foundation Stage (EYFS) and reflects the requirements of the Statutory Framework for the Early Years Foundation Stage (2024).

Safety and support plans

Where a pupil's welfare is affected by a safeguarding concern, the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL) may, in collaboration with relevant staff, develop an individualised safety and support plan to reduce risk, promote wellbeing and ensure appropriate support is in place. Such plans may be used for pupils experiencing mental health difficulties, those involved in cases of child-on-child abuse, victims of sexual violence or sexual harassment, pupils who have experienced serious violence, exploitation, or any other safeguarding concern that may impact their safety, welfare or educational engagement. The DSL or DDSL will normally coordinate the development, implementation and review of the plan, working in partnership with the pupil, relevant members of staff and, where appropriate, parents. Plans will be tailored to the individual needs and circumstances of the pupil, will clearly identify protective measures, support strategies and responsibilities, and will be reviewed regularly to ensure they remain effective and responsive to the pupil's needs.

Physical contact

There are occasions when it may be appropriate for staff to use physical contact or reasonable force in order to safeguard and support children and young people.

Full details of the School's approach are set out in the **Use of Reasonable Force to Restrain Pupils Policy**.

The School recognises that a "no contact" approach is neither practical nor desirable, as it may prevent staff from providing appropriate care, support and protection to pupils. The decision as to whether reasonable force should be used to control or restrain a child rests with the professional judgement of the staff member concerned and will always depend on the individual circumstances of the situation.

There are also circumstances in which appropriate physical contact may be necessary, including:

- providing instruction in practical subjects such as Drama, Music or Physical Education;
- administering first aid or other approved medical assistance; and
- offering appropriate comfort and reassurance to a pupil who is distressed.
- Holding the hands of Pre-Prep children when going to the park or on trips.

Staff should always ensure that any physical contact is appropriate, proportionate and in the best interests of the pupil. A member of staff can never take the place of a parent in providing physical comfort and should exercise professional judgement and caution in all such interactions. Physical contact must never be secretive, for the gratification of the adult, or represent a misuse of authority. If a member of staff is unsure whether physical contact is appropriate in a particular situation, they should err on the side of caution and seek advice where necessary. Where a member of staff believes that physical contact may have been misinterpreted or misconstrued, they should report the matter promptly to a Designated Safeguarding Lead (DSL). Staff are also advised, wherever possible, to avoid situations in which they are alone with a pupil when physical contact may be required.

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 telephone during weekends, school holidays and at other times when pupils may be on site or participating in school trips or visits.

Where a safeguarding concern arises outside normal school hours, the duty DSL or DDSL may be contacted via the School's shared confidential safeguarding email address:

safeguarding@queensgate.org.uk.

This email account is monitored periodically during such times but should not be used for emergencies.

Further information can be found in the **Trips and Visits Policy**.

Arrangements for 1:1 lessons

Pupils at Queen's Gate may engage in one-to-one teaching, support or pastoral sessions with staff. This may include specialist music or sports tuition, additional academic support, mentoring or pastoral conversations, counselling sessions, or lessons with small class sizes.

In these situations, the following safeguarding arrangements apply:

- Most teaching and meeting rooms throughout the School have glass panels in the doors and/or windows that allow visibility from other areas of the School. Staff are also encouraged, where appropriate, to leave doors open when meeting with a pupil on a one-to-one basis or to use more public areas of the School, such as the Library or Dining Room.
- All staff and visiting peripatetic teachers are subject to safer recruitment checks and receive annual safeguarding training, including guidance on professional conduct and expectations relating to one-to-one teaching and meetings.
- Most staff avoid seeing pupils on a one-to-one basis at times when fewer staff are present on site, such as before 8.00 am or after 5.00 pm however this is not always possible for music lessons or some sporting activities. A member of SMT is always on site till all pupils have left.
- Timetabled lessons and teaching arrangements are recorded centrally.
- Staff are encouraged to inform an appropriate line manager if they regularly see a pupil on a one-to-one basis.
- Staff must not share personal telephone numbers, personal email addresses or social media details with pupils except 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 activity to the Designated Safeguarding Leads (DSLs).

Those with specific responsibility for ensuring that 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 Makhoulouf**. The Network Manager, **Mr Hardish Hirani**, is responsible for procuring, implementing and maintaining the School's filtering and monitoring systems and for producing regular reports. These reports are reviewed by the safeguarding team.

The School follows the Department for Education's guidance on meeting digital and technology standards in schools and colleges.

The effective day-to-day management of filtering and monitoring systems requires the expertise of both safeguarding and IT staff.

The School seeks to protect pupils from encountering harmful material online through the use of robust filtering and monitoring systems, whilst remaining mindful of the need not to over-block content that may be relevant or beneficial for educational purposes. On an annual basis, the Governor responsible for safeguarding, the DSLs for the Junior and Senior Schools and the Network Manager meet to review filtering and monitoring arrangements to ensure that they remain effective, relevant and proportionate. The outcomes of these reviews are recorded. Additional reviews may be undertaken at any point during the year if required. Staff may request that specific websites be unblocked where there is a legitimate educational reason and no safeguarding risk.

Pupil and staff online activity is monitored, and searches relating to the following categories are flagged for review:

- abuse;
- adult content;
- bullying;
- criminal behaviour;
- radicalisation;
- substance misuse; and

- suicide and mental health.

Where a search is flagged within one of these categories, the Network Manager and/or DSL will investigate further and take appropriate action. The DSLs and Deputy DSLs review monitoring reports regularly in order to identify, assess and follow up safeguarding concerns. In doing so, they remain mindful of the risk profile of individual pupils, including those with SEND or EAL.

Further safeguards to protect pupils online are contained within the **Pupil IT Acceptable Use Policy** and the School's **AI Traffic Lights** framework, which prohibits pupils from attempting to bypass technological safeguards, including filtering and monitoring systems.

Pupils are taught about online safety through PSHE, RSE and Computing lessons, together with presentations from specialist providers. Teaching focuses on the four areas of online risk (the "Four Cs"), as well as the safe and responsible use of generative artificial intelligence:

- **Content:** Minimising the risk that pupils may be exposed to illegal, inappropriate or harmful content, including pornography, extremist material, racism, misogyny, self-harm content, suicide-related content, antisemitism, radicalisation, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact:** Minimising the risk that pupils may come into contact with individuals who may seek to harm, manipulate or exploit them, including through peer pressure, commercial influence, online grooming and harmful interactions with generative AI applications.
- **Conduct:** Guiding pupils away from online behaviours that may cause harm to themselves or others, including the making, sending or receiving of explicit images, including AI-generated imagery, and online bullying.
- **Commerce:** Providing pupils with information about, and protection from, risks associated with online gambling, inappropriate advertising, phishing, scams and other forms of financial exploitation.
-

Consensual and non-consensual making or sharing of nudes and semi-nudes, including images generated using AI, is a child protection issue. Even where explicit material is shared without malicious intent, or is self-generated, the consequences can be serious and place those involved at risk of significant harm. The possession or sharing of indecent images of a person under the age of 18 may constitute a criminal offence. Pupils are taught about these risks as part of their online safety education. The School takes incidents of this nature extremely seriously and responds in accordance with child protection procedures, including referral to the police where appropriate.

Pupils are also taught about:

- the safe and responsible use of generative AI; and
- the legal, ethical and safeguarding considerations associated with AI technologies.

The School recognises that pupils may have unrestricted access to the internet outside school through mobile phones, tablets and other connected devices. Such access may increase the risk of online bullying, harassment, coercive behaviour, exploitation and the consensual or non-consensual sharing of indecent images. These behaviours are prohibited by the **Pupil IT Acceptable Use Policy**. To support pupils' wellbeing and online safety, pupils in Remove, LIV, Form IV, Form V and UV are required to place their phones in locked Yondr pouches during the school day. Sixth Form pupils must keep their phones out of sight except in designated Sixth Form areas and at permitted times. The School may take disciplinary action where the Pupil IT Acceptable Use Policy is breached, including where conduct occurs outside school hours and away from the School site. These expectations are clearly set out in the policy, which is shared with pupils and parents and signed at the start of each academic year. Pupils joining the School during the year are required to sign the policy upon admission.

The School treats online safety and the healthy use of technology as an ongoing and interconnected aspect of safeguarding. Online safety education is embedded throughout the curriculum and wider school life, including within PSHE and RSE, assemblies, form time activities, Computer Science lessons and presentations by external speakers.

The effectiveness of the filtering and monitoring system is reviewed annually by the Designated Safeguarding Leads, supported by the Network Manager. The review includes checks to ensure that filtering and monitoring systems are operating effectively on all internet-connected devices and across all relevant areas of the School. Records of these reviews, including any findings, actions taken and improvements identified, are maintained and used to inform the School's ongoing approach to online safety and safeguarding.

Organisations and individuals using school premises

Queen's Gate runs an extensive outreach programme, including visits to and from organisations such as Age UK, and pupils may also participate in outreach placements as part of the School's wider educational and community engagement activities. In addition, the School site may be used by external organisations during school holidays and at other times outside the normal school day. Any safeguarding concern, allegation or low-level concern arising from these activities will be managed in accordance with the procedures set out in **Part Four of Keeping Children Safe in Education (2026)**, including consultation with the Local Authority Designated Officer (LADO) where appropriate.

The principles and procedures set out in this policy apply equally where the School receives a safeguarding concern or allegation relating to an individual or organisation using the School premises, including community groups, external providers, lettings organisations or holiday programmes. Appropriate action will be taken to ensure that any concerns are responded to promptly, proportionately and in accordance with relevant statutory guidance and local safeguarding procedures.

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 (2026) Queen's Gate obtains DBS enhanced certificates 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.

Contextual Safeguarding

All staff, and particularly the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs), should be alert to the risk of abuse, neglect, exploitation and harm occurring both within and beyond the family environment. Consideration should be given to the fact that children may be vulnerable to a range of extra-familial harms, which can occur in a variety of social, community and online contexts.

Extra-familial harm may include, but is not limited to:

- Child sexual abuse, including sexual harassment and sexual exploitation;
- Domestic abuse within a young person's own intimate relationship, including physical, sexual, emotional, coercive or controlling behaviour, and stalking;
- Criminal exploitation, including financial exploitation;
- Serious youth violence;
- County lines and other forms of organised criminal activity; and
- Radicalisation and extremism.

Staff should remain vigilant to indicators of vulnerability and recognise that children may be at risk of multiple and intersecting forms of harm. Any concerns should be reported promptly to the DSL in accordance with the procedures outlined in this policy.

It is important that as much relevant information as possible is shared when making a safeguarding referral. This will enable any assessment to consider the full context of the child's circumstances and ensure that decisions are informed by all available evidence relating to potential abuse, neglect or exploitation.

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 supply staff, temporary staff, trainee teachers and 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, may be 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 you are going to do with it;
- keep notes, either at the time or as soon as possible afterwards, whilst remaining fully engaged with the child and avoiding unnecessary distraction through note-taking;
- seek a second member of staff to be present during the disclosure, where possible;
- record only the facts as the child presents them;
- record the concern on CPOMS and send an email to **safeguarding@queensgate.org.uk**;
- remain calm and reassure the child that they were right to speak and have not created any kind of problem by making the disclosure;
- limit questions to those necessary for clarification and avoid leading questions;
- do not express personal opinions;
- do not investigate the matter yourself;
- pass the concern to the relevant DSL or DDSL without delay and explain to the child that you will be informing the DSL; and
- do not criticise the alleged perpetrator.

In all disclosures, it is essential that the pupil 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 be made to feel ashamed. This reassurance, together

with careful consideration of the pupil's confidentiality and anonymity, is particularly important in cases involving reports of sexual violence or sexual harassment.

Where an allegation involves illegal images of a child, or where staff have concerns relating to such images, they should not request to view the images or ask for them to be sent to them.

In some circumstances, staff may view non-illegal images and/or screenshots on a pupil's device for safeguarding purposes. In such cases, further guidance can be found in the **Searches** section of the **Exclusions Policy**.

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

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

- speak to a DSL or DDSL as soon as possible, as some concerns may be time-sensitive or may involve a risk posed by another pupil;
- make a written record of the concern on CPOMS or, if this is not possible, send the concern to safeguarding@queensgate.org.uk as soon as possible;
- do not carry out any investigation.

Responses to safeguarding concerns and making referrals

Any concerns about a child's welfare should be reported promptly to the Designated Safeguarding Lead (DSL), who will consider the level of need, seek appropriate advice where necessary, and make referrals in accordance with local safeguarding procedures.

Where a safeguarding concern is identified, the Designated Safeguarding Lead (DSL) will consider the most appropriate response based on the individual circumstances of the child and the level of need identified. This may include providing support through the School's pastoral systems and wellbeing provision and, where appropriate and not placing the child at additional risk, involving parents in order to support the child's welfare. Where concerns indicate that a child or family would benefit from additional support, the DSL may undertake or contribute to a Family Help assessment and work collaboratively with other agencies. In cases where a child is in need, is suffering, or is likely to suffer significant harm, the DSL will make a referral to Children's Social Care or other relevant statutory services. The School will always act in the best interests of the child and will work with external agencies as necessary to safeguard and promote their welfare.

All staff should be aware of the local processes for Family Help and Children's Social Care referrals and understand the thresholds for intervention. This includes understanding when a child or family may benefit from Family Help services at both targeted early help level, under Sections 10 and 11 of the Children Act 2004, and statutory family support services under Section 17 of the Children Act 1989 for children in need, including disabled children.

Staff should also understand the circumstances in which concerns must be referred to Children's Social Care for assessment, including where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, requiring statutory intervention under Section 47 of the Children Act 1989.

If children do not require the support of statutory children's services, the DSL or DDSL will generally lead liaison with other agencies and, where appropriate, the establishment of an inter-agency assessment. This may involve liaison with CAMHS, a GP or another appropriate external agency.

Other relevant staff, for example the SENDCo, may be required to support other agencies and professionals in carrying out an assessment and, in some cases, act as the lead practitioner. 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 an appropriate 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;
- liaison with other agencies or professionals;
- contacting the relevant Safeguarding Children Partnership for advice;
- contacting the relevant Safeguarding Children Partnership regarding a Family Help referral;
- making a referral to the relevant Safeguarding Children Partnership; or
- contacting the police.
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The DSLs will report all safeguarding concerns to the Principal. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral to Children's Social Care will be made immediately or, where there is concern that the pupil is in immediate danger, to the police.

Referrals to specialist statutory services, including those requiring inter-agency working, should be made in accordance with the Bi-Borough of Kensington and Chelsea/Westminster Safeguarding Partnership Threshold of Need Document which is within the London Safeguarding Children Procedures. However, all referrals should be made to the relevant Safeguarding Children Partnership for the pupil's home address, and the School will then follow the relevant procedures for inter-agency working. Contact details for the Bi-Borough of Kensington and Chelsea/Westminster Safeguarding Partnership are included in this policy, along with a web link to contact details for all other London Safeguarding Children Partnerships. These referral processes should also be used where there are concerns that a pupil is at risk of radicalisation or being drawn into terrorism. At all stages, written records should be kept, wherever possible using CPOMS Pupil Safe, and should be passed to the relevant DSL. The Safeguarding Leads will keep detailed records, including the reasons for decisions made and actions taken, which will be held on the pupil's safeguarding file. Whenever a referral or assessment is made, the whole social context of the pupil's circumstances will be taken into consideration.

Decisions to seek support for a child about whom concerns have been raised will normally be taken in consultation with the pupil and her parents or guardians. However, consent is not required for a referral if there are reasonable grounds to believe that 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 or guardians may place 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, staff should always act in the best interests of the child, and in exceptional circumstances this may mean acting contrary to the child's expressed wishes.

Appropriate pastoral support will be provided 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 support where needed.

Where a referral has been made, or concerns regarding a pupil are being managed internally, the DSL will ensure that the pupil has a named member of staff whom she feels able to approach if she wishes to express further views or provide feedback.

Staff are entitled to make a referral directly to the relevant Safeguarding Children Partnership if they consider it necessary and are reminded of this through annual training and safeguarding updates.

If a parent wishes to make a complaint, Ofsted can be contacted on **0300 123 1231** or the Department for Education on **0370 000 2288**. The Ofsted complaints procedure can be accessed via: <https://www.gov.uk/government/organisations/ofsted/about/complaints-procedure>
Complaints will be managed in accordance with the relevant procedures and timescales.

Support from Universal Services, Community-Based Early Help and Family Help

Children may benefit from support and intervention before statutory services are required. This support may be provided through **universal services, community-based Early Help** or **Family Help**. Queen's Gate works collaboratively with pupils, families and external agencies in accordance with *Working Together to Safeguard Children (2026)* to ensure that children receive appropriate support at the earliest opportunity. This includes contributing to multi-agency assessments, support plans and interventions designed to safeguard and promote the welfare of children.

Universal services are services available to all children and families, including education, healthcare and other community-based support services.

Community-based Early Help provides preventative support where emerging needs have been identified and additional assistance may be required to improve outcomes for a child or family.

Family Help provides targeted support for children and families where needs are more complex. Family Help combines targeted assistance, coordinated professional support and a family help plan led by a multi-disciplinary team. Effective intervention at this stage can improve outcomes, strengthen family resilience and reduce the likelihood of problems escalating.

All staff are reminded of the importance of listening to pupils' concerns and sharing relevant information promptly so that appropriate support can be identified and provided. Pupils are regularly reminded of the staff and services available to support them through form time, assemblies, pupil planners and information displayed around the School. Together with the provision of School Counsellors, this helps to promote a culture of listening and early intervention.

Effective support relies upon agencies working together to:

- identify children and families who may benefit from additional support; and
- provide appropriate services and interventions that improve outcomes and reduce risk.
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Pupils who may benefit from support through universal services, community-based Early Help or Family Help include those who:

- are disabled or have health conditions requiring additional support;
- have special educational needs and/or disabilities (SEND), whether or not they have an Education, Health and Care Plan (EHCP);
- have mental health needs;
- are young carers;
- are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement, organised crime or county lines activity;
- are frequently absent from education, home or care;
- have been repeatedly removed from the classroom, experienced multiple suspensions, are on a part-time timetable, are at risk of permanent exclusion, or are attending Alternative Provision or a Pupil Referral Unit;
- are at risk of modern slavery, trafficking, sexual exploitation and/or criminal exploitation;

- are at risk of radicalisation or extremism;
- have a parent or carer in custody, or are affected by parental offending;
- live in families experiencing difficulties such as domestic abuse, parental mental health difficulties, or substance misuse;
- are misusing drugs or alcohol themselves;
- are at risk of so-called honour-based abuse, including female genital mutilation (FGM) or forced marriage;
- are privately fostered;
- may benefit from support in relation to non-violent harmful sexual behaviour (HSB) in order to prevent escalation;
- are pregnant and/or are young parents; or
- have exhibited early signs of abusive, violent and/or harmful behaviour.

If a member of staff believes that a pupil may benefit from additional support through universal services, community-based Early Help or Family Help, they should consult a DSL, who will consider the most appropriate course of action and liaise with the relevant agencies where necessary.

Where a pupil is receiving support through universal services, community-based Early Help, Family Help or other interventions (for example, CAMHS), their welfare and progress will be monitored regularly. Where concerns persist or increase, consideration will be given to whether a referral to Children's Social Care is required.

Allegations Against Staff, Supply Teachers, Trainee Teachers, Governors, Contractors and Volunteers, Including Low-Level Concerns

Allegations of abuse may be made against a member of staff, a supply teacher, trainee teacher, volunteer, governor, contractor, Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Lead (DDSL), or other person connected to the School. Staff should be familiar with the School's procedures for managing such concerns and understand the different processes that apply depending on the nature of the allegation.

Where a member of staff has concerns about the behaviour of another adult towards a child, they should report those concerns immediately to the Principal. Concerns relating to the Principal should be referred to the Chair of Governors.

Allegations against teachers and other staff, supply teachers, trainee teachers, governors, contractors and volunteers will be managed in accordance with Parts Two and Four of *Keeping Children Safe in Education (2026)*. Different procedures apply depending on whether the allegation meets the harm threshold. This includes situations where an individual has:

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

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Low-Level Concerns

Concerns that do not meet the harm threshold may nevertheless be considered low-level concerns and must still be addressed appropriately in accordance with *Keeping Children Safe in Education (2026)*.

A low-level concern is one where a member of staff or another 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 work; and/or

- behaved in a way that does not meet the harm threshold and is not otherwise serious enough to require referral to the Local Authority Designated Officer (LADO).

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

- being over-friendly with children;
- showing favouritism towards particular pupils;
- taking photographs of children on a personal mobile phone;
- engaging in one-to-one situations with pupils in an insufficiently visible or appropriate setting, such as behind a closed door; or
- using inappropriate, sexualised, intimidating or offensive language.

Staff may use their professional judgement to decide whether a one-to-one conversation is appropriate, particularly where a pupil wishes to discuss a sensitive matter, make a safeguarding disclosure, or meet with the School Counsellor. Staff receive training on how to conduct such meetings safely and professionally, including informing a line manager or colleague where appropriate and using rooms with visibility panels or other appropriate safeguards.

Any member of staff who has a low-level concern regarding a colleague should report it to the Principal in the first instance. The Principal will consider the concern and, where appropriate, consult the LADO to determine whether it should be managed as a formal allegation, addressed through normal management procedures and the Staff Code of Conduct, or whether no further action is required.

All low-level concerns must be recorded in writing. Records should include:

- details of the concern;
- the context in which the concern arose;
- any action taken; and
- the name of the individual who raised the concern.

The School maintains appropriate records of low-level concerns in accordance with statutory guidance and safeguarding requirements.

Allegations of Abuse

Where an allegation of abuse is made against a member of staff, a supply teacher, trainee teacher, contractor or volunteer, it should be referred directly to the Principal or, in her absence, the Chair of Governors. Where the allegation concerns the Principal, the matter should be reported directly to the Chair of Governors or the Local Authority Designated Officer (LADO) without informing the Principal first. In such circumstances, staff are not required to inform a Designated Safeguarding Lead (DSL).

Whilst the School is not the employer of supply teachers, it will ensure that any safeguarding concern relating to a supply teacher is investigated appropriately and in accordance with statutory guidance, including liaison with the LADO. At all stages, the relevant supply agency will be kept fully informed and involved. In the case of trainee teachers, the university, college or training provider will be kept informed as appropriate.

In accordance with *Keeping Children Safe in Education (2026)*, the Principal (or the Chair of Governors where the allegation concerns the Principal) may determine, on the basis of the information available and without undertaking an investigation, whether an allegation meets the harm threshold. This includes situations where an individual has:

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

Where the Principal or Chair of Governors determines that the allegation does not meet the above criteria, they will decide how the matter should be managed. This should be done without delay. Such concerns will still be investigated internally and recorded in the low-level concerns record, together with the outcome.

Where the Principal or Chair of Governors believes that the allegation meets the harm threshold, the matter will be referred to the LADO immediately, and in any event within one working day. Where the allegation concerns the Principal, she should not be informed of the allegation prior to consultation with the LADO. Allegations concerning a teacher who is no longer teaching, and historical allegations, should be referred to the police. There may be circumstances in which the case manager considers it appropriate to involve the police immediately, for example where there is reason to believe that a criminal offence may have been committed.

Borderline cases may initially be discussed with the LADO without identifying the individuals concerned. Following these discussions, the LADO will determine whether the concern meets the threshold for a formal allegation. The LADO and the Principal or Chair of Governors will then decide what further action is required.

Parents and guardians of the child or children involved will be informed as soon as possible, subject to agreement with the LADO and, where relevant, following consultation with the police or Children's Social Care. Any discussions and decisions relating to parental communication will be recorded in writing.

The individual who is the subject of the allegation will 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 before this occurs and, where appropriate, from Children's Social Care and/or the police. The School will normally appoint a named contact to keep the individual informed of progress and to discuss any support that may be required.

All allegations meeting the threshold for referral to the LADO will be dealt with as a priority. Any discussions with the individual concerned will be recorded in writing, and all communications will be agreed with the LADO. Careful consideration will be given to whether suspension is necessary or whether alternative arrangements can be implemented. Where suspension is deemed necessary, the individual will be informed of their named contact within the School and provided with appropriate contact details.

The outcome of an allegation investigation will be recorded as one of the following:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Unsubstantiated:** there is insufficient evidence either to prove or disprove the allegation;
- **False:** there is sufficient evidence to disprove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive; or
- **Unfounded:** there is no evidence or proper basis to support the allegation.

Where an allegation is found to be malicious, no details of the allegation will be retained on the individual's personnel file. In all other cases, a written record of the allegation, the investigation and the outcome will be retained on the individual's confidential personnel file in accordance with statutory guidance.

Where an allegation is found to be malicious, consideration will also be given to whether disciplinary action should be taken against the individual responsible for making the allegation and whether the matter should be referred to the police. Where the allegation has been made by a pupil, consideration should be given to whether the pupil has unmet needs requiring support and whether appropriate pastoral intervention is required.

During the course of any investigation, the School, in consultation with the LADO, will determine what information should be shared with parents and guardians, staff and pupils, and how any media enquiries should be managed. In doing so, the School will have regard to the reporting restrictions

contained within the Education Act 2011 and *Keeping Children Safe in Education (2026)*. The privacy, dignity and welfare of all individuals involved will remain an important consideration throughout the process.

At the conclusion of the investigation, the LADO will discuss with the case manager and Principal whether a referral should be made to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA), in accordance with the School's legal obligations under safeguarding legislation and guidance.

The School will make a referral to the DBS where an individual has harmed, or may pose a risk of harm to, a child and has been removed from regulated activity, or would have been removed had they not resigned, retired or otherwise left their role.

Queen's Gate School will make such referrals as soon as possible following the resignation, dismissal, non-renewal of contract, termination of placement or withdrawal of services of any individual whose conduct renders them unsuitable to work with children. This applies to employees, contractors, supply teachers, volunteers, trainees and any other adults working on behalf of the School.

Where appropriate, the School will also consider whether a referral should be made to the Teaching Regulation Agency for consideration of a prohibition order, where a teacher may have demonstrated unacceptable professional conduct, conduct that may bring the profession into disrepute, or has been convicted of a relevant offence.

The School will submit a serious incident report to the Charity Commission whenever this is required by the Commission's guidance.

Where the School ceases to use the services of a teacher because of serious misconduct, or would have dismissed them had they not resigned, consideration will be given to referring the matter to the Secretary of State in accordance with sections 141D and 141E of the Education Act 2002.

Where an allegation is substantiated, the School will consult with the LADO to determine whether any lessons can be learned and whether any changes to policy, procedure or practice are required. For all allegations other than those found to be malicious, a clear and comprehensive summary of the allegation, details of how it was investigated and resolved, and any action taken will be retained on the individual's confidential personnel file. A copy of this record will be provided to the individual concerned.

False, unsubstantiated or malicious allegations will not be included in employment references. Throughout any investigation involving allegations against a member of staff, appropriate pastoral support will be provided to any pupils involved.

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. This can be committed or facilitated by an organised network or gang, and victims may identify as part of this group. Child Criminal Exploitation may constitute modern slavery. 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 (CSE) is a form of child sexual abuse in which a child is manipulated, coerced, persuaded or forced into sexual activity in exchange for something they need or want, such as money, gifts, drugs, alcohol, affection, protection, accommodation or status. It can involve violent, humiliating and degrading sexual assaults and may take place in person or through the use of technology. Exploitation may occur even where the sexual activity appears consensual, and it should be recognised that children aged 16 and 17 can be victims of child sexual exploitation despite being above the legal age of consent.

Child sexual exploitation can be perpetrated by an individual or by groups and organised networks. Whilst abuse may be committed by strangers, most sexual abuse is perpetrated by individuals known to the child. Child sexual exploitation does not always involve physical contact and may occur entirely online. A significant number of children who experience sexual exploitation go missing from home, care or education at some stage. Children who are victims of child sexual exploitation may also be victims of child criminal exploitation and other forms of abuse.

The experiences of victims may not always be recognised as abuse and, in some circumstances, children may be criminalised for actions they have been compelled, coerced or manipulated into carrying out as part of their exploitation. Staff should remain alert to the signs and indicators of child sexual exploitation and share any concerns promptly with the Designated Safeguarding Lead (DSL) in accordance with the School's safeguarding procedures.

Some of the indicators of child sexual exploitation may include:

- 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 experience changes in emotional wellbeing;
- children who misuse drugs or alcohol;
- children who go missing for periods of time or regularly return home late; and
- children who regularly miss school or otherwise disengage from education.

Signs of child sexual exploitation may also indicate that a child is at risk of modern slavery.

If a member of staff believes that a pupil may have been a victim of, or may be at risk of becoming a victim of, child sexual exploitation, they should report their concerns to a DSL immediately and follow the procedures set out in Section 4 of this policy.

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 (2026) 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 abuse and child criminal exploitation and modern slavery. The school monitors all pupil absences from school and promptly addresses concerns about irregular attendance with the parent/carer. As standard, we seek to hold at least two emergency contact numbers for each pupil.

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. Where leave has been sought during term time for a pupil, even if authorisation has not been granted, the school has the right to seek evidence from parents relating to the nature of the absence for example the DSL or DDSL may request travel documents. 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 or any illegal use of AI.

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. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse. Such behaviour may be a sign of an unmet need.

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.

Modern Slavery

Victims of modern slavery may be found in a wide range of settings, including schools and educational environments. Staff and governors at Queen's Gate should be alert to the possibility that safeguarding concerns affecting pupils or their families may be linked to modern slavery. The statutory guidance on modern slavery recognises that identifying victims can be challenging, as indicators may be complex and involve a combination of physical, emotional, behavioural and environmental factors.

Modern slavery encompasses human trafficking, slavery, servitude and forced or compulsory labour. It may be perpetrated by an individual, organised criminal group or wider network. In some cases, victims may believe that they are part of a trusted group or relationship and may not recognise that they are being exploited.

For a variety of reasons, potential victims of modern slavery may:

- be reluctant to come forward with information;
- not recognise themselves as having been trafficked or enslaved; and
- provide accounts that contain inconsistencies, omissions or inaccuracies.

Potential indicators of modern slavery may include:

- being distrustful of, or fearful of, authorities;
- being afraid to disclose their immigration status;
- not being in possession of passports, identity documents or travel documents because these are being held by another person;
- having had travel costs paid by others and feeling obliged to repay a debt through work or services;
- having limited or no access to medical care;
- having limited opportunities for social interaction;
- having little or no contact with family members or people outside their immediate environment; and
- appearing withdrawn, anxious, fearful or under the influence or control of another person.

Staff should remain vigilant to the signs of modern slavery and recognise that they may overlap with indicators of child criminal exploitation, child sexual exploitation, county lines activity and missing education. Any concerns that a pupil may be a victim of, or at risk from, modern slavery should be

reported immediately to a Designated Safeguarding Lead (DSL), who will take appropriate action in accordance with the School's safeguarding procedures and statutory guidance.

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 (including supply staff, temporary staff and trainee teachers) 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

Mental and Physical Health

Queen's Gate recognises that a child's mental and physical health are important aspects of their overall wellbeing and can, in some circumstances, become safeguarding concerns. Mental health difficulties may be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, exploitation or other adverse childhood experiences. Concerns relating to a child's physical health, including situations where necessary medical treatment or support is not being provided, may also

be indicative of neglect. Further information can be found in the School's Mental Health and Wellbeing Policy.

Only appropriately qualified health professionals should diagnose mental health conditions. However, school staff are well placed to observe pupils on a day-to-day basis and to identify changes in behaviour, presentation or emotional wellbeing that may indicate that a pupil is experiencing, or may be at risk of developing, a mental health difficulty. Staff and counsellors may identify concerns through changes in attendance, engagement, relationships, behaviour, appearance or academic performance and should share any concerns with a Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL).

Staff should be aware that mental health concerns can, in some cases, develop into safeguarding concerns. These may include self-harm, suicidal thoughts, suicidal ideation or behaviours indicating an increased risk of suicide. Possible warning signs may include:

- significant or prolonged changes in behaviour, mood or personality;
- ongoing difficulties with sleep;
- withdrawal from friendships, social situations or previously enjoyed activities;
- a marked decline in attendance, engagement or academic performance;
- expressions of hopelessness, distress or thoughts of self-harm;
- physical signs of self-harm; and
- evidence of self-neglect or a deterioration in personal care.

The presence of one or more of these indicators does not necessarily mean that a child is experiencing a mental health condition or contemplating suicide. However, recognising and responding to such indicators can enable early intervention and appropriate support. The School will ensure that any mental health or wellbeing interventions it provides are evidence-informed, safe, effective and appropriate to the age and needs of the pupil.

The School recognises that abuse, neglect, exploitation and other adverse childhood experiences can have a significant and lasting impact on a child's mental health, behaviour, relationships and educational outcomes. Where appropriate and lawful, relevant information will be shared with staff on a need-to-know basis so that pupils can be supported effectively and sensitively. Where required, reasonable adjustments and appropriate pastoral or behavioural support strategies will be implemented.

Any member of staff who has concerns about a pupil's mental or physical health should report these promptly to a DSL or DDSL in accordance with the procedures set out in this policy. The DSL will consider the nature and context of the concern, the level of risk presented and the most appropriate course of action. This may include providing additional pastoral support, liaising with parents, seeking advice from health professionals, facilitating support through universal services, community-based Early Help or Family Help, making referrals to external agencies, or initiating safeguarding procedures where necessary.

Where a concern about a child's mental health also constitutes a safeguarding concern, staff must follow the School's safeguarding and child protection procedures and report the matter to a DSL immediately. The School will always act in the best interests of the child and may share information with parents,, health services, Children's Social Care or other relevant agencies where this is necessary to safeguard and promote the child's welfare.

If a child is considered to be at immediate risk of serious harm, including where there are concerns regarding suicide, self-harm or a medical emergency, emergency services will be contacted and immediate medical assistance sought. Where urgent mental health support is required but the situation is not life-threatening, appropriate NHS services, including NHS 111, may be contacted.

The School recognises that concerns relating to a pupil's medical conditions, including allergies, physical health conditions or mental health needs, do not automatically constitute safeguarding concerns. However, a safeguarding response may be required where circumstances indicate that a child may be at risk of neglect, abuse or exploitation. Examples may include the repeated failure to provide essential medical information, the persistent omission of prescribed medication, failure to seek appropriate medical treatment, or other circumstances that place a child at increased risk because their health needs are not being adequately met. Such concerns will be considered on a case-by-case basis and may be managed with a safeguarding referral if appropriate.

Gender Questioning Pupils

Where a child raises questions about their gender, the School will respond in a calm, supportive and child-centred manner. Staff will take time to understand the child's views, wishes and experiences, exercising appropriate professional curiosity and considering the wider context of the child's life and development. The School will not make assumptions about a child's needs or experiences and will carefully consider all relevant factors when determining how best to support them. The School also recognises that it is common for children to explore interests, activities, behaviours or forms of self-expression that may not align with traditional gender stereotypes. For many children, feelings about gender may change over time, whilst for others such feelings may continue or intensify during adolescence.

Being lesbian, gay or bisexual is not, in itself, an inherent risk factor for harm. However, children who are lesbian, gay or bisexual, or who are perceived to be lesbian, gay or bisexual, may be targeted by other children. Risks may be compounded where such children do not have a trusted adult to whom they can turn. Staff should therefore seek to reduce any additional barriers these pupils may face and provide a safe environment in which they feel able to share concerns and seek support.

When supporting a gender-questioning child, the School will not initiate any action. The School will take time to understand the thoughts and feelings of a child who is questioning their gender and will be appropriately professionally curious about the full range of the child's experiences. Staff should remain aware of potential vulnerabilities, including the possibility of complex mental health and psychosocial needs relating to family relationships, peer relationships or the wider social environment, including discriminatory bullying. In making decisions about support, staff will comply with their safeguarding responsibilities and their obligations under equality and human rights legislation.

The Designated Safeguarding Lead (DSL) will be involved in all cases where a child is questioning their gender. Parents will be involved in the vast majority of cases unless there is a documented and specific safeguarding reason why this would not be appropriate.

As Queen's Gate is a girls' school, all pupil toilet, changing and shower facilities are provided within a single-sex educational environment. The School will always comply with its safeguarding duties, the requirements of the School Premises Regulations and relevant statutory guidance when considering the needs of individual pupils. Where a pupil is questioning their gender and concerns arise regarding access to facilities, the School will work sensitively with the pupil and, in most cases, their parents to identify arrangements that protect the safety, privacy, dignity and wellbeing of all pupils.

When planning residential visits, exchange programmes or other overnight stays, the School recognises that additional considerations may arise for pupils who are questioning their gender. Decisions regarding sleeping arrangements, changing facilities, toilet use and other welfare matters will be made on a case-by-case basis, taking account of the pupil's wishes and feelings, safeguarding

obligations, the needs and rights of other pupils and, where appropriate, the views of parents. Sleeping arrangements on residential visits will comply with KCSIE 2026, safeguarding requirements and Equality Act obligations. The School's primary consideration in all such decisions will be to safeguard the welfare, dignity, privacy and wellbeing of the pupil concerned, whilst maintaining the safety and comfort of the wider school community.

For further information regarding the School's support for gender-questioning pupils, please refer to 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. This issue may affect pupils directly or indirectly if other family members are victims.

Homelessness and Housing Instability

The School recognises that homelessness, temporary accommodation and housing instability can have a significant impact on a child's welfare, safety, wellbeing and educational outcomes. Staff should be aware that factors such as rent arrears, household debt, domestic abuse, anti-social behaviour, family breakdown or being asked to leave accommodation may indicate that a family is at risk of homelessness.

Any concerns that a pupil or their family may be homeless, at risk of homelessness, or experiencing housing instability should be reported promptly to the Designated Safeguarding Lead (DSL). The DSL will consider the appropriate support required and, where necessary, liaise with the Local Housing Authority, Children's Social Care and other relevant agencies. Referrals to housing services do not replace safeguarding referrals where a child has been harmed or is at risk of harm.

The School recognises that some older pupils, particularly those aged 16 and 17, may be homeless or living independently following exclusion from the family home or family breakdown. In such circumstances, Children's Social Care is likely to have a lead role, and the DSL will ensure that appropriate referrals are made and appropriate support arrangements are put in place.

The School will work collaboratively with pupils, families and external agencies to reduce barriers to education and promote the safety, welfare and wellbeing of children experiencing housing difficulties.

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. Some of our pupils may live in Kinship Care arrangements and, of the pupils living in Kinship Care arrangements at Queen's Gate, most 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.

Making or Sharing Nudes and Semi-Nudes

The consensual and non-consensual making or sharing of nudes and semi-nudes, including images generated or altered using artificial intelligence (AI), is a safeguarding and child protection issue. For the purposes of this policy, the term *making or sharing nudes and semi-nudes* refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term *images* includes all visual content, such as photographs, videos and livestreams. Images may be self-

generated by a child, created by another person, digitally altered, or wholly generated using AI, including what are commonly referred to as "deepfakes" or "deep nudes".

Even where explicit material is created, shared or requested without malicious intent, the consequences can be serious and may place those involved at risk of abuse, exploitation, bullying, coercion, emotional harm or criminalisation. Pupils should be aware that creating, possessing or sharing indecent images of a person under the age of 18 may constitute a criminal offence. The School therefore educates pupils about these risks through its online safety, PSHE and RSE programmes.

Queen's Gate takes all incidents involving the making or sharing of nudes and semi-nudes extremely seriously and will respond in accordance with child protection procedures, current Department for Education guidance and UK Council for Internet Safety (UKCIS) guidance. All incidents will be treated as safeguarding matters and assessed on a case-by-case basis by the Designated Safeguarding Lead (DSL), who will determine the appropriate response, taking account of the age, developmental stage and circumstances of the children involved, as well as any indicators of coercion, exploitation, abuse or vulnerability.

Staff must not view, copy, print, share, save or forward indecent images of children unless there is a clear and lawful reason to do so and they are acting in accordance with statutory guidance. Any concerns relating to the making or sharing of nudes and semi-nudes must be reported immediately to a DSL or DDSL.

The School recognises that pupils may be reluctant to seek help because they are worried about getting into trouble. All concerns of this nature will therefore be managed sensitively and supportively. Pupils will be encouraged to report concerns relating to themselves or others at the earliest opportunity, safe in the knowledge that their welfare and protection will be the School's primary consideration.

The School will seek to create an environment in which concerns can be raised without fear, embarrassment or shame, whilst ensuring that appropriate safeguarding action is taken to protect all those involved. Appropriate support will be provided to any pupil affected by an incident, whether they are a victim, alleged perpetrator or witness.

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 Family Help assessment will enable support to be put in place to help the family.

Child-on-Child Abuse (Including Harassment and Violence)

All staff, including supply staff, temporary staff, volunteers and trainee teachers, should recognise that children are capable of abusing other children both in person and online. All staff should be familiar with the School's procedures for identifying, reporting and responding to child-on-child abuse and should remain vigilant to the possibility that such abuse may occur within the School community.

Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. Queen's Gate adopts a zero-tolerance approach to all forms of child-on-child abuse. Abusive behaviour will never be dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys". Such attitudes can contribute to a culture of unacceptable behaviour, misogyny, an unsafe environment and a reluctance amongst pupils to report concerns.

The School recognises that even where there are no reported incidents of child-on-child abuse, such abuse may nevertheless be occurring and remain undisclosed. Staff should therefore remain alert to signs, indicators and disclosures of abuse and challenge inappropriate behaviour at the earliest opportunity.

The School seeks to minimise the risk of child-on-child abuse through a whole-school approach to safeguarding, including:

- clear expectations for behaviour and conduct;
- effective pastoral support systems;
- supervision of pupils throughout the school day, including in areas where abuse may be more likely to occur;
- anti-bullying strategies and procedures;
- assemblies, tutor time discussions and wider pastoral education;
- the Behaviour Policy and Anti-Bullying Policy; and
- a planned PSHE and RSE curriculum.

Pupils are taught about:

- healthy and respectful relationships;
- consent and personal boundaries;
- equality and respect for others;
- online safety;
- harmful sexual behaviour;
- recognising abusive behaviour;
- how to report concerns; and
- how to seek help for themselves or others.
-

The School has clear, well-promoted and accessible systems through which pupils can raise concerns. Reports may be made to any member of staff, Form Tutor, Head of Year, member of the pastoral team, School Counsellor, DSL or Deputy DSL. Pupils are regularly reminded that concerns will be taken seriously, investigated appropriately and responded to promptly.

Child-on-child abuse may take many forms, including:

- bullying, including cyberbullying, prejudice-based bullying and discriminatory bullying;
- abuse within intimate personal relationships between children (sometimes referred to as teenage relationship abuse);
- physical abuse, including hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm;
- serious physical assault or the threat of harm with a weapon;
- harmful sexual behaviour;
- sexual violence, including rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent;
- sexual harassment, including sexual comments, remarks, jokes and online sexual harassment;
- misogyny, misandry and sexist behaviour;
- consensual and non-consensual making or sharing of nudes and semi-nudes, including AI-generated images;
- upskirting, which is a criminal offence;
- initiation or hazing-type violence and rituals; and
- online abuse, including abusive, harassing, misogynistic or misandrist messages, the non-consensual sharing of sexual imagery and the sharing of unwanted sexual or abusive content.

There is no clear boundary between behaviour that should be managed as poor behaviour, conflict or bullying and behaviour that should be regarded as abusive. Staff must exercise professional judgement and consult a DSL whenever they are unsure.

Behaviour may be considered abusive where:

- there is a significant imbalance of power between those involved, for example in age, size, ability, status or developmental stage;
- the behaviour is repeated or forms part of a pattern;
- coercion, intimidation, manipulation or threats are present;
- a child has repeatedly attempted to harm one or more other children; or
- there is evidence of an intention to cause harm.

Where the evidence suggests that there was an intention to cause severe harm, the behaviour should be regarded as abusive whether or not significant harm was ultimately caused.

The School recognises that children with special educational needs and disabilities (SEND) may be particularly vulnerable to child-on-child abuse and may face additional barriers to recognising, reporting or communicating abuse. Staff should be mindful of these increased risks and ensure that appropriate support and communication strategies are in place.

Responding to Child-on-Child Abuse

Any allegation or concern relating to child-on-child abuse must be referred as soon as practically possible to a Designated Safeguarding Lead (DSL).

Such concerns will be recorded, investigated and managed in accordance with the School's safeguarding procedures. In consultation with the Principal, the DSL will determine the most appropriate course of action. Whilst an internal investigation may often be the first step, the DSL may seek advice from external agencies or make a referral to Children's Social Care where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

Detailed records will be maintained of:

- concerns raised;
- disclosures received;
- interviews and investigations undertaken;
- decisions reached;
- actions taken; and
- outcomes and follow-up arrangements.

Staff should challenge inappropriate behaviours in accordance with the Behaviour Policy and Anti-Bullying Policy and escalate concerns promptly to the relevant pastoral lead or DSL.

Supporting Victims and Alleged Perpetrators

The School recognises that children who display abusive behaviour may themselves have experienced abuse, trauma, neglect or other adverse childhood experiences. Evidence suggests that children who abuse their peers often have unmet safeguarding, welfare or educational needs of their own.

Accordingly, both the victim and the alleged perpetrator will be considered in need of support, assessment and, where appropriate, intervention.

Support measures may include:

- pastoral support;
- counselling;
- safety and support plans;
- risk assessments;
- increased supervision;
- behavioural interventions;
- timetable adjustments;
- separation arrangements;
- involvement of external agencies; and
- suspension or exclusion where necessary and proportionate.

Victims will be supported through measures appropriate to the circumstances of the case, which may include separating pupils for educational activities or implementing additional safeguarding arrangements.

All pupils involved in a case of child-on-child abuse, including victims, alleged perpetrators and affected witnesses, will be supported through the School's pastoral systems. Cases will remain under review for as long as necessary to safeguard the welfare, wellbeing and educational progress 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)²

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 (2026) , Annex A, 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.

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, including supply staff, temporary staff and trainee teachers, 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, Sexual Harassment and Harmful Sexual Behaviour

Queen's Gate takes a zero-tolerance approach to sexual violence and sexual harassment.

The School recognises that there is often a gendered dimension to child-on-child abuse, with girls more commonly identified as victims and boys more commonly identified as perpetrators. However, staff must not allow assumptions or stereotypes to influence their professional judgement and should always respond on the basis of the specific facts of each case. Staff should be mindful that sexual violence and harassment may occur outside the School environment and may be perpetrated by a pupil of the same sex as the victim.

The umbrella term harmful sexual behaviour (HSB) is widely used in safeguarding and child protection and applies to behaviour occurring online, face-to-face, or both. Harmful sexual behaviour should always be considered within a child protection context.

Staff should recognise that children's sexual behaviour exists on a continuum ranging from behaviour that is developmentally normal and expected, through to behaviour that is inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause harm to those involved.

Harmful sexual behaviour can, in some cases, escalate over time. Early intervention in behaviours such as misogyny, sexualised language or inappropriate sexual conduct can help prevent progression to more serious forms of abuse, including sexual harassment and sexual violence. The School also recognises that children who display harmful sexual behaviour may themselves have experienced abuse, trauma or other adverse childhood experiences and may therefore require safeguarding support and intervention.

The School acknowledges that pupils may find it particularly difficult to disclose experiences of sexual violence, sexual abuse or harmful sexual behaviour. It is therefore essential that staff foster an environment in which pupils feel safe, listened to and supported. All reports, disclosures and concerns will be taken seriously and managed in accordance with the School's zero-tolerance approach to sexual violence and sexual harassment.

Sexual violence, sexual harassment and harmful sexual behaviour will never be dismissed as "banter", "just having a laugh" or part of growing up. Immediate consideration will be given to the safety, wellbeing and support needs of both the victim and the alleged perpetrator where they are members of the School community. Staff should also be mindful that the School's response to reports of this nature can significantly influence whether pupils feel confident in reporting future concerns and may affect the wider culture of safety within the School.

Any investigation into an allegation of sexual violence, sexual harassment or harmful sexual behaviour will be managed by appropriately trained members of staff under the direction of the

Designated Safeguarding Lead (DSL). In considering the appropriate response, account will be taken of the age, developmental stage and individual circumstances of those involved.

The School may liaise with, or seek support from, external agencies, including:

- Children's Social Care and Family Help services;
- the police;
- health and medical professionals;
- specialist safeguarding services; and
- parents, where appropriate and safe to do so.

Where there is a report of rape, assault by penetration or sexual assault, the matter will be referred immediately to the police and Children's Social Care, as appropriate. The DSL will also undertake a risk and needs assessment to determine the support required for the victim, the alleged perpetrator and any other pupils affected by the incident.

Where the alleged perpetrator is a member of the School community, the School will consider what interim measures are necessary to protect all pupils whilst investigations are ongoing. This may include changes to timetables, supervision arrangements, restrictions on contact between pupils or, where appropriate, suspension in accordance with the School's Behaviour Policy and Discipline and Exclusion Policy.

The outcome of any investigation will inform subsequent actions and decisions, which will be made with reference to the School's safeguarding procedures, Behaviour Policy and Discipline and Exclusion Policy.

Where an allegation is found to be unsubstantiated, unfounded, false or malicious, the School will consider whether the child who made the report requires additional pastoral, wellbeing or safeguarding support. Consideration will also be given to whether any further action is required in accordance with the Behaviour Policy, while recognising that false reports may sometimes arise from unmet needs, trauma or vulnerability.

Following every allegation, regardless of outcome, the DSL team will review the case to identify any learning points and determine whether any changes are required to safeguarding practice, staff training, curriculum provision, policies or procedures.

Where an allegation is substantiated, the victim will receive ongoing pastoral support, monitoring and safeguarding oversight for as long as necessary to support their welfare and educational progress.

Young carers

A young carer is a child or young person under the age of 18 who helps to care for a family member or relative with a disability, physical illness, mental health condition, or drug or alcohol dependency. The School recognises that caring responsibilities can have a significant impact on a pupil's attendance, attainment, behaviour, emotional wellbeing and wider educational experience. Staff should remain alert to the possibility that a pupil may have caring responsibilities and understand that young carers may require additional support to enable them to participate fully in school life. Early identification is important to ensure that appropriate support can be put in place and, where necessary, referrals made to external agencies, health services or local authority support. Queen's Gate maintains a register of pupils identified as young carers to help ensure that their needs are recognised and that appropriate pastoral, academic and wellbeing support can be coordinated. Any concerns regarding a pupil who may be a young carer, or if staff think they have identified that a pupil may be a young carer, should be shared with the Designated Safeguarding Lead (DSL) or DDSLs.

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

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

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

NSPCC Whistleblowing Advice Line

0800 028 0285

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

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

Policy reviewed: September 2026

Next review: September 2027

Section 7: Appendices

1: Indicators of abuse neglect and exploitation and modern slavery.

The indicators of abuse and neglect are set out below. Indicators of exploitation, including child criminal exploitation, child sexual exploitation and modern slavery, are outlined in Section 5. It is important to recognise that neglect, exploitation and other safeguarding concerns rarely occur in isolation and cannot always be defined by a single indicator or category. In many cases, children may experience multiple and overlapping forms of abuse, harm and vulnerability. Staff should therefore consider the child's circumstances holistically and be alert to the possibility that a range of safeguarding concerns may be present simultaneously.

Possible indicators of neglect

Staff should be aware that neglect may present through a range of physical, developmental, emotional and behavioural indicators. These may include, but are not limited to:

- Poor personal hygiene or consistently unkempt appearance.
- Clothing that is dirty, inappropriate for the weather, ill-fitting or in poor condition.
- Unmet health, dental, vision or medical needs, including a failure to attend appointments or follow treatment plans.
- Persistent hunger, poor nutrition, food-seeking behaviour or signs of dehydration.
- Being underweight, failing to thrive, unexplained weight loss or, in some circumstances, obesity linked to unmet health and nutritional needs.
- Recurrent skin conditions, untreated rashes, sores or infections.
- Poor oral health, untreated dental problems or persistent bad breath.
- Lack of appropriate footwear, clothing, equipment or other essentials.
- Persistent tiredness, fatigue or falling asleep during the school day.
- Inadequate supervision, including being left alone inappropriately or exposed to age-inappropriate risks including those online.
- Excessive or unrestricted access to online environments without appropriate parental oversight.
- Delayed physical, emotional, social or language development.
- Frequent illnesses, repeated accidents or injuries, or concerns that medical advice is not being followed.
- Persistent infestations, such as head lice, which remain untreated over time.
- Repeated absence, lateness or poor engagement with education.
- Signs that a child's physical, emotional, educational or developmental needs are not being met consistently.
- Conditions, injuries or health concerns that fail to improve despite concerns being raised and support being offered.

Neglect can be difficult to identify and often occurs over an extended period of time. Individual indicators should always be considered within the context of the child's overall circumstances,

presentation and family situation. No single indicator should be viewed in isolation as evidence of neglect; however, staff should remain alert to patterns of concern and report any safeguarding worries to the DSL or a DDSL in accordance with the School's safeguarding procedures.

A child who is experiencing neglect may also:

- Appear underweight, poorly nourished or lacking in energy.
- Present as consistently unkempt, unwashed or inadequately clothed.
- Have untreated medical, dental or vision problems.
- Experience ongoing sleep difficulties due to a lack of routine, supervision or appropriate care.
- Display low self-esteem, anxiety, emotional distress or difficulties regulating emotions.
- Take on inappropriate caring responsibilities within the family.

Neglect often develops over time and may have a significant impact on a child's health, development, wellbeing and educational outcomes. Staff should report any concerns promptly to the DSL or a DDSL, who will consider the child's circumstances, presentation and wider context in line with the School's safeguarding procedures.

Possible indicators of physical abuse

Staff should be aware that physical abuse may result in visible injuries, changes in behaviour, or a combination of both. Indicators may include, but are not limited to:

- Unexplained injuries or injuries where the explanation is inconsistent, implausible or changes over time.
- Frequent injuries, repeated accidents or a pattern of recurring injuries.
- Injuries occurring in unusual locations or with unusual patterns.
- Bruising, particularly in areas less commonly injured through normal childhood activity, including the face, ears, neck, torso, genital area, buttocks or upper arms.
- Bruising, marks or injuries that appear to have a distinct shape, pattern or outline.
- Injuries that appear to have occurred on multiple occasions or are at different stages of healing.
- Bite marks, scratches, cuts, lacerations or unexplained swelling.
- Burns or scalds, including those with clear edges or patterns.
- Fractures or other significant injuries, particularly where there is no adequate explanation.
- Untreated injuries or delays in seeking medical attention.
- Frequent attendance at school with injuries that cause concern or are not adequately explained.
-

Staff involved in activities where pupils change clothing, such as physical education, sport or educational visits, may be particularly well placed to observe injuries or physical signs of concern. Any observed injuries, concerning marks or patterns of absence should be recorded and reported in accordance with the School's safeguarding procedures.

Possible behavioural indicators of physical abuse

A child who is experiencing physical abuse may:

- Appear fearful, anxious, withdrawn or unusually watchful.
- Flinch, recoil from touch or appear wary of physical contact.
- Show an unusual fear of particular adults or become distressed when discussing home life.
- Be reluctant to change clothing for sport or other activities.
- Display heightened anxiety about making mistakes or getting into trouble.
- Seek excessive reassurance, approval or comfort from adults.
- Appear unusually compliant, passive or eager to please.

- Display aggression, anger, emotional dysregulation or challenging behaviour.
- Appear reluctant to return home or express concerns about going home.
- Regularly arrive at school with unexplained injuries or after periods of absence.
- Make comments suggesting fear of punishment or negative consequences at home.
- Avoid discussing injuries or provide explanations that appear rehearsed or inconsistent.

No single indicator should be viewed in isolation as evidence of abuse. Staff should consider the child's presentation, developmental stage and wider circumstances and report any concerns promptly to the DSL or a DDSL in accordance with the School's safeguarding procedures.

Possible indicators of sexual abuse, sexual violence, sexual harassment or sexual exploitation

Staff should be aware that children who are experiencing sexual abuse, sexual violence, sexual harassment or sexual exploitation may display a range of behavioural, emotional or physical indicators.

These may include, but are not limited to:

- Sexual knowledge, language or behaviour that is not age-appropriate or developmentally expected.
- Sudden changes in behaviour, presentation, emotional wellbeing or relationships.
- Unexplained anxiety, fearfulness, distress, self-harm, low mood or withdrawal.
- Reluctance to be alone with, or avoidance of, a particular individual or group.
- Increased secrecy, changes in online activity, or concerns relating to social media or digital communication.
- Sending, receiving, possessing or sharing nude or semi-nude images and/or videos.
- Inappropriate sexualised behaviour towards peers or other children.
- Unexplained gifts, money, possessions, transport, accommodation or other items that may indicate grooming or exploitation.
- Frequent contact with unknown adults or older young people, either in person or online.
- Missing episodes, unexplained absences, or spending time in locations that give rise to safeguarding concerns.
- Physical signs such as pain, discomfort, bruising, bleeding, injuries or recurrent infections affecting the genital or anal areas.
-

Staff should be mindful that these indicators may have explanations other than abuse or exploitation. However, where concerns arise, they should be discussed promptly with the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL). The School recognises that grooming may occur both online and offline and that perpetrators may build trust over time through attention, gifts, emotional support, manipulation, coercion or other forms of exploitation. Any concerns regarding child-on-child abuse, sexual violence, sexual harassment, exploitation or grooming will be managed in accordance with the School's safeguarding procedures and statutory guidance.

Possible indicators that a child may have experienced sexual violence, sexual harassment or harmful sexual behaviour from another child

A child who has experienced sexual violence, sexual harassment or harmful sexual behaviour from another child may display a range of behavioural, emotional, social or educational indicators. These may include, but are not limited to:

- Increased anxiety, distress, fearfulness or emotional dysregulation.
- Withdrawal from friends, activities or previously enjoyed interests.
- Reluctance or refusal to attend school, particular lessons or extracurricular activities.
- Avoidance of a specific child, friendship group, location or situation.
- Changes in attendance, engagement, attainment or behaviour.
- Low mood, depression, low self-esteem or feelings of shame, guilt or worthlessness.

- Self-harm, suicidal ideation or other indicators of significant emotional distress.
- Sleep difficulties, nightmares or persistent tiredness.
- Changes in eating habits or disordered eating behaviours.
- Reluctance to use communal areas such as changing rooms, toilets or shared spaces.
- Increased secrecy or withdrawal from trusted adults.
- Becoming unusually quiet, isolated or socially withdrawn.
- Appearing frightened of receiving messages, social media notifications or online contact.
- Sudden changes in friendship groups or social interactions.
- Loss of confidence, increased vulnerability or a marked change in personality.
- Physical injuries, pain, discomfort or unexplained marks that give rise to concern.
- Age-inappropriate sexual knowledge, language or behaviour.
- Sexualised behaviour towards others that is not developmentally expected.
- Persistent preoccupation with sexual themes in conversation, play, writing or artwork.
- Disclosures, concerns or rumours relating to sexual harassment, sexual violence or coercive behaviour among peers.
- Sharing, receiving or being pressured to share nude or semi-nude images and/or videos.
- Signs of online sexual harassment, image-based abuse or sexual bullying.
- Going missing, avoiding certain routes, changing routines or seeking to remain close to staff or trusted adults.
- Difficulty concentrating, hypervigilance, "frozen watchfulness" or appearing constantly on edge.
- Aggressive, challenging or risk-taking behaviour that may indicate underlying distress.

Staff should recognise that children may not report sexual violence or sexual harassment directly. They may instead communicate their experiences through changes in behaviour, emotional wellbeing, attendance, relationships or academic engagement. Any concerns should be reported promptly to the DSL or a DDSL, and managed in accordance with the School's safeguarding procedures, the child-on-child abuse policy, and relevant statutory guidance

Possible indicators of emotional abuse

Staff should be aware that emotionally abused children may present in a variety of ways. Indicators may include, but are not limited to:

- Persistent low self-esteem, excessive self-criticism or feelings of worthlessness.
- Withdrawal, social isolation or difficulty forming and maintaining relationships.
- Excessive reassurance-seeking, anxiety, fearfulness or lack of confidence.
- Age-inappropriate dependency, clinginess or fear of making mistakes.
- Overly compliant, passive or eager-to-please behaviour.
- Excessively controlling, demanding, oppositional or aggressive behaviour.
- Emotional dysregulation, including frequent outbursts, anger or distress.
- Developmental delay affecting emotional, social, speech or cognitive development.
- Regression to earlier developmental behaviours, such as thumb-sucking, rocking, bedwetting or other self-soothing behaviours.
- Sleep difficulties, including nightmares, insomnia or persistent tiredness.
- Difficulties concentrating, poor attendance or a decline in educational engagement or attainment.
- Hypervigilance, "frozen watchfulness" or an apparent reluctance to relax.
- Taking on inappropriate caring responsibilities for parents, carers or siblings (sometimes referred to as role reversal or parentification).
- Self-harm, risk-taking behaviours, eating difficulties or other indicators of emotional distress.
- A lack of attachment to parents, carers or other trusted adults, or an apparent reluctance to seek comfort when distressed.

No single indicator should be viewed in isolation as evidence of abuse. Staff should consider the child's presentation, circumstances and wider context and report any concerns promptly to the DSL or a DDSL in accordance with the School's safeguarding procedures

2: What all staff (including supply staff, temporary staff and trainee teachers) should know

All staff, including supply staff, temporary staff and trainee teachers, and volunteers, including those who do not work directly with children, should know the following:

1. the identity of all Deputy Designated Safeguarding Leads (DDSLs) and how to contact them;
2. the School's procedures for reporting safeguarding concerns and the requirement to act immediately if they have concerns about a child's welfare;
3. the process for making a referral to children's social care and that any member of staff may make a referral if necessary;
4. the process for community-based Family Help assessments, including the thresholds for targeted early help, Section 17 Child in Need support, Section 20 accommodation, Section 31 care and supervision orders, and Section 47 child protection enquiries;
5. how to respond if a child discloses abuse, neglect or exploitation, including the importance of maintaining appropriate confidentiality and never promising to keep safeguarding concerns secret;
6. that safeguarding incidents may occur inside or outside school, inside or outside the home, and online;
7. that abuse, neglect, exploitation and other safeguarding concerns rarely occur in isolation and that multiple vulnerabilities may overlap;
8. the importance of maintaining professional curiosity and building trusted relationships with pupils to support early identification of concerns;
9. the indicators of abuse, neglect, exploitation, child criminal exploitation, child sexual exploitation, modern slavery and extra-familial harm;
10. the school's procedures for responding to child-on-child abuse, including harmful sexual behaviour, sexual harassment and sexual violence;
11. that child-on-child abuse can occur both online and offline and that all concerns should be reported to the DSL or a DDSL;
12. the safeguarding vulnerabilities associated with children who are absent from education, children with a social worker, looked after and previously looked after children, young carers, pupils with SEND and pupils experiencing mental health difficulties;
13. that mental health concerns may be indicators of abuse, neglect or exploitation and may themselves become safeguarding concerns;
14. the school's whistleblowing procedures and how to raise concerns about unsafe practice, safeguarding failures or concerns about another member of staff
15. the school's procedures for reporting allegations and low-level concerns about adults working in or on behalf of the School;
16. the importance of accurate record keeping and that all safeguarding concerns, discussions, decisions and actions must be recorded appropriately;
17. that information sharing is vital to safeguarding and that data protection legislation does not prevent the lawful sharing of information where this is necessary to keep children safe;
18. the school's approach to online safety, including the four areas of online risk (content, contact, conduct and commerce), the risks associated with AI-generated content, and the expectations relating to filtering and monitoring systems;
19. that safeguarding and promoting the welfare of children is everyone's responsibility and that all staff should maintain an attitude of "it could happen here".

Responsibilities of the Principal, Governors and Designated Safeguarding Leads

The Principal, Governors and Designated Safeguarding Leads (DSLs) must ensure that:

1. The School's safeguarding and child protection policies and procedures comply with **Keeping Children Safe in Education (2026)**, **Working Together to Safeguard Children (2026)** and local multi-agency safeguarding arrangements.
2. The School's safeguarding policies and procedures reflect local criteria for action, local referral pathways and local protocols for assessment.
3. They are familiar with local safeguarding arrangements and understand the School's role within the wider multi-agency safeguarding system.
4. Staff know how to identify and respond to safeguarding concerns and understand how and when to make referrals for Family Help, Section 17 Child in Need support, Section 20 accommodation, Section 31 care and supervision orders, and Section 47 child protection enquiries.
5. All staff know who the DSLs and DDSLs are, understand their roles and know how to contact them.
6. All staff understand what to do if they have concerns about a child, including concerns relating to abuse, neglect, exploitation, child-on-child abuse, harmful sexual behaviour, sexual harassment, sexual violence, serious violence, mental health, online safety or children at risk outside the home.
7. All new staff, including supply staff, temporary staff, trainee teachers, contractors and volunteers, receive safeguarding and child protection training as part of their induction and are provided with the relevant safeguarding policies and procedures.
8. All staff, including supply staff, temporary staff and trainee teachers, including those who do not work directly with children, have read at least **Part One of Keeping Children Safe in Education (2026)** and understand their safeguarding responsibilities.
9. All staff receive regular safeguarding and child protection updates, including updates relating to online safety, filtering and monitoring, at least annually and whenever required
10. Effective safeguarding procedures are in place for managing allegations and low-level concerns about adults working in or on behalf of the School.
11. Appropriate systems are in place for children to raise concerns, make disclosures and report abuse, knowing that they will be listened to, taken seriously and supported.
12. Safeguarding is embedded within the School's culture and a child-centred approach is promoted at all times.
13. Pupils receive an age-appropriate, evidence-informed programme of preventative education, including teaching about safeguarding, healthy relationships, consent, child-on-child abuse, online safety, sexual harassment, sexual violence, exploitation, mental health and how to seek help.
14. Appropriate online safety arrangements, including effective filtering and monitoring systems, are in place and reviewed regularly.
15. The voice, wishes and feelings of children are considered when making safeguarding decisions and determining appropriate support.
16. Staff understand that safeguarding and promoting the welfare of children is everyone's responsibility and maintain an attitude of "**it could happen here**" when considering safeguarding concerns.

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 (Croner's Section 6, p. 128, February 2003).
5. 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 Designated Safeguarding Leads (DSLs) are senior members of staff who take lead responsibility for safeguarding and child protection within the School. Details of the DSLs and Deputy Designated Safeguarding Leads (DDSLs) are available on the School's website and displayed throughout the School. Whilst many activities may be delegated to appropriately trained DDSLs, the ultimate lead responsibility for safeguarding and child protection remains with the DSLs and cannot be delegated.

The DSLs have the appropriate status, authority, time, funding, training and resources to carry out their responsibilities effectively. Their broad areas of responsibility include:

- Promoting a whole-school approach to safeguarding and ensuring that safeguarding and child protection underpin all relevant aspects of school life, policy development and decision-making.
- Ensuring that safeguarding arrangements are child-centred and that the wishes, feelings and best interests of children are considered when making decisions and determining support.
- Creating and maintaining a culture in which children feel safe, listened to and able to raise concerns, and in which staff are encouraged to share safeguarding concerns promptly.
- Acting as a source of support, advice and expertise for staff on safeguarding and child protection matters.
- Ensuring that all safeguarding concerns are responded to appropriately and that safeguarding records are maintained accurately and securely.

Managing Referrals

The DSLs take lead responsibility for managing safeguarding referrals and working with external agencies, including:

- referrals to Children's Social Care where a child may be suffering, or is likely to suffer, significant harm;
- referrals for Family Help, early help and other support services;
- referrals to Channel where there are concerns that a child may be vulnerable to radicalisation;
- referrals to the Disclosure and Barring Service (DBS) where the legal threshold is met;
- referrals to the Teaching Regulation Agency (TRA) where appropriate;

- referrals to the police where a criminal offence may have been committed; and
- liaising with the Local Authority Designated Officer (LADO) in respect of allegations against adults working in or on behalf of the School.

The DSLs will also support and advise staff who are making referrals and will ensure that referrals contain comprehensive and relevant information, including information about extra-familial harm and risks outside the home.

Working with Others

The DSLs will:

- work collaboratively with Children's Social Care, health services, the police, Family Help services and other safeguarding partners;
- contribute to assessments, child protection conferences, core groups, child in need meetings and other multi-agency processes;
- support staff who are working with children subject to Child Protection Plans, Child in Need Plans and other safeguarding arrangements;
- promote educational outcomes by sharing relevant safeguarding information with appropriate staff on a need-to-know basis;
- work closely with pastoral staff, the SENDCo, medical staff, attendance staff, IT staff and other relevant professionals;
- support the identification of pupils who may benefit from Family Help or additional services; and
- ensure that children with a social worker, looked after children, previously looked after children and other vulnerable pupils receive appropriate support.

Training, Knowledge and Skills

The DSLs and DDSs will:

- undertake safeguarding training to provide them with the knowledge and skills required to carry out their roles;
- update their knowledge and skills regularly and at least every two years through formal training;
- remain alert to emerging safeguarding risks, local safeguarding priorities and changes to statutory guidance;
- support and advise staff on safeguarding matters; and
- help ensure that all staff receive appropriate safeguarding training and updates.

Raising Awareness

The DSLs will:

- ensure that safeguarding and child protection policies are reviewed, updated and implemented effectively;
- ensure that staff, pupils, parents and governors understand the School's safeguarding arrangements;

- support the development of effective safeguarding practices throughout the School; and
- provide regular safeguarding reports to the Governing Body and liaise with the Safeguarding Governor.

Online Safety

The DSLs take lead responsibility for safeguarding and child protection, including online safety. This includes:

- supporting staff and pupils to understand online risks;
- ensuring online safety is embedded within the curriculum and wider safeguarding culture;
- understanding the filtering and monitoring systems and processes in place;
- working with IT staff and senior leaders to ensure filtering and monitoring systems are effective; and
- responding appropriately to online safety concerns and incidents.

Information Sharing and Record Keeping

The DSLs will:

- maintain, review and securely store child protection files and safeguarding records;
- ensure safeguarding information is shared appropriately and in accordance with statutory guidance and data protection legislation;
- ensure child protection files are transferred securely and promptly when a pupil moves school;
- maintain oversight of safeguarding records to identify patterns, emerging risks and appropriate interventions; and
- ensure that confidential safeguarding information is shared only with those who need to know in order to safeguard children.

The full description of the DSL role can be found in Annex B of *Keeping Children Safe in Education 2026*. Deputy Designated Safeguarding Leads are trained to the same standard as the DSLs and work in a coordinated manner to support the delivery of safeguarding responsibilities across the School

Safeguarding Governor(s) role

Governors' Safeguarding Responsibilities

Responsibility for safeguarding is shared by all Governors. Governors provide strategic leadership and oversight of the School's safeguarding arrangements and should ensure that safeguarding and child protection are at the forefront of the School's culture, policies and procedures. Governors must satisfy themselves that safeguarding arrangements are effective, compliant with statutory requirements and support a whole-school approach to safeguarding in which the best interests of the child are paramount.

The Safeguarding Governor visits the School at least once each term, chairs the termly Safeguarding Committee meeting and reports regularly to the Full Governing Body. Governors receive appropriate safeguarding and child protection training at induction and regularly thereafter in order to provide effective strategic challenge and oversight.

The full role is outlined in Part Two of *Keeping Children Safe in Education 2026* and includes, but is not limited to, the following responsibilities:

- Ensuring that safeguarding and child protection policies, procedures and practices, including online safety, are effective, up to date and compliant with statutory guidance, legislation and local multi-agency safeguarding arrangements.
- Ensuring that the School adopts a whole-school approach to safeguarding and that safeguarding considerations underpin all relevant policies, procedures and strategic decisions.
- Ensuring that children are able to report concerns, make disclosures, express their views and access support through systems that are well promoted, understood and accessible.
- Liaising with the Principal and DSLs and receiving regular reports regarding safeguarding practice, trends, training, monitoring and emerging risks, including the production of an annual safeguarding report.
- Ensuring that the DSL is a suitably qualified member of the Senior Leadership Team with the status, authority, time, funding, training, resources and support required to fulfil the role effectively.
- Ensuring that Deputy Designated Safeguarding Leads are appropriately trained and that suitable safeguarding cover arrangements are always in place.
- Ensuring that all staff, including supply staff, temporary staff, trainee teachers, volunteers, governors and contractors, receive appropriate safeguarding and child protection training, including online safety training, at induction and regular updates thereafter.
- Ensuring that pupils receive age-appropriate safeguarding education, including online safety, healthy relationships, consent, child-on-child abuse, exploitation and other relevant safeguarding themes, through the curriculum and wider pastoral programme.
- Ensuring that appropriate safer recruitment procedures are in place and that all required pre-employment checks are carried out in accordance with Part Three of *Keeping Children Safe in Education 2026*.
- Ensuring that procedures are in place to manage safeguarding concerns, allegations and low-level concerns relating to adults working in or on behalf of the School.
- Ensuring that the School has effective systems to prevent, identify and respond to child-on-child abuse, including harmful sexual behaviour, sexual harassment and sexual violence.
- Ensuring that the School has effective arrangements to identify, assess and support pupils whose welfare may be affected by safeguarding concerns, including pupils with mental health needs, SEND, children with a social worker, young carers, looked after and previously looked after children, and those at risk of exploitation, serious violence or harm outside the home.
- Ensuring that appropriate filtering and monitoring systems are in place, that these are reviewed at least annually, and that governors receive assurance regarding their effectiveness.
- Ensuring that safeguarding arrangements for persistently absent children, alternative provision, educational visits, homestays and external providers are effective and appropriately monitored.
- Ensuring that there is a designated teacher to promote the educational achievement of looked after and previously looked after children.
- ensure that safeguarding remains a standing item for scrutiny and challenge throughout the academic year.

Appendix 5: Safeguarding Arrangements for Occasional Remote Learning and Staff Teaching from Home

In exceptional circumstances, it may be necessary for a member of staff to teach remotely or for a pupil to access lessons from home or another location through an approved online platform.

Examples may include a pupil recovering from illness, a pupil who is temporarily unable to attend school for medical reasons, or other exceptional circumstances approved by the Principal.

Where remote learning arrangements are put in place for an extended period, the School may arrange additional pastoral check-ins through a Form Tutor, Head of Year, Head of Section or other appropriate member of staff to support the pupil's welfare, wellbeing and engagement with learning.

Expectations During Remote Learning

When participating in remote learning, pupils and staff must:

- follow the School's Safeguarding and Child Protection Policy, IT Acceptable Use Policy and Staff Code of Conduct at all times;
- use only School-approved platforms, systems and email accounts;
- participate from an appropriate location within the home or other suitable environment, with a neutral background wherever possible;
- wear clothing that would be appropriate for attendance at School;
- communicate respectfully and appropriately at all times, including when using chat functions;
- not record, photograph, copy, share or distribute any lesson, meeting or its contents without the prior permission of the Principal or an authorised member of staff; and
- report any safeguarding concern, inappropriate behaviour or online safety concern immediately in accordance with the procedures set out in this policy.

Any pupil who is concerned about something that occurs during remote learning should report this to a trusted adult, member of staff, DSL or DDSL as soon as possible.

Appendix 6: Safeguarding Arrangements for Whole-School Remote Learning

Should the School move to a period of remote learning, the safeguarding arrangements set out in this policy will continue to apply.

Key Safeguarding Contacts

During any period of remote learning:

- the same Designated Safeguarding Leads (DSLs), Deputy Designated Safeguarding Leads (DDSLs) and Safeguarding Governor will remain in post;
- safeguarding contact details will continue to be communicated regularly to pupils, parents and staff;
- a DSL or DDSL will be available during the school day; and
- safeguarding concerns can be reported via CPOMS, by telephone, or by email to safeguarding@queensgate.org.uk.

The DSLs will continue to liaise with Children's Social Care, Family Help services, social workers, health professionals and other safeguarding partners, including attendance at multi-agency meetings where required.

Vulnerable pupils

The School will maintain oversight of pupils who may be particularly vulnerable during periods of remote learning. These may include, but are not limited to:

- pupils with an Education, Health and Care Plan (EHCP);
- children with a social worker;
- children subject to Child Protection Plans, Child in Need Plans or Family Help arrangements;
- looked after and previously looked after children;
- pupils experiencing mental health difficulties;
- pupils with SEND; and
- pupils identified through the School's safeguarding processes as requiring additional support.

The DSLs will determine what additional contact, support, monitoring or intervention may be required and may implement individual safety and support plans where appropriate.

Attendance and engagement

The School will continue to monitor attendance and engagement throughout any period of remote learning.

- Registration arrangements will be clearly communicated to pupils and parents.
- Form Tutors will monitor attendance and engagement and will follow up concerns in accordance with School procedures.
- Concerns regarding repeated absence, failure to engage, welfare concerns or loss of contact will be referred promptly to a DSL.
- Where concerns persist, the School may make referrals to Children's Social Care, Family Help services, the local authority or other relevant agencies.

Contact with parents

The School will maintain accurate contact details for parents and emergency contacts and will seek to hold at least two emergency contacts for every pupil.

The School will continue to communicate regularly with parents regarding attendance, welfare, safeguarding and educational provision throughout any period of remote learning.

Reporting safeguarding concerns

Any safeguarding concern arising during remote learning must be reported immediately to a DSL or DDSL.

Staff should:

- follow the same safeguarding procedures that apply during normal school operations;
- record concerns on CPOMS;
- contact a DSL immediately where there is an urgent safeguarding concern; and
- ensure that any temporary notes are transferred securely and deleted once recorded appropriately.

Concerns about the conduct of a member of staff should be managed in accordance with Section 4 of this policy.

Where concerns relate to the Principal, they should be reported to the Chair of Governors via the Bursar.

Child-on child abuse

Staff should remain alert to the risk of child-on-child abuse during periods of remote learning. This includes:

- online bullying and cyberbullying;
- online sexual harassment;
- harmful sexual behaviour;
- the creation or sharing of nude or semi-nude images; and
- coercive, abusive or threatening behaviour through digital platforms.

Any concerns must be reported promptly to a DSL and managed in accordance with the School's child-on-child abuse procedures.

Training

Any new staff, volunteers or temporary staff appointed during a period of remote learning will receive:

- safeguarding induction training;
- information regarding local safeguarding procedures;
- the identity and contact details of the DSLs and DDSs;
- a copy of the School's Safeguarding and Child Protection Policy;
- Part One and Annex A of *Keeping Children Safe in Education (2026)*; and
- training in relation to remote learning arrangements, online safety and reporting procedures.

Safer recruitment

The School will continue to follow its safer recruitment procedures during periods of remote learning in accordance with:

- Part Three of *Keeping Children Safe in Education (2026)*; and
- the School's Safer Recruitment Policy.

Appropriate safeguarding checks will be completed before any individual begins work with pupils, and no unchecked volunteer will be permitted to undertake regulated activity or work unsupervised with children.