

**Queen's College London**  
**Queen's College Preparatory School**  
(including Early Years Foundation Stage)



*Safeguarding and Child Protection Policy*

(The policy to Safeguard and Promote the Welfare of Children in line with  
Section 175/157 of The Education Act 2002)

*Due for review Michaelmas Term 2026*

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## Key Contacts

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Member of the Council responsible for Safeguarding and Child Protection	Patricia Wilks <a href="mailto:pwilks@qcl.org.uk">pwilks@qcl.org.uk</a> +44 (0) 20 7291 7000 (Office)
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Principal, Queen's College Preparatory School	Richard Tillet <a href="mailto:rtillet@qcl.org.uk">rtillet@qcl.org.uk</a> +44 (0) 20 7291 0661 (Office)
Child and Family Services of the London Borough of Westminster	
Children's Access Team	+44 (0) 20 7641 4000
Emergency Duty Team	+44 (0) 20 7641 2388 (24 hours)
Westminster Local Safeguarding Children Partnership	+44 (0) 7739 315388
Allegations Manager/LADO	+44 (0) 20 7641 7668
Prevent Team	+44 (0) 7817 054759 <a href="mailto:prevent@westminster.gov.uk">prevent@westminster.gov.uk</a>

<b>National Contacts</b>	
ISI (Independent Schools Inspectorate)	CAP House, 9-12 Long Lane, London, EC1A 9HA +44 (0) 20 7600 0100
Crimestoppers	0800 555 111
NSPCC	Weston House, 42 Curtain Road, London, EC2A 3NH 0800 800 500
Childline	0800 1111
National Domestic Abuse Helpline	0808 2000 247
Samaritans	0845 790 9090
OFSTED	0300 123 4666
NSPCC Whistleblowing Helpline (for staff)	0800 028 0285 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Children's Commissioner for England	Anne Longfield 0800 5280731 <a href="mailto:advice.team@childrenscommissioners.gsi.gov.uk">advice.team@childrenscommissioners.gsi.gov.uk</a>

## Introduction

Queen's College, London and Queen's College Preparatory School (hereafter the School) recognises that it has a duty to ensure that safeguarding permeates all activities and functions. The School expects all members of staff, volunteers and third parties to share its commitment to safeguarding and promoting the welfare of pupils. The School prohibits the use of corporal punishment.

This policy is addressed to all members of staff and volunteers. It is available to all parents on request and is available on the website. It applies to all staff and volunteers who work with pupils from the School, even where this is away from the School's premises. Safeguarding and promoting the welfare of children is **everyone's** responsibility and all staff have a responsibility to provide a safe environment in which children can learn. The term 'children' includes everyone under the age of 18 years. However, the School's duty is to promote the welfare and health and safety of all pupils in its care, whether they are under or over the age of 18 years.

This policy should be read in conjunction with the following policies/documents at Queen's College, London and Queen's College Preparatory School:

- Safer Recruitment policy
- Attendance Policy

- Missing Pupil policy (Queen's College, London)
- Missing Pupil policy (Queen's College Preparatory School)
- Staff Code of Conduct
- Low Level Concerns policy
- E-Safety and Acceptable Use of IT policy (Queen's College, London)
- E-Safety and Acceptable Use of IT policy (Queen's College Preparatory School)
- EYFS policy
- Photography in School policy (Queen's College Preparatory School)
- Anti-Bullying policy
- Relationships and Sex Education policy (Queen's College, London)
- Prevent Risk Assessment
- PSHE policy (Queen's College, London)
- PSHE & RSE policy (Queen's College Preparatory School)
- Behaviour, Management and Discipline policy (Queen's College, London)
- Behaviour policy (Queen's College Preparatory School)
- Whistleblowing policy
- SEND and EAL policy

## Terminology

***Safeguarding and promoting the welfare of children*** refers to the process of protecting children from maltreatment; preventing the impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

***Child at Risk*** is where a child is identified as suffering, or being at risk of suffering, significant harm. If the child is in immediate danger the police should be called as well as children's social care and the Designated Safeguarding Leads informed.

***Child in Need*** is when a child is unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision of services by a Local Authority. Equally, a child is in need if their health or development is likely to be significantly impaired or further impaired, without the provision of such services, or if they are disabled.

***Child Protection*** refers to the process undertaken to protect children who have been identified as suffering, or being at risk of suffering, significant harm.

## Aims and Objectives

All staff are aware of the obligation laid upon them by the 1989 Children Act and subsequent legislation which is invoked when it is considered that a child is at risk of significant harm. However, this policy also outlines our expectations and

responsibilities regarding the wider agenda of safeguarding and promoting the welfare of children in the School in response to our statutory obligations under the Education Act 2002 (Section 175/157). This policy is updated in line with Working Together to Safeguard Children (2023), The Children Act 2004, The Education Act 2011, London Child Protection Procedures (2023) and the latest guidance on managing allegations, preventing and tackling bullying, use of reasonable force, screening searching and confiscation and managing student behaviour (2022), and Keeping Children Safe in Education (Statutory guidance for schools and colleges 2025). All staff, including supply teachers and volunteers who work directly with children in addition to school leaders, have been issued with a copy of 'Keeping Children Safe in Education': Part 1 and Annex B. All staff who work or volunteer at the College but who did not work directly with children are issued with Part 1.

The School fully recognises its respective responsibilities for safeguarding and child protection. The School adopts a whole school approach to safeguarding. This means ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. The safety and welfare of children is embedded in all of the School's processes and procedures, and consequently enshrined in its ethos.

Our policy applies to all staff, Council members and volunteers working in the School. There are five main elements to our policy:

- ensuring that we practise safer recruitment procedures in checking the suitability of staff and volunteers to work with pupils, including obtaining assurance that appropriate checks and procedures apply to any staff employed by another organisation, and ensuring all staff have read the policy and understood the chain of command and their responsibility;
- raising awareness of child protection and safeguarding issues and equipping pupils with the skills needed to keep themselves safe;
- developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
- supporting any pupil who has been abused in accordance with their agreed child protection plan; and
- establishing a safe environment in which pupils can learn and develop.

We recognise that, because of the day to day contact with pupils, School staff are well placed to observe the outward signs of abuse. The School will therefore:

- establish and maintain an environment where pupils feel secure, are encouraged to talk, and are listened to;

- ensure that pupils know that there are adults in the School whom they can approach if they are worried; including, but not exclusively, through the system of Form Tutors/teachers, pastoral team, Counsellors and the College Nurse;
- include opportunities in the PSHE curriculum, the Thrive curriculum, Form time and assemblies for pupils to develop the skills that they need to recognise and stay safe from abuse and harm. This includes opportunities to promote online safety through Computer Science or IT lessons or through PSHE;
- ensure that all staff in the School receive Basic Awareness training in safeguarding and child protection regularly, and at least every year, and that the Designated Safeguarding Leads for safeguarding and child protection attend more advanced child protection training every two years, including training in Prevent duties. All staff will receive updates on child protection and safeguarding as appropriate;
- ensure that staff receive Prevent training, at least annually;
- ensure that staff receive online safety training that is integrated, aligned and considered as part of the whole School safeguarding approach;
- ensure that all staff in the School are prepared and able to identify children who may benefit from early help, providing support as soon as a problem emerges in a child's life;
- ensure that all staff know what to do if they are concerned about a child and recognise that safeguarding is everyone's responsibility;
- ensure that staff read and understand Part 1 of Keeping Children Safe in Education (KCSIE 2025) and for those who work directly with children Annex B and that they recognise that they have a responsibility to provide a safe environment in which children can learn. The Teachers' Standards 2012 state that teachers, including headteachers, have a duty to safeguard the well-being of children and maintain public trust in the teaching profession as part of their professional duties;
- ensure that all staff are aware of the process for making referrals, as set out in Part 1 of KCSIE 2025 and the role that they might be expected for play in such a process;
- ensure that the Council undertakes an annual review of this policy and its procedures and confirms that the related duties are being discharged fully and, if necessary, exercises its commitment to rectify any identified shortcomings without delay;
- ensure that all Council members receive appropriate safeguarding and child protection (including online) training at induction and that this training is regularly updated. This training ensures that the Council can provide strategic challenge to test and assure themselves that the safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding.

## **Role of the Designated Safeguarding Leads (DSLs)**

DSLs are responsible for matters relating to child protection and safeguarding. This includes taking lead responsibility for online safety and understanding the filtering



and monitoring systems and processes in place in the School. Staff should speak to the DSL if they have a concern about a child's welfare and parents are welcome to approach the respective DSL if they have any concerns, whether they relate to their own child or any other. In accordance with Annex B of KCSIE 2024, the main responsibilities of the DSLs are:

### **Managing referrals**

- to take lead responsibility for promptly referring all cases of suspected abuse of any pupil at the School to Children's Social Care Services;
- to have a working knowledge of the Westminster Local Safeguarding Children Partnership (LSCB) procedures;
- to develop effective links with relevant and statutory and voluntary agencies including Westminster Local Safeguarding Children Partnership;
- to work together with the three safeguarding partners (the Local Authority; an integrated care board for an area within the Local Authority; and the chief officer of police for an area (any part of which falls within a Local Authority area) to safeguard and promote the welfare of children;
- to take lead responsibility for making referrals promptly to the police where a crime may have been committed which involves a child;
- to liaise with the Principal in respect of police investigations or investigations under Section 47 of the Children Act which involve the School. This includes being aware of the requirement for children (investigated by the police) to have an Appropriate Adult; and
- to act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;

### **Raising awareness**

- to ensure this policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Council regarding this;
- to ensure this policy is publicly available;
- to ensure that parents are aware that referrals about suspected abuse or neglect may be made to Children's Social Care Services and the School's role in this;
- to maintain links with the Westminster LSCB and to ensure staff are aware of training opportunities and the local policies on safeguarding;
- to ensure that the School's PSHE and RSE programmes as well as Computer Science and Thrive lessons teach pupils about safeguarding, including safe and appropriate use of the internet and social media;
- where children leave the School, to ensure their child protection file is transferred to any new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt will be obtained. Where a pupil leaves the College after completing their

final Senior year, the College will retain the child protection pupil record until the pupil reaches the age of 25 years; and

- where children leave the school, to ensure that any concerns about the safety and welfare of the children are shared with their new school or college, whether this is when problems are first emerging, or where a child is already known to the Local Authority Children's Social Care Services.

### **The Designated Safeguarding Leads will:**

- advise and act upon all suspicion, belief and evidence of abuse reported to them;
- keep the Principal informed of all actions unless the Principal is the subject of a complaint. In this situation, the Designated Safeguarding Lead should consult with the Chair of the Council or, in their absence the Vice Chair, without notifying the Principal first;
- liaise with Children's Social Care Services and other agencies on behalf of the College/Preparatory School; and
- promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and the leadership teams in the College and Preparatory School.

### **Training**

The DSLs for child protection and safeguarding attend training courses every two years. The DSL also, as a minimum, has accessed Prevent Awareness training. The DSLs also receive LSCP advice in relation to Prevent and online safety and receive informal updates from other agencies.

The DSLs are trained to understand the unique risks associated with online safety and be confident that they have the relevant and up to date capability required to keep children safe whilst they are online in the School. In the School, the DSLs are supported by the Director of IT and Digital Learning Leads, and in the Preparatory School, also by the Head of Prep, Head of Pre-Prep (Deputy DSLs).

At the start of each academic year there is a child protection and safeguarding briefing for all staff. New staff who join the School at other points in the year see the DSLs for training. The DSLs ensure that Part 1 KCSIE 2025 is read by all staff, and Annex B by school leaders and those who work directly with children.

As a minimum, the annual safeguarding training covers the following topics:<sup>1</sup>

- Safeguarding and Child Protection policy \*
- Online safety

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<sup>1</sup> \* denotes that all staff have been issued with a copy of this document.

- School policy - role of and identity of the DSLs and Deputy DSLs
- KCSIE 2025 – Part 1 (all staff)\*
- KCSIE 2025 - Annex B (leaders and those who work directly with children)\*
- Pupil behaviour policies
- Safeguarding response to children who are unexpectedly missing from the School
- Staff code of conduct (including whistleblowing and acceptable use of IT, staff/pupil relationships and communications including the use of social media)\*

## Child Protection Procedures

If a member of staff is concerned about a child or suspects that a child is the victim of abuse, whether physical, emotional, sexual or as a result of neglect or being exposed to domestic violence, they should inform the DSL. For pupils in the College this is Dr Susannah Abbott and for pupils in the Preparatory School it is Ms Katherine Colquhoun. They are responsible for liaising with Children's Social Care Services and the Local Safeguarding Children Board (LSCB). **If, however, a child is in immediate danger or is suffering, or likely to suffer harm, a referral should be made to Children's Social Care Services and/or the police immediately. Referrals should follow the local referral process for the borough in which the child lives.**

The online tool <https://www.gov.uk/report-child-abuse-to-local-council> directs to the relevant Children's Social Care Services contact number. Anyone can make a referral but if a referral is not made by the DSL, the DSL should be informed as soon as possible after referral. All referrals should be made within 24 hours of disclosure.

DSLs can be contacted during School hours. The College Deputy DSL can also be contacted on her mobile out of hours. Other numbers, including those that are manned 24 hours a day, can be found on the first page of this document.

The DSL will usually decide, in consultation with the Principal, whether to make a referral to Children's Social Care Services, but it is important to note that any staff member can refer their concerns to Children's Social Care Services directly. Referrals to statutory agencies do not require parental consent.

## Recognising Abuse

**Types of abuse and neglect** (*Taken from Keeping Children Safe in Education, 2025*)

**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. They may be abused by an adult or adults or another child or children. 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.

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

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

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

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Domestic abuse:** whilst the Government identifies four main types of abuse (outlined above) there is also the need to recognise domestic abuse. The cross-Governmental definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to, psychological, physical, sexual, financial, and emotional. In April 2021 the Domestic Abuse Act introduced the first ever statutory definitions of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experiences the effects of abuse.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have to leave the family home as a result.

Operation Encompass operates in the Borough of Westminster and helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) in the School before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

The National Domestic Abuse Helpline also provides support and guidance for victims of domestic abuse and can be called free of charge and in confidence. See contact details on page 5.

## **Indicators of Abuse**

The identification of physical signs of abuse is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell.' It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that members of staff are also aware of the range of behavioural indicators of abuse and reports any concerns to the DSL. It is the responsibility of all staff to report any and all niggling worries or concerns over safeguarding and welfare. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- be reckless with regard to their own safety;
- self-harm;
- show signs of not wanting to go home;
- display a change in behaviour - from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their schoolwork;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol; or
- display sexual knowledge or behaviour that exceeds that expected for their age;
- have 'tummy pains' with no medical reason; and
- be dirty, smelly, poorly clothed or appear underfed.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed. It is, therefore, essential that staff report any concerns that they have.

## **Mental Health**

All staff should also be aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that all staff are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and they should speak to the DSL and log their concerns on CPOMS in a timely manner.

## **Contextual Safeguarding**

Safeguarding incidents and/or behaviour can be associated with factors outside of the School and can occur between children outside of the school day. All staff at the

School, and especially the DSLs, should consider the context in which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means that any assessment of a child should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. All staff, but especially the DSL (and deputies), should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms and children may be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse) criminal exploitation, serious youth violence, county lines, and radicalisation. Children's Social Care Services assessment should consider such factors and so it is important that the School is in a position to provide as much information as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

## **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 years into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years old, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity that may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

CCE is similar to CSE in that it describes a situation where an individual or group take advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (rather than specifically sexual activity). CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (see county lines below), forced to shoplift or pickpocket, or to threaten other young people.

Both CSE and CCE are forms of abuse. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

## County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other forms of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools. Children are often recruited to move drugs and money between locations.

## Sexting/ Youth Produced Sexual Imagery (YPSI)

Sexting, also known as Youth Produced Sexual Imagery (YPSI) is an increasingly common activity among young people where they share inappropriate or explicit images online or through mobile phones. In the latest advice for schools and colleges ([Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(updated March 2024\) - GOV.UK](#)) sexting is defined as ‘the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18 years.’ It includes nude or nearly nude images and/or sexual acts. Sexting does not include the sharing of sexual photos and videos of under 18 year olds with or by adults; this is a form of child sexual abuse and must be referred to the police.

Regrettably, there is a national concern related to young people (under the age of 18 years of age) engaging in sending/sharing inappropriate/indecent photographs of themselves or of other children via texts, SnapChat messages, Facebook Messenger, Instagram, WhatsApp etc.

### The Law

The sharing of sexual videos and pictures of children under the age of 18 years, even if the child/young person shares an image of themselves, is a criminal offence. Specifically, crimes involving indecent photographs of a person under 18 years of age fall under Section 1 of the Protection of Children Act 1978 and Section 160 Criminal Justice Act 1988. Under this legislation, it is a crime to: take an indecent photograph or allow an indecent photograph to be taken; make an indecent photograph (this includes downloading or opening an image that has been sent via email/text/Snap Chat etc.); distribute or show such an image; possess with the intention of distributing images; advertise and possess such images. Young people may also call it:

- cybersex;



- sending a nude; or
- trading nudes/ 'Dirties'.

Sexting is often seen as flirting by children and young people who feel that it is a part of normal life and relationships. Laws were created long before the widespread use of the internet and, therefore, the School should always take a measured approach and seek to avoid criminalising children and young people where possible. Consensual image sharing, especially between older children of the same age, may not be abusive and should not always be treated as such. Even so, children still need to know it is illegal.

### **Dealing with sexting/ YPSI incidents**

When an incident involving YPSI comes to the School's attention the incident should be referred to the DSL as soon as possible. The DSL will apply their professional judgement to each incident and consider the following:

- whether there is a significant age difference between the sender/receiver involved;
- whether there is any external coercion involved or encouragement beyond the sender/receiver;
- whether the child is recognised as more vulnerable than is usual (i.e. at risk);
- whether the image is of a severe or extreme nature;
- whether the situation is not isolated and the image has been more widely distributed;
- whether this is not the first time children have been involved in a sexting act;
- whether other knowledge of either the sender/recipient may add cause for concern (i.e. difficult home circumstances);
- that sexting among children can be a common occurrence where they often describe these incidents as 'mundane'; and
- children, involved in sexting incidents, will be dealt with (by the police) as victims as opposed to perpetrators (unless there are mitigating circumstances).

All incidents of sexting should be recorded, including any action taken by the member of staff who found out about the incident.

### **Initial response**

The DSL should hold an initial review meeting with appropriate pastoral staff. There should be subsequent interviews with the children involved (if appropriate) and parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm. At any point in the process, if there is a concern that a child has been harmed or is at risk of harm, a referral should be made to Children's Social Care Services and/or the police immediately. An immediate referral to police and/or Children's Social Care Services should be made if at this initial stage:

- the incident involves an adult;
- there is reason to believe that a child has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs);
- the imagery suggests the content depicts sexual acts which are unusual for the child's developmental stage, or are violent;
- the imagery involves sexual acts and any student in the imagery is under 13 years; or
- there is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example, the child is presenting as suicidal or self-harming.

If none of the above apply, then the School may decide to respond to the incident without involving the police or Children's Social Care Services duty team (the School can choose to escalate the incident at any time, if further information or concerns become known).

The DSL should always use their professional judgement in conjunction with those of their colleagues to assess incidents. Adults should not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible, responses to incidents should be based on what the DSLs have been told about the content of the imagery. The decision to view imagery should be based on the professional judgement of the DSL and in line with the School Safeguarding and Child Protection policy.

If the DSL is satisfied that no other agency needs to be involved in dealing with the case, consideration should be given to deleting the images. The child should do this under supervision. Images should never be copied printed or shared with others; this is illegal. If any devices need to be seized and passed onto the police, the device(s) should be confiscated, and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

## **Peer on Peer Abuse (Child on Child)**

Children can abuse other children. This is often referred to as peer on peer abuse and can take many forms. This can include (but is not limited to):

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- sharing nudes (also known as sexting or youth produced sexual imagery);
- initiation/hazing type violence and rituals; or

- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

There is often a gendered nature to peer on peer abuse and it is more likely that girls will be victims and boys perpetrators. Whilst Queen's College is an all-girls' school, staff will never become complacent about peer on peer abuse, and all staff will recognise that children of both genders are capable of abusing their peers.

Peer on peer abuse should be treated as a child protection and safeguarding concern when there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm. Abuse of this nature should **never** be tolerated or passed off as 'banter'; 'just having a laugh'; or 'part of growing up'.

### **Strategies to minimise the risk of peer on peer abuse**

The School aims to prevent peer on peer abuse (which can include bullying) from becoming established. This is achieved by promoting a culture in which peer on peer abuse is not tolerated and where it is seen as the responsibility of all members of the School community to report any instances of peer on peer abuse. All staff understand how important it is to challenge inappropriate behaviour between peers. The School promotes a culture that minimises the risk of peer on peer abuse by promoting an open environment where pupils feel safe and where they feel that they are listened to. The School operates an open-door policy where pupils are encouraged to discuss concerns and worries with any member of staff.

Pupils in the College and Preparatory School have weekly PSHE/RSE lessons, which give pupils a forum to talk openly about any difficulties that they may have and discuss issues which may affect them. The Preparatory School follows the 'Jigsaw' Scheme of Work (further details of this Scheme can be found in the QCPS PSHE policy). A number of pupils in the Senior and Junior College year groups have had formal peer mentor training and we have a new Anti-Bullying Ambassadors Scheme in all sections of the College starting in September 2025. They will regularly drop in to form times and run educational sessions for form groups. The mentors and ambassadors have had safeguarding training and are aware of the need to pass on concerns if a pupil discloses that they have been abused, including abuse by their peers. In addition, there is an email address that pupils can use to raise concerns, including any that they have about peer on peer abuse ([worry@qcl.org.uk](mailto:worry@qcl.org.uk)) and pupils can use *Whisper* to anonymously report concerns.

The School operates a clear behaviour policy to support pupils, which includes rewards and sanctions. The School has a Nurse at both sites, who are available during school hours. Both the College and Preparatory School have School counsellors.

In addition, peer on peer abuse is regularly discussed in staff meetings across the School. The result of these meetings is to feed back information to senior leaders about friendship patterns, particular incidents, any pupil who seems to be isolated, any growing "power base" and any known conflict between a member of staff and a pupil, or between pupils so that strategies can be developed to prevent peer on peer abuse.

### **Procedures to deal with peer on peer abuse**

Peer on peer abuse may be identified in several ways:

- disclosure to a member of staff by the individual being abused;
- disclosure to another pupil by the individual being abused;
- witnesses to specific incidents; or
- suspicion of peer on peer abuse based upon the indicating factors.

When a disclosure or allegation is made by a pupil against another, members of staff should treat it as a safeguarding concern. Staff should inform the DSL. The DSL will gather information from the pupil making the allegation and consider whether they are at risk of significant harm. The child's wishes and feelings will be taken into account when determining what action to take and what services to provide, although the safety of the child will be the overriding priority.

If the DSL believes that the child has been harmed or is at risk of harm, they will make a referral to Children's Social Care Services immediately. If the allegation indicates that a potential criminal offence has taken place, the DSL will inform the police. Once advice has been taken from Children's Social Care Services and/or the police, the School will begin its investigation. The DSL or member of staff designated by the DSL will speak separately to the pupils involved to gain a statement of facts from them, using consistent language and open questions for each account. Any written evidence or images will be gathered. Parents, of both the alleged perpetrator and the alleged victim will be informed at an early stage and kept updated, **unless there is good reason to believe that involving parents would put the child at risk of harm**. If the police/Children's Social Care Services are involved, the School will wait for their agreement before informing parents.

If the allegation highlights a potential risk to the School and the pupil, the School will follow the School's behaviour policy and procedures and take appropriate action. If there is a criminal investigation ongoing, the School may consider that the pupil is unable to be educated on site until the investigation is concluded. In such cases, the pupil will be provided with appropriate support and education whilst they are off site.

## **Support for the victim and perpetrator**

The support that the victim requires will depend upon the individual, but the School can offer support to the victim in a number of ways:

- a support plan, naming someone to whom they can talk and listing support strategies for managing issues;
- the victim can speak to a trusted adult of their choosing in the School;
- the victim can speak to the College Nurse;
- the victim can speak to one of the School's counsellors; and
- the School may consider a referral to outside agencies including CAMHS.

It is important to find out why the perpetrator has behaved in such a way. It may be that they may have been harmed themselves in a similar way or may be experiencing their own difficulties. The School acknowledges its responsibility to offer support and will consider the following:

- a support plan, including support strategies for managing issues;
- the perpetrator can speak to a trusted adult of their choosing in the School;
- the perpetrator can speak to the College Nurse;
- the perpetrator can speak to one of the School's counsellors;
- the School may complete a CAF to ensure that outside services are made available to the perpetrator;
- a referral to outside agencies, including CAMHS or the CSE exploitation team, may be a requirement in the case of sexually harmful behaviour support plan, including support strategies for managing issues; and
- such other action as may appear appropriate to the Assistant Head, Deputy Head Pastoral or Principal.

## **Child on Child Sexual Violence and Harassment**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur both online and offline (both physically and verbally) and are never acceptable.

Sexual violence and sexual harassment should never be accepted. It is **never** acceptable to dismiss it as "banter", "part of growing up", or "just having a laugh." The School will take all allegations of sexual violence and sexual harassment seriously. Any pupil making such a disclosure will be reassured that they have done the right thing in coming forward and that they will be supported and kept safe. Any disclosures of this nature will be passed immediately to the DSL.

## **Sexual violence**

Sexual violence can be defined as rape, sexual assault or assault by penetration without consent. The legal age of consent in the UK is 16 years and no child under 13 years can ever give consent.

## **Sexual harassment**

Sexual harassment can be defined as ‘unwanted conduct of a sexual nature’ that can occur online and offline.’ Sexual harassment is likely to violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment may include:

- sexual comments such as telling sexual stories and making lewd comments;
- making sexual remarks about clothes and appearance
- calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone or interfering with someone’s clothes;
- upskirting;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; and
- Initiation/ hazing type violence or rituals.

Online sexual harassment may include:

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

Any allegations of sexual violence or harassment that are made must be reported to the DSL immediately. The DSL will follow the procedure as outlined in the investigation, referral and reporting section of this policy. In addition, if an incident of sexual violence has been reported, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a written risk assessment should be considered on an individual basis. This will consider:

- the victim, especially their protection and support;
- the alleged perpetrator;
- all the other children (and, if appropriate, senior pupils over the age of 18, staff and volunteers) at the School; and
- the time and location of the incident, and any action required to make the location safer.

As well as supporting the victim in cases of sexual violence and or sexual harassment, the DSL will also consider the importance of understanding intra familial harms and provide any necessary support for siblings following incidents.

## **Forced Marriage**

A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Coercion can include physical, psychological, financial, sexual and emotional coercion. It is illegal in the UK to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used.

There is a clear distinction between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement still remains with the prospective spouses.

In addition to the above, there are also specific safeguarding issues of which staff should be aware, some of which are outlined in further detail elsewhere in this policy. Any member of staff who has a concern about forced marriage or any of the issues listed below should discuss this with the DSL immediately:

- child missing from home or care;
- bullying including cyberbullying;
- domestic violence;
- drugs;
- fabricated or induced illness;
- faith abuse;
- gangs and youth violence;
- gender-based violence/violence against women and girls (VAWG);
- hate;
- mental health;
- private fostering
- relationship abuse;
- youth produced sexual imagery (sexting); and
- trafficking.

## **Female Genital Mutilation (FGM) and Honour Based Violence (HBV)**

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person

may be at risk of FGM, which individually may not indicate risk but, if there are two or more indicators present, this could signal a risk to the child or young person.

Potential risk factors may include:

- a female child is born to a woman who has undergone FGM;
- a female child has an older sibling or cousin who has undergone FGM;
- a female child's father comes from a community known to practise FGM;
- the family indicate that there are strong levels of influence held by elders
- and/or elders are involved in bringing up female children;
- a woman/family believe FGM is integral to cultural or religious identity;
- a girl/family has limited level of integration within UK community;
- parents have limited access to information about FGM and do not know about
- the harmful effects of FGM or UK law;
- a girl confides to a professional that she is to have a 'special procedure' or to
- attend a special occasion to 'become a woman';
- a girl talks about a long holiday to her country of origin or another country
- where the practice is prevalent;
- parents state that they or a relative will take the girl out of the country for a
- prolonged period;
- a parent or family member expresses concern that FGM may be carried out on
- the girl;
- a family is not engaging with professionals (health, education or other);
- a family is already known to social care in relation to other safeguarding
- issues;
- a girl requests help from a teacher or another adult because she is aware or
- suspects that she is at immediate risk of FGM;
- a girl talks about FGM in conversation, for example, a girl may tell other
- children about it;
- a girl from a practising community is withdrawn from Personal, Social, Health
- and Economic (PSHE) education or its equivalent;
- a girl is unexpectedly absent from school;
- sections are missing from a girl's Red book; and/or
- a girl has attended a travel clinic or equivalent for vaccinations / anti-malarials.

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that pupils at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found in Annex B of the Government's [Multi-agency statutory guidance on female genital mutilation \(2020\)](#). Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care Services.



A mandatory reporting duty commenced in October 2015, whereby teachers must report to the police cases where they discover that an act of FGM in young people who are under 18 years has occurred. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with the DSL and involve Children's Social Care Services as appropriate.

Honour Based Violence is a crime which has, or may have been, committed to protect or defend the honour of the family and/or community. HBV has the potential to be a child abuse concern. Any member of staff who has concerns about HBV must report them to the DSL at the earliest opportunity. The DSL will then make a judgement as to whether or not it is appropriate to make a safeguarding referral.

## **Prevent 2015**

The Prevent Duty is the duty in the Counter-Terrorism and Security Act 2015 where all schools are subject to the duty to have due regard to the need to prevent people from being drawn into terrorism. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

The Terrorism Act (2000) defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat may be designed to influence the Government or to intimidate the public and is typically made for the purpose of advancing a political, religious or ideological cause.

The Government has defined extremism as the vocal or active opposition to British fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Section 26 of the Counter-Terrorism and Security Act which came into force on 1 July 2015, places a duty on schools to have 'due regard to the need to prevent people from being drawn into terrorism'. This guidance is issued under Section 29 of the Act. The [Prevent Duty Guidance \(2015\)](#) , states that 'Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The Prevent Duty guidance is not intended to limit discussion of these issues. Schools should, however, be mindful of their existing duties to forbid indoctrination and secure a balanced presentation of political issues.'

Different people display various signs of radicalisation. Some people are able to hide it so well that they are indistinguishable from anybody else, making it hard to identify them as radicalised and understand what their intentions are or could be.

The following are some signs that could mean somebody is susceptible to radicalisation or is going through a radicalisation process:

### **Physical changes**

- sudden or gradual change in physical appearance;
- sudden or unexpectedly wearing religious attire;
- getting tattoos displaying various messages;
- possesses unexplained gifts and clothing (groomers will sometimes use gifts such as mobile phones and clothing to bribe a young person);

### **Social changes**

- cuts ties with their friends, family or community;
- starts to become socially withdrawn;
- becoming dependent on social media and the internet;
- begins to associate with others who hold radical views;
- bullies or demonises other people freely;
- begins to attend rallies and demonstrations for extremist causes;
- associates with known radicals;
- visits extremist websites, networks and blogs;

### **Emotional and verbal changes**

- begins to complain, often with anger, about governmental policies, especially foreign policy;
- advocates violence or criminal behaviour;
- begins to believe in government conspiracies;
- exhibits erratic behaviour such as paranoia and delusion;
- speaks about seeking revenge;
- starts to exhibit extreme religious intolerance;
- demonstrates sympathy to radical groups; or
- displays hatred or intolerance of other people or communities because they are different.

Members of staff, who have concerns about a pupil, must make these concerns known to the DSL at the earliest opportunity. The DSL will then make a judgement as to whether or not it is appropriate to make a referral to the Channel Programme, through the Local Authority in which the pupil resides. The Channel Programme is voluntary and any pupil who is referred must give their consent (via a parent or guardian if they are under 18 years) before they can be given support.

## **Children who may be particularly vulnerable**

Some pupils may be at an increased risk of abuse both online and offline. It is important to understand this increase in risk is more likely due to societal attitudes and assumptions, and failures to acknowledge pupils' diverse circumstances, rather than the individual's personality, impairment or circumstances.

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that pupils at the School receive equal protection, special consideration will be given to pupils who are:

- disabled or have special educational needs;
- young carers at home;
- living in a domestic abuse situation;
- affected by parental substance misuse;
- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living transient lives;
- living in chaotic and unsupportive home situations;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality;
- involved directly or indirectly in sexual exploitation; or who
- do not have English as their first language.

This list provides examples of particularly vulnerable groups, but is not exhaustive.

## **Children who need a social worker**

Local Authorities should share the fact that a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both Local Authorities and schools and colleges to safeguard and promote the welfare of children. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

## **Children who require mental health support**

The School has an important role to play in supporting the mental health and wellbeing of its pupils. All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff in the School are well placed to observe children and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. The School effectively uses data so that changes in pupil's patterns of attainment, attendance or behaviour are noticed and acted upon. The School's effective pastoral system means that every pupil is well known to at least one member of staff and that staff are able to identify poor or unusual behaviour that may have a root cause that needs addressing. The system includes the nurse (who is also the Senior Mental Health lead) and three trained counsellors, all of whom provide the opportunity for pupils to seek support in a confidential way. Support includes assessments to establish an analysis of the pupil's needs; a plan on how the pupil will be supported and action to provide that support alongside regular reviews. The reviews enable the effectiveness of the provision to be assessed and to lead to changes where necessary, for example, if more long term counselling is required. Staff understand that only appropriately trained staff should attempt to make a diagnosis of a mental health problem.

If a member of staff has concerns that a child's mental health might be suffering because the child is being abused or at risk of suffering abuse, they should treat it as a safeguarding issue and immediately speak to the DSL.

## **Children with Special Educational Needs and Disabilities**

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Staff must be aware that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumption that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

To address these challenges, the School offers additional pastoral support, including one to one and small group sessions, where appropriate, for children with SEND.

## **Children who are lesbian, gay, bi, or trans (LGBT+)**

All staff are aware that LGBT+ pupils can face additional barriers and that risk of harm can be compounded where pupils who are LGBT+ lack a trusted adult with whom they can be open. The School has a zero-tolerance culture towards transphobia and abuse of this nature will always be taken seriously.

The School endeavours to reduce the additional barriers LGBT+ pupils face. It prides itself on being a diverse and tolerant community and celebrates individuals for who they are. In addition to the School's open door policy, the College has its own LGBT+ Society where LGBT+ pupils are provided with a safe space to discuss issues and share their concerns. The Society also organises whole school presentations for example taking assemblies/ prayers. All pupils in the College have access to the 'Worry' email address where they can share any concerns they have that they feel they cannot verbalise.

## **Children who are absent from education**

'All children, regardless of their circumstances, are entitled to a full-time education' (*Keeping Children Safe in Education, September 2025*.) A child absent from education for prolonged and/or on repeat occasions, can act as a vital warning sign of a range of safeguarding possibilities. This may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk or traveling conflict zones, risk of FGM or risk of forced marriage. Registers are taken twice daily and absences are reports to the School Office. Pupils are also registered at the start of every lesson. Absences are monitored and DSLs are informed if a pupil fails to attend school regularly. The School's response to persistently absence pupils helps prevent the risk of them becoming a child missing in education in the future. This includes when problems are first emerging but also where children are already known to the Local Authority Children's Social Care Services and need a social worker (such as a child in need or who has a child protection plan, or is a looked after child). The DSL will notify a pupil's Local Authority if a pupil fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more. The School will also inform their Local Authority of any pupil who is going to be removed from the School roll where the pupil:

- has been taken out of school by their parents and the School has received written notification from the parent that they are being educated outside the school system, e.g. home education;
- has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered;

- has been certified by a medical practitioner as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age and neither parent has indicated the intention that their child will continue to attend the school after ceasing to be of compulsory school age;
- has been permanently excluded; or
- is in custody for a period of more than four months due to a final court order and it is understood that the pupil will not be returning to school at the end of that period.

In the event of a parent expressing their intention to remove a child from school with a view to educating them at home, the School will work with the Local Authority and any other key professionals to coordinate a meeting with parents/ carers. Where possible, this meeting will take place before a final decision to home educate a child has been made. This will ensure that the parents/ carers have considered what is in the best interests of the child and that the child will be safe and supported at home. This is particularly important where a child has SEND, is vulnerable and/or has a social worker. In a case where the intention is for a child who has an EHCP to be removed from the School and home educated, the School will ensure that the Local Authority is aware of this. This will ensure that the Local Authority can review the EHCP with the parents and carers.

The Local Authority must be informed when the School is to remove a pupil from its register for any of the five grounds listed above. This must be done as soon as possible. The Local Authority must also be informed if any pupil joins or leaves the School at non-standard times.

The School is committed to meeting our obligations with regards to school attendance, including those laid out in the Department for Education's (DfE's) statutory guidance on [working together to improve school attendance \(applies from 19 August 2024\)](#), through our whole-school culture and ethos that values good attendance. Further information on how the School will monitor attendance under this new guidance can be found in the Attendance Policy.

## **Missing child procedures**

All staff are informed of the separate procedure to be used for searching for and, if necessary, reporting any pupil missing from the School. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing.

Please see the separate Missing Pupil policy (College) or Lost Child policy (Preparatory School) for further details.

If the College or Preparatory School becomes aware of a child having run away from or having gone missing from home, this will be dealt with as a safeguarding matter and Child Protection procedures will be followed.

## **Staff interaction with pupils**

Full details of required behaviour from staff towards pupils are given in the Code of Conduct.

The current climate of suspicion with regard to child abuse poses a real dilemma for caring adults. In order to protect pupils from abuse, and staff from suspicion of abuse, the natural inclination to comfort and reassure pupils through physical contact has to be curbed, and this impulse restrained, by a considered assessment of the situation.

This does not mean that physical contact is never permissible, but adults touching pupils must operate within understood limits. Contact beyond those limits must be a considered response which must be justified if necessary.

Rigid rules about what is and is not permissible/acceptable are difficult to implement. See the additional specific guidelines for peripatetic teachers (below).

The simplest advice is to that staff, as far as is possible, should avoid being alone with a pupil. Where one-to-one contact does happen, e.g. in music lessons and guidance interviews, it should be arranged with others, where possible, within ear shot or vision.

### **(i) Physical contact and the use of reasonable force**

This may be for the purpose of:

- care;
- instruction; or
- restraint.

Staff should always be able to justify resorting to any physical contact. There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of contact to control or restrain children. Reasonable in these circumstances means 'using no more force than is needed.' The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Should physical contact appear necessary, staff should, if at all possible, summon a colleague to assist. Any incidents where reasonable force is used must be reported to the DSL immediately after the incident.

This policy should be read in conjunction with reference to the Code of Conduct for staff. The Preparatory School sets out guidelines for staff in the Physical Contact and Intervention policy.

As adults in positions of trust, and in order to minimise the risk of accusations being made against staff as a result of their daily contact with pupils, all School staff will adhere to the School's expectations regarding professional conduct and should familiarise themselves with the 2013 DfE guidance regarding reasonable force, '[Use of Reasonable Force](#).'

#### **(ii) Remarks**

Salacious or demeaning remarks should never be made to or in the presence of, pupils. Remarks about a pupil's physical characteristics or development, or suggestive or derogatory comments could fall into this category.

#### **(iii) Attachments**

Staff are strongly advised to share your concerns with the Principal or the appropriate DSL if:

- they suspect a pupil is becoming inappropriately attached to you or another member of staff; or
- their relationship with, or feelings towards, a child or young person is placing them at risk of unprofessional behaviour.

#### **(iv) Residential and non-residential trips**

During residential trips, staff are strongly advised to adhere to all the guidelines above and to be extra vigilant because:

- pupils will be around people who are unknown to them and the staff; and
- pupils may perceive boundaries to be blurred during residential trips.

During the completion of a risk assessment for any residential trip, a discussion will take place on how these risks can be minimised. Any concerns should be discussed with the DSL.

#### **(v) Non-residential trips**

As above.

#### **Advice and guidance for peripatetic teachers**

Any peripatetic teacher, for example, instrumental and visiting sports or languages teachers, should be made fully aware of the School's Safeguarding and Child Protection policy and procedures by DSLs in the College or the Preparatory School.



By the nature of their duties, instrumental teachers usually establish a personal relationship with pupils. Individual tuition could provide an opportunity for pupils to give information which teachers feel constrained to pass on. There is also the potential for unfounded accusations about the conduct of music teachers during lessons.

The following guidance is given to visiting music teachers:

- if a pupil seems unhappy, this should be mentioned to the Director of Music (Head of Music in the Preparatory School) or the relevant Head of Section or to the DSL in the College or Preparatory School;
- when teaching individuals, especially in rooms that have no direct view from the corridor, staff should continue to create an impression of easy access and openness to other pupils and colleagues; and
- whilst some physical contact is an essential element in some lessons, unnecessary proximity to pupils must be avoided. If there is a need to touch a pupil, it should be made obvious that this is going to happen and an explanation provided as to why physical contact is necessary. For example: 'I am going to move your arms into the correct position over the keyboard. Is that ok?'

If staff have any physical contact that may in any way be considered inappropriate, this must be reported to the DSL immediately.

## **Handling a disclosure**

If a pupil discloses directly, it is important to remember that this may become the basis of evidence in a criminal or civil court.

Staff must carefully to what is said and **ask only open questions such as:**

- What was happening at the time?
- Is there anything else you want to tell me?

Staff should not ask leading questions which may be considered as suggesting what might have happened, or who has perpetrated the abuse, as this can later be interpreted as putting ideas into the child's mind. The child should lead the conversation and remain calm.

**STAFF MUST NEVER GIVE UNDERTAKINGS OF ABSOLUTE CONFIDENTIALITY TO A PUPIL.** Breaking a child's confidence could be highly damaging; it is advisable from the outset that staffs say that they might have to tell someone. At the same time, the pupil should be reassured that there will be an appropriate level of confidentiality. This means only involving those who need to be informed of the disclosure (such as the DSL) and children's social care.

Staff should take notes of the details of the disclosure using the child's words where possible.

Records should:

- be handwritten and if at all possible submitted within one hour, but certainly within 24 hours to the DSL;
- be accurate and descriptive, using the child's words/quotations as much as possible;
- not make assumptions;
- not include any opinions;
- indicate sources of information;
- be clear and concise and include date, time, place and who was present where applicable; and
- include what led up to the disclosure and include what you said to the child (to illustrate that you did not ask leading questions).

The pupil should be reassured that they are being taken seriously and that they will be supported and kept safe. A pupil should never be given the impression that they are creating a problem by reporting abuse or sexual violence or harassment. The pupil making the disclosure must never be made to feel ashamed for making a disclosure.

Once a disclosure has been made, the member of staff should immediately contact the relevant DSL, unless the complaint involves an allegation against a member of staff or volunteer, in which case **the DSL and/or the Principal of the College and the Prep School should be informed immediately.** They should not discuss the matter with anyone else.

If a member of staff observes anything that involves a pupil at the School which they feel could be a Child Protection matter, they must talk to the relevant DSL as soon as possible.

**In any case where a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Care Services and/or the police immediately.** Anyone can make a referral and, if a referral is not made by the DSL, then the DSL should be informed as soon as possible that a referral has been made. Referrals should be made to the Children's Social Care Services in the Borough in which the pupil lives. The online tool <https://www.gov.uk/report-child-abuse-to-local-council> directs to the relevant Children's Social Care Services contact number. If the danger to the child is not immediate, the DSL should make the referral within 24 hours of the disclosure. Referrals to statutory agencies do not require parental consent.

## Investigation, referral and reporting

It is the responsibility of the College and Preparatory School staff to:

- protect children from abuse;
- be aware of the School's Child Protection procedures;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSL; and
- undertake appropriate training, including refresher training at least annually.

It is not the responsibility of School staff to investigate suspected abuse. The School is not an investigation or intervention agency for child protection, but it has an important role to play at the recognition and referral stages. The School will take into account the procedures published by the Local Safeguarding Children Board when dealing with allegations of abuse.

Having taken advice from Children's Social Care Services and acting in accordance with locally agreed agency procedures, and when considered appropriate and safe to do so, the DSL will discuss the concerns with the parents/guardians and seek their agreement before making a referral to Children's Social Care Services, recognising that this may strengthen the capacity of parents to respond to the needs of their children before problems develop into abuse. The only exceptions would be in the case of sexual abuse, significant physical abuse or where seeking parental consent might put a child at further risk of abuse/significant harm. If consent to referral is not given by the parent/guardian, the DSL may consult Children's Social Care Services who will advise whether any further action should be taken by the School or other agencies.

If there is doubt over whether a referral should be made, the DSL may consult with Children's Social Care Services or other appropriate professionals on a no-name basis without identifying the family. However, as soon as a sufficient concern exists, a referral will be made without delay. If a referral is made by telephone, the DSL will confirm the referral in writing to Children's Social Care Services within 48 hours. If no response is received within three working days, the DSL will contact Children's Social Care Services again.

If a referral is made, the DSL will keep the Principal/ informed of the case; unless the complaint involves the Principal in which case the Chair of the Council must be contacted.

In circumstances where a pupil has not suffered, and is not likely to suffer, significant harm but is in need of additional support from one or more agencies, the DSL will

liaise with Children's Social Care Services and, where appropriate, an inter-agency assessment will take place.

## **Confidentiality and information sharing**

Child protection records will be kept securely locked, separate from the pupils' main files, and are exempt from the disclosure provisions of the Data Protection Act 1998 where a child is, has been or may be at risk of child abuse. The best interests of the pupil will always be paramount. For manual records in principle the sharing of details of individual cases will be limited to the minimum number of people, while still ensuring that the staff who will be supporting and monitoring the child are kept appropriately informed.

If there have been any concerns of a child protection nature relating to a child, or the child is the subject of a Child Protection Plan, the DSL and/or the Principal of the School has the responsibility for passing this information on should the child transfer to a new school. If the School is unaware of the destination of a child leaving, the School will refer the child to the Local Authority in order to ensure that they are tracked appropriately.

## **Allegations against pupils**

The School acknowledges its responsibility to protect pupils and prevent them from possibly committing a criminal offence, in line with Government guidance on [Preventing and tackling bullying \(2017\)](#). All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender-based violence/sexual assaults and sexting.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the Behaviour, Management and Discipline policy in the College and the Behaviour policy in the Preparatory School will apply. Issues of bullying and especially cyber-bullying will be addressed through the School's Anti-Bullying policy and the relevant Acceptable Use of IT policy in the College and the Internet Use Agreement for Pupils in the Preparatory School.

## **Allegations against staff**

Allegations against members of staff (including cover/supply teachers and volunteers) can involve claims that they have:

- 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 he or she 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 (for example, an incident of domestic abuse).

If an allegation is made against anyone working in the School (including supply/ temporary cover teachers and volunteers), the Principal of the College/ Head of the Preparatory School must be informed immediately. Advice will be sought from the Local Authority Designated Officer (LADO) where appropriate. At any stage of consideration or investigation, all unnecessary delays will be avoided. The School will not undertake its own investigation of an allegation without prior consultation with the LADO.

In the event of allegations being made against an individual not directly employed by the School (such as a supply teacher or contractor) the School will ensure that the allegations are dealt with properly. The School will not cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will involve the supply agency or agencies where the supply teacher is working across a number of schools or colleges as to whether it is appropriate to suspend the supply teacher, or redeploy them to another school or college, whilst they carry out their investigation. This will also ensure that any potential patterns of inappropriate behaviour can be identified.

In a situation where there is a conflict of interest in reporting the matter to the Principal/ Head, this should be reported directly to the LADO.

Where an allegation or complaint is made about the Principal of the College/Head of the Preparatory School, the incident will be reported to the Chair of the Council. The Chair should contact the LADO immediately for advice and support. If there is an allegation against the Chair of the Council, the member of the Council responsible for Safeguarding and Child Protection should be contacted and they should contact the LADO immediately for advice and support.

Confidentiality will be maintained throughout this stage in order that any subsequent investigation is not prejudiced.

There are three possible routes for further investigation: either by the police, under local child protection procedures, or under the School's disciplinary and competence procedure.

The School will refer any member of staff to the DBS who has harmed, or poses a risk of harm, to child or vulnerable adult where:

- the harm test (where a person may harm a child or put them at risk of harm) is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

For teachers, separate consideration will be given to whether to refer the matter to the TRA (Teaching Regulation Agency) to consider prohibiting the individual from teaching. Reasons such an order may be considered are: “unacceptable professional conduct”, “conduct that may bring the profession into disrepute”, or “conviction, at any time, for a relevant offence”.

Allegations against a teacher who is no longer working at the School should be referred to the police. Historical allegations of abuse should also be referred to the police.

There may be occasions where a member of staff’s behaviour towards a child does not meet the threshold of harm but is still of concern. This concern may be ‘low-level’ but this does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being overfriendly with children;
- having favourites;
- taking photos of children on their mobile phone (without permission from the DSL);
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

The School’s open-door policy extends to staff as well as pupils as the School promotes an open and transparent culture. This helps to ensure that all concerns are dealt with promptly and appropriately.

Staff are clear about what appropriate behaviour is and are required to read the staff code of conduct annually. Staff are encouraged to share any low-level safeguarding concerns with the Principal and they are aware that such concerns will be dealt with.

All low-level concerns are recorded in writing and are kept by the Principal. The records include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concern is also noted. If the individual wishes to remain anonymous then that should be respected as far as reasonably possible. These records will be kept confidential, held securely and will comply with The Data Protection Act 2018.

Records will be reviewed on a termly basis by the Principal and DSL so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO. The School will address unprofessional behaviour and support the individual to correct it at the earliest stage possible.

The School will use any reports of low-level concerns to identify any weakness in the School's safeguarding system. Any weaknesses or deficiencies will be remedied without delay. For further details, please refer to the School's Low Levels Concerns policy.

### **Whistleblowing:**

All staff have a duty to raise concerns about the attitude and actions of colleagues. For further details on this, please refer to the School's Whistleblowing policy.

## **Appropriate and inappropriate use of electronic communication**

All staff recognise the importance of safeguarding children from potentially harmful and inappropriate online material and understand that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online. This can take the form of abusive, harassing and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of indecent images, to those who do not want to receive such content. Staff are aware that for young people the connected world embraces both online and offline and for young people there is often no separation in their minds between 'real life' and the 'online world.'

To address this, the School aims to:

- o have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and members of the Council;
- o protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology;
- o set clear guidelines for the use of mobile phones and electronic devices for the whole school community; and,
- o establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

#### **The 4 key categories of risk:**

The School's approach to online safety is based on addressing the following categories of risk:

- o **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- o **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- o **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- o **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

#### **To meet our aims and address the risks above, the School will:**

- o educate pupils about online safety as part of our curriculum. For example:
  - o The safe use of social media, the internet and technology
  - o Keeping personal information private
  - o How to recognise unacceptable behaviour online
  - o How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim;
- o train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year;
- o educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety;



- o make all pupils, parents/carers, staff, volunteers and members of the Council aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology;
- o explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones;
- o make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones and electronic devices as set out in the College's Management, Behaviour and Discipline policy and the Preparatory School's Behaviour Policy;
- o put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems;
- o Carry out an annual review of the School's approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community; and,
- o Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

### **Use of mobile phones**

The use of mobile technology is carefully managed in the School. In the Prep School, pupils in Form VI who have consent to travel to and from school alone, may have a mobile phone that is safely stored in the School Office during the day. Written permission from the Principal or Deputy Head Pastoral must be obtained by the parents before the phone is sent into school.

In the College, phones belonging to pupils are kept in Yondr pouches. Pupils in the Senior College are allowed to keep their phones with them, but their use is restricted. In the Senior College, pupils can use their phones in the Senior Common Room, their form rooms and in lessons where permission has been given. They must not have their phones visible in any other areas of the College. Pupils in the Senior College are required to share their mobile phone numbers with the School and these are stored on Schoolbase. This is because pupils in the Senior College are allowed to go out during the school day and the College may need to contact them should an emergency arise. A pupil would only be contacted on their personal mobile phone in an emergency and the DSL would be informed of this. Pupils in all year groups may be asked to provide their personal mobile phone numbers on school trips as a safety measure. These numbers will be kept only for the duration of the trip and deleted after the trip has ended.

### **Electronic devices**

Pupils in the Prep School are not allowed to bring their own devices into school, except those who have permission due to exceptional SEN requirements.

The College requires all pupils to have their own electronic device for learning. Devices are bought and owned by parents, although all devices must meet the requirements set out in the appendix of the Acceptable Use Policy for pupils. As devices are parent-owned, monitoring and filtering at home will be the responsibility of individual families. At school, the devices will be monitored and filtered through the QCL Wi-Fi.

On occasions pupils may need to borrow devices that are owned by the School. The College will be responsible for the monitoring and filtering of these devices, including when pupils use them off-site.

Pupils in the Senior College and IJ year, can use their devices for educational purposes during study periods, morning break, lunchtime, before and after school. Devices can be used in the Library, form rooms and the Senior College. Pupils in the IJ year group and Classes 3, 2 and 1 can only use their devices for educational purposes outside of lesson time in the following areas: the Blue Library or a dedicated classroom. Devices should be kept securely in lockers or in bags when pupils are not in lessons.

All pupils are encouraged to access the internet via the College WiFi rather than the use of 4G/5G. Further details are provided in the School's Acceptable Use of IT policy.

A comprehensive programme of online safety study is delivered across all year groups, during timetabled lessons and PSHE/Thrive lessons. Topics are appropriately differentiated dependent upon age group, with a primary focus of preventative strategies. All pupils are aware of a direct course of action that should be followed if they wish to report an incident of online misconduct, either within the College/Preparatory School or directly to an external agency. Clear guidelines when using the College and/or Preparatory School electronic devices are set out in the School's Acceptable Use of IT Technology policy. These guidelines make clear that, even while using social media, blogs and forums, pupils are representing the School's community. The programme of online safety also includes an annual internet safety evening for parents at the Preparatory School and the College. At the Preparatory School, there is also an annual internet safety workshop provided for pupils of Form V and VI.

All staff should exercise caution in electronic communication with pupils. Staff should not give their personal mobile phone numbers or email addresses to pupils, nor should they communicate with them by text message or personal email, unless this has been agreed with the DSL. If staff need to speak to a pupil by telephone, they should use one of the School's telephones and email using the School system.

The group leader on all trips and visits, including overnight stays, should ideally take a School mobile phone with him/her but may well use his/her own phone home discussions and agreement with the DSL and EVC or a member of SMT in the Preparatory School. The group leader will delete any record of pupils' mobile phone numbers at the end of the trip or visit and should ensure that pupils delete any staff numbers that they may have acquired during the trip. Staff should also:

- ensure that their own personal social networking sites are set as private and ensure that pupils are not approved contacts;
- never use or access social networking sites of pupils (the only exception being if there is a serious safeguarding concern that has led to the DSL giving permission to access a specific public networking site);
- never use internet or web-based communication channels to send personal messages to pupils;
- only make contact with pupils for professional reasons; and
- recognise that text messaging should only be used when other forms of communication are not possible.

The School is aware that technology, the risks and harms related to it, evolve and change rapidly. As a result, the School carries out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks their pupils face.

## **Filtering and monitoring**

When using the School's ICT facilities and wireless network, internet access is comprehensively filtered and monitored to prevent access to harmful or offensive websites. Filtering and monitoring in the School is also informed in part by the School's Prevent Duty risk assessment. The School meets the DfE's filtering and monitoring standards.

The database of blocked websites is regularly updated to capture any new and emerging online threats. At the same time as ensuring that appropriate filters and monitoring systems are in place, the School is careful that 'over-blocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

The DSLs at the Prep School and the College are the leads responsible for understanding the filtering and monitoring processes. The DSLs are responsible for ensuring that all staff understand their role in relation to filtering and monitoring; receive appropriate training; follow policies; processes and procedures and act on reports and concerns. They are also responsible for overseeing and acting on filtering

and monitoring reports; safeguarding concerns and checks to filtering and monitoring.

The DSLs, members of SLT, and the Director of IT work in collaboration to review the filtering and monitoring provision (both from a safeguarding and IT perspective) at least annually. Reviews are also carried out when a safeguarding risk is identified there is a change in working practice (for example: with the introduction of One to One devices to all year groups in the College from September 2023) or where new technology has been introduced.

The member of the Council responsible for Safeguarding and Child Protection carries out an online safeguarding audit annually. This includes checking that the School has appropriate filtering and monitoring standards in place and reviewing their effectiveness; ensuring that the School meets that the filtering and monitoring standards; ensuring that the DSLs understand their role in the filtering and monitoring process; checking that staff have been trained and understand their roles and responsibilities around online safety, including filtering and monitoring. The audit is logged and shared with the Council.

### **Acceptable use of staff mobile phones, cameras and recording devices**

All devices are monitored by our filtering and monitoring systems, including a robust firewall and safeguarding IT systems, e.g. Senso.

#### **Mobile Phones**

All staff should aim to ensure that their mobile phones, personal cameras and recording devices are not in use or in evidence in front of pupils. If a member of staff is using a mobile device in front of a pupil, they should be able to demonstrate that it is on School business. Pre-Prep and Prep staff take their mobile phones to the Garden each day in order to ensure contact with the School and for emergencies. Similarly, the PE Department may also use their mobile phones when going off-site as a point of contact.

#### **Cameras**

Children should only be photographed or filmed on video for the purpose of recording their development or participation in events organised by the School. Parents are asked at the start of each academic year to consent to their child's image being used in particular ways. Parents have the right of access to records holding visual images of their child.

Staff are allowed to:

- take photos of pupils on any School device;
- store the photos on the School network;

- use the photos for School promotions (where permission has been given by parents);
- in the College, take photos on a personal device but then delete them from the device and the cloud once they have been used.

If in a College context, a member of staff takes a photo on a personal mobile phone or device, this must be uploaded to a School social media account and deleted from the personal mobile device as soon as possible.

In EYFS, staff must ensure they only take photos and videos using a School device.

Staff in the Marketing department are permitted to take photographs or videos of pupils for the explicit purpose of updating the School's social media sites, websites or marketing collateral (in which cases, the images will be quickly deleted from the phones.) They should ideally use the Marketing Phone to do so.

Staff may not:

- keep photos unnecessarily on personal tablets or mobile phones;
- download photos to personal computers or devices at home;
- store any photos of pupils that have been obtained from elsewhere on personal computers, e.g. Twitter; or Instagram
- name pupils by surname on any social media.

By following the above procedures, staff minimise their risk of being exposed to inappropriate images as contact is kept within professional boundaries.

Images taken must be deemed suitable without putting the child in any compromising position that could cause embarrassment or distress. Staff must ensure that the pupil/s understand why the images are being taken and have agreed to the activity. Images should not be made during one-to-one situations. Staff should ensure that pupils are appropriately dressed.

Images taken on a School camera must be downloaded as soon as practicable. Images should be downloaded to a School network folder. All images of children should be stored securely and only accessed by those authorised to do so. Images must never be taken secretly.

Images may only be uploaded to the School website and social media channels by authorised staff and should never be uploaded to the internet for any other reason, including on to staff's own social media accounts.

If an image is to be displayed in a place to which the public have access, it should not display the pupil's surname. Similarly, where a pupil is named (for example, in a School prospectus), the name should not be accompanied by a photograph or video.

Under no circumstances must cameras of any kind be taken into bathrooms or changing areas.

It is the responsibility of all members of staff to be vigilant and report any concerns to the DSL.

Any non-compliance will be taken seriously, logged and investigated appropriately in line with the School's disciplinary policies.

## **Use of Generative Artificial Intelligence (AI) in Education**

Queen's College London and Queen's College Preparatory School recognise both the opportunities and potential safeguarding risks associated with the use of Generative Artificial Intelligence (AI) technologies in education. In line with the DfE's 2025 guidance on Generative AI: Product Safety Expectations, and in support of our obligations under Keeping Children Safe in Education (KCSIE) 2025, we set out the following standards:

### **Safeguarding Expectations**

We will ensure that any generative AI tools used within school settings (by pupils or staff) comply with the following safeguarding and child protection principles:

- Filtering and Moderation:
  - Generative AI tools must have robust, active filtering systems in place to prevent access to harmful or inappropriate content, including disinformation, conspiracy theories, and violent or sexual material.
  - Filtering systems must:
    - Operate consistently across all platforms, devices and user types (including BYOD).
    - Adapt to age, developmental stage, and specific needs (e.g. SEND).
    - Include moderation of multimodal content, such as images and multilingual text.
    - Be regularly updated to respond to emerging online threats and content trends.
- Monitoring and Reporting
  - AI products must log user interactions securely, including prompts and generated responses.
  - Systems must:

- Alert safeguarding staff if a pupil attempts to access harmful content or makes a potential safeguarding disclosure.
- Generate user-facing alerts in age-appropriate language when content is blocked.
- Produce reports that are clear and accessible for staff, enabling early intervention without adding unnecessary burden.
- Security and Data Protection
  - All generative AI tools must:
    - Be secure against 'jailbreaking' and unauthorised modification.
    - Provide role-based access controls and password or multifactor authentication.
    - Undergo regular safety testing and updates.
    - Comply with the Cyber Security Standards for Schools and Colleges.
    - Be supported by a Data Protection Impact Assessment (DPIA), aligned with the UK GDPR and Data Protection Act 2018.
- Privacy and Transparency
  - AI products must:
    - Provide clear privacy notices in language accessible to children and parents.
    - Avoid collecting or processing personal data for commercial purposes (e.g. further model training) without lawful basis and consent.
    - Be compliant with the ICO's Age Appropriate Design Code and other relevant standards.
- Intellectual Property
  - The intellectual property created by pupils or staff must not be used to train or fine-tune AI models without explicit consent from the copyright owner or their legal guardian.
- Design and Testing
  - AI tools must be tested thoroughly for safety and equity before use in the school.
  - Developers must include a child-centred design approach and involve diverse users in product testing to minimise bias or harm.
- Governance and Accountability
  - All generative AI tools used within the School must be subject to:
    - A formal risk assessment prior to deployment.
    - A clear complaints and escalation mechanism for raising concerns about inappropriate content or AI behaviour.
    - Transparent documentation of decision-making processes and safety measures, accessible to regulators and school staff.

The School will review the use of generative AI annually as part of its safeguarding and online safety provision and will monitor regulatory guidance for further developments.

## **Relationships and Sex Education (RSE)**

Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) was made compulsory from September 2020. The College and the Preparatory School teach the new curriculum. The programme is fully inclusive and age/ stage appropriate. It tackles age-appropriate stage issues such as:

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

Further details can be found in the PSHE and RSE policies. We await the revised guidance, which is due to be published later this year and then will be integrated in our Safeguarding Policy and RSE guidance.

## **Visiting Speakers and Volunteers**

The College and the Preparatory School will ensure that visiting speakers, whether invited by staff or pupils, are suitable and appropriately supervised. The following outlines the procedure for visiting speakers:

- all visiting speakers will be approved by the Principal, or the DSL;
- appropriate checks on the suitability of the speaker should be made, which may include internet searches and/or contacting schools where the person has already spoken. Although not always possible, it is useful to invite speakers from an established company, charity or other group whose aims are well-documented;
- there will be an understanding that the speaker will be expected to talk with staff about the content of the presentation before the event; speakers and staff must allow time for this discussion, whether it is on the day or beforehand;



- visiting speakers must arrive at the Front Office/School Office in good time to sign in. They must bring suitable identification to prove who they are, such as a passport or driving licence. Although viewing DBS certificates may be appropriate, most visiting speakers will not be in 'regulated activity' and so will not necessarily have a DBS certificate to present;
- all visitors must clearly display their visitors' badge whilst they are on site (lanyards are provided);
- all visitors must be supervised at all times and not left alone with pupils;
- visiting speakers should understand that their presentation will be brought to an early end, if the content proves unsuitable;
- all information about the visiting speaker and the booking process should be recorded on a Visiting Speakers' Record which will be kept in the Visiting Speakers' Register is kept in the Front Office/School Office; and
- where the College uses volunteers, the College will adhere to the vetting requirements outlined in KCSIE 2025 and undertake risk assessments, as appropriate.

## **Home-Stays (Exchange Visits)**

If pupils from the School are hosting other children as part of an exchange, the School will arrange for the parents to have an enhanced DBS check. This check must be completed before the parents host the exchange pupils. Where pupils from the School are being hosted by parents in another country, the trip organiser will work with the DSL to ensure that measures have been taken to ensure the safety of the pupils.

## **Monitoring**

The DSLs will monitor the operation of this policy and procedures and liaise with the member of Council responsible for Safeguarding and Child Protection, Ms Patricia Wilks.

Any child protection incidents at the School will be followed by a review of the safeguarding procedures within the School by the DSLs and a prompt report to the Council. When an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

The Principal and Senior Management teams (including the DSL in the College and the DSL in the Prep School, including the EYFS setting) will monitor and evaluate, with the Council, the effectiveness of the Safeguarding and Child Protection policy on an annual basis. This includes reviewing the School's annual online safety audit. The

policy will be subject to review at least annually (or more frequently if changes to legislation, regulation or statutory guidance so require).

The implementation of the Safeguarding and Child Protection policy will also be subject to a full audit on an annual basis by the Member of Council responsible for Safeguarding and Child Protection. The annual audit will be reported to the Council. The Council will review this policy and its implementation annually, including good cooperation with local agencies, and approve any amendments to the policy, which will in turn be signed off by the Chair of the Council. This annual audit will seek evidence including: staff training in safeguarding; referral data; analysis of any issues and themes which have emerged in the College/Preparatory School and how these have been handled; initiatives to educate pupils about safeguarding; and details of any contribution the College/Preparatory School has made to local discussions and multiagency working on safeguarding matters.

## **Secure School Premises**

The School will take all practical steps to ensure that premises are as secure as circumstances permit.

All visitors to both the College and the Preparatory School are required to sign in on arrival, using the school's computerised access control system. The system requires them to confirm that they have understood and agree to safeguarding and fire safety instructions, before issuing them with a visitor pass. The passes are marked 'Visitor' and distinguishes between visitors who hold a DBS (blue) and those that do not (red). It includes a photograph, and is worn on a lanyard of a different colour to Queen's staff and pupils; it must be clearly displayed at all times whilst on the premises. All visitors are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. On leaving the premises the visitor will be required to sign out and return their pass to reception.

The city centre location of the College and the Preparatory School and close proximity to a number of embassies means that there is a heightened risk of terrorist activity. Consequently, the School has a crisis management procedure. Drills are regularly carried out so that pupils know what to do in an emergency.

On occasions where the School is let out to third-party users and the activities provided are under the direct supervision or management of staff in the School the School's arrangements and policies for safeguarding children will apply. However, where activities or services are provided by another body, the School will seek assurance that the body concerned has an appropriate safeguarding and child protection policy in place. This applies regardless of whether or not the children who attend any of these activities or services are children on the School's roll or attend the

School. Failure of third-party users to comply with this would lead to the School terminating the agreement.

The School may receive 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, extra-curricular programmes during the holidays). As with any safeguarding allegation, the School will follow their safeguarding policies and procedures, including informing the LADO where appropriate.

## **Safer Recruitment Practices**

The College and Preparatory School share a Safer Recruitment policy. All relevant staff undertake Safer Recruitment training with the dual aim of safeguarding the pupils in the school and avoiding any allegation of negligence in the recruitment process. This vigilance is not just limited to recruitment. In the School the culture is such that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for safeguarding. Staff understand the process and procedures to follow if they have a safeguarding concern, including any low-level concerns, about another member of staff.

The Council will, when appointing staff and volunteers, take account of the DfE guidance on Safer Recruitment by observing a number of safeguards, including:

1. Documentation sent to potential candidates will make it clear that safeguarding is a high priority of the School and that rigorous checks will be made of any candidate before appointments are confirmed;
2. Carrying out online searches for shortlisted candidates. These will be carried out to help identify any incidents or issues that have happened, and are publicly available online, which the School might want to explore with the applicant at interview. All candidates who are short-listed will be informed that these checks may be done as part of pre-recruitment checks;
3. At least two references as to the suitability of a candidate to work with children will be obtained, from the last employer (where practicable) and from previous employers and/or suitable referees;
4. Candidates will be asked to account for any gaps in their career/employment history. Interview questions will include some designed to explore their knowledge and understanding of safeguarding and their responsibilities;

5. An enhanced criminal record check including barring information (Barred List check) from the Disclosure and Barring Service (DBS) will be obtained for any staff or volunteer in regulated activity. Where required, evidence of relevant checks will be recorded in a single central register (SCR);

6. Where new members of staff have lived abroad for three months or more during the ten years prior to their appointment, they will obtain an overseas check from the relevant country or countries. In accordance with their role, new members of teaching staff will be checked for any prohibition orders issued by the Secretary of State. From 1<sup>st</sup> January 2021, the TRA services system no longer maintains a list of those teachers who have been sanctioned in EEA member states. Therefore, the School will make any further checks that they think are appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include, where available:

- criminal records checks for overseas applicants - Home Office guidance can be found [here](#);
- Obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Advice about which regulatory or professional body should be contacted is available from the Recognition Information Centre for the United Kingdom, UK NARIC;

7. Confirmation will be obtained that the necessary safeguarding checks have been completed for any staff employed by another organisation and working at the College and/or Preparatory School;

8. Members of Council acknowledge their responsibility for any safeguarding issues that may arise when other organisations use the facilities of the College or Preparatory School, except where a Deed of Trust has been negotiated. They exercise their responsibility by ensuring such organisations accept and meet all the requirements of the School's Safeguarding and Child Protection policy or that the organisation's own policy is suitably compliant;

9. The School will comply with the regulatory requirements of the Independent Schools Inspectorate (ISI) (also known as the Independent School Standards Regulations);

10. Induction and continuing professional development (CPD) at the School will include a focus on safeguarding, in order to maintain the profile of the issues, but also to minimise the risk of a member of staff deliberately or inadvertently abusing their relationship with pupils;

11. (EYFS) Queen's College Preparatory School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person working or looking after children at the premises, whether the allegations relate to harm or abuse committed on the premises or elsewhere;

12. The School will report to the Disclosure and Barring Service within one month of leaving the School any person (whether employed, contracted, a volunteer or student) whose services are no longer used because s/he is considered unsuitable to work with children. In the event of such a person resigning, the investigation will continue to a conclusion. If that conclusion indicates that the person would have been suspended had s/he not resigned, a similar referral will be made immediately.

## **Appendix 1. Further Guidance**

[Keeping children safe in education 2025](#)

[Working together to safeguard children - GOV.UK](#)

[Report child abuse to a local authority - online tool to identify a local authority](#)

[Revised Prevent guidance for England and Wales \(April 2019\)](#)

[Female Genital Mutilation Guidelines \(February 2021\)](#)

[Sharing nudes and semi-nudes: advice for education settings working with young people \(December 2020\)](#)

[Sexting in schools and colleges: responding to an incident \(UKCCIS, 2016\)](#)

[Teaching online safety in schools \(June 2019\)](#)

[Mental health and behaviour in schools \(November 2018\)](#)

[Preventing youth violence and gang involvement \(March 2015\)](#)

[Criminal exploitation of children and vulnerable adults: county lines \(February 2020\)](#)

[Child sexual exploitation: guide for practitioners \(February 2017\)](#)

[Searching, screening and confiscation: advice for schools \(July 2022\)](#)

[Preventing and tackling bullying: advice for headteachers, staff and governing bodies \(July 2017\)](#)

[Use of reasonable force: advice for headteachers, staff and governing bodies \(July 2013\)](#)

Full Tri-Borough LSCP procedures can be found at: [London Child Protection Procedures \(londoncp.co.uk\)](http://londoncp.co.uk)

- The School recognises the increasing risks posed by online misinformation, disinformation and conspiracy theories. Staff will receive training to identify and address these online harms, which now fall under the revised 'Content' category of online safety risk.
- The School acknowledges the potential risks associated with generative artificial intelligence (AI). Filtering and monitoring practices will be informed by the DfE's 2025 guidance on Generative AI: Product Safety Expectations, with oversight by the DSL and Director of IT.
- The School recognises the increasing risks posed by online misinformation, disinformation and conspiracy theories. Staff will receive training to identify and address these online harms, which now fall under the revised 'Content' category of online safety risk.
- The School notes that the Department for Education is expected to publish revised RSHE guidance during the 2025 / 26 academic year. The School's curriculum and safeguarding policies will be updated accordingly once the guidance is finalised.