Queen Elizabeth's School
GURUGRAM, INDIA

Safeguarding and Child Protection Policy

Academic Year 2026–2027

Purpose and Aims

The purpose of this Safeguarding and Child Protection Policy is to ensure every child who is a registered student at the school is safe and protected from harm. This means we will always work to:

- provide help and support to meet the needs of children as soon as problems occur.
- protect children and young people at the school from maltreatment, whether that is within or outside the home or online.
- prevent impairment of our children's and young people's mental and physical health or development.
- ensure that children and young people at the school grow up in circumstances consistent with the provision of safe and effective care.
- undertake that role so as to enable children and young people at the school to have the best outcomes, optimum life chances and enter adulthood successfully.
- provide all staff with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of our children and young people.
- ensure consistent good practice across the school.
- demonstrate the school's commitment with regard to safeguarding our children and young people.

This policy will give clear direction to the school community about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children and young people at school. The school fully recognises the contribution it can make to protecting children from harm and supporting and promoting the welfare of all children and young people at the school.

Our Ethos

The school recognises the importance of a whole-school safeguarding culture. This means that safeguarding should not be seen as a discrete set of procedures but should be considered and embedded in all areas of the school's operations. Our ethos and approach is one of prevention, protection and support. Everyone has a responsibility to actively contribute to safeguarding and protecting the physical and mental wellbeing of children and young people.

This policy applies to all teaching, non-teaching, residential, pastoral, support, peripatetic, contract staff and ancillary staff, volunteers, non-school-based Queen Elizabeth's School, Gurugram staff and any other adults working at the school.

All staff and regular visitors will, either through training or induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child, and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose.

Throughout our curriculum, we will provide activities and opportunities for students to develop the skills they need to identify risks and stay safe. This will also include material that encourages our students to develop essential life skills.

At all times we will work in partnership and endeavour to establish effective working relationships with parents and carers.

Best Practice and Indian Law

In drawing up this policy the following documents have been consulted on:

Indian Legislation

- POCSO (2014).
- The POCSO Act, National Human Rights Commission of India.

UK Legislation

- The Children Act 1989 and 2004.
- Education Act 2002.
- The Education and Skills Act 2008.
- The Education (Health Standards) (England) Regulations 2003.
- The School Staffing (England) Regulations 2009 as amended by SI 2012/1740 and SI 2013/1940.
- Safeguarding Vulnerable Groups Act 2006.
- In addition, to underpin the values and ethos of the school and our approach to Safeguarding and Child Protection, the following policies also need to be referred to:
- Bullying
- Staff Code of Conduct
- Safer Recruitment
- Data Protection
- Drugs
- Educational Visits
- First Aid and Medical Room Procedures
- Intimate Care Policy
- Health and Safety
- Information and Communication Technology
- Mental Health and Wellbeing
- Student's Attendance
- Student Discipline
- Special Educational Needs and Disabilities (SEND)
- Whistleblowing

Safeguarding Post Holders

- Designated Safeguarding Lead Senior School (DSL)
- Designated Safeguarding Lead Prep School (DSL)
- Assistant safeguarding Leads
- Principal
- Administrator (Child Protection)
- Administrator (Single Central Record)

The Roles and Responsibilities

Governing Body

The Governing Body is accountable for ensuring the effectiveness of this policy and the school's compliance with it. Although the Governing Body takes collective responsibility to safeguard and promote the welfare of our students, we also have a named Governor who takes a particular interest in safeguarding within the school and is also responsible for child protection.

Principal

The Principal is responsible for:

- Identifying a member of staff to be the DSL and Assistant DSLs.
- Ensuring that the school policies on Safeguarding and Child Protection are fully implemented and followed by all staff.
- Ensuring that all necessary training is carried out on a regular basis.
- Ensuring that the pastoral processes and procedures support the school ethos of Safeguarding and Child Protection.
- Ensuring the curriculum supports effective safeguarding and student wellbeing, giving full consideration to statutory guidance in Indian law and due regard to principles of good safeguarding practice applicable to schools.

- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and that such concerns are addressed sensitively in accordance with agreed whistleblowing procedures.

Designated Safeguarding Lead

- The DSL's role is detailed in Appendix 2: The Role of the DSL

Recognising Abuse

To ensure students are protected from harm, staff need to understand what types of behaviour constitute abuse and neglect. There are four main categories of abuse: physical abuse, emotional abuse, sexual abuse (and child sexual exploitation), and neglect. Someone may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. It is also important to recognise that in some cases a child can be impacted by abuse that occurs where they see, hear or experience its effects.

4.1   Physical abuse: 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 symptoms of or deliberately induces an illness in a child (this used to be called Munchausen's syndrome by Proxy but is now more commonly referred to as fabricated or induced illness).

4.2   Emotional abuse: is the persistent emotional maltreatment of a child, such as causing severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age- or developmentally inappropriate expectations imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social

interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. There is some level of emotional abuse involved in all types of child maltreatment, although it may occur alone.

4.3   Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

4.4   Child sexual exploitation: is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation end up missing from their home, care and education at some point.

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

Indicators of Abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs 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 staff are also aware of the range of behavioural indicators of abuse and report any concerns to the DSL.

Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused. A child who is being abused and/or neglected may:

- have bruises, bleeding, burns, fractures or other injuries.
- show signs of pain or discomfort.
- keep arms and legs covered, even in warm weather.
- be concerned about changing for PE or swimming.
- look unkempt and uncared for.
- change their eating habits.
- have difficulty in making or sustaining friendships.
- appear fearful.
- be reckless with regard to their own or others' safety.
- self-harm.
- frequently miss school or arrive late.
- 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.

- have a boyfriend or girlfriend older than them.

- appear with unexplained gifts or expensive new possessions.

- display sexual knowledge or behaviour beyond that normally expected for their age.

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 very important that you report all of your concerns – you do not need 'absolute proof' that the child is at risk.

It should be recognised that harm can be caused by children witnessing abuse, not just as the direct victim of it. For example, witnessing domestic abuse will be a relevant safeguarding matter and any such concerns raised by a student should be reported and considered.

Procedures for Managing Concerns

6.1 The DSL should be used as a first point of contact for concerns and queries regarding any safeguarding concern in the school. If the DSL is not available, a deputy DSL should be contacted regarding any concerns.

It is not the responsibility of other school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and to report them in accordance with the procedures outlined in this policy and its appendices. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to a member of the Safeguarding Team. In the absence of any of the above, the matter should be brought to the attention of the most senior member of staff.

All concerns about a child or young person should be reported without delay and recorded in writing using the agreed template (see Appendix 1) or a suitable format. The procedures set out in Appendix 2 and 3 should be followed.

Following receipt of any information giving cause for concern, the DSL will consider what action to take. All information and actions taken, including the reasons for decisions, will be fully documented.

Confidentiality must be maintained and information relating to individual pupils/families will be shared with staff on a strictly need to know basis.

6.2 Managing Allegations Against Staff and Volunteers

Our aim is to provide a safe and supportive environment which secures the well-being as well as the best possible outcomes for the children at the school. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

We will take all possible steps to safeguard our children and to ensure that the adults in the school are safe to work with children. This is achieved through regular training and seeking advice when needed.

All disclosures of information which relate to suspected wrongdoing at work are considered to be whistleblowing; for further details of how this is managed and for the measures taken to support whistle-blowers, reference should be made to the School's Whistleblowing Policy. If you have a concern about a member of staff or a volunteer in connection with a safeguarding issue, even if that concern might be considered 'low level', you must follow the procedure set out in Appendix 4.

If an allegation is made or information is received about an adult who works in or volunteers at the school (including supply staff) which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the DSL and the Principal immediately. Where a staff member (including supply staff and volunteers) has behaved, or may have behaved, in a way that indicates they may not be suitable to work with children, this is to take into account of situations where a person's behaviour outside of school may suggest transferable risk. This may be an incident that occurred outside of school which did not involve children but could impact on their suitability to work with children.

If an allegation is made relating to an incident that happened when an individual or organisation was using the school's premises for the purposes of running activities for children, the school's safeguarding policies and procedures would be followed.

Should an allegation be made against the Principal, this must be reported to the Chairman of Governors. If the Chairman of Governors is not contactable on that day, the information must be passed on to and dealt with by either the Deputy Head (Pastoral) or the Vice-Chairman of Governors.

Child-on-Child Abuse

Child-on-child abuse (also referred to as peer-on-peer abuse, recognising that those involved may not necessarily be peers) or bullying between young people is a very serious issue that can cause considerable harm, anxiety and distress. This abuse may involve one victim and one perpetrator, or multiple victims and perpetrators (and any combination thereof). Child-on-child abuse can also take many different forms including, but not limited to:

- Bullying (including cyber-bullying).
- Physical violence.
- Sexual violence and sexual harassment.

- Non-consensual sharing of nudes and semi-nude images and/or videos.
- Initiation/hazing rituals or violence.

Bullying

All incidences of bullying should be reported and managed through the school's anti-bullying procedures. All students and parents receive a copy of the school's Anti-Bullying Policy on joining the school and the subject of bullying is addressed at regular intervals in the school curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Principal and/or DSL will consider implementing safeguarding procedures.

Staff are aware that young people can be particularly vulnerable to abuse by other children through the use of online and social media, as well as through the transfer and sharing of information and images via electronic devices. Any students found to be involved in cyber-bullying will be dealt with strictly under the terms of the school's Anti-Bullying and Student Discipline policies.

Sexual Violence and Sexual Harassment

These behaviours can overlap on a continuum of abuse, and will never be tolerated at the school. Staff will challenge any such behaviour and communicate its unacceptability. Inappropriate or abusive sexual behaviour should never be dismissed as a joke, 'banter', or viewed as a natural or inevitable part of growing up.

'Sexting'

The term 'Sexting' refers to the transmission of sexually explicit text or the sharing of nude and semi-nude images via electronic devices, primarily mobile phones. When an incident of this nature comes to the attention of a member of the school's staff it will be referred to the DSL as soon as possible for investigation and a decision made regarding the involvement of outside agencies, if it is necessary to do so. Guidance and education regarding the illegal sharing of nude and semi-nude images and videos as well as the context of online safety will be part of the school's Personal Development Time (PDT) curriculum. Through the PDT curriculum, including Relationships and Sex Education, students will explore what behaviours constitute healthy and unhealthy relationships, and the values of equality, diversity and inclusivity will be promoted to foster mutual respect both between students, and in their relationships. Parents will be informed of the PDT curriculum content.

Child-on-child-abuse will be dealt with extreme seriousness in accordance with the school's policies and ethos. In particular, however:

- Students will be advised on how to report any incident of abuse or harassment.
- When making a disclosure, the student or students will be reassured that they will be supported, kept safe and that their disclosure will be fully investigated.
- The incident will be referred to the DSL as soon as possible.
- An investigation into the matter will be carried out by interviewing the relevant member(s) of staff and the student(s) involved.
- Parents will be informed at an early stage and involved in the process unless there is valid reason to believe that involving parents would put the young person at risk of harm.
- Reasonable steps will be taken to manage the situation and mitigate any risks to both the student(s) making the disclosure and the student(s) alleged to have perpetrated the abuse.
- The school will pay close attention to the wishes of a victim of child-on child abuse and factor these into its consideration of the next steps following an investigation.

Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, male or female, as well as children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when the activity appears consensual. It should be noted that the exploitation, as well as being physical, can be facilitated and/or take place online. Indicators can include:

• appearing with unexplained gifts or new possessions.

• associating with other young people involved in exploitation.

• suffering from changes in emotional well-being.

• misusing drugs and alcohol.

• going missing for periods of time or regularly coming home late.

• regularly missing school.

Staff should always be aware of the different ways in which children can be exploited emotionally, financially, within a family or in a community setting known to them.

Exploitation may take place wholly online, or technology may be used to exploit someone and facilitate offline abuse. They may be exploited by an adult, adults or by another child or children. Financially motivated sexual extortion, a type of online blackmail also known in the media as 'sextortion', is particularly relevant in this respect as it frequently affects young people between the ages of 14 and 18.

Students Staying with Host Families

A student staying with a host family occurs when schools arrange for their students to have learning experiences away from home for a short period of time, such as on a trip for sports or language exchange. Usually, this will occur overseas, and the school will align itself with the laws of the country concerned. Staying with host families will not occur in India.

If the arrangement is taking place overseas, as when students stay with a family on a language exchange trip, the school will work with the partner school abroad to ensure that similar safeguarding assurances are obtained prior to a visit.

Pupils with SEND

It is recognised that students with special educational needs and disabilities, including medical conditions, may face additional safeguarding challenges (this could involve issues concerning missing education, child-on-child abuse, personal care or the lack of understanding of others' motives). Staff are trained to look beyond a student's condition for signs of abuse and understand the issues students with SEND can face so as to provide the appropriate extra level of vigilance and support required.

Autism spectrum disorder (ASD) and slow processing issues remain the two most common SEND factor amongst students, but other factors, such as visual impairment,

hearing impairment, ADHD and speech and language difficulties, are also present. Training is provided to assist staff to support these students, ensuring their full participation in the school's academic and extracurricular life. All students with SEND have a personal inclusion report, drawn up by the Head of Inclusion in consultation with the student and their parents, to ensure staff understand their particular challenges and what strategies they respond positively to.

The school employs a number of strategies to ensure that students with SEND are supported in their progress and communication with their peers and adults, including personalised inclusion strategies for the classroom, peer/staff mentoring, counselling and access to external specialists, thereby preventing social isolation and identifying concerns.

Information is shared regularly with parents, recognising that some conditions may result in increased safeguarding risks outside of school, such as in an online environment. Where necessary, parents are supported to acknowledge that their child has a special need or disability and to seek further professional medical input, as required, to ensure an accurate diagnosis and effective management of the condition.

Personal Devices, Mobile Devices and Online Safety

Where the school provides students with access to the internet, such as through their personal devices or one of the school's personal computers (PCs), appropriate security and filtering systems will be in place to protect them from harmful content so far as is possible. Students and staff will be expected to follow Information and Communication Technology Policy to support these efforts and keep school systems secure.

Where students learn from home, staff must remain particularly aware of the signs of cyberbullying and other online risks. The school's filtering and monitoring software will remain in use on school devices during this time to safeguard and support students.

Contact between staff and students online should be conducted via school platforms (for example MS Teams and OneNote, or QE Gurugram email addresses). Staff should refer to the Code of Conduct for further information on communications with students and their use of social media.

There are risks associated with students accessing inappropriate material via mobile devices with 3G, 4G or 5G internet access. This technology makes it theoretically possible to circumvent the security and child protection arrangements in place on the school's network. Staff will therefore remain vigilant and enforce the school's policies regarding the use of mobile phones in school, which are not required under any circumstances. Using a mobile device will be dealt with under the school's Student Discipline Policy and may lead to the device being confiscated and searched, where there is reasonable justification for this.

Information and guidance around online safety more broadly will be delivered to students through the PDT and Digital Literacy curriculum. This will help raise awareness of the potential dangers associated with online activities and equip them with strategies to use technology safely. These matters will be covered across different year groups, so students:

- understand the safe use of social media and the internet.
- understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy.
- recognise inappropriate content, contact and conduct.
- take responsibility for their online activity.
- know how to report a range of concerns.
- are aware of the consequences of issues such as cyber-bullying, inappropriate downloading or uploading of photographs, the illegality of sharing nude and semi-nude pictures of those under 18, making threatening, abusive, defamatory or humiliating remarks on social media platforms, such as Facebook, X, Instagram, TikTok, WhatsApp, Snapchat or You Tube; and

- understand how their use of social media, and other online activities, can affect their mental health and wellbeing and that of other people.

Appropriate monitoring and filtering will be put in place to ensure student safety. This will be reviewed at least annually, while staff and an appropriate governor will undertake training to ensure they are aware of their responsibilities. The DSL will take overall responsibility as outlined in Appendix 8.

Working with Parents, Carers and Guardians

The school is committed to working in partnership with parents in order to safeguard and promote the welfare of children and support them in understanding our statutory responsibilities in this regard.

When new children join the school, parents will be informed of our Safeguarding Policy. Parents will receive a copy of the policy, and they will be informed of what will happen in the event of a disclosure or concern.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality. We will not share sensitive information unless we have permission, or it is necessary to do so in order to safeguard a child from harm.

Records and Information Sharing

If staff are concerned about the welfare or safety of any child at the school, they will record their concern on the agreed reporting form (Appendix 1). They should ensure that the form is signed and dated. Any concerns should be passed on to the DSL without delay.

The school will follow the communication and record-keeping procedures set out in Appendix 5. Any safeguarding information recorded will be kept securely and separate from the child's academic file. These files will be the responsibility of the DSL. Child protection information will only be kept in the designated electronic file and kept up to date.

Appropriate arrangements will be put in place to ensure the secure transfer of information, both general and safeguarding related, between schools if a child transfers from Prep to Middle School.

When a child leaves the school to attend another, the DSL will contact the DSL at the new school and will ensure that the relevant safeguarding and child protection information is forwarded to the receiving school in an appropriately agreed manner. Child protection information will only be shared within the school based on 'need to know in the child's interests' and on the understanding that it remains strictly confidential.

Safer Recruitment

At all times the Principal and Governing Body will ensure that safer recruitment practices are followed in accordance with the requirements and the school's Safer Recruitment Policy.

Safer Working Practices

All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so.

There will be occasions when some form of physical contact is inevitable, for example if a child has an accident or is hurt or is in a situation of danger to themselves or others

around them. The Code of Conduct for Staff and Governors provides guidance in relation to activities such as demonstrations in Physical Education (PE)/games/music and sets out the parameters for the use of restraint and reasonable force, should a situation require it as a last resort.

All staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach. In addition, staff should understand that, under the Protection of Children from Sexual Offences Act (POSCO) Act, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a child under 18 may be a criminal offence, even if that child is over the age of consent.

If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts at school, who they are with and for how long. Doors, ideally, should have a clear glass panel and should be left open.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during their induction. These are sensible steps that every adult should take in their daily professional conduct with children. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

Staff who interact with students online (for example, when they or students work remotely) will be alert to any indication that a student is at risk. If a staff member is concerned about a student, that staff member will follow the approach set out in this policy and report that concern to the DSL or to a deputy DSL.

Staff may be expected or encouraged to interact directly with students online and in groups. In these circumstances, staff must always remain professional in their conduct. Staff should be guided by the requirements of the school's Code of Conduct to ensure that communications remain appropriate. Staff should use school systems to

communicate with pupils, for example Teams and school email addresses. To enable effective home learning, the school asks staff to utilise other online platforms to facilitate academic, enrichment and pastoral provision. The principles of child protection will continue to be implemented in these situations. Clear guidance on how to teach via MS Teams, with a focus on safeguarding, has been provided to all teaching staff. Staff should end and rearrange an online meeting if they would otherwise be alone (online) with a single student.

All staff and students should give full consideration to online safety, security, privacy and data protection when conducting online activities. When leading an online session, the teaching staff should remind students of the importance of appropriate conduct. Teaching staff should also immediately terminate an online session if they are concerned that student safety may be at risk. Staff should be aware that the guidance regarding appropriate contact with students remains relevant after their school employment contract ends. As a former employee, one should not initiate or respond to anything more than incidental contact with children who are students at the school, or their parents, without obtaining consent of the school. Former staff should be cautious to ensure that, having been in a position of trust, they do not leverage their former role for personal advantage.

The Training of Staff

The DSL arranges the annual training of the staff. Every new member of staff or volunteer will have an induction period that will include essential safeguarding information. This programme will include basic safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to record and issues of confidentiality. The induction will also remind staff and volunteers of their responsibility to safeguard all children at the school and the remit of the DSL's role.

The DSL will ensure that staff read the necessary policies and documentation every year and confirm that they have done so.

All staff and regular visitors will, either through training or induction, know how to recognise indicators of concern. They will also know how to respond to a disclosure from a child and record and report this information. We will not make promises to any child, and we will not keep secrets. Every child will know what the adult will do with any information that they choose to divulge.

Safeguarding Students: First Aid

If a student or member of staff is unwell or an accident occurs, the school's primary first aider or, in their absence, an authorised first aider, should be informed immediately. If it is appropriate for treatment or recuperation to occur at school, the person injured or feeling unwell should report to the school's Reception from where a first aider will be called.

Every member of staff is expected to:

- ensure that all students receive first aid when injured at the earliest opportunity by calling for one of the named first aiders.
- act quickly when an incident occurs to ensure the safeguarding of a student.
- take responsibility for assisting a student wherever an incident occurs, be it in a classroom, corridor, playground or in the vicinity of the school.
- know how to summon assistance from the school nurse.
- in the case of a medical emergency a member of staff at the scene knows how to summon immediate help such as contacting the school nurse or emergency services.
- ensure that suitable first aid equipment is taken on any school trip or visit.
- accurately record any case of injury or accident using the school's accident report form.

- ensure that they are familiar with the provision of care for those with ongoing medical conditions.
- full details are included in the Medical Room Procedures.

Recording Form for Safeguarding Concerns

In the event of a safeguarding concern arising about a child in the school, or a disclosure being made by a child, the person raising the concern and/or who has heard the disclosure should speak to the DSL, or a member of the Safeguarding Team. Having done so, they should either:

- send an e-mail report of the concern to the DSL.
- use the following form and send it to the DSL and send it to the DSL.

Your name and role in School:	
Your e-mail address:	

Full name of child:	Date of birth	Year/Tutor group:

Date and time of concern/disclosure	Was anyone else with you? Who?
Has this happened before? If yes give details.	

Nature of concern/disclosure
Please include where you were when the child made a disclosure; what you saw; who else was there; what did the child say or do and what you said.
Was there an injury?   Yes/No   Did you see it?   Yes/No

Describe the injury:

Has this happened before, and did you report the previous incident?

Your signature:

Date:

Appendix 2: Procedure to follow in the event of suspected child abuse or neglect and the role of DSL

- If a member of staff has concerns about a possible safeguarding issue, they should:
- immediately report the matter to the DSL or, if they are absent, one of the other designated members of staff (see above);
- promptly make, and keep safe, an accurate written record of any incident(s);
- NOT discuss the matter with any other person (unless the member of staff reporting the concern is the DSL);
- NOT make a promise to a child or to any other person to keep information confidential.
- The DSL, in conjunction with the Principal, will then consider the course of action to take. The priority is the safety of the child about whom a concern has been raised. For this reason, the DSL will consider whether it is necessary to contact parents/guardians and/or other agencies.
- In the event of suspected child-on-child abuse when both children are students in the school, staff should follow the above procedures, and in addition:
- Adopt a stance of supportive neutrality towards both individuals. This may be difficult as there will be strong pressure from both sides to validate their version of events.
- Make it clear that, because there is conflicting evidence, you are obliged to keep an open mind regarding the accuracy of any allegations or denials made.
- However, if the alleged abuse falls under POCSO (2014) an immediate report will be made to Police. The DSL and Principal will advise the reporting staff member about how the report should be made.

The DSL should support the Principal in fostering a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures

The Role of the DSL

At Queen Elizabeth's School, Gurugram students' wellbeing is paramount as we wish to see all children flourish. To this end, Queen Elizabeth's School, Gurugram ensures that a trained DSL is available at all times in school. Assistant DSLs are trained to the same level as the DSL, and work to support the DSL in preforming their role in school. The Principal also undertakes Level 3 training for a DSL.

The DSL has the appropriate authority and the time, funding, training, resources, and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings – and/or support other staff to do so – and contribute to the help, support and protection of children and young people. In particular:

- The DSL should act as a source of support, advice and expertise to staff, children and students on matters of safety and safeguarding.
- The DSL should be mindful that Safeguarding legislation (POCSO 2014) of India which supersedes UK Safeguarding legislation, and this can lead to variation in practice. In such cases, Indian law is to be followed. The DSL should meet weekly with the Principal and inform the Principal regarding any serious safeguarding issues within the school.
- The DSL will liaise with staff on matters of safety and safeguarding, and training needs.
- The DSL acts as a source of support, advice and expertise for staff and the Principal.
- The DSL will ensure that all staff, volunteers, and regular visitors have received appropriate child protection information during induction and have been trained within the school. The DSL will provide confidential support and guidance to any staff member who seeks advice on child safeguarding issues.
- The DSL will ensure that the Principal is informed in a timely manner of any alleged, suspected or reported child safeguarding issue.
- The DSL will lead meetings of the Safeguarding team and report to the Principal any concerns arising from the Team Around the Child (TAC) team meeting.

Online Safety/Monitoring and Filtering

The DSL will:

- oversee the process of monitoring and filtering, including ensuring that roles and responsibilities are assigned to the appropriate person to safeguard students in the school.
- check the system for monitoring and filtering frequently, to ensure that the systems function as they should.
- make recommendations on how filters are applied according to the risk profile of students at the school and in response to any issues which occur.
- direct the response to any safeguarding concerns that arise.
- organise the appropriate briefing and training of staff in terms of online safety and monitoring and filtering.
- ensure that summary reports are created and analysed to determine if further action is needed.
- ensure that the effectiveness of the school's systems is reviewed at least annually.
- prepare any reports that are necessary for internal or external use.

DSL Training

- The DSL should undertake Level 3 safeguarding training every two years and other training as directed by the Principal.
- The DSL's Assistant DSLs should undergo training at least every two years as well.

In addition to the formal training set out above, the DSL's knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest the latest safeguarding developments) at regular intervals, as required.

- The DSL should develop a working knowledge of how POCSO 2014 and legislation promoting the welfare of children works and the requirements placed on the school by law.

- The DSL should ensure that each member of staff has access to and understands the school's Safeguarding and Child Protection policy and procedures, especially new and part-time staff.
- It is important that the DSL is aware of the specific needs of children, and those with special educational needs; the school may take measures to secure their protection.

Lastly, the DSL must ensure that the Safeguarding and Child Protection policy of the school is reviewed each year (at a minimum) and the procedures and their implementation are reviewed and updated regularly, and that all staff involved in safeguarding and child protection have received training.

Child protection files for school leavers

In some countries, schools send out notifications requesting safeguarding records or comments. If a request is received, the DSL should consult with the Principal prior to taking any action.

Any safeguarding comments to be shared with another school, should be communicated separately from the main student file. Information security and children's privacy is paramount, and Child Protection files should never be shared lightly, even if a proforma from another school is completed or some information is communicated in response to the school's request document.

Applicable to students moving to a UK school: If communicating with another school, the DSL's report will contain all relevant detail regarding a situation arising and will explain why/why not a decision for action/no further action has been taken. If the new school is in the UK, these should be transferred as soon as possible..

In order to protect the privacy of children, any data referring to other children or students in the communication to another school, such as witnesses to an incident, should be redacted before transmission.

No file should be transferred or information shared if it is subject to a legal proceeding that is active, without clear approval from the Principal.

Availability

During term time the DSL (or Assistant) should always be available (during school hours) for staff, children or students in the school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or Assistant) would be expected to be available in person, it is a matter for individual schools, working with the DSL, to define what 'available' means and whether, in exceptional circumstances, it is acceptable for the DSL (or Assistant) to be available by phone and or WhatsApp or other means of communication.

Appendix 3: Procedure in the event of suspected abuse

If a member of staff has concerns about a possible safeguarding issue, they should:

- immediately report the matter to the DSL or, in their absence, one of the other designated members of staff.
- promptly make, and keep safe, an accurate written record of any incident(s).
- not discuss the matter with any other person (unless the member of staff reporting the concern is the DSL).
- not make a promise to a child or to any other person to keep information confidential. The DSL, in conjunction with the Named Safeguarding Governor, if necessary, will then consider what action to take.
- ensure the priority is the safety of the child about whom a concern has been raised. For this reason, the DSL will consider whether it is necessary to contact parents/guardians. In the event of suspected child-on-child abuse when both children are students at the school, staff should follow the above procedures,

  in addition:

- adopt a stance of supportive neutrality towards both individuals. This may be difficult as there will be strong pressure from both sides to validate their version of events.
- make it clear that, because there is conflicting evidence, you are obliged to keep an open mind regarding the accuracy of any allegations or denials made.

Appendix 4: Procedure in the event of an allegation against a member of staff

If you consider that a member of staff may have acted improperly towards a child, you should immediately make a disclosure to the DSL or the Principal (or, if the allegation is regarding the DSL to the Principal, or if against the Principal to the Chief Executive's Office). The same action should be taken in the event that a concern is raised about the conduct of volunteers and/or supply staff working at the school.

- If the improper action towards a child concerns an alleged sexual offence, then there is a mandatory duty on the staff member to report it to the police (POCSO 2014). The staff member should immediately seek advice about how to make a report from the DSL or Principal. If the allegation is against the DSL, then the Principal should be informed, and if against the Principal, inform the DSL. The Office of the Chief Executive Officer should also be informed.

- In the event of any allegations, you must:

- make a written, signed and dated account of the alleged incident(s) as soon as possible; and

- record any information about the times, dates, names, and locations of potential witnesses.

- give the statement to the Principal or DSL who will pass it on to the Principal.

- The Principal will also urgently consider the substance of the allegation and take the following actions if appropriate:

- suspend the member of staff, pending an investigation, if this is the best way to ensure that children are protected, or to prevent evidence from being tampered with; and/or

- make arrangements to ensure that there is no ongoing risk to students, whilst enabling the member of staff to continue working whilst the allegation is investigated; and/or

- initiate internal disciplinary procedures (if abuse is not suspected but the allegation is prompted by inappropriate behaviour on the part of the member of staff); and/or

- take no action against the member of staff (if the allegation is entirely without foundation).

The DSL and Principal will also consider whether, how and when to inform the child's parents or guardians of the allegation.

Throughout the investigation process, the school will take into consideration the stress that such an investigation may cause to all parties involved. The school will inform the member of staff against whom the allegation has been made of the process as soon as practicable and explain that they are entitled to representation by their union or colleague support. A named member of staff should be appointed to keep the person who is the subject of the allegation informed of the progress of the case. Social contact between the accused and colleagues should not routinely be prohibited, unless there is evidence to suggest this could be prejudicial to the investigation.

- The school must make every effort to ensure confidentiality. However, the school must also follow the provisions within POCSO 2014, if they are applicable, in which case, the POCSO law supersedes the principles drawn from the UK Education Act of 2002.
- The outcome of investigations into allegations of abuse against a member of staff, or indeed another member of the school community, should be categorised as one of the following:
- Substantiated: there is sufficient evidence to prove the allegation.
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive (in which case the person making the accusation may be subject to the provisions of the Whistleblowing or Student Discipline policies);
- False: there is sufficient evidence to disprove the allegation.
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or proper basis for the allegation being made.
- When considering what actions should follow the determination of a case, the school will take full account of the provisions of POCSO 2014 as well as Indian employment laws.

- Whilst there can be a range of different outcomes reflecting the nature and circumstances of the case, there is a legal requirement for the school to notify Police in the case of sexual offences (POCSO, 2014), and the school can also inform the Disclosure and Barring Service (DBS) where it thinks that an individual has harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Low Level Concerns:

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, for example:

- inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- over-friendly with students.
- having favourites.
- shouting at or belittling a student.

The guidance states that, "It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings."

Who should colleagues share low-level concerns with?

- If a member of staff considers that a fellow member of staff, or someone working on behalf of the school, may have acted improperly towards a child, they should immediately make a disclosure to the DSL or the Principal as soon as is reasonably possible and, in any event, within 24 hours of becoming aware of it. However, it is never too late to voice your concerns.

- If a low-level concern relates to the behaviour of the Principal, it should be referred to the Chief Executive's Office.

Self-Reporting:

- Occasionally, a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the school's Staff Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons, and all self-referrals will be dealt with sensitively and appropriately.