



Child Protection and Safeguarding Policy 2026

Including safer recruitment, allegations against staff and low-level concerns

School	Thames Ditton Infant School
Policy owner	Headteacher / Designated Safeguarding Lead
Applies from	1 September 2026
Review cycle	At least annually and sooner following statutory or local changes
Next scheduled review	September 2027
Approval	Full Governing Body

This policy is written for implementation from 1 September 2026. It is designed to align with Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026, the Early Years Foundation Stage statutory framework for group and school-based providers applying from 1 September 2026, and Surrey safeguarding arrangements. It must be read alongside current local procedures and the school policies listed in section 24.

Where statutory guidance or local safeguarding procedures change, the school will apply the current requirement immediately and update this policy at the earliest practicable opportunity.

Important safeguarding contacts

Role / service	Name	Contact
Designated Safeguarding Lead (DSL)	Elspeth Leach, Headteacher	dsl@thames-ditton-infant.surrey.sch.uk
Deputy DSL	Monika Dennemont	mdennemont@thames-ditton-infant.surrey.sch.uk
Deputy DSL	Karen Lita	nest@thames-ditton-infant.surrey.sch.uk
Deputy DSL	Sue Coulter	office@thames-ditton-infant.surrey.sch.uk
Deputy DSL	Emma Gregory	acorns@thames-ditton-infant.surrey.sch.uk
Safeguarding Governor	Emma Palmer	epalmer.gov@thames-dittoninfant.surrey.sch.uk
Co-Chairs of Governors	Bronek Carr / Rachael Claridge	bcarr.gov@thames-ditton-infant.surrey.sch.uk / rclaridge.gov@thames-ditton-infant.surrey.sch.uk
Surrey Children's Single Point of Access (C-SPA)	Children's Services	0300 470 9100 cspa@surreycc.gov.uk
C-SPA professional consultation line	Schools / Early Years	0300 470 9100, option 3
Emergency Duty Team	Out of hours	01483 517898 edt.ssd@surreycc.gov.uk
Local Authority Designated Officer (LADO)	Surrey County Council	0300 123 1650 LADO@surreycc.gov.uk
Police	Emergency / immediate danger	999

Contact details must be checked at the start of each academic year and whenever the school is notified of a change.

1. Purpose and aims

Safeguarding and promoting the welfare of children is everyone's responsibility. Thames Ditton Infant School will provide a child-centred, coordinated approach in which the child's best interests, safety, voice, development and lived experience remain central.

- take timely action to protect children from maltreatment, abuse, neglect and exploitation, including harm outside the home and online;
- provide help and support as soon as needs or problems emerge, including through universal services, early help and Family Help arrangements;
- prevent impairment of children's mental and physical health or development;
- ensure children grow up in circumstances consistent with safe and effective care;
- maintain an open, anti-discriminatory safeguarding culture in which racism, prejudice, harassment and abuse are challenged;
- ensure staff, volunteers and governors understand their safeguarding responsibilities and know how to report concerns;
- operate robust safer recruitment, allegations and low-level-concern arrangements; and
- work effectively with Surrey safeguarding partners, children's social care, police, health and other agencies.

2. Statutory framework

This policy has regard to, and where applicable is based on, the following current legislation and statutory guidance:

- Keeping Children Safe in Education 2026 (KCSIE 2026), effective from 1 September 2026;
- Working Together to Safeguard Children 2026;
- Early Years Foundation Stage statutory framework for group and school-based providers, applying from 1 September 2026;
- Children Act 1989 and Children Act 2004;
- Education Act 2002, including section 175;
- School Staffing (England) Regulations 2009;
- Safeguarding Vulnerable Groups Act 2006 and the statutory definition of regulated activity as amended;
- Childcare Act 2006 and Childcare (Disqualification) Regulations 2018;
- Counter-Terrorism and Security Act 2015 and current Prevent duty guidance;
- Female Genital Mutilation Act 2003 and Serious Crime Act 2015;
- Domestic Abuse Act 2021;
- Human Rights Act 1998 and Equality Act 2010, including the Public Sector Equality Duty;
- Data Protection Act 2018, UK GDPR and applicable provisions of the Data (Use and Access) Act 2025;
- Rehabilitation of Offenders Act 1974 and relevant Exceptions Orders; and
- current Surrey Safeguarding Children Partnership procedures, threshold/continuum arrangements and referral pathways.

The governing body will ensure that the school complies with its duties and follows statutory guidance unless there is a lawful and properly evidenced reason to depart from it.

3. Definitions

Safeguarding and promoting the welfare of children includes providing help and support as soon as problems emerge; protecting children from maltreatment whether inside or outside the home, including online; preventing impairment of mental and physical health or development; ensuring safe and effective care; and taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding and concerns activity undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm.

A child is anyone under the age of 18.

Abuse may be physical, emotional or sexual, or take the form of neglect. Abuse, neglect and exploitation can occur in families, institutions, the community or online, and may be perpetrated by adults or other children.

Child-on-child abuse includes bullying, abuse in intimate personal relationships between children, physical abuse, sexual violence, sexual harassment, consensual or non-consensual making or sharing of nudes or semi-nudes, upskirting and initiation/hazing-type violence and rituals. It can occur online and offline.

Family Help is used in this policy consistently with Working Together 2026 to describe the more seamless support bringing together targeted early help and section 17 support, delivered according to local arrangements.

4. Equality, inclusion and additional vulnerability

The school recognises that some children face additional barriers to recognition or disclosure of abuse and may be disproportionately exposed to harm. Safeguarding responses will be inclusive, anti-discriminatory, culturally informed and adapted to communication and developmental need.

- children with SEND, communication needs, disabilities or medical conditions;
- young carers;
- looked-after and previously looked-after children, children in kinship care and adopted children;
- children with a social worker or who have experienced adversity, domestic abuse or parental conflict;
- children experiencing homelessness or temporary accommodation;
- children absent from education on repeat occasions or for prolonged periods;
- children at risk of exploitation, trafficking, modern slavery, FGM, forced marriage, honour-based abuse or radicalisation;
- children who are lesbian, gay or bisexual and children who are questioning their gender;
- children who experience racism, discrimination, prejudice or hate;
- children with mental health difficulties, self-harm or other indicators of distress; and
- children whose family circumstances create multiple or overlapping needs.

Staff must not assume that behaviour, injury, distress or communication difficulty is explained by SEND, disability or a medical condition. Reasonable adjustments will be made to enable children to understand safeguarding processes and communicate concerns.

5. Roles and responsibilities

5.1 All staff

All staff will read and understand Part One of KCSIE 2026. Annex A is no longer used as a substitute. Staff will receive induction and regular updates and will know the identity and role of the DSL and deputies.

- maintain an attitude of 'it could happen here';
- listen to children, take concerns seriously and never promise confidentiality;
- recognise abuse, neglect, exploitation and emerging safeguarding threats;
- record and report concerns promptly through the school's safeguarding system and directly to the DSL/DDSL;
- make a referral themselves to children's social care where necessary if the DSL is unavailable or action is not being taken; absence of a DSL must never delay protection;
- know the school's whistleblowing and low-level-concern routes;
- understand online safety, filtering and monitoring responsibilities;
- understand the safeguarding response to children absent from education;
- be alert to mental health as a possible indicator that a child has suffered or is at risk of abuse, neglect or exploitation; and
- follow the staff code of conduct and professional boundaries.

5.2 Designated Safeguarding Lead

The DSL is a member of the senior leadership team and has lead responsibility for safeguarding and child protection, including online safety and understanding the school's filtering and monitoring systems. Deputies are trained to the same standard and may carry out delegated activities, but ultimate lead responsibility remains with the DSL.

- manage referrals to children's social care, police, Channel/Prevent, DBS and LADO as appropriate;
- support staff who make referrals and liaise with safeguarding partners;
- lead information sharing and ensure decisions and rationales are recorded;
- promote educational outcomes for children known to social care and share relevant information with staff on a need-to-know basis;
- work closely with the SENCO, designated teacher for looked-after children, senior mental health lead and relevant health professionals;
- ensure safeguarding files are secure, coherent and transferred promptly when children move;

- ensure children have accessible, trusted routes to seek help;
- maintain oversight of online safety, AI-related risks and filtering and monitoring;
- ensure appropriate DSL cover at all times when children are on site or participating in school activities; and
- undertake training at least every two years and update knowledge and skills at least annually.

5.3 Headteacher

The Headteacher ensures this policy is implemented, resources and time are available for safeguarding, appropriate staffing and EYFS arrangements are maintained, and all staff and volunteers receive appropriate induction. The Headteacher normally acts as case manager for allegations against staff.

5.4 Governing body

- ensure safeguarding arrangements are effective and comply with KCSIE 2026 and local procedures;
- ensure all governors receive appropriate safeguarding and online-safety training at induction and regular updates;
- ensure the DSL has status, authority, time, funding, training and resources;
- ensure safer recruitment and the single central record are compliant;
- ensure appropriate filtering and monitoring systems are in place and their effectiveness is reviewed at least annually;
- ensure safeguarding is considered when school premises are used by external organisations;
- ensure EYFS safeguarding and welfare requirements are met; and
- review and approve this policy at least annually.

The Chair/Co-Chair will act as case manager where an allegation concerns the Headteacher.

6. Recognising and responding to concerns

Staff must act immediately on concerns. They should not investigate abuse themselves, ask leading questions or delay a referral while seeking proof.

1. Listen carefully and remain calm.
2. Reassure the child that they have done the right thing by speaking and that the concern will be taken seriously.
3. Do not promise secrecy. Explain that information will be shared only with people who need it to keep them safe.
4. Make a factual, contemporaneous record using the child's own words where possible.
5. Report immediately to the DSL or a DDSL.
6. If a child is in immediate danger, call 999. If a child may be suffering or likely to suffer significant harm, make an immediate referral to Surrey C-SPA and/or police as appropriate.
7. If the DSL/DDSL is unavailable, staff must not delay and may make the referral directly, informing the DSL as soon as possible.

Concerns about a member of staff, volunteer, contractor, supply worker or trainee teacher must not be entered on the child's general safeguarding record before the Headteacher/case manager has been informed and the allegations procedure followed.

7. Help, Family Help and statutory intervention

The school will identify emerging needs early and work with families and partner agencies. Consent will normally be sought for non-statutory help, but lack of consent will never prevent information sharing or referral where a child may be at risk of harm.

In line with Working Together 2026, the school will contribute to local Family Help arrangements, including multi-disciplinary assessment and planning, and will support continuity of practitioner relationships where possible. Where needs indicate section 17 support, section 47 enquiries or immediate protection, the school will make or support the appropriate statutory referral.

Staff should use Surrey's current Continuum of Support/threshold arrangements and C-SPA. Professional consultation is available via 0300 470 9100 option 3.

8. Information sharing, confidentiality and records

Effective safeguarding depends on timely information sharing. Data protection law does not prevent the sharing of information for safeguarding purposes. Staff will share information when there is a lawful basis and it is necessary to safeguard or promote a child's welfare.

Information sharing will be necessary, proportionate, relevant, adequate, accurate, timely and secure. Decisions to share or not share information, and the rationale, will be recorded.

Safeguarding records will contain a clear summary of the concern, follow-up, decisions, actions and outcomes. Records will be stored securely in CPOMS or the school's approved safeguarding system, separately from the main pupil record and accessible only to those with a professional need.

Transfer of safeguarding records

When a child transfers, the DSL will ensure the child protection file is transferred securely and separately from the main pupil file as soon as possible: within five days for an in-year transfer or within the first five days of the start of a new term. The school will obtain confirmation of receipt.

Where concerns are current, significant or complex, the DSL will speak directly with the receiving DSL before or at transfer and provide a clear structured summary distinguishing current risks and support needs from historic information, so that support can be in place when the child arrives.

9. Online safety, filtering, monitoring and artificial intelligence

Online safety is an integral part of safeguarding. The school addresses content, contact, conduct and commerce risks and recognises that technology can facilitate abuse, grooming, exploitation, harassment, radicalisation and the creation or distribution of harmful or sexual material.

- generative AI and AI-enabled manipulation, including deepfakes and 'deep nude' or digitally altered sexual imagery;
- grooming, coercion, sextortion and financially motivated sexual extortion;
- cyberbullying, misogyny, racism, hate and harmful communities;
- misinformation, disinformation and age-inappropriate content;
- child sexual and criminal exploitation online; and
- risks created by sharing personal data, images, location or school information.

The school will maintain appropriate filtering and monitoring systems that meet DfE standards. Roles and responsibilities will be clear. The effectiveness of filtering and monitoring will be reviewed at least once every academic year by the responsible senior leader, with the DSL and IT support, and checks will consider school-owned and internet-connected devices in relevant locations.

Staff must use only school-approved systems for work involving pupil or safeguarding information. Confidential, safeguarding or identifiable pupil information must not be entered into unauthorised generative AI services.

The school will communicate online-safety expectations to parents and carers, including the nature of online activity pupils may be asked to undertake.

10. Mobile phones, cameras and personal devices

Staff, volunteers, visitors and contractors must follow the school's mobile-phone and acceptable-use arrangements. Personal devices must not be used to photograph or record pupils. In EYFS, the school will meet the statutory requirements governing cameras, mobile phones and other electronic devices with imaging and sharing capability. School devices will be used only for authorised educational or safeguarding purposes and images will be stored and disposed of securely.

11. Child-on-child abuse, sexual violence and sexual harassment

The school operates a zero-tolerance approach to child-on-child abuse. This does not mean incidents will be treated identically; it means abuse will never be dismissed as banter, part of growing up or harmless behaviour.

All children involved in an incident may have safeguarding needs. Responses will be child-centred, proportionate and informed by age, developmental stage, SEND, power imbalance, coercion, repetition, intent, impact and context.

Harmful sexual behaviour exists on a continuum from developmentally expected behaviour through inappropriate or problematic behaviour to abusive and violent behaviour. For infant-aged children, developmental context is particularly important, but harmful behaviour must still be assessed and responded to.

Reports of sexual violence or harassment will be managed in line with KCSIE 2026 Part Five. The school will consider immediate safety, support for the child who has been harmed, safeguarding needs of the child alleged to have caused harm, risk assessment, parental involvement where appropriate, and referral to children's social care and/or police.

Making or sharing nudes or semi-nudes

All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response. This includes real, AI-generated, digitally altered or pseudo-images. Staff must not view, copy, print, forward, save or ask a child to share such imagery unless specifically directed by the DSL under current national guidance and there is a clear safeguarding justification.

Where adult involvement is suspected, or there is evidence of coercion, exploitation, extortion or criminality, the DSL will refer promptly to police and/or children's social care.

12. Exploitation, trafficking and modern slavery

Staff will be alert to child sexual exploitation, child criminal exploitation, financial exploitation, trafficking, forced criminality, county lines, organised networks, group-based exploitation and modern slavery. Children may experience multiple forms of harm at the same time and may not recognise themselves as victims.

A child who appears to have committed an offence as a consequence of coercion or exploitation must be considered first through a safeguarding lens. The DSL will consider referral to children's social care, police and, where relevant, the National Referral Mechanism.

13. Domestic abuse and other harm in the home

Domestic abuse can include physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse and psychological or emotional abuse. Children can be victims in their own right when they see, hear or experience the effects of domestic abuse.

The school will respond to Operation Encompass notifications in accordance with local arrangements. Staff will also be alert to child-to-parent/caregiver abuse, frequent and intense parental conflict, substance misuse and other circumstances that may affect safety and wellbeing.

14. Mental health and self-harm

Mental health difficulties can, in some circumstances, indicate that a child has suffered or is at risk of abuse, neglect or exploitation. Only appropriately trained professionals should diagnose mental health conditions, but staff have an important role in recognising emerging difficulties and securing support.

- promote mental wellbeing and emotionally safe relationships;
- identify changes in behaviour, presentation, attendance, eating, sleep, play or engagement that may indicate distress;
- take self-harm, eating difficulties, suicidal language or behaviour and significant emotional dysregulation seriously;
- seek early targeted support and specialist advice where required;
- refer immediately where there is a safeguarding risk; and
- liaise with the senior mental health lead, SENCO, health professionals and Mental Health Support Team where available.

Any intervention used by the school must be safe, age-appropriate, evidence-informed and within staff competence.

15. Young carers

The school recognises that caring responsibilities can affect attendance, attainment, behaviour, relationships and wellbeing. Staff will seek to identify young carers sensitively, listen to their views and work with the family and relevant services to secure timely support. Caring responsibilities must not be treated as a behavioural or attendance failure without consideration of underlying need.

16. SEND, medical conditions and allergies

Children with SEND, disabilities and medical conditions may face additional safeguarding barriers, including communication difficulties, isolation, bullying, online vulnerability and assumptions that injury, behaviour or distress is related to their condition.

The DSL and SENCO will work closely together. Safeguarding communication and processes will be adjusted so that children can understand and express concerns.

A medical incident does not automatically amount to a safeguarding concern. However, safeguarding action will be considered where circumstances suggest abuse, neglect or exploitation, including repeated failure to provide essential medication, treatment or information, or where a child's health needs are deliberately or persistently unmet.

This section should be read with the school's Supporting Pupils with Medical Conditions, First Aid and Allergy/Anaphylaxis policies.

17. LGB children and children questioning their gender

The school recognises that lesbian, gay and bisexual children, and children who are questioning their gender, can be targeted by peers and may experience bullying, abuse or isolation. Staff will provide a safe and trusted space for children to speak, respond to safeguarding concerns without discrimination and consider the child's individual circumstances, age and developmental stage.

Safeguarding decisions will be made in accordance with current statutory guidance, equality and human-rights duties and the child's best interests. Parents and carers will ordinarily be involved unless doing so would place the child at risk of harm or otherwise conflict with safeguarding duties.

18. Prevent, radicalisation and extremism

The school fulfils the Prevent duty as part of its wider safeguarding responsibilities. Staff will be alert to children who may be susceptible to radicalisation, including online influence, and will challenge extremist narratives in an age-appropriate way.

Concerns will be reported to the DSL, who will consider local Prevent/Channel procedures and information sharing. Immediate threats or risks will be referred to police.

19. Attendance and children absent from education

Children absent from education, particularly on repeat occasions and/or for prolonged periods, can be a warning sign of safeguarding concerns including neglect, abuse, exploitation, mental health difficulties, domestic abuse, forced marriage or risk of travelling to conflict areas.

The school will follow statutory attendance and children-missing-education procedures, make reasonable enquiries, share information and escalate safeguarding concerns. A parent's stated intention to electively home educate will not reduce the school's safeguarding responsibilities while the child remains on roll or where concerns require referral.

20. Looked-after, previously looked-after children and children with a social worker

The DSL will work with the designated teacher, local authority, social worker and Virtual School Head as appropriate. Relevant safeguarding information will be shared with staff on a need-to-know basis to support educational outcomes and safety.

The school recognises the vulnerability of children in care, kinship arrangements and other care settings, including risks of exploitation, placement instability and disrupted relationships.

21. Alternative provision and education away from site

The school remains responsible for safeguarding pupils it places in alternative provision. Before placement, the school will obtain appropriate safeguarding assurance and written confirmation of required checks. During placement it will monitor attendance, welfare, progress and placement suitability; share relevant safeguarding information; maintain regular contact; and act promptly on concerns.

Safeguarding responsibility cannot be delegated simply because education is delivered elsewhere.

22. Temporary accommodation, homelessness and extra-familial harm

The school will respond promptly to information that a child is homeless or living in temporary accommodation and consider attendance, transport, health, exploitation and family-support needs. Any notification about accommodation does not replace the duty to refer to children's social care where a child may be suffering or likely to suffer harm.

Assessments will consider extra-familial contexts, including neighbourhoods, peer groups, online spaces and community locations.

23. FGM, forced marriage and honour- or faith/belief-based abuse

Teachers have a mandatory duty to report to police where, in the course of their professional duties, they discover that FGM appears to have been carried out on a girl under 18. This duty does not replace the school's wider safeguarding response or the need to inform the DSL and consider children's social care.

Staff will report concerns about forced marriage, honour-based abuse or abuse linked to faith or belief to the DSL immediately. The school will not mediate with family members where doing so could increase risk.

24. EYFS safeguarding arrangements

Because the school includes Reception provision, the school will comply with the EYFS statutory framework for group and school-based providers applying from 1 September 2026.

- all EYFS practitioners will receive safeguarding training that meets the criteria in Annex C of the EYFS framework and will be supported to implement procedures confidently;
- the school will maintain clear procedures for allegations against adults and low-level concerns;
- whistleblowing arrangements will be accessible to all staff, students and volunteers, including routes to raise concerns where internal reporting is not possible or appropriate;
- staff suitability, recruitment, childcare disqualification and supervision requirements will be met;
- mobile phone, camera and electronic-device arrangements will protect children's privacy and safety;
- required paediatric first-aid arrangements will be maintained;
- collection, non-collection and missing-child procedures will be clear and implemented;
- medicines, allergies, food safety, safer eating and medical needs will be managed in line with statutory welfare requirements;
- staff supervision will provide support, coaching, training and opportunities to discuss safeguarding concerns; and
- the school will have regard to current EYFS safeguarding requirements including screen use and other applicable welfare requirements.

25. Use of school premises, visitors, sport and external organisations

Where another body uses school premises or provides services or activities, the school will seek assurance that appropriate safeguarding and child-protection arrangements are in place, establish liaison arrangements where appropriate, and make safeguarding compliance a condition of use. Concerns about an adult working for an external organisation will be managed with the organisation and LADO as appropriate.

Visitors will be appropriately identified, checked or supervised according to their role. Professional visitors do not necessarily need to produce a personal DBS certificate where the school has appropriate written assurance from their employer or commissioning body.

Sporting activities will be organised with appropriate safeguarding, equality, supervision, privacy and dignity arrangements.

26. Reasonable force and restrictive intervention

Reasonable force must never be used as punishment. Any use must be lawful, necessary, proportionate and consistent with the school's Behaviour Policy and current guidance. Staff must consider additional vulnerability, trauma and SEND.

Any incident that raises a safeguarding concern, causes significant injury, involves an allegation, or suggests inappropriate adult conduct will be reported to the DSL and managed under safeguarding/allegations procedures.

27. Safer recruitment and the Single Central Record

The school will follow KCSIE 2026 Part Three and maintain a compliant Single Central Record (SCR). At least one person conducting an interview will have completed appropriate safer-recruitment training.

27.1 Recruitment process

- advertisements will state the school's safeguarding commitment and whether the role involves regulated activity;
- application forms will be used rather than CVs alone;
- shortlisting will involve at least two people, consider gaps and inconsistencies, and use an appropriate self-declaration;
- the school will consider an online search of shortlisted candidates as part of due diligence and will inform candidates of this;
- references will be obtained directly from appropriate referees, scrutinised and verified; open references will not be accepted;
- employment history, identity, right to work, qualifications, health/fitness to carry out the role and any required prohibition/disqualification checks will be verified; and
- appropriate overseas checks will be undertaken where relevant.

27.2 DBS, barred-list and regulated activity

The school will determine the correct level of DBS and barred-list check by reference to the statutory definition of regulated activity in force from 1 September 2026 and current DfE guidance. It will not rely on obsolete wording about a supervision exemption.

For roles involving regulated activity, the school will obtain an enhanced DBS certificate with children's barred-list information. Where a person is permitted to start regulated activity before the DBS certificate is available, the school will obtain a separate barred-list check and complete a written risk assessment with appropriate controls. No risk assessment can replace a barred-list check where one is legally required.

From 1 September 2026, the previous supervision exemption for qualifying volunteer activity must not be relied upon. Existing and new volunteers whose activity falls within regulated activity must have the required children's barred-list check and enhanced DBS arrangements.

For volunteers not in regulated activity, the school will decide whether an enhanced DBS check without barred-list information is appropriate, based on a recorded risk assessment. An unchecked volunteer will not be placed in regulated activity.

Where the DBS Update Service is used, the school will follow current DBS rules, including the applicable joining window, verify identity and see the original certificate where required.

27.3 Agency staff, contractors, self-employed people and trainees

For agency and third-party staff, the school will obtain written confirmation that required checks have been completed and will verify the identity of the person presenting for work.

Contractors will have the appropriate level of check for their role and access to children. Self-employed contractors may be checked by the school or the school may inspect an appropriate certificate obtained by the individual, provided it is at the legally required level and all other checks are satisfied.

Trainee teachers and students will be subject to the appropriate safeguarding assurances and checks according to who employs or places them and the nature of their activity.

27.4 Governors

Governors will have the checks required by KCSIE and legislation, including enhanced DBS checks and section 128 checks where applicable.

27.5 Childcare disqualification

The school will comply with the Childcare Act 2006 and Childcare (Disqualification) Regulations 2018 and retain appropriate records of decisions and risk assessments.

28. Allegations that may meet the harm threshold

This procedure applies to staff, supply staff, volunteers, contractors and trainee teachers where it is alleged that a person has:

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

Concerns must be reported immediately to the Headteacher. Concerns about the Headteacher must be reported to the Chair/Co-Chairs. The case manager will consult the Surrey LADO without delay where the threshold may be met or where there is doubt.

The school will not investigate before LADO advice where this could compromise statutory enquiries. It will consider immediate safeguarding measures, support for the child and adult, suspension only where necessary and proportionate, confidentiality, police/social-care involvement, agency/contractor liaison, record keeping and required DBS/Teaching Regulation Agency referrals.

Where an adult is removed from regulated activity because they harmed or posed a risk of harm to a child, or would have been removed had they not left, the school will make the required referral to the DBS.

29. Low-level concerns

A low-level concern is any concern, however small, 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 work, but does not meet the harm threshold or is otherwise not considered serious enough for LADO referral.

Examples can include being over-friendly, having favourites, taking photographs on a personal phone, engaging one-to-one in a secluded area without appropriate safeguards, humiliating children or using inappropriate language.

- all low-level concerns should be shared with the Headteacher promptly; concerns about the Headteacher go to the Chair/Co-Chairs;
- staff are encouraged to self-refer;
- the Headteacher will determine appropriate action and consult the DSL/LADO where necessary;
- records will include the concern, context, action, decision and rationale;
- records will be confidential, secure and reviewed for patterns;
- where concerns relate to supply staff or contractors, the employer will be informed; and
- low-level concerns will not normally be included in references unless they have met the relevant threshold or relate to matters that would ordinarily be included, such as substantiated misconduct or poor performance.

30. Whistleblowing

All staff, students and volunteers must be able to raise concerns about unsafe practice, poor safeguarding practice or wrongdoing without fear of reprisal. Concerns should normally be raised with the Headteacher; where the concern relates to the Headteacher or internal reporting is inappropriate, the school's Whistleblowing Policy provides alternative routes, including the governing body and relevant external bodies.

A safeguarding concern must never be withheld merely because the person raising it is uncertain whether it is a whistleblowing, low-level-concern or allegation matter.

31. Training and supervision

- all staff receive safeguarding and child-protection training at induction and regular updates at least annually, including online safety, filtering and monitoring, whistleblowing, staff conduct and local referral arrangements;
- all staff read KCSIE Part One annually and confirm that they have done so;
- DSLs and deputies train at least every two years and refresh knowledge at least annually;
- governors receive appropriate safeguarding and online-safety training at induction and regular updates;
- staff involved in recruitment receive safer-recruitment training;
- Prevent awareness is included at a level appropriate to role;
- EYFS practitioners receive training meeting EYFS Annex C criteria; and
- staff working directly with children and families have access to appropriate supervision, support and opportunities to discuss sensitive safeguarding issues.

32. Curriculum and preventative education

Safeguarding is embedded through the curriculum, relationships education, health education, online safety, behaviour expectations and the school's wider culture. Teaching will be age-appropriate and accessible, helping children understand safe and unsafe situations, trusted adults, consent and boundaries, privacy, online safety, respectful relationships and how to seek help.

The school will challenge sexism, racism, homophobia, biphobia, sexual harassment, misogyny and other prejudice in an age-appropriate way.

33. Parents and carers

The school will normally work openly with parents and carers and explain safeguarding concerns and referrals unless doing so could increase risk, impede a police/social-care investigation or otherwise be contrary to the child's welfare.

The policy will be available on the school website and parents will be informed of safeguarding arrangements when children join the school.

34. Monitoring, assurance and review

The Headteacher/DSL will review this policy at least annually and sooner following changes to law, statutory guidance, local procedures, serious incidents or identified weaknesses.

The governing body will receive appropriate safeguarding assurance, including training compliance, safer recruitment/SCR assurance, filtering and monitoring review, safeguarding audit outcomes, allegations/low-level-concern themes where lawful and appropriately anonymised, and EYFS compliance.

Because KCSIE 2026 is published for implementation from 1 September 2026, the school will check the version in force on 1 September 2026 and incorporate any final publication changes without delay.

35. Linked school policies

- Staff Code of Conduct
- Whistleblowing Policy
- Relationships and Behaviour Policy
- Attendance Policy
- Online Safety / Acceptable Use / Mobile Phone arrangements
- PSHE and Relationships Education Policy
- Supporting Pupils with Medical Conditions Policy
- Allergy / Anaphylaxis Policy
- First Aid Policy
- SEND Policy and SEN Information Report
- Health and Safety Policy
- Complaints Policy
- Data Protection / Privacy Notices
- Recruitment and Selection / Safer Recruitment procedures
- Managing Allegations and Low-Level Concerns procedures
- Educational Visits Policy
- Lettings / Community Use arrangements
- Restrictive Intervention / Reasonable Force arrangements where separate

Appendix 1 – Types and indicators of abuse

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. It may also arise where a parent or carer fabricates or induces symptoms of illness.

Emotional abuse

Emotional abuse is persistent emotional maltreatment that causes severe and adverse effects on emotional development. It can include conveying that a child is worthless or unloved, imposing inappropriate expectations, preventing normal social interaction, serious bullying, exploitation or causing a child to feel frightened or in danger.

Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. It may involve physical contact or non-contact activities, including involving children in sexual images, watching sexual activity, encouraging sexualised behaviour or grooming, including online.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development. It may involve inadequate food, clothing, shelter, supervision, protection from harm, medical care, education or emotional responsiveness.

Appendix 2 – Immediate staff action card

- Concern about a child: report immediately to DSL/DDSL and record factually.
- Immediate danger: call 999.
- Possible significant harm: contact Surrey C-SPA 0300 470 9100; out of hours 01483 517898.
- Concern about an adult working with children: tell Headteacher immediately; if about Headteacher, tell Chair/Co-Chairs.
- Unsure whether adult concern meets harm threshold: case manager consults LADO 0300 123 1650.
- FGM discovered by a teacher in a girl under 18: teacher reports directly to police and informs DSL.
- Never promise confidentiality; never investigate; never delay because the DSL is unavailable.

Appendix 3 – 2026 implementation checklist

- All staff issued KCSIE 2026 Part One and annual declaration completed.
- DSL/DDSL and safeguarding contact details checked.
- Surrey C-SPA/LADO details checked.
- SCR audited against KCSIE 2026.
- Existing volunteers reviewed against regulated-activity changes effective 1 September 2026.
- Filtering and monitoring roles confirmed and annual effectiveness review scheduled.
- EYFS Annex C safeguarding training requirements mapped to staff training.
- Whistleblowing routes confirmed for staff, students and volunteers.
- AI/acceptable-use arrangements communicated.
- Child-protection record transfer process includes confirmation of receipt and structured handover.
- Alternative-provision safeguarding assurance process confirmed.
- Linked policies checked for consistency with this policy.

Appendix 4 – Sources used for the September 2026 policy

Department for Education: Keeping Children Safe in Education 2026.

Department for Education: Working Together to Safeguard Children 2026.

Department for Education: Early Years Foundation Stage statutory framework for group and school-based providers, applying from 1 September 2026.

Department for Education: current guidance on regulated activity in relation to children.

Surrey County Council / Surrey Safeguarding Children Partnership: current C-SPA, LADO and local safeguarding procedures.

This appendix identifies the principal sources used to draft the policy; it is not an exhaustive list of safeguarding legislation or guidance.

DRAFT – Awaiting Governor Ratification