

Safeguarding Network's response to the Keeping Children Safe in Education 2026 consultation.

Submitted 22nd April 2026

Responses based on views expressed across three webinars hosted by Safeguarding Network in March 2026.

Please note that questions 1 and 2 were requesting personal information on the person submitting (name and email) so these have not been replicated here.

Please note that many of the free text boxes had a character limit on, and so some responses may seem truncated – this is to ensure that they fit within the character limit.

3. What is the name of your organisation?

Safeguarding Network

4. What type of organisation is it?

Consultancy.

5. In what capacity are you responding?

Other.

Safeguarding Network is a specialist organisation working with Designated Safeguarding Leads and brings much experience of working with schools, colleges and other education settings on this topic through webinars, supervision, direct consultation and audits as well as the provision of training materials to organisations working with children and young people.

We undertook a series of webinars in March 2026 where we advised participants of the proposed updates and then asked for their views. Across the webinar series we had 1958 attendees from a variety of settings including mainstream and private schools as well as specialist providers and MATs. Participants were mainly Designated Safeguarding Leads and other members of the senior leadership team such as Deputy/Assistant Head Teachers and Trust Safeguarding Leads. This submission is a summary of the responses from that process.

Where we have included our own view, this is clearly marked as such.

6. In which local authority is your organisation based?

We cover England, as well as providing support to education settings outside of England who follow the English education system.

7. How many staff are employed at your organisation?

11-50

8. How many learners does your organisation support?

1000+

9. How long have you worked in education or your current sector?

Over 20 years.

10. Would you like us to keep your responses confidential?

No.

Section 1 – Summary of the guidance**Background**

This section of the consultation addresses the changes we propose to make to the Keeping children safe in education (KCSIE) statutory guidance, which includes:

- *status of the guidance*
- *about this guidance*
- *who is this guidance is for, and*
- *general questions relating to the guidance such as, length, format, language, etc.*

Please note: paragraph references throughout refer to KCSIE 2026 unless otherwise stated.

KCSIE Structure**Proposal and rationale**

Feedback from schools, colleges and safeguarding professionals continues to be very mixed in relation to the length of the current KCSIE document. We are keen to explore this further to see if we can better meet the needs of the sector.

11. How do you typically access and refer to the KCSIE guidance?

Other (please specify).

Currently we download and review a PDF.

The breadth of attendees at our webinar events meant that the document is accessed across many different devices and mediums, so it is not possible to provide a specific answer to this question.

12. Do you think the current length of KCSiE is appropriate for its purpose?

Too long.

The overwhelming majority of attendees at our webinars (70.3%) were of the view that the current length of KCSiE was too long. One view that was echoed a number of times was that the document should be separated based on audience, however one participant noted that they preferred all the guidance to be in one place, e.g. the moving of the Sexual Violence and Sexual Harassment guidance into KCSiE was a good move. Part 4 should, in our view, be mainly standalone multi-agency guidance more associated with Working Together, with a short section about anything specific to education.

We mention the guidance for gender questioning children below, but this is one example of broader issues being incorporated into safeguarding making the guidance (and the role of the DSL) increasingly wide.

We would urge caution in how the guidance is reduced: the sweeping reductions made to Working Together 2010 meant significant and useful information was taken out. One example of this was the national guidance on training requirements for different levels. For example, Group 3 training now means different things in different local authorities and different agencies, causing confusion and creating risk.

13. Would you prefer:

A modular approach (core guidance plus optional annexes).

(Please note that we did not ask this question in the webinars, however this was considered the best answer based on the interactions in the webinars.)

Given the views expressed in relation to the current version being too long and number of individuals suggesting that there were various parts aimed at different cohorts, this was considered to fit with a modular approach.

This approach may also allow closer ties with Working Together where both documents can reference the same modules.

14. What benefits or challenges do you foresee in moving from a PDF to HTML format?

A HTML format would work better with screen readers and allow for some translation by web browsers where required (however this would need to be accompanied by a warning that nuance may be lost in translation). Some individuals do however prefer to download and print a hard copy of the guidance, and this is where a PDF version prevails, and a PDF version allows for quick reference in terms of pagination (e.g. “see page ...”)

We recommend both are provided.

15. We have produced a one-page summary of Part one of KCSiE. Would schools and colleges find this helpful?

No.

The general consensus is that all staff should read and understand Part One and therefore to have a one-page summary could potentially be seen as a way for staff to not read the full version.

EYFS framework

Proposal and rationale

Stakeholder feedback has highlighted that schools are sometimes unaware of the additional safeguarding requirements set out in the Early Years Foundation Stage (EYFS) framework, particularly for children in reception year. To address this, we have clarified that this statutory guidance applies to school-based nurseries and reception classes for children aged 0–5, by explicitly referencing the EYFS.

16. Were you aware that the Early Years Foundation Stage (EYFS) framework sets out additional safeguarding requirements for children in school based nurseries and reception classes?

Yes.

The majority of participants (69.3%) were aware of the additional requirements set out by the EYFS Framework.

There remains a concern that non-school Early Years settings do not use KCSiE as their primary document and often refer only to Working Together. Given this is the most vulnerable group by age there should either be a widening of the guidance to include them or specific EYFS guidance in a module.

Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

Proposal and rationale

KCSiE currently uses the terminology “Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).”

Following stakeholder feedback, we propose to change this language to “consensual and non-consensual self-generated intimate images and/or videos including those generated using AI e.g. deepfakes.” This change in language aims to improve clarity, consistency with current safeguarding terminology, and better reflect the seriousness of both consensual and non-consensual image sharing.

17. Do you agree with this change?

Yes.

Whilst we have answered yes to this question, there is a caveat. The benefit of changing the wording is that, as you identify in the explanatory text before the question, it reflects the scope and seriousness of the issue, as well as aligning with other terminology. However this, and indeed the phrase currently in use, is not something that all individuals would necessarily understand, and not necessarily accessible, creating a potential barrier to individuals knowing when and how they need to act. There are also issues in relation to the terminology which may need revisiting – the term “self-generated” suggests an individual is behind generating the images of themselves, whereas it may (and indeed is more likely to be) be done by others and it uses third party software to do this (with the third party providers escaping accountability in this definition).

18. What other terms or language do you currently use (or hear used) to describe situations involving the creation and/or sharing of self-generated intimate images?

Due to the significant number of diverse conversations that our consultants have with individual safeguarding professionals, we have not identified any consistent themes which would assist in answering this question.

Misogyny

Proposal and rationale

The current KCSIE guidance already includes references to misogyny, however we propose to include further references throughout the guidance to explicitly address where misogyny intersects with harmful sexual behaviour (HSB).

Extreme misogyny is increasingly prevalent online and is often linked to harmful sexual behaviour amongst young people. Misogynistic ideologies can contribute to:

- *The normalisation of sexual harassment and sexual violence*
- *Child-on-child exploitation and coercion*
- *The spread of harmful narratives*

19. Do you agree with the proposal to include further references to misogyny throughout KCSIE, specifically to highlight its intersection with harmful sexual behaviour (HSB)?

Yes.

Misogynistic behaviour is a growing problem within education settings, with this being particularly fed by the views of a cohort of individuals on internet-based platforms, but also at times tapping into existing prejudice. It is therefore important that there is a clear understanding amongst all professionals around what constitutes misogynistic behaviour and how to identify and address such behaviour.

Section 2 – Part one: Safeguarding information for all staff

Background

Part one of KCSIE sets out what all staff need to know, what they need to look out for and where they should report their concerns.

Changes to Part one

Annex A

Proposal and rationale

Annex A was introduced into KCSIE in the September 2021 update. It was created as a condensed summary to Part one specifically for staff who do not work directly with children. Currently, schools and colleges can decide, based on their own assessment, whether such staff should read Part one or Annex A. We are proposing to remove Annex A as evidence suggests that it is Part one that is more commonly used, and we take the view that all staff need a broader safeguarding awareness which Part one provides.

20. If Annex A were removed from KCSIE, how would this affect your ability to engage with safeguarding guidance?

It would improve consistency by requiring all staff to read Part one

Views on this were less clear than other polls. 47.2% said that it would improve consistency, however 27.3% identified that they felt that it would significantly reduce accessibility for non-teaching staff, particularly in larger settings. Participants also identified that for staff with limited reading ability this will potentially introduce a barrier to them understanding the requirements on them.

What school and college staff need to know

Proposal and rationale

To align with Working Together to Safeguard Children (WT), we have made changes to paragraphs 13-14 and paragraph 65. Aligning KCSIE with WT promotes consistency across the safeguarding system and clarifies schools' roles within multi-agency arrangements.

21. Do you agree with the proposed changes to paragraphs 13–14 and paragraph 65 of KCSIE to align with Working Together to Safeguard Children (WT), promoting consistency across the safeguarding system and clarifying the role of schools and colleges within multi-agency arrangements?

Yes.

The overwhelming majority (91.8%) of those participating in the webinars stated that they agreed with these proposals. Comments centred around the lack of education as a safeguarding partner, despite the significant role that they play in safeguarding children and young people. It was also identified that there is an expectation that education takes a role in the new multi-agency child protection teams and provides a dedicated resource for the teams. There were also comments that safeguarding demands are continually increasing, and therefore there needs to be clear structures in place behind this to support those involved with the access to necessary skills, training and support.

However, in our view some of the requirements are unnecessarily broad to be within Part 1. For example, should cleaning staff within a primary school need to know the “procedures and processes for cases relating to... children managed within the youth secure estate” (para 13). We suggest the focus of Part 1 should be kept pragmatic: what do people need to know to understand their responsibilities and to ensure they take action to keep children safe.

Early help

Proposal and rationale

Following stakeholder feedback, we have suggested amendments to paragraph 17 to include “...has been repeatedly removed from the classroom...” to reflect the Behaviour in Schools guidance around causes and responses to misbehaviour. And also “...is on a part-time timetable...,” which can be a contributing factor towards child criminal exploitation.

22. Do you agree with the proposed amendments to paragraph 17 of KCSIE, including the references to pupils who have been “repeatedly removed from the classroom” and those “on a part-time timetable”, to better reflect the guidance and highlight potential safeguarding risks such as child criminal exploitation?

Yes.

Children who are at risk of being excluded from mainstream education are known to have increased vulnerability in relation to issues such as child criminal exploitation. Therefore, the addition of these two aspects in this section serves to ensure that all staff recognise the potential need for additional support for these groups of children and young people.

Child Sexual Exploitation

Proposal and rationale

The current wording of paragraphs 26 and 39 of KCSIE risks creating confusion about the legal definition of rape. Under UK law, rape occurs when a person uses their penis without consent to penetrate the vagina, anus, or mouth of another person. Phrases such as “rape or oral sex” may imply that non-consensual oral penetration by a penis is not rape, which is incorrect. To

improve clarity, we propose removing this phrasing and adding an example of penetration with an object, which is legally recognised as a distinct form of sexual assault.

23. Do you agree that the proposed changes to paragraphs 26 and 39 improve clarity around the legal definition of rape and sexual assault?

Yes.

Sexual abuse remains a taboo subject, and as with all taboo subjects there can be a lot of talking around the subject, as opposed to saying things for what they are. The changes help to provide clarity in relation to rape and sexual assault meaning that there is less chance of ambiguity.

Evidence from the Casey Review and other research highlights that, as with child criminal exploitation (CCE), some victims of child sexual exploitation (CSE) have been, and can still be, criminalised for actions they take under coercion. It is important that education professionals understand this dynamic so they can respond appropriately and remain curious when a child is involved in the criminal justice system. We have updated paragraph 41 to reflect this.

24. Do you agree that the revised wording in paragraph 41 helps education professionals better understand the risk of victims of child sexual exploitation being criminalised for actions taken under coercion?

Partially.

Children who are victims of exploitation often do not realise that they are being exploited, and the professionals around them may not identify the situation as exploitation either. The paragraph does identify that there are situations where the experiences of the child are not recognised as exploitation (which can lead to criminalisation). However, it may be more appropriate to add some information about the need to remain professionally curious as this link is not immediately apparent in the paragraph as written.

Serious violence

Proposal and rationale

We have clarified that violence between children may, in some instances, constitute a safeguarding issue, particularly where there is a risk of harm, exploitation, or vulnerability. The guidance now includes:

- *explicit references to physical assault and threats with weapons.*
- *recognition that children who display violent behaviour may themselves be at risk or in need of support.*

- *a strengthened message that safeguarding responses should consider both the child who has been harmed and the child who has caused harm.*

This change reflects stakeholder feedback and aligns with a more trauma-informed approach to safeguarding.

25. To what extent do you agree with the following statement? “The revised guidance makes it clear that serious violence, including when children are perpetrators, is a safeguarding issue.”

Agree.

No space to add additional commentary.

26. How confident are you that you understand your setting’s responsibilities in identifying and responding to serious violence as a safeguarding issue?

Not applicable.

As Safeguarding Network are replying as a result of our discussions with many individuals in the sector, we are unable to answer this question.

27. To what extent do you agree with the following statement? “The guidance supports early identification of risk and outlines appropriate early help or preventative responses.”

Agree.

No space to add additional commentary.

28. To what extent do you agree that the revised Part one better equips schools and colleges to identify and prevent abuse and violence between children?

Agree.

No space to add additional commentary.

29. If KCSIE were to include more guidance on recognising and preventing child-on-child violence, what would be most helpful?

This question offers the following options – the options highlighted in bold represent those that webinar participants considered would be most helpful.

- **Case studies**
- Checklists
- Training resources
- Clearer definitions
- Partner roles
- Other, please specify

Our participants felt that there should be training resources and case studies provided, however the above checklist does not allow for more than one option.

What school and college staff should do if they have a safeguarding concern or an allegation about another member of staff

Proposal and rationale

Following stakeholder feedback, we have added wording to paragraph 75 to highlight earlier in the guidance that the headteacher or principal will consider whether a LADO referral is appropriate. This should help staff to understand that this is an expectation.

30. Do you agree with the proposed addition to paragraph 75 of KCSIE, which highlights earlier in the guidance that a headteacher or principal should consider whether a referral to the Local Authority Designated Officer (LADO) is appropriate? This aims to clarify expectations for staff.

Yes.

92.2% of all those who responded to our poll stated that they agreed with this addition. There does however need to be some consideration of MAT structures with the current emphasis that all schools should be part of a MAT.

Section 3 – Part two: The management of safeguarding

Background

Part two of KCSIE sets out the responsibilities of governing bodies and proprietors to safeguard and promote the welfare of children and includes guidance on the safeguarding policies and procedures they should have in place.

Mental Health

Proposals and rationale

In response to stakeholder feedback, we have revised the section on “children requiring mental health support” in Part two of KCSIE. The updated text aims to provide a clearer high-level overview of how mental health concerns may intersect with safeguarding duties - particularly in cases involving serious risks such as self-harm, eating disorders, or suicidal ideation.

While KCSIE is not intended to be the primary source of detailed advice on mental health, it now more explicitly acknowledges that mental health problems can, in some cases, develop into safeguarding concerns. The guidance signposts to specialist resources and supports schools in recognising when safeguarding action may be appropriate.

We welcome views on whether the revised section strikes the right balance between providing a high-level safeguarding overview and directing schools and colleges to more detailed mental health guidance. We are particularly interested in whether the changes help settings feel confident in identifying and responding to serious mental health related safeguarding risks.

We have made a substantial redraft of the section on children requiring mental health support, clarifying:

- *The role of education staff in identifying early signs of mental health issues.*
- *The importance of whole-school approaches to wellbeing.*
- *The need for appropriate referral pathways and targeted support.*

This update reflects growing awareness of the link between mental health and safeguarding and aims to support schools in responding confidently and compassionately.

31. To what extent do you agree with the following statement: “The revised section on ‘children requiring mental health support’ clearly explains the role of schools and colleges in identifying and responding to mental health needs.”?

Agree.

32. To what extent do you agree with the following statement: “The revised section on ‘children requiring mental health support’ provides a clear and useful high-level summary and appropriately signposts to more detailed guidance.”?

Agree.

Knowing how to support children who are experiencing mental ill-health is a key aspect of keeping children safe. If unsupported they are increasingly vulnerable to other forms of abuse. Mental ill-health is a complex area, and it is important that schools are supported to understand their role in identification. Mental ill health is something that is also not talked about openly and may be seen as a sign of weakness for some people (e.g. males seeing it as something that they need to just “deal with”). More information about where to get advice and support section is always welcomed, and its inclusion in this section emphasises that this is a whole setting issue and needs consideration at all levels, as opposed to being an individual’s issue. We welcome in particular the specific inclusion of suicide as a growing and hugely concerning issue for schools and colleges. We would suggest staff should have training in identifying concerns and know how to respond when they are worried for someone, both in reporting and in what to say. It would be helpful to include specific resources to support schools in the same way as the document does for online safety and other areas.

Guidance relating to children who are questioning their gender

Background

We have updated the section on children questioning their gender which focuses on issues that might arise in relation to children who are questioning their gender. We have also proposed separate new sections on single-sex spaces (paragraphs 104-115) and single-sex sports (paragraphs 94-97). These sections are informed by the public consultation on the draft non-statutory Gender Questioning Children: Guidance for Schools and Colleges. We will not be publishing standalone guidance for schools and colleges on gender questioning children but propose instead to include this content in KCSIE so that children's wellbeing and safeguarding are considered in the round, and so that schools and colleges can easily access this information in one place.

Proposal and rationale

Overall, the consultation demonstrated that this is a highly contested policy area, with no clear consensus on the appropriate approach, but more respondents expressed negative than positive views about the useability of the draft guidance published for consultation. The Cass Review – an independent review of gender identity services for children and young people – published its final report on 10 April 2024, after this consultation had closed.

By including advice in KCSIE, our intention is to reflect the importance for schools of making careful decisions about what is in the best interests of children, including children who are questioning their gender. Schools and colleges have obligations to safeguard and promote the welfare of all children in their care, and children who are questioning their gender are no exception. Children who are questioning their gender may need sensitive and thoughtful involvement from their school or college. When handled well, with appropriate parental involvement and attention to any clinical input, the school or college's involvement can help to avoid safeguarding issues arising.

Guidance in this area must be focused on the best interests of children as well as the legal duties of schools and colleges. Our intention is to provide a framework for schools and colleges as they consider these issues. By including this in KCSIE, the advice and framework we are offering will be on a statutory footing.

Paragraphs 104-115 and paragraphs 191-196 in KCSIE clarify a school or college's legal obligations in relation to single-sex spaces, including toilets, changing rooms and boarding / residential accommodation.

The guidance is clear about the law, that schools and colleges should not make exceptions to single-sex policies that are required to comply with statutory requirements 23 and based on safety, but the guidance stresses that where it is both possible and in the interests of the child, schools and colleges should do their best to accommodate the needs of children who are experiencing distress using facilities designated for their biological sex by providing alternative arrangements.

Paragraphs 94-97 clarify the legal issues relating to provision of single-sex sports. Again, where there are safety concerns about mixed-sex provision, we have been clear that sports should be provided in single-sex groups. However, we recognise how important it is that all children can participate in sports and PE, and the draft reflects the importance of considering fairness and safety for all children.

33. Does the updated section of the guidance on children who are questioning their gender provide clarity about the considerations schools and colleges will need to take into account?

No.

We found we were significantly hampered by the character limit on this answer. Below is what we were proposing to submit, followed by what we actually submitted due to the character limit.

Across all three of the webinars that we ran, it was the section on the gender questioning guidance that proved the most controversial. Whilst the premise of its inclusion in KCSIE is that it will provide the guidance with a statutory footing, and ensure that the issues are seen in the round, participants were concerned that there is a very real risk that anything to do with children questioning their identity becomes siloed as a safeguarding issue, and perversely then prevents the wider picture being seen by all staff.

As an organisation, Safeguarding Network agrees that supporting gender-questioning children is a significant undertaking, covering a multitude of different areas, for example mental health, interaction with parents and peers, individual's inherent beliefs and values (both in terms of children and young people and the staff supporting them). We are concerned that whilst the proposed guidance does recognise this complexity in paragraph 248 of the draft document, along with recognising the need to maintain flexibility in approach, it then appears to focus solely on legal obligations, sidestepping the wider issues completely. For us, there is then an inherent risk that every school, MAT, local authority, private enterprise and alternative provision (not an exhaustive list) will develop their own policies and procedures, leading to a patchwork of responses and creating what is effectively a postcode lottery.

Alongside this there are then very vocal sections of society who are rightly keen to ensure that their views are heard to a greater or lesser extent. This was evident in our webinars, with one webinar specifically seeing participants having a very active discussion in the chat function. This chat saw two cohorts of participants who had opposing views make their cases about what should and should not happen in relation to children who are questioning their gender. At Safeguarding Network, we recognise that this area of work can lead to polarising views, and without very clear guidance, there is a risk that settings will be pulled into these debates and the focus on the child lost.

Other issues identified by participants in our webinars included the need to recognise that there is no one size fits all approach, for example if the child has other needs, such as being neurodivergent. Participants identified that in this scenario further thought and planning would

be required in order to make sure that the child's needs are met effectively and they are able to process information that they are provided with. Other participants were clear that they felt that there needed to be more training on gender and social norms, whilst there were other discussions about how the age of the child (both physical and developmental) will affect how settings need to respond.

Age was also a factor for participants from settings providing education for those 16 and over – representatives from these settings were asking about involvement of parents, rights of the child for their parents to not be involved and the fact that children of this age naturally have more choice over their identity meaning that they could be at odds with the guidance proposed for KCSIE.

What was submitted:

Whilst the premise of its inclusion in KCSIE is that it will provide the guidance with a statutory footing, and ensure that the issues are seen in the round, there is a very real risk that anything to do with children questioning their identity becomes siloed as a safeguarding issue, and prevents the wider picture being seen by all staff. Safeguarding Network agrees that supporting gender-questioning children is a significant undertaking, and we are concerned that whilst this complexity is recognised along with the need to maintain flexibility in approach, the main focus is on legal obligations, sidestepping the wider issues. The risk is that every setting will develop their own policies and procedures, potentially influenced by wider debates and losing focus on the individual child. There is no one size fits all approach, e.g. if the child is neurodivergent further planning would be required in order to make sure that the child's needs are met and they are able to process what they are told. For a child aged 16 or over there are questions about rights of the child for parents to not be involved. Children of this age also naturally have more choice over their identity.

34. Do paragraphs 104-115 provide clarity for schools and colleges about their legal obligations relating to toilets, changing rooms, and boarding and residential accommodation?

Yes.

See caveats in answer to previous question.

35. Do paragraphs 94-97 provide clarity for schools and colleges about the circumstances in which the school is justified in having a policy of single-sex sports?

Yes.

Additional technical updates - other changes to Part two include:

- *'Opportunities to teach safeguarding,' included references to 'racism' and derogatory behaviour' and included links to RSHE resources.*
- *'Artificial intelligence,' proposed the addition of paragraphs focusing on the use of generative artificial intelligence in education.*

- *'Filtering and monitoring', updates to include an annual review at least every academic year.*
- *'Information security and access management,' proposed a change of wording with additional information on cyber security.*
- *'Alternative provision,' additional detail included. • 'Medical conditions,' clarification of safeguarding responsibilities for children with medical conditions, children absent from education, and those in alternative provision.*
- *'Information sharing,' strengthened guidance on the transfer of child protection files.*

Opportunities to teach safeguarding

Proposal and rationale

Proposal and rationale Paragraph 153 in KCSIE 2026 describes the importance of preventative education and zero tolerance for sexism and other forms of prejudice or harmful behaviour. Including references to "racism" and "derogatory behaviour" in this paragraph aligns the guidance with existing expectations set out in Ofsted's school inspection framework and the DfE guidance on promoting fundamental British values. This addition reinforces the importance of addressing discriminatory behaviour as part of a whole-school safeguarding approach and supports schools in creating inclusive, respectful environments.

Following stakeholder feedback, we have also updated the wording in paragraph 155 to include new links to RSHE resources: Free, time-saving teacher resources | Oak National Academy

36. Do you agree that including references to "racism" and "derogatory behaviour" in paragraph 153 of the KCSIE guidance is helpful?

Yes.

No space to add additional commentary.

37. Are the new links to RSHE resources helpful for schools and colleges?

No opinion.

Artificial intelligence (AI)

Proposal and rationale

We are proposing the addition of two new paragraphs after paragraph 159 focusing on AI. The department updated its policy paper on the use of generative artificial intelligence in education. The paper outlines key safety considerations and legal responsibilities for schools and colleges when using generative AI in both teacher-facing and pupil-facing contexts. To support implementation, the department, working in partnership with the Chiltern Learning Trust and the Chartered College of Teaching, has published online resources for all school and college

staff. These resources emphasise safe and effective use of AI, with a strong focus on safeguarding.

38. Do you support the inclusion of references to the DfE's generative artificial intelligence policy and resources within KCSiE, to help schools and colleges understand their safeguarding responsibilities when using AI tools?

Yes.

No space to add additional commentary.

39. In your view, does this addition provide sufficient clarity and support for managing risks related to ethics, data protection, and safeguarding in AI use?

No.

It will be complicated for KCSiE to keep pace with the development of AI. It would be better to have a framework of areas that must be considered and reference to organisations that focus on this task.

This was not an area we consulted participants on.

Filtering and monitoring

Proposal and rationale

KCSiE currently states that "...governing bodies and proprietors should ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness." paragraph 166.

Following recent ministerial commitments and cross government work to strengthen school and college online safety, we propose adding that governing bodies and proprietors should 'carry out a review of their effectiveness at least once every academic year', and that 'Reviews should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks.'

This wording is already used in the filtering and monitoring standards and reflects expectations that schools and colleges proactively assure the effectiveness of their systems.

Annual, documented reviews are essential to demonstrate that schools and colleges are taking timely and effective action to keep children safe online, particularly given the increasing risks from harmful digital content, AI generated material, and rapid changes in online behaviour.

40. Do you agree with this change?

Yes.

This change brings KCSIE in line with other guidance that is already widely available.

Information security and access management

Proposal and rationale

We propose to change the wording in paragraph 170 and also add an additional paragraph on cyber security.

Cyber security is now recognised as a safeguarding concern, not just an IT concern. Schools and colleges hold sensitive personal data about children, including safeguarding records and health information. If this data is compromised through a cyber-attack, this can pose immediate risks to a child's safety and wellbeing.

41. Does the revised wording in paragraph 170 and additional paragraph effectively communicate that cyber security is an integral part of safeguarding practice?

Yes.

Alternative provision (AP)

Proposal and rationale

We propose adding a paragraph between paragraphs 203 and 205, which sets out the department's voluntary national standards for non-school alternative provision, along with guidance to support schools and local authorities in quality assuring providers.

Including reference to the voluntary national standards for non-school alternative provision in KCSIE helps strengthen safeguarding oversight for children educated outside traditional school settings. These standards provide a clear framework for quality assurance, supporting schools and local authorities in selecting safe and appropriate providers.

42. Do you agree that referencing the voluntary national standards for non-school alternative provision in KCSIE helps reinforce the responsibility of schools to carry out safeguarding checks and ensure the suitability of commissioned provision?

Yes.

Children and young people in non-school alternative provision are often highly vulnerable, and it is therefore important that any alternative provision is providing safe environment for that individual.

43. Does this inclusion support schools and local authorities in maintaining high standards of care for children educated outside mainstream settings?

Yes.

Medical conditions

Proposal and rationale

We have added a new paragraph (paragraph 243) which sets out guidance on 'safeguarding children with medical conditions.'

44. Do you agree with the addition of guidance on safeguarding children with medical conditions, and does it help clarify when a medical condition may become a safeguarding issue?

Yes, agree with addition only

The addition helps to clarify that there is a need to consider whether a clinical incident should trigger a safeguarding duty and refers the reader off to other guidance. However, in our view, neither this paragraph or the additional guidance referred to would help the reader to clarify when a medical condition may become a safeguarding issue, instead merely identifying that the healthcare professional and DSL "should consider whether a safeguarding duty has been considered".

Special Educational Needs and Disabilities (SEND)

Proposal and rationale

We have listened to previous stakeholder engagement which indicated that more was needed on additional barriers.

45. Do you think the expansion of the list of additional barriers children with SEND can face is helpful?

Yes.

Whilst supportive of the inclusion of this information in the guidance, the question is whether its inclusion in Part Two is the best place for this, or whether this should be located in Part One of the guidance as something for all staff to read and understand.

Information Sharing

Proposal and rationale

We have strengthened guidance on the transfer of child protection files when a pupil moves to a new school or college. The update clarifies that the designated safeguarding lead (DSL) or a deputy should share any information indicating that a pupil may pose a risk to themselves or others, such as concerns about serious violence or harmful behaviours, with the receiving setting. In addition, we recommend that DSLs or a deputy from both settings have a direct conversation where there are significant issues or concerns, as good practice, to ensure continuity of safeguarding support.

46. Do you support the proposed clarification that, when a pupil transfers to a new school or college, the DSL or a deputy should share any information indicating potential risk to self or others (e.g. serious violence or harmful behaviours)?

Yes.

Poor information sharing is an ever-present issue in case reviews both at a local and national level. Anything that strengthens the guidance in relation to good quality and appropriate information sharing is welcomed.

47. Do you support the addition that it is considered good practice for DSLs at both settings to have a direct discussion where concerns exist?

Yes.

A conversation is always a good addition to the transfer of any records as it allows for key areas of risk and concern to be identified and for the receiving organisation to challenge or get more information around decisions made and views reached by the sending organisation. A conversation also allows for a shared understanding to develop, meaning that the receiving organisation can understand any concerns a lot quicker and in greater detail.

Section 4 - Part three: Safer recruitment

Background

Part three of KCSIE provides schools and colleges with guidance on the statutory requirements and important information about safeguarding and recruitment.

Changes to Part three

In response to feedback from key stakeholders, schools and colleges we have inserted a single central record template that meets the statutory requirements of KCSIE. Other revisions, address concerns from the sector that schools are requesting unnecessary DBS checks for those on work experience. Minor revisions have also been made to improve clarity throughout the text.

Adults who supervise children on work experience

Proposal and rationale

We have suggested amendments to the current work experience section, in response to feedback from the sector that schools are requesting Disclosure and Barring Service (DBS) checks from employers where they are deemed unnecessary, i.e. where the workplace experience does not meet the definition of regulated activity.

Rationale for specific changes are listed below:

- *Paragraph 398 – we have updated language to reflect policy changes on work experience and also plan to suggest an amendment to the 16-19 study programmes reference in early 2026, following planned publication of new best practice on work experience.*
- *Paragraph 399 – We have amended language to respond to concerns from employers that schools are requesting DBS checks from employers where they are not necessary. E.g. for Key Stage 3 workplace group visits.*
- *Paragraph 400 – We have included the word 'both', as our reading of the two bullets in paragraph 399 is both are required to be true to be deemed regulated activity.*
- *Paragraph 402 – We have updated language to reflect policy changes on work experience.*

48. Are there any aspects of the work experience section in KCSIE that are unclear and deter, schools, colleges, or employers from enabling young people to undertake work experience?

No.

Single Central Record

Proposal and rationale

In response to feedback from key stakeholders, we have included an example Single Central Record (SCR) template that meets the statutory requirements of KCSIE.

49. Do you think this is helpful?

Yes.

The Single Central Record is a key document for education settings, however for many years there has been no clear guidance as to what is expected in the document. The inclusion of this in KCSIE provides a baseline from which all organisations can work. This also then benefits other organisations such as alternative provisions, etc. who may not necessarily have the same

structures in place to have an understanding of the minimum requirements that they should be working to.

Webinar participants did have the view that the template within KCSIE as it stands is too simple and does not add anything, however as above, we see this as a starting point from which to build. There is also a need to ensure that the template provided would meet the requirements of Ofsted under the Inspection Framework as they may have a different set of expectations.

Section 5 - Part four: Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors

Background

Part four of Keeping children safe in education is about managing cases of allegations that might indicate a person poses a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This part of the guidance should be followed when dealing with allegations against anyone in the school or college, including supply teachers, volunteers, and contractors.

Changes to Part four

We have suggested amendments to Part four to clarify that when an allegation is made against a trainee teacher schools and colleges should follow the same procedures as set out for supply teachers and contracted staff.

Rationale for change:

- *Include the words 'trainee teachers' throughout, and*
- *Insert new paragraph which explains that schools and colleges should follow the same procedures as set out for supply agencies.*

50. How confident are you in responding to allegations about trainee teachers and understanding their respective roles?

Don't know / Not applicable.

As Safeguarding Network is responding on a group basis, it is not possible to answer this question as it is aimed at individuals.

51. To what extent do you agree with the following statements about a school's safeguarding responsibilities for individuals who are not directly employed by the school (e.g., volunteers, contractors, trainee teachers, or staff from third-party organisations)? Note: This relates to safeguarding responsibilities, not safer recruitment.

Schools have full safeguarding responsibility for all individuals working on their site or with their pupils, regardless of employment status.

Strongly agree.

No space to add additional commentary.

52. To what extent do you agree with the following statements about a school's safeguarding responsibilities for individuals who are not directly employed by the school (e.g., volunteers, contractors, trainee teachers, or staff from third-party organisations)? (Note: This relates to safeguarding responsibilities, not safer recruitment.)

Schools share safeguarding responsibility with third parties but must ensure appropriate checks, supervision, and policies are in place.

Strongly agree.

No space to add additional commentary.

53. To what extent do you agree with the following statements about a school's safeguarding responsibilities for individuals who are not directly employed by the school (e.g., volunteers, contractors, trainee teachers, or staff from third-party organisations)? (Note: This relates to safeguarding responsibilities, not safer recruitment.)

Schools can delegate safeguarding responsibility to external providers but must retain oversight and assurance that appropriate standards are met.

Strongly agree.

No space to add additional commentary.

Section 6 - Part five: Child-on-child sexual harassment and sexual violence

Background

Part five of KCSIE is about managing reports of child-on-child sexual harassment and sexual violence. It sets out what governing bodies and proprietors should be doing to ensure reports of child-on-child sexual harassment and sexual violence are managed appropriately.

Changes to Part five

Proposal and rationale

We have restructured Part five of KCSIE to present a clearer and more progressive continuum of sexual behaviours. The revised structure begins with early indicators of harmful sexual behaviour, progressing through to sexual harassment and culminating in sexual violence. This sequential approach enhances clarity, improves the logical flow, and supports ease of reference for professionals addressing safeguarding concerns.

This approach also aligns with evidence-based frameworks such as the Hackett Continuum, which distinguishes between developmentally inappropriate, problematic, and abusive behaviours.

54. Do you agree that the revised structure of Part five of KCSIE, presenting a clearer continuum of sexual behaviours from early indicators of harmful sexual behaviour through to sexual harassment and sexual violence, improves clarity and supports professionals in identifying and responding to safeguarding concerns?

Yes.

The clearer representation of escalation of behaviours will assist readers in understanding how this is a continuum of need and not a disparate set of events.

55. Does this approach, aligned with evidence-based frameworks such as the Hackett Continuum, help schools and colleges better distinguish between developmentally inappropriate, problematic, and abusive behaviours?

Yes.

Please refer to above commentary.

Section 7 - Annex B (to become Annex A): Further information

Background

Following the proposed removal of Annex A, Annex B of KCSIE will become Annex A. It provides detailed guidance on a wide range of safeguarding issues that schools and colleges may encounter. Annex B serves as a reference point for staff to understand specific safeguarding concerns and how to respond appropriately, including when to refer to external agencies such as children's social care or the police.

Changes to Annex B (to become Annex A)

Proposal and rationale

We have added in links to Understanding and responding to AI-generated child sexual abuse material guidance from the National Crime Agency's CEOP Education programme in collaboration with the Internet Watch Foundation, and Financially motivated sexual extortion (FMSE) guidance for education settings on FMSE from the National Crime Agency's CEOP Education programme.

56. Are these new links helpful for schools and colleges?

Yes.

These areas could all be classed as emerging areas of harm for education settings to have to understand and be aware of. Therefore, additional reference links are welcomed.

Section 8 - Annex C (to become Annex B): The role of the designated safeguarding lead

Background

Following the proposed removal of Annex A, Annex C of KCSIE will become Annex B. It sets out the role of the DSL including their responsibilities, status, and the required skills of the role as key point of contact for safeguarding and child protection in schools and colleges.

Changes to Annex C (to become Annex B)

Proposal and rationale

We have added further detail regarding the importance of schools having robust cover arrangements. We recognise there may be times when the DSL may not be available, for example because of an illness. We aim to ensure that any safeguarding concerns are acted upon without delay. We have added “skills and experience” to paragraph 125, this aims to reinforce the expectation that designated safeguarding leads (DSLs) should not only hold appropriate status and authority but also possess the practical capability to carry out their responsibilities effectively. This has also been reflected in Part two.

57. Do you support the inclusion of a requirement for schools to implement robust cover arrangements to ensure safeguarding concerns are addressed promptly when the designated safeguarding lead is unavailable?

Yes.

There will be times when the DSL is not available to provide safeguarding advice and support as per the requirements of KCSIE. It is therefore important that there are clear procedures in place to ensure that there is continuity of support by someone who is equally appropriately qualified. The inclusion of this requirement means that the governors and SLT in settings are required to not only consider it but put plans in place. This position had the support of 97.9% of webinar participants.

58. Do you agree with the proposed addition of “skills and experience”, to reinforce the expectation that designated safeguarding leads (DSLs) should have the practical capability, background, and expertise to carry out their responsibilities effectively?

Yes.

Being a DSL is a significant undertaking, and it is important that it is not seen as a role which anyone can be put into. There does however have to be scope for individuals without prior experience to get the exposure that they need to be able to progress into meeting this requirement. This position was overwhelmingly supported by participants on our webinars with 96% of participants saying “yes”.

Section 9 – Expanding our evidence base

Background

In this section of the consultation, we are seeking to expand our evidence base in areas where we have routinely been asked to consider changes to KCSIE, but where our knowledge is currently limited.

General feedback on KCSIE

59. What aspects of KCSIE do you find most helpful in supporting safeguarding practice?

As an organisation, Safeguarding Network is not able to answer this question as the response would be very much an individual response. That said there needs to be a balance between providing information to support safeguarding practice and ending up with a weighty and inaccessible document.

60. What aspects of KCSIE do you find least helpful or most challenging?

As an organisation, Safeguarding Network is not able to answer this question as the response would be very much an individual response. That said there needs to be a balance between providing information to support safeguarding practice and ending up with a weighty and inaccessible document.

61. Is there anything missing from KCSIE that would help you safeguard children more effectively?

As an organisation, Safeguarding Network is not able to answer this question as the response would be very much an individual response. That said there needs to be a balance between providing information to support safeguarding practice and ending up with a weighty and inaccessible document and that there needs to be an aligning of definitions between KCSIE and Working Together to ensure practitioners have consistency in messaging.

Affluent neglect

“Affluent neglect” refers to situations whereby children from wealthy or privileged backgrounds experience neglect (particularly emotional or supervisory) despite having their material needs met.

62. Are you familiar with the term “affluent neglect”?

Yes.

No space to add additional commentary.

63. If yes, do you believe “affluent neglect” is becoming a growing safeguarding concern and warrants explicit reference and guidance within KCSIE?’

Webinar participants were resoundingly in agreement with the statement that “affluent neglect” is becoming a growing concern that warrants explicit mention in the guidance. The experience of both participants and us at Safeguarding Network is that there is an increasing cohort of young people who, whilst living in the same property as their parents / carers are leading very separate lives, meaning that there are then instances where needs are persistently not being met.

Artificial intelligence (AI)

We welcome your views on how KCSIE can best support staff in understanding and responding to the evolving risks posed by AI technologies.

Technology continues to play a significant role in both safeguarding risks and opportunities. As AI tools become more widely used, particularly AI-powered chatbots, there is growing concern about their potential misuse in ways that could harm children and young people. These risks are evolving rapidly and may not yet be fully understood by all staff working in education settings.

64. Should KCSIE include specific reference to the emerging safeguarding risks associated with artificial intelligence (AI)?

Not sure/ No opinion.

In line with our previous response around AI, it will be complicated for KCSiE to keep pace with the development of AI. It would be better to have a framework of areas that must be considered and reference to organisations that focus on this task.

British Sign Language (BSL)

Currently KCSIE is not available in British Sign Language (BSL), we’re seeking views on whether there is a need for a BSL version to improve accessibility and equity in education settings.

65. Do you feel there is a need for a British Sign Language (BSL) version of the KCSIE guidance?

Not sure/ No opinion.

This is not an area that Safeguarding Network has consulted on, however it is important that the guidance (at least Part one if not all) is available as widely as possible.

Domestic abuse

Feedback from the wider sector has highlighted the need for clearer advice and strengthened language around Children Affected by Domestic Abuse (CADA).

66. To what extent do you agree that KCSIE should include more detailed information on Children Affected by Domestic Abuse (CADA), including clearer signposting to support services?

Neutral.

Exposure to domestic abuse is a significant for of harm for children and young people, and there is a wealth of guidance in relation to this. Whilst information on CADA would be useful, this would also lead to a further increase in the size of the document whereas the provision of a reference to other guidance may suffice. There is also concern that the implementation of CADA (and indeed Operation Encompass) is not universal meaning that this may introduce a level of confusion / differing expectations for practitioners.

Grooming gangs

67. Should KCSIE include clearer guidance on safeguarding risks associated with organised networks or grooming gangs, including links to relevant statutory guidance?

Yes.

Although we have answered yes to this question, it is important to remain mindful that the more information that is included in the document the larger and less accessible / agile the document becomes and so it is important to find this balance.

Gaming platforms

As children and young people increasingly engage with online platforms, the risks they face continue to evolve. While social media has long been recognised as a space where children may be targeted by offenders, there is growing concern about the use of gaming platforms as environments where grooming, exploitation, and contact by organised networks can occur.

In parallel, there is a rising trend in sextortion, particularly financially motivated sexual extortion, which disproportionately affects young males. Offenders often coerce victims into sharing explicit images and then demand money under threat of exposure. This form of abuse can have devastating emotional and psychological consequences.

68. Given these emerging threats, do you think that there is a need to consider explicit reference to a) the risks associated with gaming platforms as potential sites of harm and/or b) the growing prevalence of sextortion, especially targeting young males, and the need for schools and colleges to be aware of and respond to this form of abuse?

Yes, both should be included.

As above, although we have answered yes to this question, it is important to remain mindful that the more information that is included in the document the larger and less accessible / agile the document becomes and so it is important to find this balance. Given that this is a rapidly developing area, as with references to AI it may be more pragmatic to refer readers to other sources of information which can be more easily updated.

Harmful sexual behaviour (HSB)

Currently, KCSIE focuses on child-on-child harmful sexual behaviour (HSB). However, school staff may encounter situations involving HSB that is not criminal in nature and may not always harm another child e.g. a child watching pornography. These behaviours may not always result in direct harm but can still indicate underlying vulnerabilities or risks.

This consultation aims to ensure that school staff are equipped with the right knowledge and tools to respond confidently and appropriately to all forms of HSB, in line with best practice and evolving safeguarding needs.

69. Would you welcome more specialist advice in KCSIE on harmful sexual behaviour including behaviours that are not criminal and may not always harm another child e.g. a child watching pornography, or would you prefer to be signposted to other sources of help?

Yes.

As with the section relating to harmful sexual behaviour, sexual harassment and sexual violence above, information about how this behaviour is on a continuum and how to respond to lower levels of concern would be widely appreciated. This was echoed by our webinar attendees, with 96% of participants answering “yes” to this question.

Self-Referral – harm towards a child

It is our expectation that schools’ safeguarding policies and procedures would require individuals to disclose relevant information, including self-referral where they have harmed a child or are subject to safeguarding measures.

We are seeking views on whether KCSIE should provide clearer expectations around self-referral by staff. The current guidance requires staff to refer concerns about colleagues who

may have harmed a child, but it is less explicit about situations where staff themselves may have harmed a child or are subject to safeguarding measures, such as a child protection plan.

We want to understand whether stakeholders believe KCSIE should make this expectation clearer.

70. Should KCSIE include clearer guidance requiring staff to refer themselves to the headteacher or principal if they have harmed a child or are subject to a child protection plan, even where this has not resulted in criminal charges?

Don't know/ No opinion.

There are aspects of this which are very important, however is this something that should be included in KCSIE, or is this a matter that needs to be included in individual's contract of employment which would arguably carry more weight and, if the individual has been found not to have complied with their contractual obligations, means that there is greater action that can be taken in response?

Teenage relationship abuse

Currently, KCSIE includes limited wording on teenage relationship abuse, despite growing evidence of its prevalence among young people. With high and increasing rates of abuse in teenage relationships, especially online and through technology, teachers and school staff may require clearer guidance on how teenage relationship abuse may present, how children may be abused or controlled by their partners, and what interventions are appropriate.

While KCSIE outlines signs of harm in the context of intra-familial domestic abuse, it does not currently support school staff in recognising or responding to abuse within teenage relationships.

71. Do you agree that KCSIE should include more detailed guidance on Teenage Relationship Abuse (TRA), including how it may present in online and digital contexts, and how school staff can identify and respond to abuse and coercive control within teenage relationships?

Strongly agree.

As identified in the introduction to this question, Teenage Relationship Abuse is becoming more widely identified. Partly this is down to better understanding of the issues and what classes as TRA, however it can also be suggested that there is an increase in TRA linked with misogyny as referred to earlier in this consultation. It would therefore be very useful for this information to be referred to, however there needs to be careful consideration given to how this is interlinked with domestic abuse and potential duplication avoided.

Verbal abuse

KCSIE sets out different forms of abuse, including physical, sexual, emotional, and neglect. While verbal abuse is referenced within emotional abuse, we are interested in whether KCSIE should say more about verbal abuse as a distinct safeguarding concern. This could include clearer examples of harmful language, persistent derogatory remarks, or threats, and how these can impact a child's wellbeing and safety.

72. Do you think KCSIE should provide more explicit guidance on verbal abuse?

No.

No space to provide additional commentary so comments added in the answer to the next question.

73. If yes, what additional content or examples would help schools and colleges identify and respond to verbal abuse effectively?

We answered no to the above question, however feel it important to quantify our answer. As identified in the introduction, verbal abuse comes in many guises and is a feature of many forms of abuse. To separate it out increases the risk of other, underlying abuse being ignored due to the impact of silo thinking. That said, historically the spoken word has been dismissed as irrelevant as abuse, especially in early years as children don't always understand or perceive the meaning behind the words, yet they can still be derogatory. Therefore a potential way forward is to reinforce the messaging that spoken words should not be brushed off as 'banter', 'only joking' or 'sarcasm'.

Designated safeguarding lead (DSL)

This section is primarily aimed at DSLs and deputies, (if you are not a DSL/Deputy please skip this section.) Previous engagement, including a 2024 call for evidence and recent stakeholder feedback, highlighted concerns around workload, emotional burden, recognition, and training. We are seeking views to help identify practical steps to better support designated safeguarding leads (DSLs) and their deputies in schools and colleges.

74. How were you recruited into the role of a designated safeguarding lead (DSL) or deputy DSL (DDSL)? (select the option that best describes your experience):

Skipped.

75. How long have you been in the DSL/DDSL role?

Skipped.

76. What is the most rewarding part of your role as a DSL/DDSL?

Skipped.

77. What would make your role even better?

Skipped.

78. If you could change one thing to improve support for DSL/DDSLs, what would it be?

Skipped.

79. How confident do you feel in your role as a DSL/DDSL?

Skipped.