

# KCSIE 2026 Consultation

Strategic overview and key changes for the education sector

## Please note

Read the draft in full. The proposed revised guidance should be read in its entirety; safeguarding professionals should not rely solely on this or other summaries or overviews.

## Consultation snapshot

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### WHAT

DfE consultation on proposed revisions to Keeping Children Safe in Education (KCSIE) 2026, the statutory guidance setting out legal safeguarding duties for schools and colleges.

### WHY IT MATTERS

The 2026 draft represents one of the most significant structural shifts in recent years. It integrates findings from the Cass Review, addresses rapidly evolving technological risks, and moves multiple pastoral issues into the statutory safeguarding domain.

### WHO SHOULD ENGAGE

All safeguarding stakeholders in England, frontline staff, DSLs/deputies, governing bodies, proprietors.

### CONSULTATION WINDOW

12th February 2026 – 22nd April 2026 (consultation closes 22nd April). A draft KCSiE 26 is anticipated mid-summer, with final statutory guidance expected 1st September 2026.

### NOTE ON SCALE

After two years of minimal change, this is a "bumper consultation" consolidating recent practice drivers, including the Children's Wellbeing & Schools Bill; the document now runs just over 200 pages.

## Headline Changes

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### Part 2

### 1) Children Questioning Their Gender (Part 2, pp. 65–71)

#### Informed, lawful decision-making

*"In making decisions about supporting social transitions, schools and colleges must comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law." (para 253)*

## Initiation & consent

*"Schools and colleges should not initiate any action regarding social transition; this guidance applies where a child or their parent has made a request. Members of staff should not adopt any changes relating to social transition unless a decision has been made by a school or college in consultation with parents or carers." (para 251)*

## Principles and approach

Take time to understand the child's thoughts and feelings, including mental health, psychosocial needs, relationships and discriminatory bullying (para 248). Policies should avoid rigid rules based on gender stereotypes and may set out steps followed when a child requests support with social transition (para 249). Accommodating social transition is an active intervention, to be approached carefully (paras 255–268). The school's approach should be kept under review (paras 271–272).

## Parental involvement (default)

Parents/carers should "be actively involved and their views treated with importance"; involving parents is the default expectation in "the vast majority of cases," unless there is a documented, specific safeguarding risk—in which case the DSL must decide how to safeguard the child before any parental contact (paras 260–262).

## Biological sex, records, and facilities

- **Staff** should always be aware of and record a child's biological sex accurately wherever it is recorded (para 273).
- **Toilets/changing:** Children may not use toilets designated for the opposite biological sex; schools should consider alternative single-user facilities and record the rationale with a safeguarding risk assessment for any mixed-sex arrangements (paras 106–110). Children in Year 7+ should not undress in front of children of the opposite biological sex; consider private rooms or staggered times (paras 111–115).

- **Boarding/residential:** Children of different biological sexes must not share overnight accommodation; if a child does not want to share with the same biological sex, "alternative arrangements should be sought where possible." Consider requests for social transition where relevant (paras 191–196).
- The guidance references children "living in stealth" and the need for DSL involvement due to complexity (paras 274, 269).

## Part 1

## 2) Technology, AI, and Cyber Security

**Child-on-child abuse** now explicitly includes AI-generated images/videos (deepfakes) (Part 1, para 34).

### Filtering & monitoring

Governing bodies/proprietors must review effectiveness at least annually and keep a log confirming filtering works on all devices in all relevant locations (para 166). Oversight clarified (paras 170–172).

### Cyber security as safeguarding

Continued emphasis on cyber security standards for schools and colleges and technology planning guidance for leaders (paras 170–172).

Safeguarding records and child data are now treated as core safeguarding concerns; compromised data is an immediate risk to wellbeing. Shifting cyber security from "IT task" to core safeguarding responsibility.

### Curriculum & harms

Age/stage-appropriate teaching should address "the prevalence of deepfakes, pornography and misogynistic influencers" and where to seek help (para 153). The four C's expand to include extreme sexual/physical

violence (content), simulated harmful online AI interactions (content), and making/sending/receiving self-generated intimate images using AI (conduct) (para 158). Cybercrime risk is flagged in Annex A.

#### Core Safeguarding

### 3) Mental Health and Serious Violence

#### Mental health as safeguarding

Links are made explicit between mental health and self-harm, eating disorders, suicidal ideation, and youth suicide; staff are well placed to recognise warning signs (para 45). Staff should call 999, 111, or take the child to A&E if they believe a child is in danger (para 47).

#### Whole-setting roles

Most settings are expected to have a mental health lead (para 221) and links to Mental Health Support Teams are recommended (para 223). Four key roles for education staff (para 220):

- Promote good mental wellbeing/prevent onset,
- Observe/identify early,
- Ensure early targeted support,
- Liaise/refer to specialists when needed.

#### Serious violence | intent threshold

Staff are expected to report concerns a child may carry or intends to carry a weapon; the DSL must assess risk and act. Risk factors include disrupted education, exclusion, alternative provision, offending history (paras 48–51). Annex A emphasises early "teachable moments," mentoring/therapeutic support, and listening to children and staff to

map where young people congregate before/after school, working with partners on end-of-day responses.

## Further notable revisions & clarifications

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### A) Definitions, terminology & emphases

- **Child-on-child abuse** now defined to include harassment and violence; staff must report concerns to the DSL on or off site, with focus at times of highest risk (e.g., end of day). Misogyny is flagged as a cultural risk factor; staff should view both victim and alleged perpetrator as safeguarding cases, with "timely, evidenced-based support." (paras 29–35, 185, 32).
- **Language updates:** "Nude/semi-nude" reframed as "self-generated intimate images and/or videos including those generated using AI e.g. deepfakes." Assault by penetration indicators corrected (removes oral sex, adds object penetration).
- **LGBTQ+ clarity:** Children who are lesbian, gay or bisexual are considered separately from children questioning gender; schools should prevent discriminatory bullying with appropriate sanctions (para 244).
- **Teenage relationship abuse**—focus on physical, sexual, emotional abuse and stalking (para 20). Young Carers (Part 2, para 239) and children with SEND/health issues (para 240) are highlighted for additional vulnerability; clinical incidents may trigger DSL consideration under Supporting pupils with medical conditions (para 243).
- **Honour-based abuse** retitled "Honour or faith-based abuse."

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### B) Early Help / Family Help

- The consultation reframes Early Help under "Family Help" and sets out two strands under Family Help:

- Community-based early help (universal support via schools/colleges, health visitors, early years, community).
- Targeted early help (focused, partnership-based support).

It references qualified lead practitioners (para 61) to be noted in local assessment/support protocols (para 65).

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## **C) Online Safety | Governance & Curriculum**

Annual governance review of filtering/monitoring and device/location logs (para 166); oversight clarified (paras 170–172). References to Cyber Security Standards, National Education Network, and Plan technology for your school are added.

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## **D) Modern Slavery, Exploitation & NRM**

Explicit recognition of financial exploitation & modern slavery risks, including movements by organised networks in CCE/CSE. Suspicions of movement for exploitation should trigger modern slavery and child protection referrals; exploited young people are to be treated as victims, not offenders. The NRM section reminds schools that children referred have access to an Independent Child Trafficking Guardian (ICTG).

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## **E) Operation Encompass & Domestic Abuse**

- Operation Encompass is highlighted; in November 2025 Police gained a legal duty to notify a child's education setting and the local authority where they suspect a child may be a victim of domestic abuse, regardless of household status or presence at the incident. Free Key Adult training is referenced; controlling and coercive behaviour statutory guidance is flagged.
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## F) Alternative Provision & Off-Site Education

Voluntary national standards for non-school alternative provision are highlighted (para 204). LAs may use them to build a register of suitable settings, but responsibility for pupils remains with the school, including due diligence and ensuring needs are met.

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## G) Preventative Education, Mobile Phones, Reasonable Force, Host Families

- **Preventative education** expanded to a zero-tolerance culture addressing sexism, misogyny, misandry, homophobia, biphobia, racism, derogatory behaviour, and other forms of physical violence and conflict (para 153).
  - **Mobile phones in schools:** Pupils should not have access to mobile phones in school (summarised in a dedicated section).
  - **Reasonable force:** incidents should be limited, for the least amount of time, and proportionate (reflecting shifts in restraint guidance).
  - **Host families** (old Annex D) largely removed or integrated (paras 403–408).
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## H) Child-on-Child Sexual Harassment/Violence & HSB (Part 5)

Greater emphasis on understanding harmful sexual behaviour (HSB), the escalatory nature of misogyny, and benefits of earlier intervention (para 521).

Quotes:

- "The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both." (para 525)
- "When assessing HSB, the ages and developmental stage of the children involved is critical... a younger child may also abuse an older child." (para 526)

DSLs/deputies should have a good understanding of HSB; links to training, preventative education, policy, and whole-school approaches are strengthened (para 527).

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## I) DSL Role, Cover, Safer Recruitment & Transfers

- **DSL status, skills, experience:** strengthened (para 125).
  - **Robust cover** is expected, including a confidential shared mailbox and arrangements to avoid any breakdown in safeguarding activity (para 126; Annex B).
  - **Deputies** should meet DSL training expectations (Annex C).
  - **Good practice** is to have DSL-to-DSL conversations on transition where concerns exist; explicit mention of sharing context on serious violence and harmful behaviours.
  - A **simple SCR template** is added (para 345). Applicants can join the DBS Update Service within 30 days of the certificate's issue date (para 320).
  - **Types of visitors** clarified (para 369); work experience wording improved (para 399).
  - Strengthened safeguarding transfers: maintaining the five-day rule, but raising expectations for proactive, contextual information sharing (e.g., serious violence, Channel, AI-related harms) before arrival, and strongly expecting DSL-to-DSL verbal consultations.
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## J) New/Updated Resources (Annex A)

Additions include

- CEOP/NCA guidance on AI-generated CSAM and financially motivated sexual extortion (FMSE);
- Missing People resources (e.g., SafeCall),
- Catch22 County Lines support;
- Educate Against Hate updates;

- UK CMO commentary on screen time/social media.

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## K) Structural/Format Notes for Staff

- All staff must read Part 1 in full - the previous Annex A summary is removed. DfE proposes a one-page quick reference guide(staff must still read Part 1).

# Strategic Implementation Roadmap

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The DfE is seeking grounded feedback. While still draft, leaders can prepare and help shape the final version.




- Review Annex D / Annexes (noting structural changes and integrated content).
- Submit feedback by 22nd April 2026.
- **Preliminary Gap Analysis**
  - Policy audit: Safeguarding, Behaviour, Attendance - align with the serious-violence intent threshold and mental health referral expectations.
  - Resource assessment: Plan additional training time for non-teaching staff now required to read Part 1 in full.
  - DSL cover plan: Implement documented continuity systems (e.g., confidential shared mailbox) and define succession/cover arrangements.
  - Strategic Briefing for Boards: Use a Statement of Impact to surface implications for:
    - Biological sex recording and single-sex facilities,
    - Half-termly Alternative Provision safety reviews,

- Mandatory annual digital audits (filtering/monitoring; cyber security governance).

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## **Practical Next Steps for DSLs – whilst in draft phase**

- Planning for implementing Part 1 to all staff and plan briefings on the new/expanded areas (AI harms, HSB, serious violence intent, mental health actions).
- Update the DSL continuity plan: Shared mailbox, deputy cover, and transition information-sharing protocols.
- Review online safety governance: Evidence the annual review, device/location log, and cyber security standards compliance.
- Map local Family Help pathways: Clarify community-based vs targeted early help and identify local lead practitioners.
- Check Alternative Provision arrangements: Align with voluntary standards, due diligence, and ongoing responsibility for placed pupils.

 [www.ecpsafeguarding.co.uk](http://www.ecpsafeguarding.co.uk)  01727 641 395  [info@ecpsafeguarding.co.uk](mailto:info@ecpsafeguarding.co.uk)

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