



# Briefing Note

## KCSIE 2026

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SAFEGUARDING  
MATTERS

The final *Keeping Children Safe in Education (KCSIE) 2026* guidance (published 7 July 2026, in force from 1 September 2026) makes substantive changes to the consultation draft, including: removal of Annex A, strengthened expectations around early help and multi-agency working, new requirements linked to the Information Sharing Duty, major changes to regulated activity and volunteer checks, expanded online safety and AI-related risks, restructuring of Part 5 on harmful sexual behaviour and clearer expectations for DSLs.

The July version should now be treated as the definitive preparation document for September.

This is HH:SM first overview of KCSIE 2026 and more detailed information will be shared in a video message at the end of term and in training from September 2026.

## The headlines

The most important differences concern early identification, families first and multi-agency working, image-sharing terminology, the role of parents where children are distressed, serious violence, information sharing and child-protection-file transfer, mobile phone guidance, filtering and cyber security, safer recruitment, supply staff responsibilities, harmful sexual behaviour and the removal of the supervision exemption for volunteers.

## At a glance: the most important changes since the consultation draft

- **Status:** the final guidance is now published for implementation from 1 September 2026.
- **Part one overview:** the one-page overview has been retained, but the final materials make it explicit that it complements and never replaces Part one. Annex A has been entirely removed. All staff must read Part one.
- **Image-sharing language:** the proposed umbrella term ‘self-generated intimate images’ has not been adopted. The final guidance returns to ‘making or sharing nudes and semi-nudes’ and expressly covers content made by the child, by another person, altered digitally or generated using AI.
- **Parents and mental health:** the final wording gives greater emphasis to appropriate parental involvement where a child is distressed, balanced against any safeguarding reason not to involve them.
- **Serious violence:** the final version strengthens prevention, risk assessment, safety and support planning and the need to consider children who cause harm as potentially vulnerable themselves.

- **Information sharing:** the final guidance is clearer about transferring a structured safeguarding summary, distinguishing current concerns from historic information and explaining risk to the receiving setting.
- **Mobile phones:** the final text now refers to the mobile phone guidance as statutory guidance, while retaining the expectation that schools are mobile phone-free by default.
- **Safer recruitment:** the proposed single central record template has been removed following consultation feedback.
- **Volunteers and regulated activity:** the final version reflects the Crime and Policing Act 2026, removing the supervision exemption. This is a significant post-consultation legal change.
- **Part five:** the final version is further restructured around harmful sexual behaviour, with clearer links to recognised continuum-based approaches and stronger distinction between developmentally expected problematic and harmful behaviour.

## Detailed briefing: what schools should pay particular attention to

### Early Identification, Family Help and Multi-agency working

There is strengthened language around early identification, family help, and multi-agency arrangements, aligning with *Working Together 2026* reforms.

The final guidance provides clearer expectations for DSLs and leaders on proactive identification and partnership working with stakeholders. It is imperative that DSLs work together with local and statutory agencies to identify harm and need sooner. This also emphasises how the role of the DSL is becoming more strategic. DSLs should be able to triangulate and scrutinise data to determine the next steps for the child to achieve positive outcomes.

### The final language for nudes, semi-nudes and AI-generated imagery

The consultation draft proposed ‘self-generated intimate images and/or videos’. The DfE accepted feedback that ‘self-generated’ could unintentionally narrow the scope and place too much emphasis on the child’s role in creating the content. The final guidance therefore uses ‘making or sharing nudes and semi-nudes’ and defines this broadly.

The practical point is that school procedures must cover images created by the child, images created or taken by somebody else, digitally altered images and wholly AI-generated content. The response must be based on context, consent, coercion, distribution, impact and risk - not simply on who pressed a button or produced the original image.

## Practice point

Do not let terminology drive the safeguarding response. The question is not only ‘who made the image?’ It is also ‘what has happened to this child, who else may be involved, what is the immediate risk, and what needs to happen now?’. As always please risk assess every situation on an individual needs basis.

## Strengthened expectations around distress, parents and mental health

The final guidance strengthens the message that school staff are well placed to notice changes and respond early, but diagnosis remains the role of appropriately trained professionals. It also gives more prominence to involving parents or carers appropriately where a child is distressed, while recognising that this must be balanced against safeguarding concerns.

Schools should make sure there is a clear decision pathway for parental contact. Staff should not make promises about confidentiality, and the DSL should record the reasons for involving, delaying or not involving parents where safeguarding risk is relevant. Urgent concerns must follow the school’s emergency and local safeguarding routes.

## Serious violence is prevention work as well as incident response

The final version moves beyond identifying serious violence after an event. It places greater emphasis on assessing risk to the child and others, developing safety and support plans, de-escalating child on child conflict and recognising that a child involved in causing harm may also be exploited, frightened or otherwise vulnerable.

For schools, this means joining up behaviour, attendance, exclusions, Alternative Provision, contextual safeguarding, site supervision and child protection information. Patterns before and after the school day should be considered and consideration of the child’s lived experiences and their local contexts.

## Information sharing must explain the present risk

The draft already included prompt transfer timescales. The final guidance adds stronger clarity about the content and purpose of transfer. A child protection file should not arrive as an unstructured collection of historic records. The receiving setting needs a clear summary of current concerns, relevant context and ongoing support needs, with current and historic matters distinguished.

The exporting DSL should ensure secure transit and confirmation of receipt. The receiving DSL should review and action the information promptly. Schools should be able to evidence not only that a file was sent, but that the receiving school understood what needed to be in place for the child. This is also a timely reminder to ensure electronic

systems are prepared for this and that any appropriate action is taken with CPOMs ahead of transferring and receiving information. This becomes a more explicit expectation in the role of the DSL.

## The final online-safety position is more operational

The mobile phone expectation was present in the draft, but the final text now references 'statutory guidance'. Schools should therefore check that a phone-free-by-default policy is not merely aspirational but is consistently implemented, with limited, justified exceptions from the 1<sup>st</sup> September 2026. Please see HH:SM example Mobile Phone Policy and adapt accordingly based on the decisions of your school.

Filtering and monitoring is also presented as an active governance and safeguarding responsibility. The annual review should be led by the responsible senior leader with DSL and IT support, test effectiveness across relevant devices and locations, and produce an auditable record. Cyber security and access management should be treated as part of safeguarding because compromised systems and inappropriate access can expose children and sensitive information to harm.

With new guidance around preventing school websites and communication systems where images of children are used from being manipulated by AI, it is necessary and proportionate to consider action to protect children. A webinar with more information will be presented with Rebecca Lambton at Itchyrobot in September 2026.

## Safer recruitment: two important corrections

First, the proposed single central record template has been removed. Schools should continue to use a system that accurately records the mandatory checks and any additional information they choose to retain. The absence of a national template does not reduce the requirement for accuracy, completeness or oversight. However, the proposed template was not robust enough.

Second, the final guidance reflects a major legal change that was not part of the consultation questions. As a result of the passing of the Crime and Policing Act the supervision exemption for certain volunteers is removed. A volunteer who teaches, trains, instructs or supervises children on more than three days in a month or overnight is now in regulated activity. Schools must reassess roles rather than assume that supervision keeps the activity outside regulated activity. The importance here is whether the volunteer is able to make and maintain established relationships with children and whether they will engage in any activity that would be classified as 'regulated activity'.

## Immediate safer-recruitment priority

Create a list of every volunteer role, frequency, activity and any overnight involvement. Decide whether the role is regulated activity under the final rules, identify the correct check, update the SCR and risk assessment, and make sure the person does not begin regulated activity until the school has completed the lawful process (e.g. an enhanced DBS with a barred list check).

## Responsibilities for agency, supply, trainee and contracted staff are clearer

The final wording is more explicit that responsibility is shared between the school or college and the employment agency or business when there are concerns raised about adult's behaviour towards children. The setting remains responsible for gathering facts and managing the safeguarding process because it has access to the child, witnesses and local context. The agency or business will usually lead any employment disciplinary action.

This matters because simply ending an individual's placement can leave the safeguarding concern unresolved. The school must continue to liaise with the LADO and relevant agencies and ensure the matter reaches an appropriate outcome.

## Part five requires a more nuanced, evidence-informed response

KCSIE 2026 places harmful sexual behaviour, sexual harassment and sexual violence within a clearer continuum. It supports staff to distinguish developmentally expected behaviour from behaviour that is inappropriate, problematic, abusive or violent, without minimising concern.

The response should be child-centred and proportionate. Schools should consider age and development, power imbalance, consent, coercion, repetition, intent, impact, vulnerability and the wider context. Procedures should support both the child harmed and the child who has caused harm, while maintaining safety and accountability.

## What headteachers and senior leaders need to do now

### Leadership priorities

- Use the KCSIE 2026 document from the 1<sup>st</sup> September 2026.
- Confirm that mobile phone, online safety, information security and filtering/monitoring arrangements are in line with KCSIE 2026 expectations.
- Ensure that the CP Policy, Safer Recruitment Policy/Induction Policy, Staff Code of Conduct/Staff Behaviour Policy/Staff Handbook, Online Safety Policy are all updated.

- Update the role of the DSL.
- Review and risk assess volunteers, work experience and agency/contracted staff arrangements.
- Ensure the Governing Body or Trust board receives a clear account of all changes to policies
- Ensure staff training/safeguarding training.

## What designated safeguarding leads need to do now

### DSL priorities

- Read the final guidance in full.
- Update terminology and procedures for nudes, semi-nudes, AI-generated content and harmful sexual behaviour.
- Review parental involvement in decision making/rationale, mental health escalation and serious violence safety planning.
- Audit child protection file transfer so the receiving setting gets a structured summary of current concerns, context and ongoing support and likewise that this is also received.
- Work with SLT and IT to evidence the annual filtering and monitoring review and information security arrangements.
- Review and update all Safeguarding Policies with changes (to be provided by HH:SM by September 2026 as part of Package 2).
- Brief staff on all of the updated changes (to be provided in video message by HH:SM by end of term).

## What teachers and wider staff need to know

### Core staff messages for September

- All staff must read Part One of the guidance.
- Images may be created or altered by somebody else or by AI; do not assume the child made them or consented.
- Share concerns immediately and include what you have noticed, heard, seen and why it matters.
- Serious violence, distress and harmful behaviour may indicate that a child needs safeguarding support, including a child who has caused harm.
- Follow the school reporting procedure for low-level concerns and whistleblowing.
- Understand the changes around early identification, family help and multi-agency changes.

# Checklist for schools

## Documents and policy

- Child protection, online safety, behaviour, staff conduct, low-level concerns, induction and mobile phone policies are amended.
- Review all other safeguarding policies to align with KCSIE 2026
- Review all documents that reference KCSIE 2025 and amend to KCSIE 2026

## Safer recruitment

- All volunteer roles have been reviewed against the final regulated activity rules.
- Work experience procedures reflect the supervision and DBS wording.
- Supply, trainee and contracted staff procedures identify the responsibilities of the setting and the agency/business.
- SCR entries and risk assessments reflect KCSIE 2026.

## Casework and recording

- Parental contact decisions are recorded with safeguarding rationale.
- Serious violence procedures include risk assessment, safety/support planning and de-escalation.
- Child protection file transfers include a structured summary of current concerns, context and ongoing support.
- HSB procedures support proportionate assessment rather than a single response to every incident.

## Training and assurance

- Staff training uses KCSIE 2026.
- Governors/Trustees are updated on KCSIE 2026.
- Leaders can evidence that implementation is in place for 1 September 2026.