

# Keeping children safe in education: 2026 proposed revisions

Consultation response from the National Governance Association, 22 April 2026

## Introduction

**The National Governance Association (NGA) is the sector body for school and trust governance in England, representing the interests of school governors, trustees and governance professionals across all types of schools and school structures. As the membership organisation for school governance, we support and champion good governance as the primary and first line of responsive, contextually sensitive accountability.**

Governing boards hold statutory responsibilities for ensuring schools and trusts keep their pupils safe and maintain strategic oversight for their safeguarding arrangements. In practice, it involves adopting a whole-school approach, ensuring all systems, processes and policies operate with the best interests of pupils in mind.

Keeping children safe in education (KCSiE) is a key document for NGA members that supports them in fulfilling their governance duties, and so must be robust enough to reflect the significance of boards' safeguarding responsibilities. However, as an organisation we are acutely aware of the workload implications in reading an overly lengthy document for the volunteer governance community. As we set out in this consultation response, NGA would be in favour of a more concise version of KCSiE that sets out the strategic remit of the board, as distinct from that of school staff and other stakeholders. Nevertheless, the DfE must ensure that any attempt to streamline statutory documents does not compromise the confidence of those governing in fulfilling their safeguarding obligations.

The proposed changes to KCSiE 2026 are largely positive steps that reflect the rapidly changing environment schools are operating within, particularly with the rise of AI, and NGA welcomes the greater clarity being offered to decision makers. As a sector, as we adapt to the opportunities arising, we must remain attuned to the risks that come with young people having access to often fast changing and unregulated platforms that could threaten the safety and/or wellbeing of pupils and staff alike.

We also welcome the revisions in the document that better reflect alignment with the law. Governing boards, as responsible bodies, must be confident that school staff and leaders have the guidance they need to understand and consistently apply safeguarding procedures that protect the rights and experiences of all pupils.

NGA continues to be a pragmatic, collaborative organisation that seeks to work with the Department to ensure safeguarding processes remain impactful and reflective of the lived realities of the pupils and communities they seek to protect.

## Section 1 - Summary of the guidance

### **Question 11. How do you typically access and refer to the KCSiE guidance?**

I read and refer to it electronically (e.g. PDF, online link)

#### **Please explain further (optional):**

As the National Governance Association, our members are required to comply with KCSiE while carrying out their governance responsibilities. As an organisation, we use KCSiE to inform the advice and guidance we provide to our members on their safeguarding role. In our experience, boards typically access KCSiE via the online PDF.

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

Too long

#### **Please explain further (optional):**

KCSiE is a long (187 page) document which governors and trustees are expected to read in full, so its length does pose a workload burden for the volunteer governance community. Nonetheless, we appreciate the significance of boards' safeguarding responsibilities and therefore the need for boards to receive all of the information necessary to carry out their role. As such, we think the goal of a shorter, concise version of KCSiE would be a positive step in reducing governance workload, provided all the relevant information was still able to be communicated. We make a suggestion to this effect in Question 13.

### **Question 13. Would you prefer:**

Another format/something else (please specify)

#### **Please explain further (optional):**

The strategic oversight of safeguarding by boards is a distinct role, and separate from the operational, day-to-day management of safeguarding, which falls on school or trust employees. The current KCSiE combines these elements together. We think it is worth exploring the production of role-specific guidance, whether in place of KCSiE or to complement a far narrower KCSiE, which could reduce workload for volunteers and staff by highlighting only the information relevant to a particular role.

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

We recognise the benefits of HTML format, such as easier internal navigation and more intelligent drop-down menus. Nonetheless, our members have generally raised concerns about the move away from the PDF format. They appreciate the ease with which PDF documents can be printed and shared – for some governors and trustees, hard copies are still the best way to ensure engagement. Governance professionals also tell us they like the ability to quickly search the entire document, which PDF facilitates, but HTML rarely allows.

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

Yes

**Please explain further (optional):**

Summary documents are very helpful but need clear usage instructions, ie when is consulting the summary sufficient and when is reading the entire document necessary?

## **EYFS Framework**

**Question 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?**

Not applicable/ No opinion

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

**Question 17. Do you agree with this change?**

Yes

**Please explain further (optional):**

The addition of AI generated images is welcome in light of the growing use of AI platforms among young people. In a survey of over 1000 governors and trustees, respondents noted the fears around pupil misuse of AI including the generation of deep fakes, with some explaining that “boundaries and appropriate usage” of AI is necessary.

However, schools and trusts must be given the appropriate guidance that clarifies which severity of behaviour constitutes safeguarding concerns, which in turn allows for greater consistency across:

- the support offered to victims and perpetrators
- behavioural expectations and sanctions – whether they are internal or external (ie a police matter)
- the culture around the responsible use of AI in schools

See response below for further comments on the overall changes.

**Question 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?**

The change in terminology from ‘nude/semi-nude’ to ‘intimate’ risks creating further ambiguity when schools consider such images. We would agree that in the current climate, images that are sexually explicit in nature are no longer limited to nude/semi-nude depictions. However, the term

‘intimate’ fails to offer the clarity needed to categories images, especially AI generated ones, effectively.

The government should consider how schools could be given better direction on how to classify these images. For example, we know schools are seeing examples of pupils taking photographs of their peers and using AI to manipulate these images to make them seem like they are doing something else. In these contexts, ‘sexualised’, ‘sexually explicit’ or ‘sexually suggestive’ may work best.

## Misogyny

**Question 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

## Section 2 – Part one: Safeguarding information for all staff

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

Not Answered

## What school and college staff need to know

**Question 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

## Early help

**Question 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

### **Please explain further (optional):**

As the individuals tasked with hearing suspensions and permanent exclusions, governors and trustees know all too well the importance of the earliest intervention for behaviour. Effective early help pathways are essential to ensuring that emerging needs are identified and supported before

issues escalate. Evidence supports this approach. In a survey of over 1000 governors and trustees, family-related issues were consistently cited as one of the top drivers of poor behaviour in schools and trusts. Therefore, we recognise the value of strengthening the alignment between early help safeguarding pathways and behaviour within statutory guidance to better reflect the strong link between unmet needs and the risk of exclusions.

## **Child Sexual Exploitation**

**Question 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

**Please explain further, including any suggestions for alternative wording or additional examples (optional):**

Governors and trustees have a responsibility to ensure that schools and trusts are fully compliant with their legal obligations. This means that clarity in statutory guidance is essential. NGA agrees that the proposed changes improve clarity around the legal definition of rape and sexual assault and reduces the risk of confusion among school staff and volunteers. The revised wording more accurately reflects the legal definition, which is not only for supporting staff understanding and consistently applying safeguarding procedures, but also for ensuring alignment with the law. This is critical for governing boards as responsible bodies, and, most importantly, for safeguarding the rights and experiences of victims and alleged perpetrators.

**Question 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

**Please explain your answer, including any suggestions for improving the guidance (optional):**

We welcome the inclusion of additional wording that highlights how victims of child sexual exploitation may not always be recognised as victims. The addition is helpful in signaling the issue, but it stops short of being practically useful as it highlights the risk without making clear what professionals are expected to do differently as a result. For governors and trustees, who are the responsible bodies, this creates a gap. They need to be assured not just that staff understand the risk, but that they are acting appropriately in response to it. The current wording does not clearly set out what adherence to safeguarding duties looks like in these circumstances, particularly where a child may be involved in the criminal justice system. Stronger guidance on expected practice would make this more effective and support better oversight at board level.

## Serious violence

**Question 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.”**

Not applicable/ No opinion

**Question 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/ No opinion

**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.”**

Not applicable/ No opinion

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

Not applicable/ No opinion

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

Other, please specify

### **Please explain further (optional):**

Schools are managing increasingly complex behaviour within a system under strain. In 2025, 61% of boards reported difficulties engaging with local authority services, alongside concerns about delays, limited specialist support and weak multi-agency coordination.

In a 2025 survey, governors and trustees also reported that workforce pressures, including workload and training gaps, are affecting staff ability to adequately respond to poor behaviour, where SEND needs intersect with violent behaviour. Guidance on recognising and preventing child-on-child violence therefore needs to bring all these issues together – staff training and workload; multi-agency working; and access to specialist support. We would also reiterate the point made throughout our response about the importance of clear definitions, so staff and boards are clear on what is expected.

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

**Question 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

## Section 3 – Part two: The management of safeguarding

**Question 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."?**

Not applicable/ No opinion

**Question 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

**Please explain further (optional):**

The section could go further by emphasising stronger links between the role of the mental health lead in schools and the governing board to ensure an effective whole school or college approach to mental health and wellbeing. Whole school approaches rely on the strategic direction of governors and trustees. Therefore, if the Department wants to meaningfully safeguard children requiring mental health support, guidance must adequately reflect how strategic oversight and operational delivery work together in practice.

## Guidance relating to children who are questioning their gender

**Question 3. 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

**Please explain further (optional):**

We have been calling for additional clarity in this area, so are pleased that KCSiE is attempting to deliver this. However, feedback from governors and trustees indicates significant uncertainty about whether the updated section provides sufficient clarity to support decision-making.

When asked whether the proposed additions would help them confidently fulfil their safeguarding duties, 64% either disagreed or were unsure. This points to a lack of confidence across the sector. The uncertainty is, in part, reflective of the contested nature of this area. Views among respondents are divided with some seeing the guidance as offering necessary protection in

navigating legal risk and parental conflict, while others were concerned it may risk marginalising vulnerable children – safeguarding, after all, is more than a compliance exercise.

Ultimately, many governors and trustees described gender identity as a “grey area”, leaving schools exposed to potential legal challenge, parental complaints and inconsistent decision-making. In this context, more could be done to provide the level of clarity and assurance required for governing boards to effectively oversee safeguarding in this area.

**Question 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

**Please explain further (optional):**

The clarification around single-sex toilets provides helpful direction and clarity. The added flexibility for schools to consider alternative facilities where appropriate is also noted. However, governors and trustees highlight that the practical implementation of the flexibility around alternative facilities is heavily constrained by funding and infrastructure. Many schools, particularly those in older buildings, do not have the physical capacity to make structural changes or provide additional facilities without significant capital investment. While there is no explicit mandate, there is concern that expectations in practice may still create pressure for schools to respond to individual needs without the resources to do so. Governors and trustees emphasise the importance of ensuring that guidance remains sensitive to these operational realities, particularly given ongoing financial constraints across the sector.

**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

**Please explain further (optional):**

The guidance does offer clear explanation of the legal basis for single-sex sport and the main circumstances where this is justified. It could be strengthened by more clearly connecting these decisions to existing safeguarding and risk assessment processes used in schools. This would help ensure consistent application in practice and support governors and trustees in overseeing decision-making that balances inclusion and safety within established operational frameworks.

**Additional technical updates - other changes to Part two include:**

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

Yes

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

Yes

## **Artificial intelligence (AI)**

**Question 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?**

Not Answered

**Question 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?**

Not applicable/ No opinion

## **Filtering and monitoring**

**Question 40. Do you agree with this change?**

Yes

**Please explain further (optional):**

We welcome the added clarity and alignment with existing filtering and monitoring standards, particularly the move towards more consistent expectations for governing boards. This reflects issues raised in early stakeholder discussions with the DfE, where a clearer articulation of board level oversight responsibilities was highlighted as an area for development. While current guidance does set expectations around review and oversight, the emphasis remains largely on compliance. This means that a clear definition of what effective looks, or how schools and trusts should evidence impact, is missing. The next iteration of KCSiE should go further by encouraging schools to provide evidence of impact and by suggesting clearer success criteria for what effective filtering and monitoring ought to look like in practice.

## **Information security and access management**

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

No

**Please explain further (optional):**

We welcome the strengthening of the board’s role in securing effective cyber security within the context of its safeguarding responsibilities. However, it would be helpful to be clearer that the rationale extends beyond the protection of pupil personal data alone. From a safeguarding perspective, other risks include the way cyber incidents can undermine the functioning of internal systems (including safeguarding systems), ie interrupting access to records; slowing communication with partner agencies; weakening the ability of schools and trusts to identify risk in real time etc. In that sense, cyber resilience is closely tied to the operational continuity of safeguarding, which could be better captured in the guidance.

## Alternative provision (AP)

**Question 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

**Please explain further (optional):**

The inclusion of reference to the national standards does help to reinforce the responsibilities of schools and local authorities in commissioning safe provision. This reflects concerns raised in earlier discussions with the Department where governors and trustees identified a gap in practical mechanisms to assure themselves that alternative provision meets safeguarding expectations. In particular, there remains a need for clearer support for boards in understanding how assurance can be evidenced across key areas such as staffing, supervision, attendance monitoring and oversight of commissioned or subcontracted settings.

As such, while the reference to national standards is a positive step, there is still scope to better support governing boards in translating these expectations into more practical guidance.

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

No

**Please explain further (optional):**

While the inclusion of voluntary national standards provides a useful framework, it does not significantly strengthen the overall oversight picture for pupils in alternative provision. The standards are voluntary and do not materially change the underlying accountability arrangements. Oversight of pupils in AP continues to be spread across commissioning schools, local authorities and providers, with governing boards retaining ultimate responsibility but without a clearer system-level mechanism to support consistent assurance. As a result, the inclusion of the standards does little to address broader weaknesses in the system.

## Medical conditions

**Question 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?**

Not applicable/ No opinion

## Special Educational Needs and Disabilities (SEND)

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

Yes

**Please explain further (optional):**

NGA welcomes the reconsideration of the above list as it strengthens the recognition that safeguarding risks can present differently for children with SEND and reinforces the need for those risks to be actively considered. It aligns well with the parallel SEND reform, particularly the principle of inclusion by design, which expects the needs of children with SEND to be consistently considered across all aspects of school life. Clearly, this approach is about joining up the dots so that vulnerability and risk are understood in context and reflected in everyday decision-making.

It also has value in the governance context. Boards are responsible for ensuring that child protection policies are not only in place but reflect the lived reality of the school and its pupils. Making these additional barriers more explicit helps support that oversight role, particularly in ensuring safeguarding approaches are appropriately responsive to a school's individual need.

## **Information Sharing**

**Question 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

**Please explain further (optional):**

This is a sensible clarification and reflects what boards already see in practice: when key information is not shared at transition, issues can escalate quickly and only become visible once they have resulted in serious behaviour, safety risks and/or exclusions and suspensions. It also supports safer decision-making on admissions and transfers as it helps ensure that staff are working with a full picture of risk rather than relying on fragmented information, enabling appropriate support/integration/risk assessments to be put in place from the outset.

**Question 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?**

Not applicable/ No opinion

## **Section 4 - Part three: Safer recruitment**

**Question 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 opinion

**If yes, please explain (optional):**

Not answered

## Single Central Record

**Question 49.** Do you think this is helpful? [Reference to the proposal of an example SCR table included in the guidance.]

Yes

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

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

Don't know / Not applicable

**Question 51.** To what extent do you agree with the following statement 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.

Not Answered

**Question 52.** To what extent do you agree with the following statement 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.)

Not Answered

**Question 53.** To what extent do you agree with the following statement 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.)

Not Answered

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

**Question 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?

Not applicable/ No opinion

**Question 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?**

Not applicable/ No opinion

## **Section 7 - Annex B: Further information**

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

Yes

## **Section 8 - Annex C: The role of the designated safeguarding lead**

**Question 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? (Please provide any comments or suggestions).**

Yes

**Please explain further (optional):**

Fundamentally, safeguarding systems in schools must be resilient and not dependent on a single individual. This means that boards need to be assured effective cover arrangements are in place where needed, so that concerns are acted on immediately, regardless of staff absence. However, the proposed guidance could go further in setting out expectations that these deputising arrangements are clearly communicated to all staff and explicitly reflected in school policies. This would strengthen robustness of arrangement and reduce any risk of uncertainty at the point of reporting. With evidence indicating a continued rise in safeguarding concerns (NGA's annual governance survey found that 49% of governors and trustees reported an increase over the previous year), robust cover arrangements are a fundamental component of a strong safeguarding culture and provides boards with the essential assurance that the safety of children remains a priority.

**Question 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

**Please explain further (optional):**

The context in which schools operate has shifted significantly. Schools are now frequently acting as a “fourth emergency service”, supporting pupils and families with mental health needs, food

insecurity and access to basic services. In 2025, 20% of governing boards reported that these wider responsibilities are placing unsustainable pressure on capacity, while 49% reported a rise in safeguarding issues, highlighting both the scale and complexity of need. In this environment, the DSL must have the experience and expertise to lead a whole-school safeguarding approach on the ground. From a governance perspective, expectations on boards are rightly comprehensive ie ensuring a senior leader is appointed as DSL with sufficient time and resources, alongside ongoing and impactful safeguarding CPD. However, these expectations can only be fully realised where the individual leading safeguarding has the depth of skill to translate policy into effective practice. As schools operate increasingly beyond their traditional remit, the DSL role has become more complex and all the more pertinent.

## Section 9 – Expanding our evidence base

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

Not Answered

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

Not Answered

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

The parallel consultation on medical needs/allergies proposes named governor roles in these areas, which raises significant concerns. NGA is unconvinced that link roles are the best way of securing effective oversight; it creates an overdependence on a single individual whereas responsibility for that oversight is held collectively by the board. That overreliance can also have implications for workload and boards are already facing significant recruitment challenges: in 2025, 66% of respondents reported difficulty recruiting governors/trustees. Additional named roles risk compounding workload pressures without necessarily increasing oversight. There is also a risk of undermining a school or trust’s broader safeguarding oversight which is most effective when approached holistically. Separating responsibilities for medical needs/allergies could lead to siloed thinking. The aforementioned consultation rightly frames medical needs/allergies as part of wider safeguarding arrangements and so it would be more coherent for any named governor responsibility in this area to sit within existing safeguarding oversight, without creating these additional/discrete roles.

### Affluent neglect

**Question 62. Are you familiar with the term ‘affluent neglect’?**

Not Answered

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

Not Answered

## Artificial Intelligence (AI)

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

Yes

**Please explain further (optional):**

School staff have varying levels of understanding of the safeguarding risks posed by AI, making it challenging to plan effectively when the full extent of its capabilities is not yet widely understood. Boards must be assured that staff have access to the most up to date information/guidance possible. As well as the risks AI poses to children, boards have a duty of care towards their employees. This includes safeguarding concerns arising from pupil/teacher conduct, particularly in relation to the misuse of AI tools such as deepfakes. For example, staff may be depicted in fabricated or explicit scenarios, which can give rise to serious safeguarding, reputational and wellbeing concerns. Current guidance could do more to explicitly reference these emerging risks.

This would align with the government's wider VAWG strategy, which recognises that the vast majority of deepfake content is sexual in nature and disproportionately affects women and girls. There is anecdotal evidence from governing boards that such issues are beginning to surface in schools eg evidence presented to pupil exclusion reviews including cases where female staff were the subject of deepfake material.

## British Sign Language (BSL)

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

Not sure/ No opinion

## Domestic abuse

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

Not Answered

## Grooming Gangs

**Question 67. Do you agree that KCSIE should include clearer guidance on safeguarding risks associated with organised networks or grooming gangs, including links to relevant statutory guidance?**

Not Answered

## Gaming platforms

**Question 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.

Not Answered

## Harmful sexual behaviour (HSB)

**Question 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. watching pornography, or would you prefer to be signposted to other sources of help?

Not applicable / No opinion

## Self-Referral – Harm towards a child

**Question 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?

Yes

**Please explain further, including any examples or considerations (optional):**

While clearer guidance would be beneficial, it is important that any new expectations align with existing internal school procedures that staff are already subject to, such as disciplinary processes. Governing boards routinely encounter cases where overlapping processes can create confusion if guidance is not well integrated. There is also a risk of creating parallel or conflicting procedures, particularly in situations where there may also be ongoing criminal proceedings. Therefore, guidance should be framed to ensure it complements established processes. Overall, there needs to be a balanced approach that prioritises child safety while also recognising the procedural frameworks that schools are required to follow.

## Teenage relationship abuse

**Question 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?

Not Answered

## Verbal abuse

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

Not Answered

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

Not Answered

## **Designated safeguarding lead (DSL)**

**Question 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)**

Not Answered

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

Not Answered

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

Not Answered

**Question 77. What would make your role even better?**

Not Answered

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

Not Answered

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

Not Answered