


<h1 style="margin: 0;">KCSiE 2026</h1> <hr style="border: 1px solid #00a0c0; margin: 10px 0;"/> <p style="margin: 0;">Keeping Children Safe in Education</p> <p style="margin: 10px 0; color: #f0a040;">Consultation draft — September 2026 ⚠ Changes may still occur</p>	OVERLAP	<h1 style="margin: 0;">Working Together 2026</h1> <hr style="border: 1px solid #c04040; margin: 10px 0;"/> <p style="margin: 0;">Safeguarding Children & Working with Families</p> <p style="margin: 10px 0; color: white;">Statutory from March 2026 Replaces Working Together 2023</p>
A combined briefing for Independent Boarding Schools & Guardianship Organisations		

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<h2 style="margin: 0;">Statutory Guidance and a Need to Work Together</h2>	
<h3 style="margin: 0;">Why are they written the way that they are?</h3>	
<h4 style="margin: 0;">Statutory Guidance</h4>	<h4 style="margin: 0;">Schools & Guardians</h4>
<ul style="list-style-type: none"> • Both KCSiE and Working Together are statutory • Providing duties for all schools & colleges and wider for those looking after children – regulated activity and positions of trust • KCSiE now expected to be 201 pages with 24 proposed changes • KCSiE effective September 2026 is likely to have further updates and some areas not making the cut. • Linking <ul style="list-style-type: none"> • Working Together to Safeguard Children 2026 • Keeping Children Safe in Education 2026 • Independent School Standards 2026 • ISI inspection framework / AEGIS Standards • Childrens' and Schools Wellbeing Act • Crime and Policing Act • And many more!!! 	<ul style="list-style-type: none"> • Both schools, colleges and AEGIS guardianship organisations have DSLs • Safeguarding is key for sponsored students • A real <i>sharing</i> of safeguarding responsibility — not just pastoral support • School responsibility as Tier 4 / Student visa sponsor for international students under 18 • Guardians provide a formal declaration as part of the student visa application • A safeguarding failure can have direct visa implications, child safeguarding practice reviews
	

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Where WT and KCSIE Overlap

01 Operation Encompass & Domestic Abuse

02 Online Safety, AI & Technology

03 Mental Health as Safeguarding

04 Exploitation, Modern Slavery & CCE/CSE

05 Information Sharing & GDPR

06 Cultural Humility & International Students

07 Holiday-Period Safeguarding

08 Visa Sponsorship, Guardian Declarations and wider shared safeguarding



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Updated Operation Encompass & Domestic Abuse

OVERLAP: Both Frameworks

What Both Frameworks Require

- Police must notify the child's school AND local authority when domestic abuse is suspected — regardless of whether the child was present
- Notification by 09:00 must include: child's name, police reference, incident details and the voice of the child
- Operation Encompass is the start of assessment — NOT the end; a full safeguarding referral may still be required
- WT 2026 expands domestic abuse to include: teenage relationship abuse, honour/faith-based abuse, intense parental conflict

Schools — School DSL

- Appoint a named Operation Encompass lead (distinct from the DSL role)
- Prepared for a trauma-informed morning welcome — not a formal meeting for interventions and support to be put in place
- Working with guardian organisation DSL same day where there relevant

Guardians — Guardian DSL

- If DA in a host home then this is a student safeguarding concern — guardian DSL must act.
- Notify the school DSL the same day — not at next term
- School and guardian DSLs must coordinate the response jointly and immediately
- Homestay – information/contract updates review to include



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Online Safety & AI — KCSiE 2026 Duties

OVERLAP: Both Frameworks

AI & Deepfakes

- Child-on-child abuse now includes AI-generated intimate images
- 'Deepfakes' explicitly named in statutory guidance
- Online Safety 4Cs framework expanded for AI-generated content

Annual Filtering Review

- Review at least annually — log must cover ALL devices
- Includes boarding accommodation and residential networks
- Cyber security = core safeguarding, not an IT task

Mobile Phones

- Phone-free 'by default' across the whole school day
- Boarding: How do we manage the evenings and prep time?
- **Consideration** – What support is needed by guardianship organisations in holiday periods? Can Schools work with guardians with key messaging and supportive boundaries/expectations v communicating & work/downtime

Joint Duty — School DSL & Guardian DSL

- More than ever if we look after children, we need to be aware of the online places and spaces where children spend their time. Awareness of AI-facilitated grooming, gaming platforms and social media as places and spaces for exploitation
- Online harm and in-person harm are one continuum — school DSL and guardianship DSL must share intelligence immediately, not wait. Early interventions are key. E.g. A student telling their guardian about a 'secret online friend' must be reported to the guardianship DSL and then to the school DSL the same day



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Mental Health & Exploitation

OVERLAP: Both Frameworks

Mental Health is Safeguarding

- Self-harm, eating disorders and suicidal ideation are now recognised as explicit safeguarding concerns and indicators for abuse/exploitation
- Staff must call 999 or 111 if a child is in immediate danger — including boarding staff and homestays overnight
- Most settings expected to have a Mental Health Lead embedded within whole school culture.
- Boarding school DSL: 24/7 environment = heightened duty to spot warning signs at any hour
- Guardian DSL: student distress during a holiday placement must be reported to the school DSL the same day

Exploitation (CCE/CSE) & Modern Slavery

- Exploited young people are victims — not offenders
- Financial exploitation and movement by organised networks explicitly named
- NRM referral gives access to an Independent Child Trafficking Guardian (advocacy)
- Exeats and holidays are high-risk windows — especially for visa-sponsored students from overseas
- Working together - if a student absconds or is reported missing, the school DSL must notify UKVI — this is a visa sponsorship obligation.



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Information Sharing & GDPR

OVERLAP: Both Frameworks

The Core Principle — Both Frameworks

- GDPR is NOT a barrier to timely information sharing — withholding in the name of data protection is itself a safeguarding failure
- Article 17 deletion rights do NOT override safeguarding obligations — records must be stored separately and marked accordingly

Schools — School DSL

- Sharing welfare information with the guardian DSL does NOT need parental consent where there is a safeguarding concern
- GDPR should not be used as a reason to withhold a concern from the guardian DSL who is part of the pastoral care for the child
- Safeguarding records must be stored separately — they are not subject to erasure requests

Guardians — Guardian DSL

- Guardian DSL should receive and share welfare information about students in their care
- A holiday placement incident may be a notifiable serious incident — guardian DSL alerts school DSL and safeguarding partnership arrangements immediately. Advice lines can advise whether UKVI need notifying.



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WT 2026: Agencies must actively address discrimination — not merely avoid prejudice.

Discrimination - The theme is consistent: **effective safeguarding must be anti-discriminatory**, and practitioners must actively recognise, challenge, and prevent discriminatory practice.

WT 2026 Leads | KCSiE Applies

Cultural considerations

School DSL

- Silence does not mean an absence of harm — cultural deference shapes disclosure
- Patterns & Trends will help to review any nationality bias
- Use accessible language in all safeguarding communications
- International students warrant welfare oversight equivalent to looked-after children due to their cultural vulnerabilities. (Risk Assessment approach?)



Guardian DSL

- Silence may reflect cultural norms around 'face' — not acceptance
- Disclosure processes in students' home languages
- Importance of screening of Homestay for cultural compatibility and schools aware of this occurring.
- Guardian DSL should liaise with school DSL when cultural concerns arise and vice versa— not working in isolation.

Visa Dimension

- Welfare concerns need recording and reporting — this includes cultural safeguarding risks
- Guardian declaration underpins the visa — guardians must actively check homestays. Q? What does homestay supervision of the student really look like?
- If a student refuses to engage with guardianship or school, this may be a visa compliance issue as well as a safeguarding one



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KCSiE 2026: Boarding & Residential Accommodation

Paras 191–196 — Mandatory

MANDATORY — schools have no discretion on these requirements

<h3 style="margin-top: 0;">Mandatory Requirements</h3> <ul style="list-style-type: none"> Children of different biological sexes must NOT share overnight accommodation Alternatives must be sought if a child does not wish to share with same biological sex School DSL must be involved for children living in stealth (paras 269, 274) 	<h3 style="margin-top: 0;">School DSL — Actions</h3> <ul style="list-style-type: none"> Review all dormitory and room allocation policies ASAP Establish a DSL escalation pathway for gender-related residential requests Train boarding staff on the new decision-making process Update boarding handbook before September 2026
<h3 style="margin-top: 0;">Guardian DSL — Actions</h3> <ul style="list-style-type: none"> Ensure full briefing on school accommodation policies — guardian DSL must understand single-sex requirements and how social transition requests are handled Guardian DSL should expect consultation on any accommodation decision affecting their student; agree escalation process with school DSL at start of each term 	

KCSiE 2026: Children Questioning Their Gender

Paras 244–274 | Cass Review Informed

Includes specific considerations for boarding schools and guardianship organisations

<h3 style="margin-top: 0;">Gender Questioning Pupils</h3> <ul style="list-style-type: none"> Gender questioning is not a risk factor Perceived gender questioning pupils equally vulnerable to bullying Anti-bullying policies and sanctions required Intervene early to prevent 	<h3 style="margin-top: 0;">Social Transition Requests</h3> <ul style="list-style-type: none"> Document all decisions — keep full records Safeguarding and best interests of all pupils first Engage parents/carers as priority — involve DSL Seek clinical & SENCO advice before agreeing Primary schools: full transition agreed very rarely Balance Equality Act against safeguarding duties Maintain flexibility — keep options open Support detransition with parents & experts 	<div style="background-color: #800000; color: white; padding: 5px; font-weight: bold;">Absolute Rules — No Exceptions</div> <ul style="list-style-type: none"> Toilets & changing rooms: opposite sex — no access Boarding/residential: same rule — no exceptions Single-sex sport (safety): no exceptions <div style="background-color: #006400; color: white; padding: 5px; font-weight: bold;">Record-Keeping (Legal Requirement)</div> <ul style="list-style-type: none"> Record biological sex accurately in all records All relevant staff must know — incl. living in stealth
<div style="background-color: #003366; color: white; padding: 5px; font-weight: bold;">Gender Questioning — Core Principles</div> <ul style="list-style-type: none"> Do NOT initiate — respond to requests only Gender-atypical behaviour is developmentally normal Most questioning does not persist to adulthood Be professionally curious about the full picture Consider mental health, neurodiversity & family factors 	<div style="background-color: #e69d00; padding: 10px; font-weight: bold;"> The Cass Review underpins the cautious approach to social transition. Familiarise leadership & DSL with its key findings — particularly on early transition and clinical involvement. </div>	
		<div style="background-color: #4b0082; color: white; padding: 5px; font-weight: bold;">Boarding & Guardianship</div> <ul style="list-style-type: none"> Residential rules are absolute — train houseparents/staff Living in stealth: involve DSL; accurate staff records No informal changes without a formal school decision Guardianship orgs: working with parents promptly Brief Homestay on school's social transition policy

KCSiE 2026: DSL Roles — Schools & Guardian Organisations

KCSiE 2026 Specific

Both schools and guardianship organisations should be working closely together.

School DSL — Strengthened Requirements

- Status, skills AND experience now all required (not just status)
- Deputies must meet full DSL training expectations
- Confidential shared mailbox mandatory — no gaps in cover including school holidays
- DSL-to-DSL consultation expected before any student arrives — including consultation with guardian DSL

Guardian DSL — Responsibilities

- Guardian organisation DSL has equivalent training to a school DSL
- Guardian DSL is the first point of contact for safeguarding concerns during holiday placements
- Regular contact with the school DSL throughout the student's placement — not just in emergencies
- Guardian DSL must be named in the joint holiday-period protocol agreed with each school

All Staff Must Read Part 1 in Full (KCSiE 2026)

- Annex A summary proposed to be removed — ALL staff including non-teaching must read Part 1 in full
- Applies to schools; guardian organisations should ensure their staff have equivalent safeguarding literacy across both KCSiE and WT 2026



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KCSiE 2026: Governance, Recruitment & Transfers

KCSiE 2026 Specific

Governance & Proprietors

- Evidence effective safeguarding — not just compliance
- Annual IT / digital audit: log all devices and locations
- Brief governors on biological sex recording, AI governance, Operation Encompass and visa sponsorship obligations etc.

Safer Recruitment

- SCR template now included for national consistency
- Reminder about the DBS Update Service: join within 30 days of certificate issue
- Applies to all adults with access to students — including guardian organisation staff and Homestay adults

School DSL — Safeguarding Transfers

- Five-day rule retained — proactive sharing now expected
- Context on serious violence, Channel and AI harms must be shared before the student arrives. Difficult to know about international students
- DSL-to-DSL verbal consultation with receiving school AND with guardian organisation DSL

Guardian DSL — Placement Transitions

- When a student moves schools or guardian organisations, both DSLs must share safeguarding context.
- Guardian organisations should update their records and the new school's DSL on any welfare concerns
- A change in guardian arrangement is a UKVI-relevant event — notify the school to assess visa implications



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Working Together 2026: Family Help & Multi-Agency Culture

WT 2026 Specific

Family Help — Replaces Early Help

- **2 strands:** community-based (universal) and targeted (multi-agency)
- School DSL: map local Family Help pathways for students in need during term
- Guardian DSL: be part of the Family Help network for students in holiday placements — not separate from it

Multi-Agency Culture

- Child-centred practice — not just structural compliance
- External sports coaches on school premises are within the school's safeguarding arrangements
- Both schools and guardian organisations must work with the local safeguarding partnerships
- Cross border safeguarding partnerships knowledge

DBS & People in Positions of Trust — Both Organisations

- Legal duty to refer to DBS if a staff member in regulated activity has harmed or poses a risk — even where conditions are not fully met
- School: agency staff, visiting coaches and sports tutors must all be DBS-checked
- Guardian organisations: Homestay adults, drivers and tutors are all in scope — failure to refer a risky adult may breach statutory duty



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Working Together 2026: Serious Incidents & Organisational Learning

WT 2026 Specific

Serious Incidents & Rapid Reviews

- Rapid reviews to Review Panel within 15 working days
- School DSL must notify local safeguarding arrangements immediately — including incidents during holidays in guardian care
- Guardian DSL must alert school DSL immediately — international parents need not be contacted first

Organisational Learning

- Active learning expected — not just audit and compliance
- Leaders in both schools and guardian organisations must create space to reflect without blame
- Follow suit with reflective practice in supervision, safeguarding audits and governance

MASA Accountability — Both Organisations

- All schools and guardianship organisations are relevant agencies — both must be aware of and follow the local safeguarding partnerships arrangements
- Therefore Guardian organisations need to map out which safeguarding partnership covers each holiday placement



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Holiday-Period Safeguarding — A Joint Responsibility

OVERLAP: Both Frameworks

Safeguarding duties do not pause for school holidays. Both DSLs must be named in a written protocol — agreed before each academic year.

01	Who holds responsibility? Both school DSL and guardian DSL must be named — with clear escalation during exehats and holidays rather than being implied.	02	Share intelligence without delay Both DSLs share online concerns, exploitation risks and DA incidents immediately — GDPR is not a barrier between them
03	Serious incidents Guardian DSL alerts school DSL immediately. School DSL notifies safeguarding partners. Both are involved — not sequentially.	04	Missing students If a student cannot be located, both DSLs alert police. School DSL must also notify UKVI — a sponsored student who absconds is a visa reporting obligation.
05		Pre-agreed written protocol Name both DSLs, escalation routes and emergency contacts. Review and re-sign before the start of each academic year or when appropriate	



Safeguarding Priority Actions — KCSiE 2026 + Working Together 2026

NOW → SEPT 2026

Schools — School DSL	⇄ DSL Shared Responsibilities	Guardian Organisations — Guardian DSL
<p>NOW: Appoint Operation Encompass lead; training for school DSL and staff awareness</p> <p>NOW: Review UKVI sponsor compliance & reporting procedures</p> <p>NOW: Policy gap analysis: Safeguarding, Boarding, Online Safety, RSHE, Visa</p> <p>MID-SUMMER: Annual filtering review — ALL devices incl. boarding accommodation</p> <p>MID-SUMMER: Review dormitory, toilet & changing room arrangements</p> <p>MID-SUMMER: Plan whole-staff Part 1 & new Annex A training and understanding</p> <p>MID-SUMMER: Ensure local safeguarding partnerships (MASA) arrangements are fully understood</p> <p>SEPT 2026: All staff to have read Part 1 & new Annex A in full</p> <p>SEPT 2026: School DSL handovers in place for all new students</p> <p>SEPT 2026: Annual digital, filtering & monitoring audit logged for all sites</p>	<p>NOW: Read KCSiE 2026 consultation draft; brief governors</p> <p>NOW: Establish DSL shared mailbox and holiday cover arrangements</p> <p>MID-SUMMER: Usually Late August Monitor DfE publication of final KCSiE 2026 for last-minute changes. There will be some!</p> <p>MID-SUMMER: Agree joint holiday-period protocol naming both DSLs for known arrangements. New arrangements in September.</p> <p>SEPT 2026: Update Safeguarding Policy, Boarding Handbook & RSHE</p> <p>SEPT 2026: Agree joint holiday-period protocol — both DSLs named</p> <p>SEPT 2026: KCSiE 2026 statutory from 1 September</p> <p>SEPT 2026: Both DSLs — handover protocols in place for every new student</p> <p>SEPT 2026: Training for school staff and homestays</p> <p>ONGOING: Guardian DSL notification protocol — same-day for any holiday concern</p>	<p>NOW: Train staff on Operation Encompass — DA at homestay triggers immediate action</p> <p>NOW: Ensure guardian declarations on file are current for all students (Visa)</p> <p>MID-SUMMER: Review policies & homestay documentation</p> <p>MID-SUMMER: Check all local safeguarding partnerships arrangements for each placement area are detailed and known.</p> <p>MID-SUMMER: DBS checks for all homestay adults, drivers and tutors (WT)</p> <p>MID-SUMMER: 'Consider Cultural deference' criteria applied to homestay vetting and for existing homestays (WT)</p> <p>MID-SUMMER: Disclosure processes available in students' home languages (WT)</p> <p>SEPT 2026: Confirm declarations are live and current for every student</p> <p>SEPT 2026: Training for homestay providers completed</p> <p>ONGOING: Guardian organisation and schools working together</p>

■ NOW (WT 2026 live) ■ MID-SUMMER (KCSiE final) ■ SEPT 2026 (KCSiE statutory) ■ ONGOING

KCSIE 2026

Working Together to Safeguard Children 2026

UKVI & Visa

Operation Encompass

Online Safety

Gender Questioning

Information Sharing

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Downloads

Files coming soon.