

**Effective 1
September 2026**

Keeping Children Safe in Education 2026

A visual guide to statutory duties, safeguarding architecture, and building a proactive culture.

Critical legislative updates redefine the 2026 safeguarding landscape

Crime and Policing Act 2026.

Removes the 'supervision exemption'. Volunteers working frequently or overnight are now engaging in Regulated Activity and require enhanced vetting.

Operation Encompass.

Imposes a new statutory duty on police to notify education settings of domestic abuse incidents affecting children.

Modernised Terminology.

Replaces 'sexting' and 'youth-produced sexual imagery' with the clearer terms 'making or sharing of nudes and semi-nudes' (including AI-generated deepfakes).

Data (Use and Access) Act 2025.

Updates data protection laws, reinforcing that fear of breaching data regulations must never hinder the sharing of critical safeguarding information.

A child-centric approach requires layers of vigilant architecture



Part 1: The Frontline – Equipping all staff to identify emerging risks



Abuse & Neglect.

Physical, emotional, and sexual abuse.

Persistent failure to meet basic physical or psychological needs.

Look for: unexplained absences, physical signs, or severe behavioural changes.



Extra-Familial Harm.

Risks outside the home.

Look for: indicators of Child Criminal Exploitation (CCE) such as county lines, serious youth violence, radicalisation, and gang involvement.

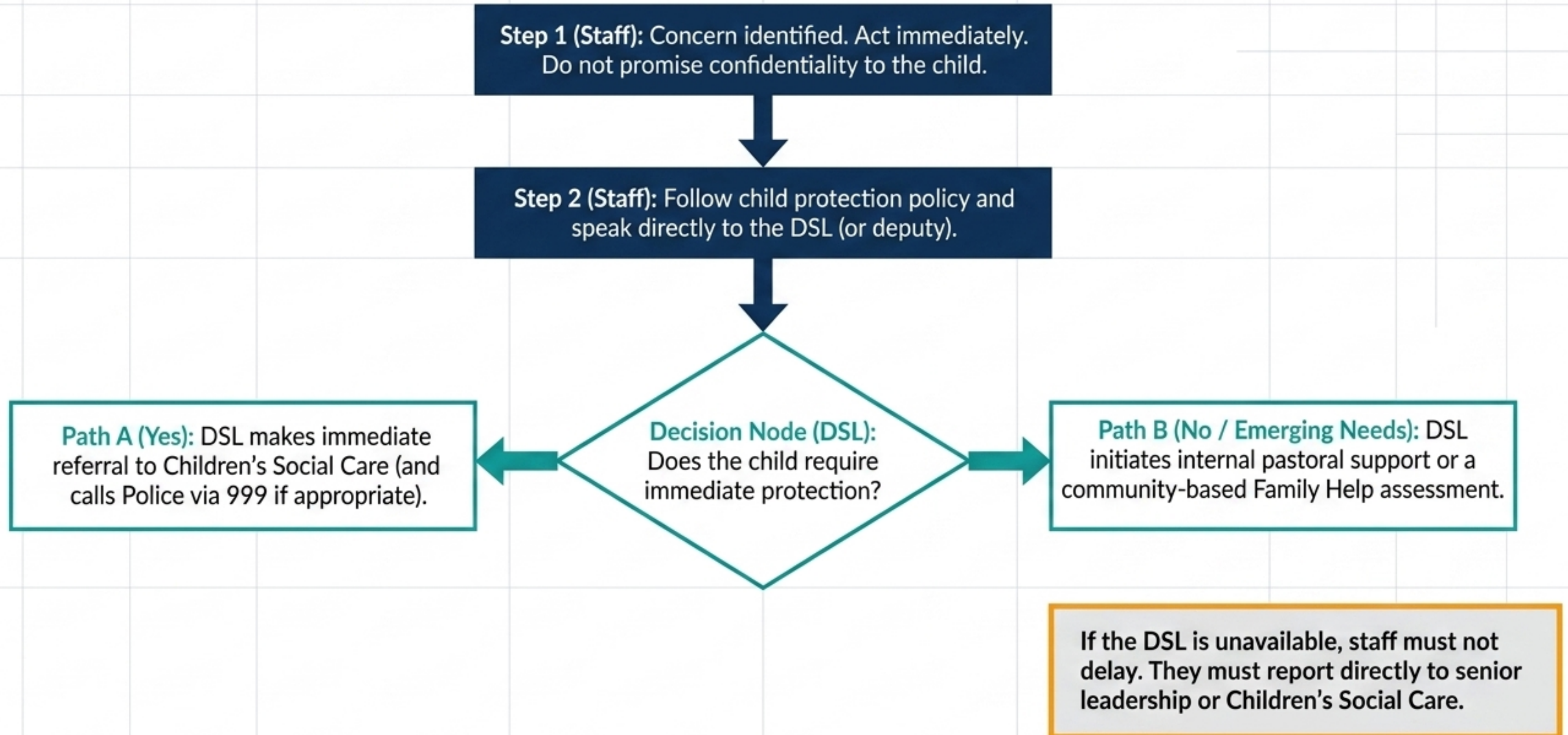


Online & Peer Risks.

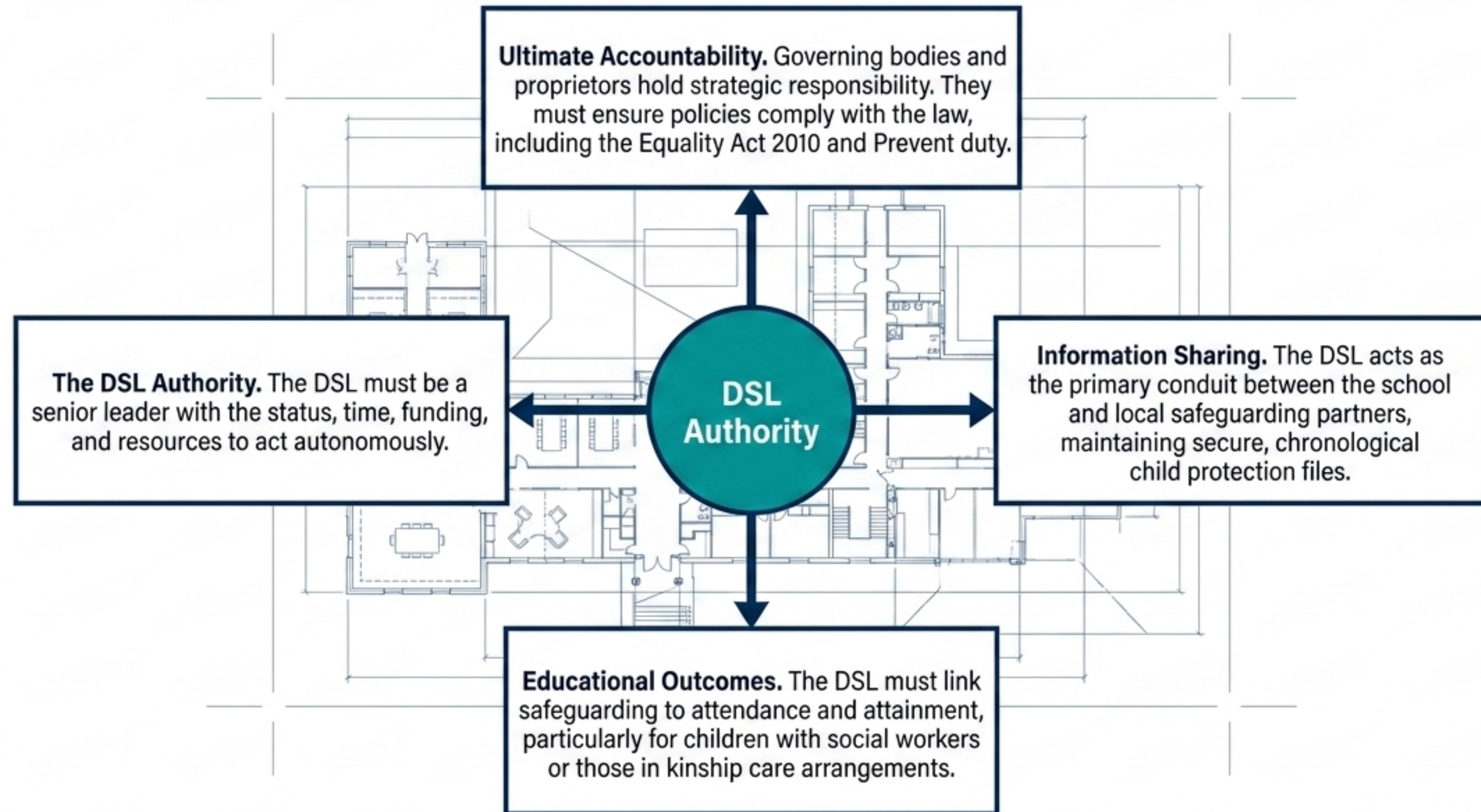
Consensual and non-consensual sharing of nudes, cyberbullying, upskirting, and teenage relationship abuse.

Look for: sudden withdrawal from digital devices or peer groups.

Immediate action protocols for frontline staff concerns



Part 2: The Framework – Governing bodies and the DSL orchestrate the safeguarding response



Filtering and monitoring must intercept the four distinct vectors of online harm



Content. Exposure to illegal, inappropriate, or harmful material. Includes: pornography, self-harm promotion, extremism, and misogynistic influencers.



Contact. Harmful online interaction. Includes: peer-to-peer grooming, predatory adult contact, or simulated interactions via generative AI.



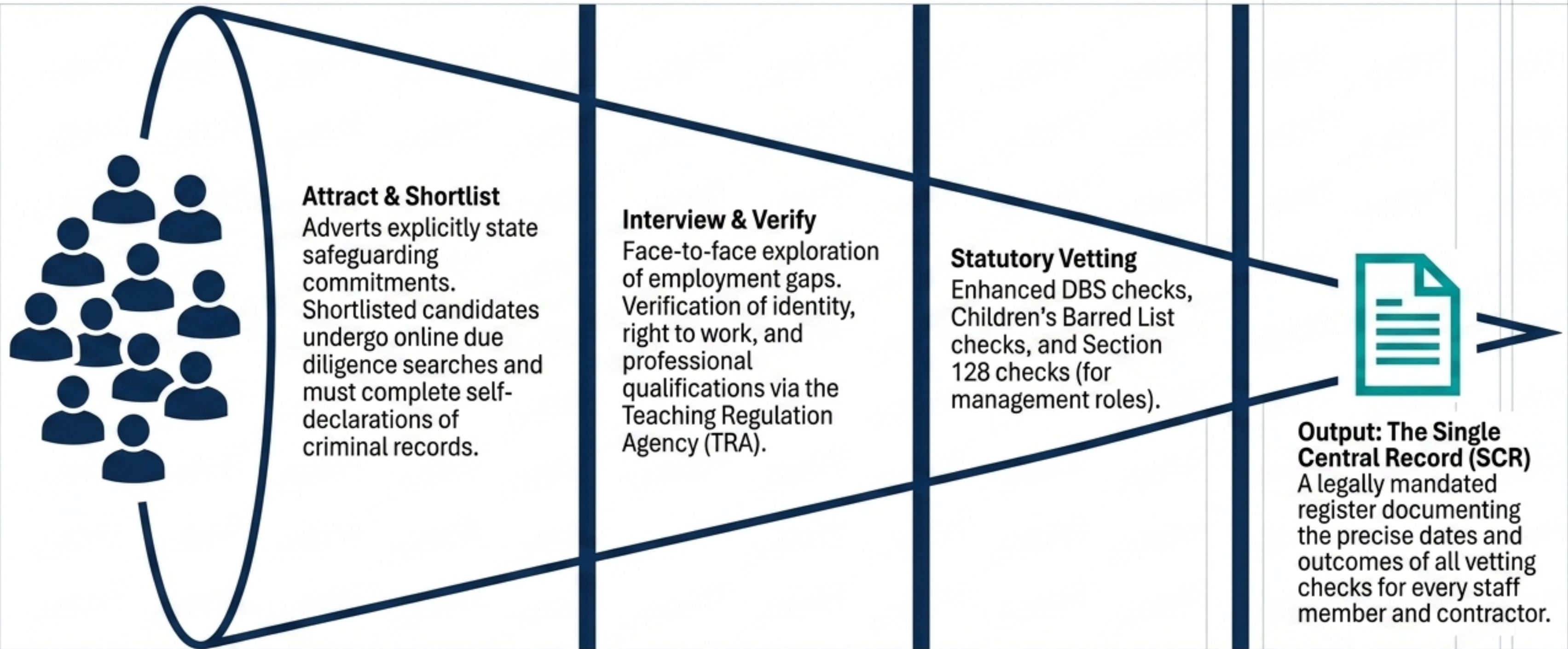
Conduct. Personal online behaviour that increases risk. Includes: cyberbullying, sharing nudes or semi-nudes, and engaging in online hoaxes/challenges.



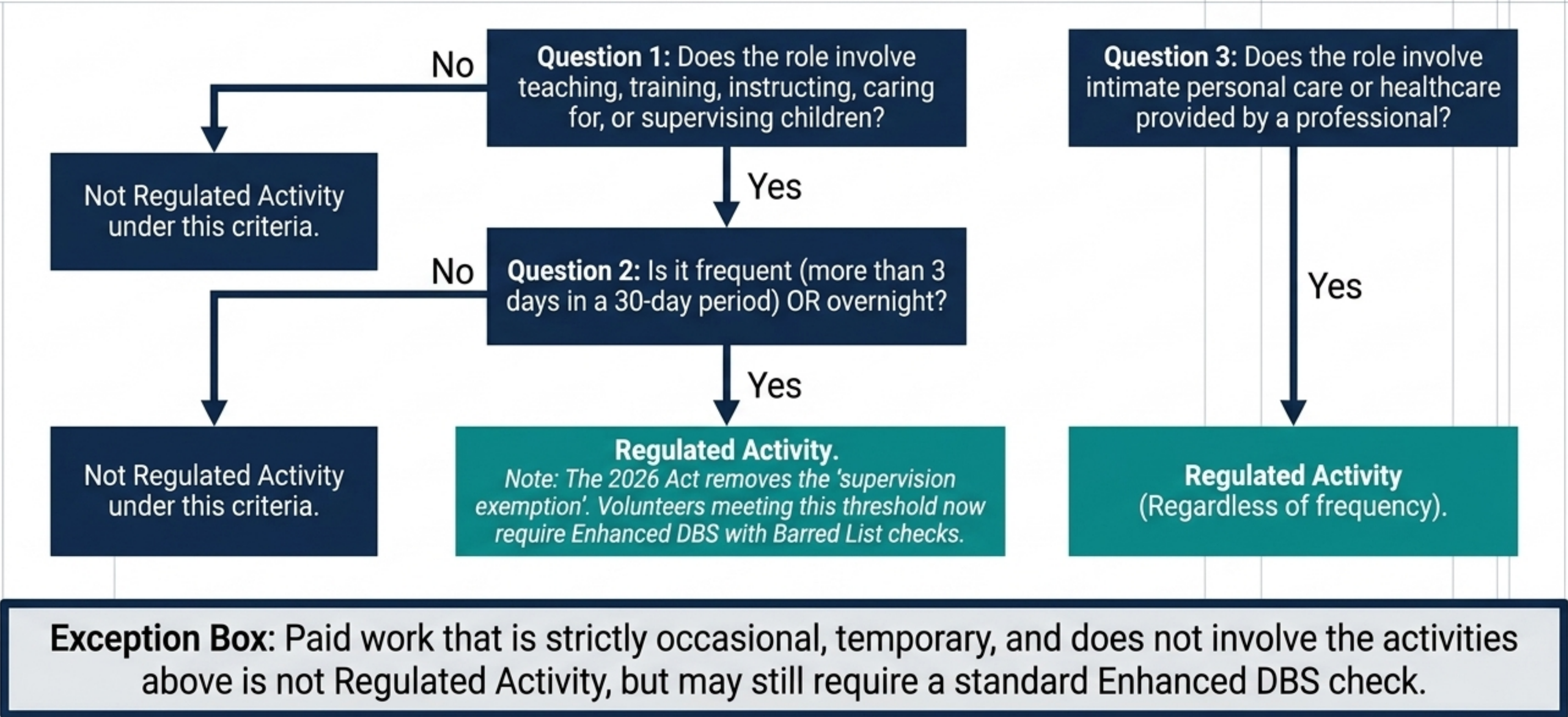
Commerce. Financial risks. Includes: online gambling, inappropriate advertising, phishing, and financially motivated sexual extortion (FMSE).

Governing bodies must undertake an annual review of filtering and monitoring effectiveness, ensuring IT systems block harm without unreasonably impacting teaching.

Part 3: The Gatekeepers – A systematic filtration funnel for safer recruitment



Determining 'Regulated Activity' under the Crime and Policing Act 2026



Diagnostic Matrix: Aligning personnel profiles with statutory vetting requirements

Role Profile	Identity Check	Enhanced DBS	Barred List Check	Prohibited from Teaching	Section 128 (Management)
Teachers & Teaching Assistants	✓	✓	✓	✓	✗ (Unless in a management role)
Frequent Volunteers (Overnight/Weekly)	✓	✓	✓ (Due to 2026 updates)	✗	✗
Independent School Governors / Academy Trustees	✓	✓	✗	✗	✓
Third-Party Contractors (Regulated Activity)	(School must obtain written confirmation from the agency that all checks, including Barred List, have been completed)				

Part 4: Internal Risks – Navigating allegations against staff and volunteers

Meets the Harm Threshold

Definition: Behaviour suggesting the individual has harmed a child, committed a criminal offence against a child, or poses a risk of transferable harm.

Action: Immediate referral to the Local Authority Designated Officer (LADO) within one working day.

Investigation: May involve Police and Children's Social Care. Internal disciplinary paused until agreed by LADO/Police.

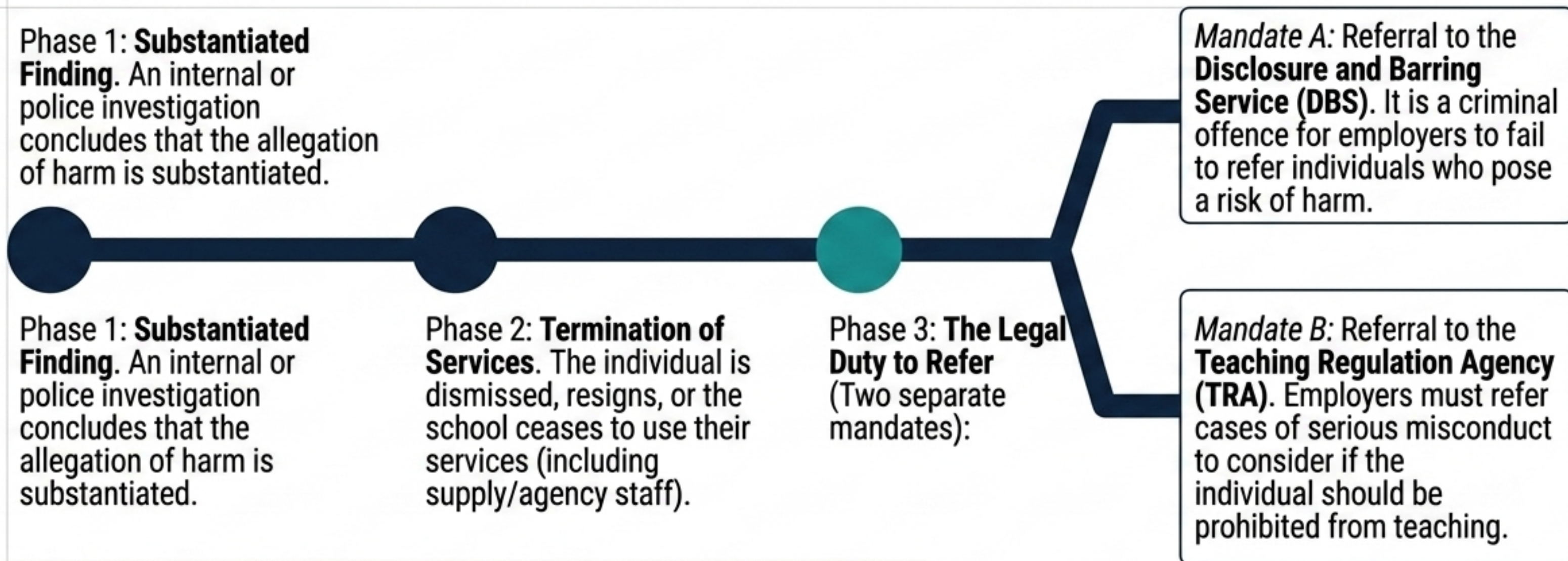
Low-Level Concerns

Definition: Behaviour that does not meet the harm threshold but falls below expected professional standards (e.g., overstepping boundaries, inappropriate language).

Action: Handled internally via the staff behaviour policy. Reported to the Headteacher/Principal.

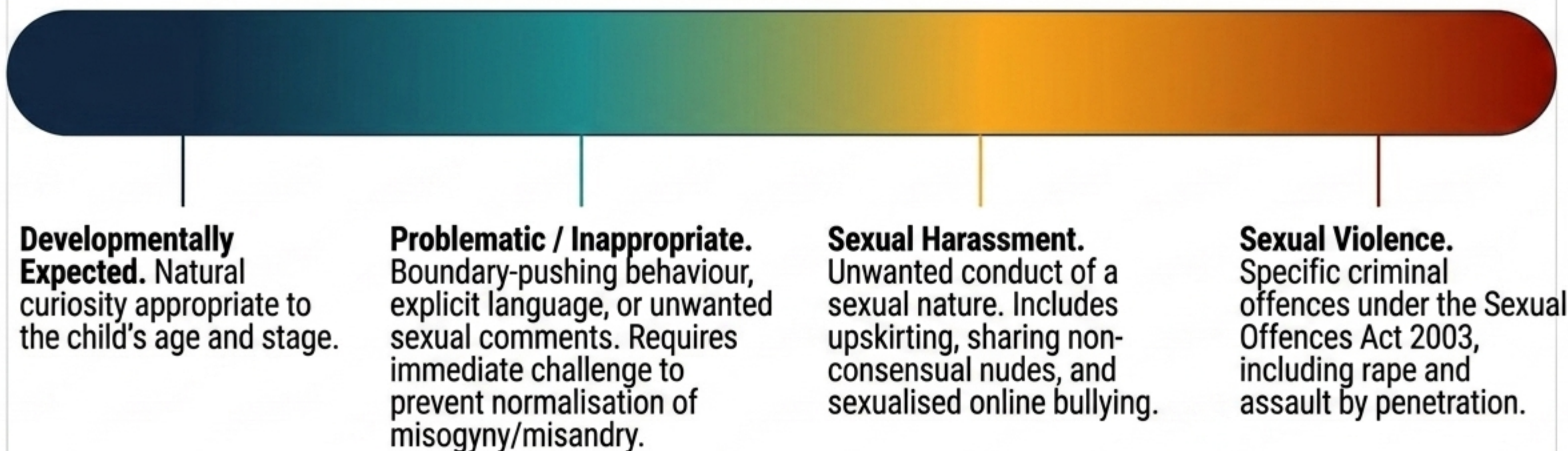
Purpose: Creates a culture of transparency, addresses problematic behaviour early, and prevents escalation.

Mandatory reporting duties following substantiated allegations



Callout Box: 'Settlement agreements' must never be used to circumvent these mandatory reporting duties where a risk to children exists.

Part 5: Peer Risks – The continuum of Harmful Sexual Behaviour (HSB)



Core Principle: Downplaying behaviours as 'just banter' or 'boys being boys' creates an unsafe environment and normalises abuse.

Image Sharing Diagnostic: Responding to nudes and semi-nudes

Context Note: The term replaces 'sexting' and applies to self-generated, peer-taken, or AI-generated 'deepfake' imagery.

Incident Identified

Pathway 1: **Non-Consensual Sharing.**

Nature: Illegal and inherently abusive.

Response: Requires an immediate safeguarding response, likely involving Police and Children's Social Care. High risk of exploitation or bullying. Devices may need confiscation without viewing the image.

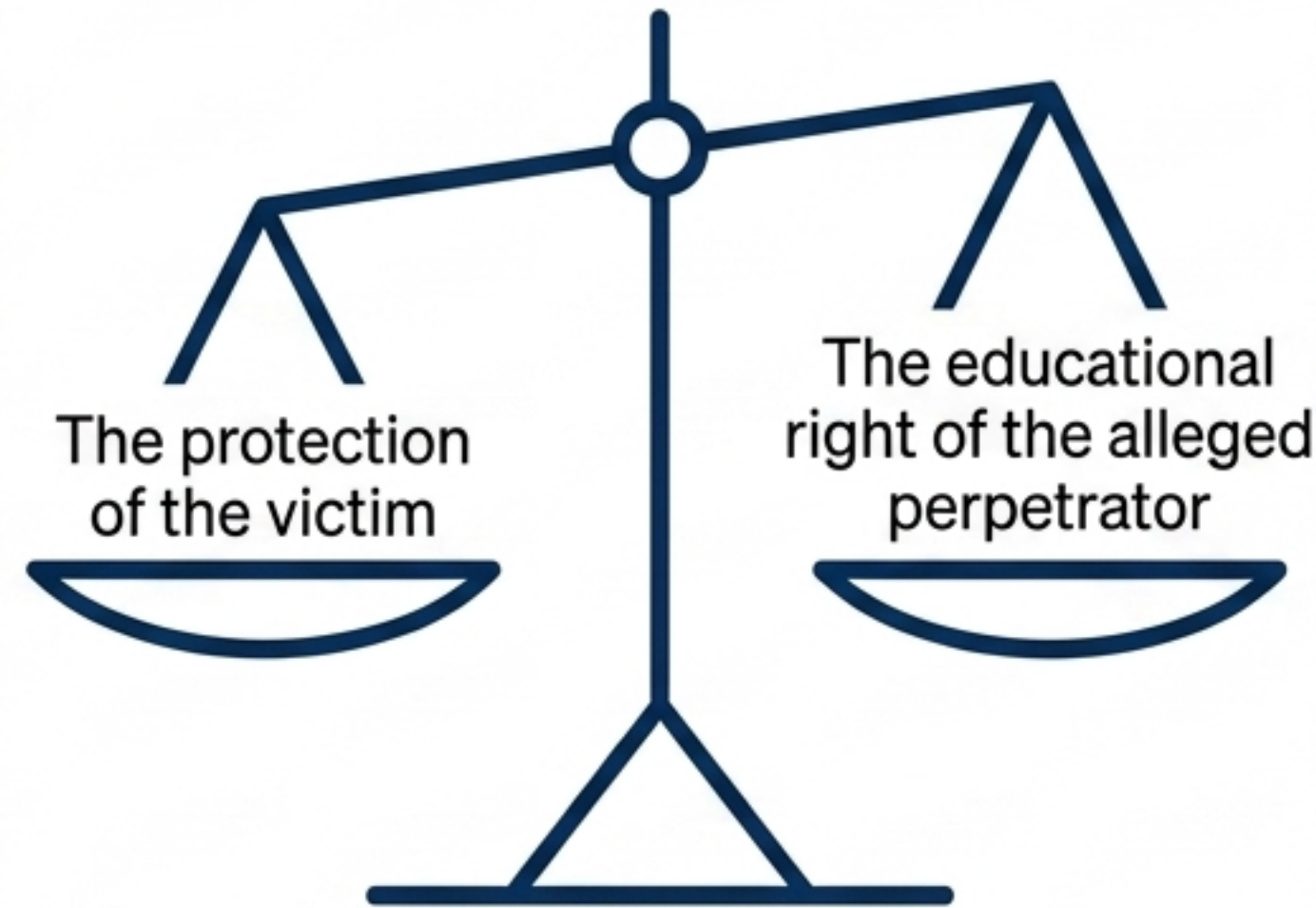
Pathway 2: **Consensual Sharing** (between peers of similar age).

Nature: Still illegal under UK law, but may not be inherently abusive.

Response: Still requires a safeguarding response. Focuses on educational intervention, risk of future exploitation, and understanding coercion, rather than immediate criminalisation.

Ongoing considerations: Managing victims and alleged perpetrators sharing space

The Balancing Act: The school must safeguard the victim while simultaneously considering their duty to educate the alleged perpetrator and enact disciplinary sanctions.



Immediate Action: In criminal investigations of rape or serious sexual assault, the alleged perpetrator must be removed from classes shared with the victim.

Logistics: Consider how to keep the children a reasonable distance apart on premises, during extracurriculars, and on transport.

Core Principle: Removing an alleged perpetrator from a shared space is an act of safeguarding the victim, not a presumption of guilt. Schools must not wait for a police outcome to enact protective measures.

Synthesis: Moving beyond compliance to a lived culture of vigilance

The Foundation: Statutory duties, vetting matrices, and reporting flowcharts are merely the architectural blueprints. They only function when animated by a whole-school culture.



Zero-Tolerance: A lived culture actively challenges misogyny, misandry, and derogatory behaviour at the lowest levels, preventing the escalation of harm.

Professional Curiosity: Staff maintain an attitude of 'it could happen here.' They do not wait to be told; they actively look for signs of trauma, neglect, and extra-familial exploitation.

The Ultimate Metric: All systems, processes, and policies must operate with one singular question at their core: *Is this in the best interests of the child?*