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Strengthening Safeguarding Through Clarity, Accountability and Equity: a critical response to KCSIE 2026

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Executive Summary

The proposed revisions to *Keeping Children Safe in Education (KCSIE) 2026* represent a substantive attempt to modernise safeguarding practice, particularly in response to evolving risks associated with online harms, artificial intelligence, child-on-child abuse, and complex vulnerabilities. While many of the changes improve clarity and link-up with multi-agency frameworks, the consultation underestimates the cumulative burden on practitioners, risks over-reliance on procedural compliance rather than professional judgement, and does not sufficiently foreground structural inequalities affecting safeguarding outcomes. Drawing on established evidence and frontline experience from Harrow, this response supports a more integrated, trauma-informed, and equity-focused approach, alongside stronger accountability for implementation rather than further expansion of guidance.

Consolidated Response

1. The proposed structural and format changes to KCSIE are broadly welcome in intent but insufficiently ambitious in execution. While movement towards modularisation and HTML accessibility may improve usability, the underlying issue is not format but cognitive overload and fragmentation of safeguarding expectations. Practitioners already operate within a dense ecosystem of statutory and non-statutory guidance, and simply redistributing content risks reinforcing a compliance culture rather than improving safeguarding outcomes. Evidence from Harrow Monitoring Group (2026) *Growing Up in the Online World* highlights that staff require contextualised, scenario-based guidance rather than expanded documentation, particularly in relation to online harms and AI-enabled abuse. This is reflected in practice in Harrow, where professionals report difficulty translating high-level guidance into real-time responses to incidents such as sextortion or peer-on-peer image sharing. The proposal to remove

Annex A is therefore defensible in principle, ensuring all staff engage with core safeguarding knowledge, but must be accompanied by differentiated training pathways, especially for non-teaching staff who may otherwise disengage.

2. The strengthening of Part One, particularly around early help, child sexual exploitation, and serious violence, reflects a more nuanced understanding of vulnerability, including the recognition that children who harm may themselves be victims. This is consistent with trauma-informed practice and is strongly supported. However, the amendments remain overly descriptive rather than operational. For example, identifying pupils removed from classrooms or on part-time timetables as risk indicators is appropriate, but the guidance stops short of mandating systematic review triggers or multi-agency escalation thresholds. Casework in Harrow demonstrates that children placed on reduced timetables or experiencing repeated exclusion have, in several instances, subsequently become vulnerable to child criminal exploitation without earlier safeguarding escalation. Research from Harrow Monitoring Group (2025) *Children in Care Homes* further evidences how institutional drift and placement instability can compound these risks. Similarly, the clarification of legal definitions around sexual offences is necessary, but should be accompanied by clearer practitioner-facing exemplars to avoid continued ambiguity in frontline decision-making.
3. The revisions to Part Two introduce important developments, particularly in recognising the intersection between mental health and safeguarding, the risks associated with AI, and the need for robust filtering and monitoring systems. However, the framing remains reactive rather than preventative. Evidence from Harrow Monitoring Group (2026) *Growing Up in the Online World* shows that harms such as sextortion, deepfake abuse, and misogynistic radicalisation are embedded within broader online ecosystems, including gaming platforms and algorithm-driven content. This is borne out locally in Harrow, where practitioners have seen a marked increase in financially motivated sextortion cases affecting boys aged 13–16, many of whom did not initially recognise themselves as victims due to peer normalisation. The guidance acknowledges these risks but does not sufficiently address systemic drivers or require schools to adopt proactive digital literacy and resilience strategies. Furthermore, the approach to children questioning their gender, while seeking to provide clarity, risks overemphasising compliance with legal frameworks at the expense of relational safeguarding. A more balanced approach would prioritise individualised risk assessment, child voice, and multi-agency support, particularly given evidence from SEND-related work in Harrow that vulnerable children often experience fragmented responses across systems.
4. The proposed updates to safer recruitment and management of allegations represent incremental improvements but do not fully resolve longstanding inconsistencies in safeguarding accountability. Clarifying expectations around work experience placements and reducing unnecessary DBS checks is pragmatic, yet there remains ambiguity around the threshold for “regulated activity” in practice. More critically, the

treatment of non-employed adults, including contractors, volunteers, and trainee teachers continues to rely on shared responsibility models that can diffuse accountability. Evidence from safeguarding casework in London, including cases involving placements outside Harrow, shows that unclear lines of responsibility can lead to delays in action and information sharing. This is particularly evident where children are placed in care homes outside their local authority, as highlighted in Harrow Monitoring Group (2025) *Children in Care Homes*. The guidance should therefore adopt a clearer principle of ultimate institutional accountability, with explicit requirements for oversight, supervision, and escalation. Additionally, the emotional and professional burden on designated safeguarding leads is acknowledged but not meaningfully addressed; without structural investment in capacity, training, and supervision, further expectations risk exacerbating burnout and inconsistency.

In addition, there remains a significant safeguarding gap in relation to children's engagement in community-based settings, including places of worship and supplementary schools. In areas such as Harrow, enquiries have identified the absence of structured monitoring, consistent safeguarding standards, and clear lines of accountability within these settings, despite their regular and often sustained contact with children. This creates a parallel safeguarding environment that sits outside formal education oversight, limiting opportunities for early identification and intervention. KCSIE should more explicitly recognise these contexts and strengthen expectations around partnership working, information sharing, and safeguarding assurance beyond the school gate.

5. The restructuring of Part Five to reflect a continuum of harmful sexual behaviour is a significant and evidence-informed improvement, coherence with multi-agency frameworks that distinguish between developmentally normative and abusive behaviours. This should enhance practitioner confidence and consistency. However, the broader consultation reveals gaps in emerging safeguarding domains that require more explicit integration. Community engagement work by Harrow Monitoring Group in Harrow has identified the growing influence of gender-based hostile content online content, particularly through gaming platforms and social media, with young people often perceiving such narratives as normalised despite links to harmful sexual behaviour in school contexts. Additionally, evidence from Harrow Monitoring Group (2026) *Early Years Safeguarding* highlights variability in practitioner confidence in identifying neglect and emotional harm, including forms of "hidden" or affluent neglect. These issues, alongside teenage relationship abuse and sextortion, should be embedded within core expectations rather than treated as peripheral concerns. Without this, there is a risk that KCSIE continues to expand in scope without achieving depth in implementation.

Follow-Up

To strengthen the final iteration of KCSIE, it is recommended that the UK Department for Education prioritises implementation fidelity over further expansion of content, including the development of sector-specific training, measurable safeguarding standards, and robust mechanisms for auditing practice across different settings. Consideration should also be given to how the guidance interfaces with wider reforms in SEND, children's social care, and digital regulation, ensuring coherence across the safeguarding system rather than incremental additions within education alone.

This should include explicit consideration of safeguarding expectations and oversight mechanisms in community-based settings, such as places of worship and supplementary education provision, to address current gaps in monitoring, consistency, and accountability, and to ensure that safeguarding protections extend effectively beyond the formal school environment.

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