DIGITAL INDEPENDENT SPECIALIST COLLEGE

Safeguarding and Protection Policy

DISC - Digital Independent Specialist College

Author / Primary person responsible for implementation and monitoring	**Caroline Dean** *Head of College and Designated Safeguarding Lead (DSL)*
Adopted	September 2026
Approved By	**Sam Hirst** *Chair of Governors* **Lizzie Northcote Smith** *Safeguarding Governor*
Next Review Date	September 2027, or sooner where legislation or statutory guidance changes
Statutory guidance	Keeping Children Safe in Education 2026 (in force from 1 September 2026)
Version	3.0 (September 2026) – supersedes Version 2.0 (November 2025)

Version Control

Version	Date	Author / owner	Summary of changes	Approved by
1.0	October 2023	Digital Advantage (Andy Lovatt, CEO)	First adoption of the Digital Advantage / DISC Safeguarding and Protection Policy and Procedures.	Andy Lovatt, CEO Caroline Dean, Head of College Diane Ainsworth, Trustee
1.1	January 2024	Digital Advantage (Andy Lovatt, CEO)	Annual review.	Andy Lovatt, CEO Caroline Dean, Head of College Diane Ainsworth, Trustee
1.2	October 2024 (signed February 2025)	Digital Advantage (Andy Lovatt, CEO)	Updated to KCSIE 2024. Full procedural policy (23 sections and 4 appendices) including key contacts, referral and early help procedures, risk assessment, allegations against staff and low-level concerns. DSL: Caroline Dean. DDSLs: Gemma Crockett, Kirsty Bradley-Law, Clare O'Toole, Lizzie Northcote-Smith, Alex Newell, Jonathan Bacon. Nominated Safeguarding Governor: Diane Ainsworth.	Andy Lovatt, CEO (February 2025) Caroline Dean, Head of College Diane Ainsworth, Trustee
2.0	November 2025 (adopted December 2025)	Caroline Dean, Head of College	New DISC policy replacing Version 1.2. Ownership moved from the Digital Advantage CEO to the Head of College. Condensed into 12 sections; detailed procedures and appendices 1–4 removed. Updated to KCSIE 2025 and Working Together 2024, with September 2025 and November 2025 addenda (attendance, AP, online safety and AI, VSH and kinship care, RSHE, governance, data protection). DDSLs: Jonathan Bacon, Lizzie Northcote-Smith, Trish Barber, Clare O'Toole, Kirsty Bradley-Law (Trish Barber added; Gemma Crockett and Alex Newell removed). Safeguarding Lead Governors: Jenny Nute / Beth Kenney (interim).	Bethany Kenney, Interim Safeguarding Governor (15/12/2025) Sam Hirst, Chair of Governors (14/12/2025) Diane Ainsworth, Digital Advantage Trustee
3.0	September 2026	Caroline Dean, Head of College and DSL	Full revision to KCSIE 2026. Previous addenda incorporated into the main body and removed. See summary of changes below.	Sam Hirst, Chair of Governors (10/09/2026) Lizzie Northcote Smith, Safeguarding Governor (21/10/2026)

Summary of Changes in Version 3.0

Section	Change from Version 2.0 (November 2025)
Cover details	Adopted date updated to September 2026; next review moved to September 2027; Version and Statutory guidance (KCSIE 2026) rows added; author title now includes DSL.
1. Introduction	Aims rewritten in line with KCSIE 2026 (protection inside and outside the home, including online; help as soon as problems emerge; professional curiosity). Definition of a child (under 18) added, with reference to interns aged 18–25 and adult safeguarding duties.
2. Statutory framework	Updated to KCSIE 2026. Added Children's Wellbeing and Schools Act 2026, Crime and Policing Act 2026 and Data (Use and Access) Act 2025. Dated references replaced with current guidance.
3.1 Designated Safeguarding Team	Restructured into DSL, Co-DSLs and DDSLs. New Co-DSLs: Jonathan Bacon and Dave Bibby. DDSLs now: Alex Newell, Trish Barber, Sophie Turner, Grace Percival, Gemma Crockett, Lee Clough, Issy Alderton, Chris Whyatt, Stephen Jones. Removed from DDSL list: Lizzie Northcote-Smith, Clare O'Toole, Kirsty Bradley-Law. Stronger DSL cover arrangements and expanded DSL responsibilities.
3.2 Governance Board	Named Safeguarding Lead Governors (Jenny Nute / Beth Kenney, interim) removed. Nominated Governor role merged into this section. Added annual review of filtering and monitoring, Governor training and SCR monitoring.
3.3 All Staff	All staff must read KCSIE 2026 Part One in full. Added recording of decisions and rationale, Prevent and filtering/monitoring training, and escalation of concerns about adults. DDSL list moved to 3.1.
4. Types of abuse	Retitled to include neglect. Definitions expanded. Child-on-child abuse now includes harassment and violence. 4.6 renamed Contextual / Extra-Familial Harm; 4.7 now includes Modern Slavery; 4.9 renamed Online Abuse and Technology-Facilitated Harm. New 4.10 Nudes and Semi-Nudes (including AI-generated images), 4.11 Prejudice-Based Harm and VAWG, 4.12 Child-to-Parent or Caregiver Abuse.
5. Specific duties	5.1 Attendance broadened (missing episodes, part-time timetables). 5.2 AP extended to work placements. 5.3 now covers care-experienced interns. 5.4 Early Help replaced with Family Help, community-based early help and statutory intervention. New 5.6 Mental Health, 5.7 Young Carers and Medical Conditions, 5.8 SEND and Additional Vulnerability.
6. Online safety	Retitled to include Generative AI. 4 Cs updated. Filtering and monitoring effectiveness to be reviewed annually by the responsible SLT member, with records kept. AI-related concerns handled through safeguarding procedures. New 6.4 Mobile Phones and Personal Devices.
7. Safer recruitment	Retitled Safer Recruitment and Regulated Activity; sub-sections merged. New 7.3 on removal of the regulated-activity supervision exemption from 1 September 2026. New 7.4 on volunteers, contractors, trainee teachers and work experience. Former 7.5 Induction removed.
8. Training	All staff to read Part One in full; training topics expanded. DSL training now includes Co-DSLs, Prevent and annual updates. Governor training now at induction with regular updates.

Section	Change from Version 2.0 (November 2025)
9. Reporting and recording	Former 9.5 Immediate Risk merged into 9.1. Disclosure guidance adds communication, SEND and trauma. Recording standards strengthened (decisions, rationale, outcomes). Whistleblowing and NSPCC line added. New 9.5 on concerns or allegations about adults, including low-level concerns and LADO.
10. Curriculum and RSHE	Retitled to include Harmful Sexual Behaviour. September 2026 RSHE implementation detail removed (now in force). Content on nudes/semi-nudes, AI and HSB responses added.
11. Information sharing	Data (Use and Access) Act 2025 added. Principles expanded (risk of not sharing, recording rationale). Multi-agency list removed. Record transfer now within five days with a structured summary.
12. Addenda	September 2025 addendum and November 2025 addendum (A1–A8) removed, with content incorporated into the main body. Replaced by Section 12: KCSIE 2026 key changes.
13. Policy review	New section on review and monitoring arrangements.
14. Approval	Signatories updated: Safeguarding Governor (Lizzie Northcote Smith) and Chair of Governors (Sam Hirst).

1. Introduction

DISC is committed to safeguarding and promoting the welfare, protection and wellbeing of all interns enrolled at DISC, including children, young people and vulnerable adults. Safeguarding is fundamental to DISC's culture and practice and is embedded across all areas of provision.

For the purposes of KCSIE 2026, a child is anyone under the age of 18. DISC also educates young adults aged 18-25, and applies the same safeguarding culture alongside its duties under adult safeguarding legislation.

DISC ensures that:

1. Interns are protected from maltreatment, whether within or outside the home, including online.
2. Interns receive help and support as soon as problems emerge.
3. Impairment of interns' mental and physical health or development is prevented wherever possible.
4. Interns receive safe and effective care and are supported to achieve the best outcomes.
5. Staff are equipped with the training, knowledge and professional curiosity to recognise and respond to concerns.

This policy sets out DISC's safeguarding approach in line with Keeping Children Safe in Education (KCSIE) 2026. KCSIE 2026 is statutory guidance and came into force on 1 September 2026. An intern-centred approach is maintained at all times.

2. Statutory and Regulatory Framework

This policy is informed by the following legislation and statutory or national guidance:

6. Keeping Children Safe in Education (DfE, September 2026)
7. Working Together to Safeguard Children (current statutory guidance)
8. Children Act 1989 and 2004
9. Children's Wellbeing and Schools Act 2026

10. Crime and Policing Act 2026
11. Safeguarding Vulnerable Groups Act 2006
12. Care Act 2014
13. Working Together to Improve School Attendance (statutory guidance)
14. Multi-agency statutory guidance on Female Genital Mutilation
15. Relationships, Sex and Health Education statutory guidance
16. Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025
17. Prevent Duty Guidance and Counter-Terrorism and Security Act 2015

DISC also follows local safeguarding partnership arrangements and contributes to multi-agency safeguarding processes.

3. Roles and Responsibilities

Safeguarding is everyone's responsibility. All staff, volunteers, Governors and Trustees must know how to recognise, report and respond to concerns and must act immediately where they have a safeguarding concern.

3.1 Designated Safeguarding Team

The safeguarding leadership structure at DISC is:

- Designated Safeguarding Lead (DSL): Caroline Dean
- Co-Designated Safeguarding Leads (Co-DSLs): Jonathan Bacon (JB) and Dave Bibby
- Deputy Designated Safeguarding Leads (DDSLs): Alex Newell; Trish Barber; Sophie Turner; Grace Percival; Gemma Crockett; Lee Clough; Issy Alderton; Chris Whyatt; Stephen Jones.

The DSL retains lead responsibility for safeguarding and child protection. Co-DSLs and DDSLs are trained to the appropriate level, support the DSL and provide safeguarding cover. DISC will maintain robust and clearly communicated cover arrangements whenever the DSL is unavailable, including during leave, illness, off-site activity and other relevant periods.

The DSL's responsibilities include:

- Managing and supporting safeguarding referrals, including Children's Social Care, the police, Channel and the DBS where required.
- Acting as a source of support, advice and expertise for staff and as a point of contact with safeguarding partners.
- Ensuring safeguarding policies, procedures, and reporting arrangements are embedded and understood.
- Oversight of attendance and patterns of absence as potential safeguarding indicators.
- Supporting looked-after, care-experienced and kinship-care interns and working with Virtual School Heads where relevant.
- Managing digital safeguarding, online safety, and oversight of filtering and monitoring arrangements.
- Liaising with SEND, pastoral, mental health, curriculum and IT colleagues, so needs are considered holistically.
- Ensuring safeguarding records are clear, factual, secure and include decisions, rationale, actions and outcomes.
- Ensuring appropriate transfer of safeguarding information at transition points.
- Ensuring staff training and updates remain current.

3.2 Governance Board including Governors and Trustees

The Governance Board provides strategic safeguarding oversight and ensures DISC complies with KCSIE 2026. The nominated safeguarding Governor/Trustee acts as the link between governance and the DSL. Governance responsibilities include:

- Reviewing this policy at least annually and monitoring its implementation and effectiveness.
- Ensuring Governors/Trustees receive appropriate safeguarding training.
- Monitoring safeguarding culture, safer recruitment and Single Central Record compliance.
- Ensuring there are appropriate filtering and monitoring arrangements and that their effectiveness is reviewed at least annually.
- Challenging and supporting the DSL and leadership team.

3.3 All Staff

All staff must:

- Read KCSIE 2026 Part One in full, including staff who do not work directly with children. The DfE overview is complementary and does not replace Part One.
- Know the identity and role of the DSL, Co-DSLs and DDSLs and understand DISC's safeguarding systems.
- Report concerns immediately and never assume someone else will act.
- Record concerns factually, promptly and with sufficient detail, including actions, decisions, rationale and outcomes.
- Maintain professional curiosity and professional boundaries.
- Complete mandatory safeguarding, online safety, filtering and monitoring and Prevent training/updates.
- Understand how to respond to disclosures and how to escalate concerns, including concerns about staff, volunteers, contractors or safeguarding practice.
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4. Types of Abuse, Neglect and Exploitation

DISC follows the definitions and expectations set out in KCSIE 2026 and Working Together to Safeguard Children. Abuse, neglect and exploitation can occur inside or outside the home, in education, in the community and online. Safeguarding issues frequently overlap.

4.1 Physical Abuse

May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. It may also include fabricated or induced illness.

4.2 Emotional Abuse

Persistent emotional maltreatment which causes severe and adverse effects on emotional development. This can include persistent criticism, belittling, name-calling, humiliation, intimidation, isolation, silencing a young person or exposing them to ill-treatment.

4.3 Sexual Abuse

Includes contact and non-contact sexual abuse, grooming and abuse facilitated online. DISC recognises that sexual abuse may be perpetrated by adults or by other children and that children under 13 can never consent to sexual activity.

4.4 Neglect

Persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development.

4.5 Child-on-Child Abuse (including harassment and violence)

DISC recognises child-on-child abuse as a safeguarding issue which is preventable and can cause significant harm to both victims and alleged perpetrators. It can include bullying, physical abuse, sexual harassment, sexual violence, harmful sexual behaviour, coercion, exploitation, initiation/hazing, prejudice-based abuse, misogynistic or misandrist abuse, and online abuse. Reports will never be dismissed as banter or an inevitable part of growing up.

4.6 Contextual / Extra-Familial Harm

Harm may occur outside the family in peer groups, intimate relationships, online spaces, neighbourhoods or community settings. This can include sexual exploitation, serious youth violence, criminal exploitation, financial exploitation, county lines, stalking and radicalisation.

4.7 Child Criminal Exploitation (CCE) and Modern Slavery

CCE can involve coercion, control, organised networks or gangs, county lines, forced criminality, financial exploitation and debt bondage. Exploitation may constitute modern slavery. Interns may be criminalised for behaviour carried out under coercion; DISC will consider safeguarding and referral pathways alongside any behavioural response.

4.8 Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse in which an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may be facilitated by an individual or organised network and most sexual abuse is committed by someone known to the victim.

4.9 Online Abuse and Technology-Facilitated Harm

Technology is a significant component of many safeguarding and wellbeing issues. Online and offline harms often occur concurrently. Risks include grooming, extortion, coercive control, harmful or illegal content, cyberbullying, scams, misogynistic/misandrist abuse, non-consensual image sharing and AI-enabled manipulation.

4.10 Nudes and Semi-Nudes, including AI-generated images

DISC will treat the making or sharing of nudes or semi-nudes involving a person under 18 as a safeguarding matter. This includes photographs, videos and livestreams that are self-generated, taken by another person, digitally altered or wholly generated using AI, including deepfakes or “deep nudes”. All incidents require a safeguarding response, whether the image sharing is described as consensual or non-consensual.

4.11 Prejudice-Based Harm and Violence Against Women and Girls

Staff must be alert to prejudice-based harm, including racism, faith-based prejudice and other discrimination, and to misogyny and gender-based harassment or violence. Such experiences may affect welfare, wellbeing, mental health and willingness to seek help and must be considered within safeguarding practice where appropriate.

4.12 Child-to-Parent or Caregiver Abuse

DISC recognises that children and young people can cause harm to parents, carers or other family members. Concerns will be considered through a safeguarding lens and appropriate support/referrals sought.

5. Specific Safeguarding Duties

5.1 Attendance and Absence

DISC recognises repeated and/or prolonged absence, frequent missing episodes, part-time timetables and disengagement as potential indicators of vulnerability or harm. DISC will record, monitor and analyse patterns; act promptly; engage with families and partners; and escalate concerns through safeguarding and attendance procedures where appropriate.

5.2 Alternative Provision (AP) / External Provision and Services

Where interns attend AP, work placements or external services, DISC retains safeguarding oversight. DISC will conduct appropriate due diligence, confirm safeguarding arrangements, obtain attendance and welfare information, respond immediately to concerns, maintain oversight of progress and review whether the placement remains safe and suitable.

5.3 Looked-After Children, Care-Experienced Interns and Kinship Care

The DSL will work with Virtual School Heads and other partners where relevant, monitor attendance, progress and welfare, support PEP processes, and ensure staff understand additional vulnerabilities and barriers.

5.4 Family Help, Community-Based Early Help and Statutory Intervention

KCSIE 2026 distinguishes between universal services/community-based early help and targeted early help delivered through Family Help. Staff must understand local pathways and thresholds and know when concerns require referral for statutory assessment under the Children Act 1989. Support should be offered as soon as problems emerge and concerns must not be allowed to drift.

5.5 Prevent Duty

DISC complies with the Prevent Duty. Staff will identify and respond to concerns about radicalisation, promote critical thinking and resilience, and make or support referrals to Channel where appropriate.

5.6 Mental Health

Mental health difficulties can, in some circumstances, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where safeguarding concerns are linked to mental health, the DSL will work with pastoral/SEND colleagues, the senior mental health lead where applicable, families and external services. Immediate safeguarding concerns will be acted on without delay.

5.7 Young Carers and Medical Conditions

DISC recognises the specific safeguarding and support needs of young carers and interns with medical or health conditions. Staff will consider whether caring responsibilities, health needs, treatment, attendance patterns or dependence on others create additional vulnerability or barriers to disclosure and support.

5.8 SEND and Additional Vulnerability

Children with SEND may face additional safeguarding barriers, including assumptions that behaviour or communication relates solely to disability, communication difficulties, increased risk of bullying and grooming, and online vulnerability. DISC will make reasonable adjustments and use communication approaches which enable interns to be heard and understood.

6. Online Safety, Generative AI and Digital Safeguarding

DISC adopts a whole-college approach to online safety and recognises that technology changes rapidly. Online safety is integrated into safeguarding, curriculum, staff training, IT practice and risk management.

6.1 The 4 Cs of Online Safety

- Content - illegal, harmful or misleading content, including extremist material, pornography, misinformation/disinformation, synthetic media and harmful algorithmic content.
- Contact - grooming, coercion, manipulation, extortion, harassment or enticement.

- Conduct - cyberbullying, harmful sexual behaviour, image sharing, misogynistic/misandrist abuse, harassment, risky challenges and digital reputation.
- Commerce - fraud, scams, gambling-style harms, microtransactions and targeted financial exploitation.

6.2 Filtering and Monitoring

DISC will ensure filtering and monitoring arrangements are appropriate to the setting and risk profile. Their effectiveness will be reviewed at least once every academic year by the SLT member responsible for filtering and monitoring, supported by the DSL and IT support. Reviews will include checks that filtering works appropriately on internet-connected devices in relevant locations, and records of checks will be retained. Alerts and incidents will be reviewed and acted on promptly.

6.3 Generative AI, Deepfakes and Emerging Technology

DISC will promote safe and effective use of generative AI. Staff and interns will be supported to understand AI-enabled grooming, harassment, deception, deepfakes/deep nudes, misinformation, privacy/data risks, bias and harmful synthetic content. AI-generated or manipulated material which raises a safeguarding concern will be managed through safeguarding procedures, not treated solely as an IT or behaviour issue.

6.4 Mobile Phones and Personal Devices

DISC will maintain clear expectations for the safe and appropriate use of mobile phones and personal devices. These expectations will consider safeguarding, accessibility, SEND, curriculum needs, photography/recording, image sharing, bullying and online harms. Concerns involving devices will be reported through safeguarding procedures.

6.5 Education and Curriculum

Safeguarding education will be developmentally appropriate and accessible, and will include healthy relationships, consent, online safety, digital literacy, misinformation/disinformation, grooming, exploitation, image sharing, AI-generated content, prejudice-based harm and responsible use of technology.

7. Safer Recruitment and Regulated Activity

DISC is committed to safer recruitment and to ensuring that staff, volunteers, Governors/Trustees and relevant contractors are suitable to work with children and vulnerable adults.

7.1 Advertising, Shortlisting and Interviews

- Job adverts include safeguarding statements and applicants are informed that safeguarding suitability will be assessed.
- Online searches are completed for shortlisted candidates in line with KCSIE.
- At least one safer recruitment-trained panel member participates.
- Employment history and gaps are scrutinised and safeguarding-specific questions are included.

7.2 Pre-Employment Checks and Single Central Record

- Enhanced DBS and Children's Barred List checks where legally required and eligible.
- Identity, right-to-work, qualifications and references are verified.
- Overseas and other relevant checks are completed where required.
- The Single Central Record is maintained accurately and kept up to date.

7.3 Regulated Activity - change from 1 September 2026

The Crime and Policing Act 2026 removed the "supervision exemption" from the definition of regulated activity with children from 1 September 2026. DISC will assess paid and volunteer roles against the revised definition. A person volunteering in a role involving teaching, training, instructing, caring for or supervising children may now be in regulated activity even where supervised, depending on the nature and frequency of the activity. Where a role is regulated activity, DISC will obtain the appropriate Enhanced DBS check with Children's Barred List information before permitting the person to undertake that regulated activity, subject to the applicable legal framework.

7.4 Volunteers, Contractors, Trainee Teachers and Work Experience

Safeguarding arrangements will explicitly cover volunteers, contractors, trainee teachers and work-experience arrangements. DISC will clarify safeguarding responsibilities with third-party organisations and will not assume that supervision removes the need to consider regulated activity or DBS eligibility.

8. Training

8.1 All Staff

All staff receive safeguarding and child protection training, including online safety and filtering/monitoring responsibilities, at induction and regular updates thereafter, at least annually. From September 2026, all staff must read KCSIE Part One in full. Training will include child-on-child abuse, harmful sexual behaviour, mental health, exploitation, modern slavery, prejudice-based harm, SEND vulnerability, AI/digital harms and local Family Help/referral pathways.

8.2 DSL, Co-DSL and DDSL Training

The DSL, Co-DSLs and DDSLs will undertake role-specific safeguarding training at least every two years, Prevent awareness training, and regular updates at least annually. Training will cover multi-agency working, Family Help/statutory thresholds, information sharing, online safety, SEND, mental health, exploitation and safeguarding record management.

8.3 Governors and Trustees

Governors and Trustees receive appropriate safeguarding training at induction and regular updates. They will understand their strategic responsibilities, including safer recruitment, filtering and monitoring, safeguarding culture, allegations/low-level concerns and the changes introduced by KCSIE 2026.

9. Reporting, Recording and Escalation

9.1 Reporting Concerns

Staff must report concerns to the DSL, Co-DSL or DDSL without delay. If a child is in immediate danger or at risk of immediate serious harm, staff must contact emergency services and inform the safeguarding team as soon as possible. If staff are unsure, they must speak to a member of the safeguarding team.

9.2 Responding to a Disclosure

- Listen calmly and take the intern seriously.
- Do not promise confidentiality and do not ask leading questions.
- Reassure the intern that they have done the right thing by speaking and that they will be supported.
- Record what was said accurately and report promptly.
- Consider communication needs, disability, language, trauma and the importance of trusted relationships.

9.3 Recording

Every safeguarding record must contain a clear and comprehensive summary of the concern, how it was followed up, actions taken, decisions reached, the rationale for those decisions and the outcome. Records must distinguish observed facts, professional opinion and historic information and be stored securely on a need-to-know basis.

9.4 Escalation and Whistleblowing

If staff believe a concern has not been appropriately addressed, they must escalate through the safeguarding team, Head of College, nominated safeguarding Governor/Trustee and/or external safeguarding partners as appropriate. Concerns about safeguarding practice may also be raised through DISC's whistleblowing arrangements. Staff may use the NSPCC Whistleblowing Advice Line where they feel unable to raise a concern internally.

9.5 Concerns or Allegations about Adults Working with Interns

Any safeguarding concern or allegation about a staff member, volunteer, trainee teacher, contractor or supply worker must be reported and managed in line with KCSIE Part Four and DISC procedures, including low-level concerns and referral to the Local Authority Designated Officer (LADO) where the threshold or local process requires this. DISC and any third-party employer/provider will share safeguarding responsibilities and cooperate fully.

10. Curriculum, RSHE and Harmful Sexual Behaviour

DISC integrates safeguarding through the curriculum and RSHE so interns develop the knowledge and skills to stay safe online and offline. Teaching is adapted to developmental stage and SEND needs.

- Healthy and respectful relationships, consent and personal boundaries.
- Sexual harassment, sexual violence and the continuum of harmful sexual behaviour (HSB).
- Digital citizenship, nudes/semi-nudes, online grooming and exploitation.
- AI, deepfakes, misinformation/disinformation and critical evaluation of online information.
- Prejudice-based harm, misogyny, discrimination and respectful behaviour.
- Mental health, help-seeking and trusted relationships.

All incidents involving nudes or semi-nudes involving under-18s require a safeguarding response. Responses to HSB, sexual harassment and sexual violence will be proportionate, child-centred, trauma-informed and will consider the needs and safety of all involved.

11. Information Sharing and Safeguarding Records

Effective information sharing is essential to safeguarding. DISC follows the Data Protection Act 2018, UK GDPR, Data (Use and Access) Act 2025, KCSIE 2026, Working Together to Safeguard Children and current DfE information-sharing guidance. Data protection law is not a barrier to sharing information where sharing is necessary and proportionate to safeguard a child.

11.1 Principles

- Share information lawfully, securely, proportionately and on a need-to-know basis.
- Consider the risk of sharing and the risk of not sharing.
- Record decisions and the rationale for sharing or not sharing.
- Seek advice where necessary without delaying action required to protect a child.

11.2 Transfer of Safeguarding Records

Safeguarding information must be transferred, reviewed and actioned promptly at transition points. For children leaving DISC, the child protection file should be transferred securely to the receiving school/college as soon as possible and within five days for an in-year transfer or within the first five days of a new term. Confirmation of receipt must be obtained. The transfer should include a clear structured summary of current concerns, relevant context and ongoing support needs, distinguishing current risk from historic information. Receiving staff should review the information promptly and seek clarification if it is incomplete or unclear.

12. KCSIE 2026 Update - Key Changes Embedded in this Policy

This September 2026 revision replaces the previous KCSIE 2025 references and incorporates the substantive changes in KCSIE 2026. Key changes relevant to DISC include:

- All staff, including those who do not work directly with children, are expected to read KCSIE Part One in full; the previous condensed Annex A has been removed.
- Updated early-help language: universal services/community-based early help and targeted early help through Family Help.
- Expanded safeguarding indicators and content on modern slavery, financial exploitation, child-to-parent/caregiver abuse, mental health and serious violence.
- Greater emphasis on prejudice-based harm, racism, misogyny and gender-based harassment/violence.
- Child-on-child abuse is explicitly framed as including harassment and violence, with strengthened content on harmful sexual behaviour.
- Updated terminology and safeguarding expectations for nudes and semi-nudes, including AI-generated/deepfake material; every incident requires a safeguarding response.
- Strengthened online safety expectations, including generative AI, mobile phones and annual effectiveness reviews of filtering and monitoring.
- More robust DSL cover arrangements when the DSL is unavailable.
- Expanded information-sharing expectations and clearer safeguarding record-transfer requirements.
- New/expanded consideration of young carers, SEND, medical conditions, mental health and Virtual School Head attendance support.
- Safer recruitment changes following removal of the regulated-activity supervision exemption from 1 September 2026.
- Expanded safeguarding responsibilities for volunteers, trainee teachers, contractors and third-party organisations.

13. Policy Review and Monitoring

This policy will be reviewed at least annually by the DSL and Governance Board, and sooner where there are changes to legislation, statutory guidance, local safeguarding arrangements, identified safeguarding risks or lessons from incidents. Implementation will be monitored through safeguarding reporting, staff training, case review, attendance analysis, filtering and monitoring review, safer recruitment/SCR checks and governance scrutiny.