

LSI Independent College

E-Safety Policy

Introduction

LSI Independent College recognises the important role that technology plays in the language learning process and fully supports and encourages the use and development of such technology as part of the student experience. This policy is to ensure that whilst doing this, we provide guidelines and support for this to be done in the safest possible way for staff and students.

The College's approach to E-Safety is informed by the 2023 Filtering and Monitoring guidance (See Appendix), which ensures that suitable filtering and monitoring processes and procedures are in place.

Responsibilities

Senior Management It is the responsibility of senior management and the proprietor to ensure that this policy is enforced and reviewed on an annual basis. It is the responsibility of the Principal to ensure that this policy is made known to all staff and students and that it is adhered to. This is to be done, as a minimum, through the following channels:

- Staff - induction procedures, staff handbook, posters and information in staff room, dissemination of this policy, Standards of Behaviour.
- Students - welcome booklet and talk, Code of Conduct, posters and information around school.

Staff

To be aware of the acceptable use set out below and to report any suspected abuse. To be aware of and abide by the acceptable use as set out below.

Students

To be aware of the acceptable use set out below and to report any suspected abuse. To be aware of and abide by the acceptable use as set out below.

Acceptable use

Staff Use

All staff are provided with access to wi-fi, computing and internet facilities, in both the staff room and classrooms. Any inappropriate use of these facilities is forbidden and will be a disciplinary issue. If deemed serious enough, it may be considered misconduct and result in dismissal (following investigation). Inappropriate use includes but is not limited to:

- Accessing/viewing sexual content or websites.
- Accessing/viewing violent content likely to cause distress.
- Accessing/viewing radical or extremist websites or content.
- Using foul or abusive language.
- Expressing radical or extremist views.
- Using social media or messaging services to bully, insult or intimidate other students or staff.
- Using social media or messaging services in any way which may harm the reputation of LSI.
- Engaging in any criminal activity.

Student use

All students are provided with access to wi-fi, computing and internet facilities, in both the loft and classrooms. Any inappropriate use of these facilities is forbidden and will be a disciplinary issue. If deemed serious enough, it may be considered misconduct and result in permanent exclusion (following investigation). Inappropriate use includes but is not limited to:

- Accessing/viewing sexual content or websites.
- Accessing/viewing violent content likely to cause distress.
- Accessing/viewing radical or extremist websites or content.
- Using foul or abusive language.
- Expressing radical or extremist views.
- Using social media or messaging services to bully, insult or intimidate other students or staff.
- Engaging in any criminal activity.

Social Media

LSI Social Media page

There is a portal available for staff and students to communicate via the official social media page. Any inappropriate communication via these channels is forbidden and will be a disciplinary issue. If deemed serious enough, it may be considered misconduct and result if

dismissal (following investigation). Inappropriate communication includes but is not limited to:

- Communication including sexual reference, images or language.
- Communication including violent reference, image or language
- Communication involving radical or extremist reference, image or language.
 - Communication involving foul or abusive language
 - Communication designed to bully, insult or intimidate.
 - Communication which may harm the reputation of LSI.

External communication including social media

Social media forms a significant part of modern day life. However, it is easily open to misinterpretation and abuse. As such:

- Staff are strongly advised not to make friends/connections or communicate through social media (facebook/twitter/snapchat etc) with students from LSI.
- Staff are not permitted to make friends/connections or communicate through social media (facebook/twitter/snapchat etc) with any students. This policy is to be reviewed on an annual basis.

This review by Dr Jan Capar: August 2024

Next review: August 2025

Appendix

Filtering and monitoring standards for schools and colleges

Standard 1. You should identify and assign roles and responsibilities to manage your filtering and monitoring systems

Schools and colleges should provide a safe environment to learn and work, including when online. Filtering and monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material.

Clear roles, responsibilities and strategies are vital for delivering and maintaining effective filtering and monitoring systems. It is important that the right people are working together and using their professional expertise to make informed decisions.

How to meet standard 1

Governing bodies/Advisory boards and proprietors have overall strategic responsibility for filtering and monitoring and need assurance that the standards are being met.

To do this, they should identify and assign:

- a member of the senior leadership team and a governor/board member, to be responsible for ensuring these standards are met;
- the roles and responsibilities of staff and third parties, for example, external service providers .

There may not be full-time staff for each of these roles and responsibility may lie as part of a wider role within the school/college. However, it must be clear who is responsible and it must be possible to make prompt changes to your provision.

Technical requirements to meet standard 1

The senior leadership team are responsible for:

- procuring filtering and monitoring systems
- documenting decisions on what is blocked or allowed and why
- reviewing the effectiveness of your provision
- overseeing reports

They are also responsible for making sure that all staff:

- understand their role;
- are appropriately trained;
- follow policies, processes and procedures;
- act on reports and concerns.

Senior leaders should work closely with governors/board members or proprietors, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring. Your IT service provider may be a staff technician or an external service provider.

Day-to-day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The DSL should work closely together with IT service providers to meet the needs of your setting. You may need to ask filtering or monitoring providers for system specific training and support.

The DSL should take lead responsibility for safeguarding and online safety, which could include overseeing and acting on:

- filtering and monitoring reports;
- safeguarding concerns;
- checks to filtering and monitoring systems.

The IT service provider should have technical responsibility for:

- maintaining filtering and monitoring systems;
- providing filtering and monitoring reports;
- completing actions following concerns or checks to systems.

The IT service provider should work with the senior leadership team and DSL to:

- procure systems;
- identify risk;
- carry out reviews;
- carry out checks.

Standard 2. You should review your filtering and monitoring at least once a year

For filtering and monitoring to be effective it should meet the needs of your pupils and staff, and reflect your specific use of technology while minimising potential harms.

To understand and evaluate the changing needs and potential risks of your school or college, you should review your filtering and monitoring provision, at least annually.

Additional checks to filtering and monitoring need to be informed by the review process so that governing bodies and proprietors have assurance that systems are working effectively and meeting safeguarding obligations.

How to meet standard 2

Governing bodies/board members and proprietors have overall strategic responsibility for meeting this standard. They should make sure that filtering and monitoring provision is reviewed, which can be part of a wider online safety review, at least annually.

The review should be conducted by members of the senior leadership team, the designated safeguarding lead (DSL), and the IT service provider and involve the responsible governor/board member. The results of the online safety review should be recorded for reference and made available to those entitled to inspect that information.

Your IT service provider may be a staff technician or an external service provider.

Technical requirements to meet standard 2

A review of filtering and monitoring should be carried out to identify your current provision, any gaps, and the specific needs of your pupils and staff.

You need to understand:

- the risk profile of your pupils, including their age range, pupils with special educational needs and disability (SEND), pupils with English as an additional language (EAL);
- what your filtering system currently blocks or allows and why;
- any outside safeguarding influences, such as county lines;
- any relevant safeguarding reports;
- the digital resilience of your pupils;
- teaching requirements, for example, your RHSE and PSHE curriculum;
- the specific use of your chosen technologies, including Bring Your Own Device (BYOD);
- what related safeguarding or technology policies you have in place;
- what checks are currently taking place and how resulting actions are handled.

To make your filtering and monitoring provision effective, your review should inform:

- related safeguarding or technology policies and procedures;
- roles and responsibilities;
- training of staff;
- curriculum and learning opportunities;
- procurement decisions;
- how often and what is checked;
- monitoring strategies.

The review should be done as a minimum annually, or when:

- a safeguarding risk is identified;
- there is a change in working practice, like remote access or BYOD;

- new technology is introduced.

There are templates and advice in the reviewing online safety section of KCSIE.

Checks to your filtering provision need to be completed and recorded as part of your filtering and monitoring review process. How often the checks take place should be based on your context, the risks highlighted in your filtering and monitoring review, and any other risk assessments. Checks should be undertaken from both a safeguarding and IT perspective.

When checking filtering and monitoring systems you should make sure that the system setup has not changed or been deactivated. The checks should include a range of:

- school owned devices and services, including those used off site;
- geographical areas across the site;
- user groups, for example, teachers, pupils and guests.

You should keep a log of your checks so they can be reviewed. You should record:

- when the checks took place;
- who did the check;
- what they tested or checked;
- resulting actions.

You should make sure that:

- all staff know how to report and record concerns;
- filtering and monitoring systems work on new devices and services before releasing them to staff and pupils;
- blocklists are reviewed and they can be modified in line with changes to safeguarding risks.

Particular reference for any review should include as a minimum:

- illegal child sexual abuse material ;
- unlawful terrorist content;
- adult content.

Standard 3. Your filtering system should block harmful and inappropriate content, without unreasonably impacting teaching and learning

An active and well managed filtering system is an important part of providing a safe environment for pupils to learn.

No filtering system can be 100% effective. Schools/colleges need to understand the coverage of your filtering system, any limitations it has, and mitigate accordingly to minimise harm and meet your statutory requirements in (KCSIE) and the Prevent Duty.

An effective filtering system needs to block internet access to harmful sites and inappropriate content. It should not:

- unreasonably impact teaching and learning or school administration;
- restrict students from learning how to assess and manage risk themselves.

How to meet standard 3

Governing bodies/board members and proprietors need to support the senior leadership team to procure and set up systems which meet this standard and the risk profile of the school or college.

Management of filtering systems requires the specialist knowledge of both safeguarding and IT staff to be effective. Schools/colleges may need to ask your filtering provider for system specific training and support.

Technical requirements to meet standard 3

Make sure your filtering provider is:

- a member of Internet Watch Foundation (IWF);
- signed up to Counter-Terrorism Internet Referral Unit list (CTIRU);
- blocking access to illegal content including child sexual abuse material (CSAM).

If the filtering provision is procured with a broadband service, make sure it meets the needs of your school or college.

Your filtering system should be operational, up to date and applied to all:

- users, including guest accounts;
- school owned devices;
- devices using the school broadband connection.

Your filtering system should:

- filter all internet feeds, including any backup connections;
- be age and ability appropriate for the users, and be suitable for educational settings;

- handle multilingual web content, images, common misspellings and abbreviations;
- identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them;
- provide alerts when any web content has been blocked.

Mobile and app content is often presented in a different way to web browser content. If your users access content in this way, you should get confirmation from your provider as to whether they can provide filtering on mobile or app technologies. A technical monitoring system should be applied to devices using mobile or app content to reduce the risk of harm.

It is important to be able to identify individuals who might be trying to access unsuitable or illegal material so they can be supported by appropriate staff, such as the senior leadership team or the designated safeguarding lead.

Your filtering systems should allow you to identify:

- device name or ID, IP address, and where possible, the individual;
- the time and date of attempted access;
- the search term or content being blocked.

Schools and colleges will need to conduct their own data protection impact assessment (DPIA) and review the privacy notices of third party providers. A DPIA template is available from the ICO. The DfE data protection toolkit also includes guidance on privacy notices and DPIAs. Furthermore, The UK Safer Internet Centre has guidance on establishing appropriate filtering.

Your senior leadership team may decide to enforce ‘Safe Search’, or a child friendly search engine or tools, to provide an additional level of protection for your users on top of the filtering service.

All staff need to be aware of reporting mechanisms for safeguarding and technical concerns. They should report if:

- they witness or suspect unsuitable material has been accessed;
- they can access unsuitable material;
- they are teaching topics which could create unusual activity on the filtering logs;
- there is failure in the software or abuse of the system;
- there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks;
- they notice abbreviations or misspellings that allow access to restricted material.

Dependencies to the standard

Check that you meet:

- Broadband internet standards;
- Cyber security standards.

Standard 4. You should have effective monitoring strategies that meet the safeguarding needs of your school or college,

Monitoring user activity on school and college devices is an important part of providing a safe environment for children and staff. Unlike filtering, it does not stop users from accessing material through internet searches or software.

Monitoring allows you to review user activity on school and college devices. For monitoring to be effective it must pick up incidents urgently, usually through alerts or observations, allowing you to take prompt action and record the outcome.

Your monitoring strategy should be informed by the filtering and monitoring review. A variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users;
- live supervision by staff on a console with device management software;
- network monitoring using log files of internet traffic and web access;
- individual device monitoring through software or third-party services.

How to meet standard 4

Governing bodies/board members and proprietors should support the senior leadership team to make sure effective device monitoring is in place which meets this standard and the risk profile of the school or college.

The designated safeguarding lead (DSL) should take lead responsibility for any safeguarding and child protection matters that are picked up through monitoring.

The management of technical monitoring systems require the specialist knowledge of both safeguarding and IT staff to be effective. Training should be provided to make sure their knowledge is current. You may need to ask your monitoring system provider for system specific training and support.

Technical requirements to meet standard 4

Governing bodies/board members and proprietors should support the senior leadership team to review the effectiveness of your monitoring strategies and reporting process. Make sure that incidents are urgently picked up, acted on and outcomes are recorded. Incidents could be of a malicious, technical, or safeguarding nature. It should be clear to all staff how to deal with these incidents and who should lead on any actions.

The UK Safer Internet Centre has guidance for schools and colleges on establishing appropriate monitoring.

Device monitoring can be managed by IT staff or third party providers, who need to:

- make sure monitoring systems are working as expected;
- provide reporting on pupil device activity;
- receive safeguarding training including online safety;
- record and report safeguarding concerns to the DSL.

Make sure that:

- monitoring data is received in a format that your staff can understand;
- users are identifiable to the school or college, so concerns can be traced back to an individual, including guest accounts.

If mobile or app technologies are used then you should apply a technical monitoring system to the devices, as your filtering system might not pick up mobile or app content.

In the online safety section of KCSIE there is guidance on the 4 areas of risk that users may experience when online. Your monitoring provision should identify and alert you to behaviours associated with them.

Technical monitoring systems do not stop unsafe activities on a device or online. Staff should:

- provide effective supervision;
- take steps to maintain awareness of how devices are being used by pupils;
- report any safeguarding concerns to the DSL.

School and college monitoring procedures need to be reflected in your Acceptable Use Policy and integrated into relevant online safety, safeguarding and organisational policies, such as privacy notices.

Schools and colleges that have a technical monitoring system will need to conduct their own data protection impact assessment (DPIA) and review the privacy notices of third party

providers. A DPIA template is available from the ICO, and the DfE includes guidance on privacy notices and DPIAs.

Dependencies to the standard

Check that you meet:

- Cyber Security Standards

Useful hyperlinks

- [The DfE data protection toolkit](#)
- [Cyber security standards](#)
- [A DPIA template](#) from ICO.
- The UK Safer Internet Centre has guidance for schools and colleges on establishing [appropriate monitoring](#).
- [Broadband internet standards](#)