

# LSI Independent College

## Safeguarding Students Policy and Procedures

**Date of policy review: August 2024**

**Next review: August 2025**

**Lead for review: Principal**

## **Introduction**

LSI Independent College fully recognizes the responsibilities it has to safeguard all students under 18 in our care. We recognize that all staff and students, including volunteers, have a full and active part to play in protecting our students aged under 18 from harm. This policy applies to all staff and volunteers working for LSI Independent College.

All staff members believe that our school should provide a caring, positive, safe and stimulating environment, which promotes the individual's learning and well-being.

This policy is drawn up in accordance with Camden Safeguarding Children Partnership (CSCP) and in compliance with the DfE guidance: "Keeping Children Safe in Education (September 2023)".

The aims of this policy are:

- To practise safe recruitment in checking the suitability of staff and volunteers to work with students (Including DBS checks where appropriate);
- To raise the awareness of both teaching and non-teaching staff and volunteers of the need to safeguard students, including raising awareness of signs of bullying, radicalization and extremism, both on and off line;
- To ensure that all staff maintain appropriate behaviour and follow LSI Independent College standards and procedures when in contact with students. This is important not only in safeguarding students, but also in protecting staff from wrongful accusation;
- To establish a safe environment in which students can learn and develop;
- To emphasise the need for good channels of communication between all members of staff and volunteers;
- To put in place a structured procedure within the College to be followed in cases or suspected cases of abuse;
- To develop and promote effective working relationships and channels of communication with other agencies, including the police and Family Services/Social Work (FSSW).

The emphasis of this Safeguarding Policy is on prevention. However, we recognize that there may be occasions when staff, students, or external contacts have concerns about potential or actual harm to students aged under 18. This policy makes provision for such complaints, ensuring any such concerns can be acted on appropriately.

## **Key Contacts**

### **Principal**

Name: David Immanuel

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### **Designated Senior Lead for Safeguarding and Child Protection**

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**Deputy DSL**

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**Deputy DSL**

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**Nominated Governor for Child Protection**

Name: Lynn Duncan

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**Camden Contacts****Child Protection Lead Officer and Local Authority Designated Officer (LADO)**

Name: Kurt Ferdinand

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**Safeguarding Lead Officers**

Name: Michelle O'Regan, Head of Service – Children in Need

Contact details: 0207 974 1905

Name: Tracey Murphy, Service Manager

Contact details: 0207 974 4103

Name: Patricia Williams, Service Manager

Contact details: 0207 974 1558

**Children's Contact Service/MASH team**

Manager: Jade Green/David Jaggs

Contact details: 0207 974 1553/3317

**Online Safety Contact Officer**

Name: Jenny Spencer

Contact details: 0207 974 2866

**Early Help/CAF team contact**

Name: Emma Haigh

Contact details: 0207 974 8832/8791

**Prevent Education Officer**

Name: Jane Murphy

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**Procedures**

Our school procedures for safeguarding students will be in line with national guidance and the London Child Protection Procedures under the auspices of the Camden Safeguarding Children Partnership (CSCP).

We will ensure that:

- We have a Designated Safeguarding Lead (DSL) who undertakes regular training (equivalent to a minimum of two days every two years) in Safeguarding, Student Protection and Inter-Agency working and has successfully completed a Safeguarding Students, Designated Person, level 3 training programme.
  - He will liaise with local statutory students' agencies as appropriate.
  - All students, members of staff, volunteers and staff from external and supply agencies are aware that he is the Designated Safeguarding Lead, responsible for student protection matters;
- Eda Cinar is the alternate Designated Safeguarding Lead, responsible for Safeguarding in the DSL's absence;
- Safer recruitment practices followed at all times for in-house staff.
  - All members of staff with regular unsupervised access to students are subject to enhanced DBS clearance;
  - Identity checks include sight of original passport, qualifications, utility bill, bank statement and driving license and right to work in the UK;
  - References are sought and checked, gaps on CVs investigated and self-declarations signed;
  - Potential staff are advised that we are a safer recruiter and that these steps will be taken;
- Enhanced DBS checklists are housed securely. There is also a single centralised register of all staff, including supply staff;
- Written confirmation sought from all external agencies that their staff, (when given regular unsupervised access to students in our care), have been appropriately screened and that all checks have been carried out on their staff's identity, medical and physical fitness to work with students, references, right to work in the UK and their suitability to work with students;
- Student behavioural policies and student contracts implemented to work against bullying. Posters and signage to promote awareness of bullying for students. This includes cyber bullying;
- Staff training and documentation to raise awareness of the signs of bullying. This to be done at induction and included in the three year safeguarding refresher training;
- All staff to complete Safeguarding Level 1 and Prevent training as part of induction;
- All staff to be given this Safeguarding Policy and Part 1 of Keeping Children Safe in Education (September 2024);
- Allegations against LSI Independent Sixth Form College staff reported to LSI Sixth Form College management immediately. Set procedures in place for management response established to protect both the student and the adult. (Details below)
- All new members of staff and adult volunteers will be alerted to the proper procedures as part of their induction into the school;
- Our procedures will be regularly reviewed and up-dated.
- All staff members are required to complete **annual safeguarding training** to ensure they are up to date with current safeguarding procedures. Additionally, all staff must sign to confirm they have read **Part 1** of the "Keeping Children Safe in Education"

(KCSIE) document. Staff who work directly with students are also required to read and sign to confirm their understanding of **Annex B**. This process is recorded and monitored to ensure full compliance.

- **Safeguarding** is the process of protecting children from abuse, neglect, and harm while ensuring their safety and wellbeing. It involves actively **promoting the welfare of children**, which includes providing a safe environment, ensuring their health and development, and supporting their educational and emotional needs. Safeguarding also encompasses taking preventative measures to avoid harm and responding effectively to concerns or risks that may arise.

### **Early Help Provision:**

At **LSI Independent College**, we are committed to providing **Early Help** to children, young people, and families as part of our safeguarding approach. Early Help is designed to identify concerns at the earliest stage and provide support to prevent issues from escalating.

### **Principles of Early Help:**

- **Prevention and Early Intervention:** We aim to address issues as soon as they arise to ensure that students receive the right support at the right time.
- **Holistic Approach:** Our Early Help provision considers the needs of the whole family and seeks to provide integrated support, involving various professionals where appropriate.
- **Multi-Agency Collaboration:** We work closely with external agencies, including health services, social care, educational psychologists, and local Early Help teams, to offer comprehensive support.
- **Voluntary Engagement:** We respect the voluntary nature of Early Help, working in partnership with students and their families to develop tailored intervention plans.

### **When Early Help is Provided:**

Early Help may be offered when concerns are identified in the following areas:

- Emotional and behavioral difficulties
- Attendance and punctuality issues
- Family circumstances affecting the student's welfare
- Mental health challenges
- Developmental delays or special educational needs

### **Referral and Support Process:**

- **Staff Training:** All staff are trained to recognize when Early Help may be appropriate and how to refer students for support.
- **Parental Involvement:** Parents and guardians will be consulted and involved in the Early Help process, ensuring collaboration and transparency.

- **Monitoring and Review:** The progress of students receiving Early Help is regularly reviewed, and adjustments are made to ensure ongoing effectiveness.

### **Data Protection and Safeguarding:**

LSI Independent College is committed to ensuring the confidentiality and security of all personal data as part of our safeguarding duties. We recommend the use of the **Department for Education (DfE) 'Data Protection Guidance'** to ensure that staff understand and comply with data protection regulations when handling sensitive information related to safeguarding. This guidance helps ensure that the personal information of students and their families is managed in accordance with the law, particularly in relation to safeguarding concerns.

All staff are expected to familiarize themselves with the DfE's guidance and adhere to the procedures it outlines to ensure the correct handling of data.

### **International Students' Safeguarding Policy**

#### **1. Safeguarding Responsibilities for International Students:**

LSI Independent College is committed to ensuring the safety and well-being of all students, including international students, who may be particularly vulnerable due to their status as non-UK nationals. We recognize that these students may face additional challenges, such as cultural differences, language barriers, and a lack of familiar support networks.

#### **2. Cultural Sensitivity and Inclusion:**

The college is committed to fostering an inclusive environment where international students feel safe, respected, and supported. All staff members receive training on cultural sensitivity to understand the diverse backgrounds of our international students. This includes recognizing and responding to any specific cultural needs and providing appropriate support.

#### **3. Guardianship for International Students:**

For international students under the age of 18, the college requires a UK-based guardian. Guardians should be at least 25 years old and preferably hold a British passport. Guardianship arrangements are closely monitored to ensure compliance with safeguarding standards. The college can assist in finding approved guardians if necessary, maintaining a list of trusted UK-approved guardianship agencies.

#### **4. Communication and Reporting:**

Regular communication with parents or guardians of international students is vital to ensure their safety and well-being. The college will promptly inform parents or guardians about any concerns, absences, or disciplinary actions involving their child. Parents and guardians are encouraged to maintain open communication with the college and schedule meetings with the Senior Leadership Team (SLT) if needed.

#### **5. Support Services for International Students:**

The college provides tailored support services for international students, including:

- Access to counsellors and pastoral care staff who are trained to deal with the unique challenges faced by international students.
- Regular check-ins to monitor well-being and academic progress.

- Language support and integration programs to help international students adjust to life in the UK.

#### 6. Safeguarding Measures During Off-Site Activities:

International students will be given additional support and guidance during off-site activities, such as field trips or external visits. Specific risk assessments will be conducted, taking into account the particular needs and vulnerabilities of international students.

#### 7. Emergency Procedures:

In the event of an emergency involving an international student, the college will immediately contact the designated guardian. The guardian is expected to take responsibility for the student's welfare and assist in making any necessary arrangements.

### **Responsibilities**

The Designated Safeguarding Lead works together with the Proprietor, Mr David Immanuel, and LSI Education Senior Management Advisor, Mr Roy Immanuel, all of whom have successfully completed a Safeguarding Students, Designated Person, level 3 training programme with the NSPCC. The relevant governor for Safeguarding is Lynn Duncan. The DSL performs an annual review of the Safeguarding documentation and an on-site inspection of the school to ensure that relevant staff training is appropriate and up to date. The DSL reports his findings to the proprietor, Mr David Immanuel.

#### **The proprietor is responsible for:**

- Conducting an annual review of the school's safeguarding, Child Protection policies and procedures and of the efficiency with which the related duties have been discharged;
- Ensuring that any deficiencies or weaknesses in Safeguarding, Student Protection arrangements are remedied without delay;
- Approving amendments to safeguarding, student protection arrangements in the light of changing regulations or recommended best practice;
- The Proprietor, Mr. David Immanuel, has a legal duty to respond to requests from the ISA for information he holds.

#### **The Designated Safeguarding Lead is responsible for:**

- Adhering to Camden Safeguarding Children Partnership (CSCP) and national guidance, London Child Protection Procedures, and College procedures with regard to referring a student if there are concerns about possible abuse;
- Ensuring that all Child Protection takes place and that all staff are aware of their needs to safeguard students at all times;
- Keeping written records of concerns about a student even if there is no need to make an immediate referral;
- Ensuring that all such records are kept confidentially and securely and are separate from student records;
- Operating safer recruitment procedures (including DBS checks and compliance with Independent Schools Standards Regulations);
- Ensuring that any deficiencies or weaknesses in Safeguarding, Child Protection arrangements are remedied without delay and the appropriate manager made aware;

- Arranging relevant staff training;
- Supporting students.

### **Safer Employment Practices**

LSI Independent College complies with all legal and regulatory requirements for safer recruitment and employment of all staff. All posts which have a clear need for direct access to students are subject to criminal records clearance. In accordance with national guidelines, all staff with regular, unsupervised access to students and young people up to age 18 must have DBS checks. Written confirmation of appropriate screening is sought from supply agencies and external organisations prior to commencing work. Further identification checks are carried out upon arrival. CVs on their own are not accepted, but must be accompanied by the College application form.

To deter unsuitable people from applying for positions in our organization, the recruitment process, including job postings and interviews, ensures that candidates know LSI Independent College is committed to safeguarding students in our care.

### **All Staff are aware of:**

- The contents of the Safeguarding Policy and have the opportunity to ask questions in relation to policy and procedures;
- Guidelines for staff, to ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student (for example one to one tuition, conveying a student by car, engaging in inappropriate electronic communication with a student and so on). This is outlined in the Standards of Behaviour, signed by all staff;
- Procedures for dealing with abuse by one or more students against another;
- The need to support/monitor any student as required;
- Procedures for dealing with accusations of abuse.
- Staff should be aware that children are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused.

### **Supporting Students**

LSI Independent College is committed to equal treatment for all students regardless of an individual's race, ethnicity, sexual orientation, social background or special educational needs. We aim to create a friendly, caring and perceptive environment in which every individual is valued the core values of democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs are supported and promoted.

Victims should be taken seriously, kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

LSI Independent College will support all students by:

- Encouraging self-esteem and confidence whilst not condoning aggression or bullying;
- Promoting a caring, safe and positive environment within the school;



- Providing clear guidelines to students and their parents on what behaviour is unacceptable and will result in disciplinary measures and expulsion from the course; bullying, incidents of racism or attacks on ethnicity, sexual orientation, social background or special educational needs, illegal activity or dangerous behaviour that may cause harm to the student or to others;
- Providing a forum for students under 18 to raise issues with management in addition to the open door policy through regular tutorials and student council meetings;
- Promoting core values of democracy, rule of law including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

## The Management of Safeguarding

The LSI Independent College governing board should ensure that all governors receive appropriate safeguarding and child protection training (including online) at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010<sup>22</sup>, (including the Public Sector Equality Duty<sup>23</sup>), and their local multi-agency safeguarding arrangements<sup>24</sup>.

**The Human Rights Act 1998 (HRA)** sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific Convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,<sup>25</sup> and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

## Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate

relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

### **Safeguarding Vulnerable Children**

Some children are living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes. Some may need from Family Services, Social Work to (FSSW) or other agencies in order to overcome problems or keep them safe.

### **Children at Risk of Sexual Exploitation**

Child Sexual Exploitation describes situations where a young person takes part in sexual activity either under duress or in return for goods, food or accommodation. It normally takes place in the context of an exploitative relationship where there is a power imbalance between the young person and their abuser, for example, a much older boyfriend. Often, the young person is not aware that they are being abused, but a feature of the exploitation is that the young person cannot be said to have given proper consent.

In order to protect these young people, the College needs to make appropriate referrals to FSSW. Some children may already be in exploitative sexual relationships, while others may be being groomed. In particular, the College should be aware of students who are truanting, who have unexplained expensive goods or who talk to other students about a much older sexual partner.

### **Children at Risk of Female Genital Mutilation (FGM)**

Schools have a mandatory duty to report known cases of FGM on girls under the age of 18 to the police. FGM is a cultural practice that involves a procedure to remove part or all of a young girl's female genital organs. UK law regards FGM as violence against women and girls and forbids the practice in the UK or the removal of a woman or girl to another country for the purpose of carrying out the procedure.

The practice of FGM can be found mainly amongst communities from sub-Saharan Africa, but can also be practised in communities from the Middle East and Asia. The procedure can be carried out at any age from birth onwards, but the average age tends to be 10 to 12 years old. The practice can have negative health consequences for the girl both in the short and long term.

The College needs to be aware of girls who are who are at risk of FGM or who have been abused through FGM. For those at risk, the College should be aware of family plans to take the girl out of the UK for a prolonged period. If there is good reason to suspect that the child may be about to have the procedure, the College should contact FSSW without notifying parents.

All concerns about FGM, including any disclosure made by a student, will be discussed with the DSL before any action is taken.

### **Children at Risk of Forced Marriage**

Any young person who is being forced into a marriage to which they do not consent is considered as a victim of child abuse and should be protected. They are likely to be in conflict with their family and may have little trust of adults, especially those from their own community. The family may have made plans to take the young person abroad for the marriage and, once this has happened, it becomes more difficult for the authorities in the UK to intervene.

The Forced Marriage Unit of the Foreign and Commonwealth Office has issued guidance for agencies on what action to take when there is reasonable cause to believe a young person may be being forced into marriage. Chapter 7 of this guidance deals exclusively with the role of schools.

If the College is concerned that a young person is about to be taken out of the UK for the purposes of a forced marriage, it will notify FSSW immediately. The family should not be notified or approached in any way. The College should remain aware of a family's plan to go overseas for a period of time and also if an older sibling has been known to have been forced to marry.

### **Children Who Run Away**

Running away is a dangerous activity that puts children at risk. The College needs to be aware of the Camden Safeguarding Children Partnership guidance on missing children so that they are clear of their role in helping to locate missing children and actions the College can take to help them integrate into College on their return.

If the College is worried about a child or young person who is thinking about running away, it can refer the young person to the Barnado's project on 0207 700 2253 for support in helping the College deal with issues and stop them running away.

The College should be aware that going missing is an indicator of other issues, such as child sexual exploitation, gang activity and trafficking.

### **Young People Living with Domestic or Sexual Violence**

Schools can refer young people affected by domestic or sexual violence to the specialist worker based in the Camden Safety Net on 0207 974 1864 for advice and support. Schools and colleges should also be aware that the definition of domestic abuse now includes victims aged 16 and 17 years old and that these victims should be referred to Camden Safety Net for a service in their own right.

### **Young People at Risk from Gang Activity or Serious Youth Violence/Child Criminal Exploitation**

Some young people may be at risk either because they are involved in gang activity or because they become a victim of gangs. Gang members may also be putting younger siblings at risk of

violence from rival gangs, or younger siblings may be being groomed into the gang culture. Female siblings in particular may be at risk of sexual exploitation or sexual violence.

Girls as well as boys can be at risk of being criminally exploited, although the experience of girls being criminally exploited may be very different to that of boys.

To help reduce the risks posed by gang activity, the College can refer young people to the Young Person's Advocate based in the Youth Offending Service on 0207 974 7174 for advice.

### **Trafficked Children**

Some children may have been illegally brought into the UK for the purposes of commercial gain, for example, as domestic servants or forced labour. They will be heavily controlled by their exploiters and likely to be moved frequently in order to avoid detection by the authorities. This includes young people who are being criminally exploited under the county lines model.

To avoid suspicion, traffickers may enrol a child on entry to the UK posing as a family member but remove the child from school shortly after. Schools need to be aware of any child who suddenly disappears off the school roll with no prior explanation, or applications for a place at the school for several unrelated children from the same address.

Any concerns about a child should be notified to FSSW. Further details can be found in the Camden Safeguarding Children Partnership guidance on child trafficking.

### **Privately Fostered Children**

A privately fostered child is a child or young person aged up to 16 who is cared for by someone who is not a parent or close family member such as a grandparent, aunt, uncle or sibling and where the arrangement will not last more than 28 days.

Private fostering is a private arrangement between parents and the carer and normally happens when parents are working or studying away or a child is sent to the UK to live with family friends or distant relatives. In general, privately fostered children are well cared for, but some arrangements may be a cover for trafficking.

### **Young Carers**

Young carers are children who frequently take on responsibility for looking after parents or younger siblings, carrying out household tasks such as cleaning and cooking beyond what would normally be expected of a child their age. This may be due to parental disability or ill health. Being a young carer can severely restrict a child's life and can lead to poor educational outcomes and social isolation.

If the College has a concern about a student it believes to be a young carer, it can contact Family Action on 0207 272 6933 for advice and can refer the student on for services and support.

## Young People at Risk of Radicalization and Extremism

The College's safeguarding duty includes the duty to promote British values in order to counter the extremist narrative and prevent young people from being radicalized and drawn into terrorism.

Under the Counter-Terrorism and Security Act 2015, the College has a duty to refer young people on to Camden's Channel Panel under the Prevent strategy where there are concerns that they are being radicalized.

Where the College has concerns that a young person might be considering extremist ideologies and/or may be radicalized and would benefit from specialist support to challenge extremist ideologies, or that a younger students may be at risk due to their parents' radicalization, the College will follow the guidance set out in the CSCB guidance, "Safeguarding Children and Young People from Radicalization and Extremism".

Schools should always be a safe space for young people to explore new ideas and perspectives and develop their critical thinking skills. Where there are concerns about radicalization and a referral to the Channel Panel is being considered, the College should discuss these concerns internally and also consider external advice and guidance where necessary and appropriate.

The College DSL should be consulted for advice on making a referral. Prior to making a referral, the College may also get advice from the Police Prevent Engagement Officer (Mark Fowler, [Mark.P.Fowler@met.pnn.police.uk](mailto:Mark.P.Fowler@met.pnn.police.uk), 0208 733 6014), Camden's Prevent co-ordinator (Karina Kaur, [karina.kaur@camden.gov.uk](mailto:karina.kaur@camden.gov.uk), 0207 974 6050) or the Prevent Education Officer (Jane Murphy, [jane.murphy@camden.gov.uk](mailto:jane.murphy@camden.gov.uk), 0207 974 1008).

## Children Who are Missing From Education

The College needs to be aware of those students who are persistently missing or absent as this may be an indicator of welfare concerns.

Attendance policies should state clearly who needs to be notified, what action should be taken and any relevant timescales. Parents should be asked to provide contact details for at least two people who may be contacted.

## Children with SEND

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. The governing board and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

## Children who are LGBT

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor

for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

### **Child-on-Child Abuse**

Where a student's behaviour is likely to cause significant harm to other students, for example, through bullying, cyberbullying, physical violence or initiation rites, the College will refer the perpetrator and the victim to the Child and Family Contact team under the Child on Child abuse protocol.

The College aims to minimize the risk of child on child abuse by adopting the approach that "it could happen here" and to be alert to early warning signs. Even though there may be no recorded instances of child on child abuse, such abuse may be taking place without being reported. Systems are in place for students to report abuse confidently, knowing that their concerns will be treated seriously. Any victims of child-on-child abuse will be fully supported by the relevant members of staff. The College has a zero-tolerance approach on child on child abuse.

Child-on-child abuse can take the following forms and in all cases will result in a robust response from the College:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- Abuse in intimate personal relationships between peers;
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- Sexual violence and sexual harassment;
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Upskirting, which is a criminal offence and typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, alarm;
- Initiation/hazing type violence and rituals.

### **Harmful Sexual Behaviour, Sexual Violence and Harassment**

The College recognizes that sexual violence and sexual harassment between students, including behaviours such as upskirting and the sharing of nude and semi-nude images, is a

serious safeguarding issue and such behaviour will not be tolerated. The College anti-bullying policy reflects the College's approach to this issue.

The College will follow the statutory guidance, "Sexual Violence and Sexual Harassment between Pupils" and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and to ensure a safe learning environment for all students.

The College will take all necessary steps to put in place a planned RHSE curriculum to convey the College's policy for preventing harmful sexual behaviour and to promote respectful behaviour between students with regard to sexual conduct.

The College will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the College and, where appropriate, referrals made to the police and FSSW.

The College will ensure that staff members receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all students.

The College will ensure staff members are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

The DfE has produced a one-stop hub for teachers which can be accessed at [Teaching about relationships sex and health \(Gov.uk\)](#). This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

### **Factors outside the College**

The College is aware that as young people grow more independent, they may face more risk from safeguarding threats from outside the home, either from within the community, at College or from their own peer group.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between students outside of these environments. All staff, but especially the Designated Safeguarding Lead and Deputy should consider whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

## Online Safety (Also see Appendix 1 on Filtering and Monitoring)

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole College approach to online safety empowers the College to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

**Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

**Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

**Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. These can be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

The governing board and proprietor should ensure online safety is a running and interrelated theme whilst devising and implementing their whole college approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the DSL (and deputy) and any parental engagement.

Guidance to support schools and colleges understand how to help keep pupils, students and staff safe whilst learning remotely can be found at [Safeguarding and remote education -GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/safeguarding-and-remote-education) and [Providing remote education: guidance for schools-GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/providing-remote-education). The NSPCC also provide helpful advice-[Undertaking remote teaching safely](https://www.nspcc.org.uk/keeping-children-safe/keeping-children-safe-online/undertaking-remote-teaching-safely).

The College is in regular contact with parents and carers. These communications should be used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the College their child is going to be interacting with online.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the governing board and proprietor should be doing all that they reasonably can to limit children's exposure to the above risks from the College's IT system. As part of this process, the governing board and proprietor should ensure the College has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to



escalate concerns when identified. The governing board and proprietor should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs versus safeguarding risks.

### **Students potentially at greater risk of harm**

Students may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

### **Students requiring mental health support**

The College has an important role to play in supporting the mental health and wellbeing of students. It recognizes that in some cases mental health is an indicator of a child suffering or at risk of abuse.

The College pastoral team is familiar with Mental Health and Behaviour in Schools and the Link programme.

### **Physical Intervention**

- Staff must only ever use physical intervention as a last resort, and at all times, it must be the last resort.
- We understand that physical intervention, the nature of which causes injury or distress to a student, may be considered under student protection or disciplinary procedures.

### **Standards of Behaviour**

The standards of behaviour set out below are presented to all staff at LSI Independent College that come into direct and unsupervised contact with students:

#### Staff Code of Conduct / Standards of Behaviour

*LSI Independent College has a robust recruitment and safeguarding policy in place to safeguard our students from harm and protect staff from wrongful accusations. The standards below apply to all staff at LSI who come into direct and unsupervised contact with students. Although these procedures are primarily intended to safeguard students under the age of 18, they apply to students of all ages, unless specified.*

*If you work with students, you are in a position of trust. It is important that you: acknowledge the influence you have on students' development and take care to ensure your behaviour is appropriate at all times. This is important not only in safeguarding students, but also in protecting yourself from wrongful accusation.*

- I understand that LSI welcomes students and staff from many different cultures and backgrounds. I therefore agree not to discriminate, insult or make inappropriate comments based on gender, orientation, race, age, nationality, religion etc. I understand the need to be sensitive to all of these issues during any and all contact with staff and students.
- I agree to pay particular attention to the age, experience and cultural background of the student, and whether this makes him or her more vulnerable. I will also take into account any physical or mental disability, and whether this makes him or her more vulnerable.
- I understand that relationships of a sexual nature between staff and students are forbidden. Any such relationships will result in dismissal.
- I will avoid sexually suggestive behaviour, or any physical contact likely to cause fear or embarrassment to the student, regardless of their age.
- I agree to challenge aggressive or sexually suggestive behaviour from the student.
- I will avoid unnecessary or inappropriate situations in which no other adult is present (with the exception of planned situations, such as language classes, of which other staff members have knowledge).
- If it is necessary to spend unscheduled time alone with a student under the age of 18, I agree to inform the Designated School Official and/or the College Principal immediately.
- I understand that contact through social networking websites (Facebook/Twitter/WhatsApp etc) with any students under the age of 18 is forbidden. Any such relationships will result in dismissal. *LSI also strongly recommends that staff do not have relationships with any students over the age of 18 through social networking sites.*
- I will not give my personal contact details (including mobile phone) to any students under 18. *LSI strongly recommends you do not give any personal details to any students.* LSI has mobile phones you can use in the event of trips etc.
- I agree not to photograph/video students with my personal electronic equipment without the express permission of a member of the management.
- I agree to keep accurate records of attendance and to inform the office immediately if students under 18 miss any of my classes. I will not convey students under the age of 18 alone by car.
- I understand the need to dress appropriately and present a smart, clean and professional image. Jeans, trainers and shorts would not normally be considered appropriate.
- I understand that taking or being under the influence of alcohol or illegal drugs while working for or representing LSI is forbidden and will result in dismissal, barring certain social activities where moderate drinking may be permitted with the express agreement of the school.
- I have been informed of and understand my duty to challenge radicalization and extremism under Prevent. I have completed or will complete on-line Prevent training for practitioners.
- I have read and understood the Staff Handbook and the LSI Safeguarding Policy and Part one of Keeping Children Safe in Education regarding students aged Under 18.
- I have completed or will complete my online Safeguarding Level 1 and Prevent training before commencing work with LSI Independent College.

## **Allegations made against/Concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors.**

- We understand that a student may make an allegation against a member of staff.
- If such an allegation is made, the member of staff receiving the allegation will immediately inform the Designated Safeguarding Lead (Dr Jan Capar). If the Designated Safeguarding Lead is absent, the allegation should be reported to the Deputy Designated Safeguarding Lead (Eda Cinar).
- The Designated Safeguarding Lead should record any information about dates, times location and potential witnesses.
- If the allegation made to a member of staff concerns the Designated Safeguarding Lead, the person receiving the allegation will immediately inform the LSI Education managing director, David Immanuel.
- If a member of staff has any concerns about the wellbeing of a student under 18, they should inform the Designated Safeguarding Lead (Dr Jan Capar) immediately. In the absence of the Designated Safeguarding Lead, they should inform the alternate Deputy Designated Safeguarding Lead (Eda Cinar).

The College will be alert to allegations that might indicate a person poses a risk of harm if they continue to work in their present position with regard to the following unacceptable behaviours:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

### **Low-level Concerns**

LSI Independent College is committed to:

- ensuring its staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns (see below)
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised, and helping identify any weakness in the school or colleges safeguarding system.

In the first instance, low-level concerns should be reported to the DSL. The DSL is the ultimate decision maker in relation to concerns which have been shared, but will take a collaborative approach with, for example, the Deputy DSL and/or the board of governors, as

appropriate. If the College is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, it will consult with the Camden LADO.

The College aims to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the College will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

#### **Referrals:**

- In response to disclosures or general concern for the wellbeing of a child, referrals to social services or to the police will not be made independently by the Designated Safeguarding Lead but will be subject to consultation with the Local Authority Designated Officer (LADO) tel. 020 7974 4556. Senior Management should also be made aware of the allegation or concern. Consultation may also be sought from the NSPCC.
- In case of referrals, LSI Independent College will contact the Local Authority Designated Officer. In case of serious harm, the police should be informed from the outset.
  - Relevant Contact Telephone Numbers:
    - Student Protection –0345 045 5203
    - Camden Local Authority Designated Officer (LADO) – 020 7974 4456
    - NSPCC 0808 800 500
    - Childline 0800 1111
    - Camden Council Young People’s Services – 020 7974 4444 Monday – Friday 8am-8pm
    - Students’ Social Care Services 0845 045 5203 and out of these hours 01733 234 724
- If anyone employed by LSI Independent College is deemed unsuitable to work with students, and thus their services are no longer required, the company will report to the Independent Safeguarding Authority (ISA) within one month of that person leaving. Any such report will include evidence about the circumstances as far as possible. The contact address is ISA, PO Box 181, Darlington DL1 9FA (tel 0300 123 1111). LSI Education is aware that failure to make a report constitutes an offence.

- In any and all such cases, LSI Independent College will not enter into any compromise agreements.
- LSI Independent College knows that it is an offence under the Vetting and Barring Scheme (VBS) to employ or take on as a volunteer in an ISA regulated activity anyone who is barred from such an activity. It is an offence not to refer to the ISA details of anyone who is removed from regulated activity, or who leaves while under investigation for allegedly causing harm or posing a risk of harm.

### **Staff support**

- In line with current procedures, a member of staff accused of abuse may be suspended from duty with pay, pending investigation and subject to bi-weekly internal review. Where possible, appropriate alternative duties will be carried out by the staff member accused, and suspension seen as a last resort.
- A suspension does not imply guilt: it is for the protection of both the student and the adult.
- If an allegation is not substantiated and the person returns to work, LSI Independent College will support that person.
- LSI Independent College will keep a written record of all allegations, resulting inquiries and outcomes.

### **Allegations against other students**

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Conduct Policy.

### **Safeguarding allegations**

- Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature.
  - Safeguarding issues raised in this way may include:
    - physical abuse
    - emotional abuse
    - sexual abuse and sexual exploitation.
    - Online abuse/bullying
- It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found:
  - The allegation:
    - is made against an older student and refers to their behaviour towards a younger or a more vulnerable student
    - is of a serious nature, possibly including a criminal offence
    - raises risk factors for other students in the school
    - indicates that other students may have been affected by this student
    - indicates that young people outside the school may be affected by this student.

Examples of safeguarding issues against a student could include:

- Physical Abuse
  - Violence
  - Forcing other students to use drugs or alcohol
- Emotional Abuse
  - blackmail or extortion
  - threats and intimidation
- Sexual Abuse
  - indecent exposure, indecent touching or serious sexual assaults
  - forcing others to watch pornography or take part in sexting
- Sexual Exploitation
  - encouraging other children to attend inappropriate parties
  - photographing or videoing other children performing indecent acts

There is no distinction whether the above takes place on or off line.

### **What to do**

- When an allegation is made by a student against another student, members of staff should consider whether the complaint raises a safeguarding concern and should discuss it with the Designated Safeguarding Lead/Alternate DSL.
- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.
- The DSL should contact social services to discuss the case. It is possible that social services are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a social services referral where appropriate.
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both students' files.
- If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the accused about and alleged victim).
- It may be appropriate to exclude or suspend the student accused for a period of time in line with the school's behaviour policy and procedures.
- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

This policy is reviewed annually.

See also:

- ***Safeguarding Students and Safer Recruitment in Education Policy***
- ***Dealing with Allegations or Suspicions of Abuse – Staff Guide***
- ***Standards of Behaviour***
- ***Code of Conduct***

- **Keeping Children Safe in Education - Part 1 -**  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/828587/Keeping\\_children\\_safe\\_in\\_education\\_part\\_one.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/828587/Keeping_children_safe_in_education_part_one.pdf)
- **Anti-Radicalisation and Extremism Policy (PREVENT)**
- [Safeguarding - Camden Learning](#)
- [Camden Safeguarding Children Partnership | Cindex](#)
- [London Child Protection Procedures \(londonsafeguardingchildrenprocedures.co.uk\)](http://londonsafeguardingchildrenprocedures.co.uk)

## Appendix 1

### 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](#)