



## Safeguarding Policy June 2020

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## 1. Introduction

This policy explains how Kindi Education aims to keep people safe from harm, setting out especially what it expects of everyone working with children, young people and adults at risk of harm.

The purpose of this policy statement is:

- to protect our participants, volunteers, staff and others in contact with Kindi Education from harm, abuse and neglect.
- to provide parents, employees, volunteers, freelancers and partner organisations with the overarching principles that guide our approach to safeguarding.
- to ensure that safety and wellbeing are paramount when using the internet, social media or mobile devices, and that the use of ICT equipment and data are adequately protected against any action that could adversely affect our activities (whether internal or external, deliberate or accidental).

This policy statement applies to anyone engaged in the organisation, including employees, volunteers and freelancers engaged in all Kindi Education supported or directed activities (“our team”).

Each person who works with Kindi Education will agree to abide by this policy and its associated procedures.

## 2. Understanding of Safeguarding

For the purposes of this policy, safeguarding is the proactive precautionary action necessary to protect people from abuse and maltreatment which may impair their health, development and/or a violation of their human rights. It aims to ensure that everyone (including children, young people and adults at risk) can develop in circumstances consistent with the provision of safe and effective care whereby their inherent worth and dignity are protected, and they have optimum life chances. It includes a wide range of issues relating to an individual’s welfare and their health and safety.

## 3. Legal Framework

In developing this policy and any associated procedures and guidance, Kindi Education has referred to key domestic legislation including the [Children Act 1989 & 2004](#), the [Protection of Children Act 1999](#) and the [Safeguarding Vulnerable Groups Act 2006](#) (as amended by the [Protection of Freedoms Act 2012](#)). It has also sought to ensure that this policy is developed in light of the principles of the [Mental Capacity Act 2005](#), the [Care Act 2014](#) and the [Data Protection Act 2018](#).

As a limited company with education at the heart of its mission, Kindi Education recognise the duties on educational bodies to safeguard and promote the welfare of all children.

This legislation and its associated statutory guidance includes [Keeping Children Safe in Education \(2019\)](#), [Working Together to Safeguard Children \(2019\)](#), [Care and support statutory guidance \(2020\)](#) and [Prevent Duty Guidance for England & Wales \(2019\)](#). This gives an underpinning to how we seek to operate in light of the unique nature and structure of the organisation and respecting the duties of statutory agencies to protect children and adults experiencing or at risk of harm.

#### 4. Policy Statement

Kindi Education is committed to protecting, fulfilling and promoting the rights of children, young people and adults at risk who are engaged in our programmes (i.e. participants, volunteers, staff members or others affected by our work). All our team members have a responsibility to safeguard the health and wellbeing of others, and to protect them from all forms of harm including abuse, exploitation and violence.

We seek to ensure that all people are treated equally, with dignity and respect at all times, and that they feel empowered to take an active role in matters which affect them. All those involved in our work should show a commitment to, and an understanding of, the rights, safety and welfare of others.

We recognise that abuse and neglect can take place amongst peers, from our team members, within the community and/or within individuals' families and intimate relationships. Further details on forms of harm are detailed in Kindi Education's Procedures for Managing Safeguarding Disclosures, Concerns and Allegations.

We recognise that information technology and the wider online world provide opportunities to all; however, they can also present risks and challenges. At Kindi Education we have a duty to ensure that all people involved in our organisation are protected from potential harm online. We have a responsibility to help keep people safe online, whether they are using our network(s) and devices or not.

Our approach to safeguarding is grounded in the following principles:

- **Equal protection from abuse:** No one should ever experience abuse of any kind through our activities. Everyone has an equal right to be protected from all types of harm or abuse regardless of their age, sex, gender, disability, race, religion or belief, sexual orientation, culture, language, personality or lifestyle.
- **Equitable practice:** Some people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues. Our practice recognises that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse.
- **Responsibility:** We recognise that protecting people from harm is both a corporate and an individual responsibility. All team members should be proactive in taking appropriate, proportionate, preventative steps to reduce the risk of, or perception of, harm occurring to children and adults at risk. They will seek to protect those that are at risk of being harmed and respond well to those that have experienced harm.
- **Best interests:** Our team members and anyone acting on our behalf must always act and respond appropriately to any concerns or allegations of abuse, harm or neglect. In doing so the primary consideration should always be the best interests of those at risk of or experiencing harm.
- **Confidentiality and information sharing:** We will protect individuals' rights to privacy and confidentiality and only disclose information about a participant to other members of

the team on a 'need to know' basis. All our team members must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.

- **Participation:** Where there is a safeguarding concern, we will ensure that the child's or adult's wishes and feelings are taken into account when determining what action to take and which services to provide.
- **Partnership:** Kindi Education recognises that working in partnership with children, young people, their parents, carers and other agencies is essential in effective safeguarding. We recognise and are committed to our responsibility to work with other professionals and agencies in line with statutory guidance. We will work to establish strong and co-operative relationships with relevant professionals in other agencies (including attending relevant multi-agency safeguarding meetings and individual assessments, protection conferences and/or strategy meetings).
- **Supporting statutory authorities:** Kindi Education is not an investigating agency. In situations where there are concerns of abuse or maltreatment our role is not to investigate but to recognise and refer. We will support statutory agencies in investigation and assessment processes as required and proactively support police or prosecutors to fulfil their duties.

## 5. Policy Implementation

Kindi Education will seek to keep building a culture of safeguarding for all in our organisation by:

### 5.1. Appointing a Designated Safeguarding Lead (DSL) and Deputy

- The company has a DSL, James Medina, who will take the lead role in championing and implementing safeguarding in our activities.
- The DSL and deputies must also be named, trained and have the time and focus to fulfil their duties effectively.
- The details of the DSL's responsibilities are set out in [Annex B](#).

### 5.2. Taking responsibility in joint working

- In any joint activities or initiatives with others, Kindi Education will discuss with the partner organisation who has responsibility for safeguarding (i.e. the "safeguarding lead organisation") which policies and procedures will be followed for the purpose of the joint initiative.

### 5.3. Ensuring safer recruitment practices

- We will recruit team members safely, ensuring all necessary checks are made.
- We will advise all team members to disclose any reason that may affect their suitability to work with children and adults at risk of harm (including convictions, cautions, court orders, reprimands and warnings).
- The details of these requirements are set out in Kindi Education's Safer Recruitment Policy & Procedure.

#### **5.4. Supporting team members to fulfil their responsibilities**

- Kindi Education will share information about the right to be safe and safeguarding best practice, as appropriate, to all engaged in our work; including through induction and training. Minimum expectations of the induction content are set out in [Annex C](#).
- All team members will receive safeguarding training appropriate to their role. All permanent staff members of Kindi Education (based in its Birmingham Head Office) will receive regular safeguarding updates, at least annually.

#### **5.5. Providing a safe and secure physical environment**

- We will provide a safe physical environment for our children, young people, team members and volunteers by applying health and safety measures in accordance with the law, regulatory guidance and good practice.
- We will maintain awareness of buildings and grounds security, reporting concerns that may come to light, whether they involve Kindi Education activities or otherwise.
- We will undertake appropriate checks with respect to visitors and volunteers entering the premises. Visitors will be expected to sign in and out via Kindi Education's Visitor Logbook and to display a visitor's badge whilst on the premises. Any individual who is not known or identifiable should be challenged for clarification and reassurance.
- We will not accept the behaviour of any individual (parent or visitor) that threatens the premises security or leads others (children or adults) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access to that individual.

#### **5.6. Providing a safe online environment**

- We recognise that the use of technology presents challenges and risks to children and adults both on and off the premises, as well as on online platforms through which Kindi Education's activities are being delivered. These risks include:
  - **content:** being exposed to illegal, inappropriate or harmful material
  - **contact:** being subjected to harmful online interaction with other users
  - **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- We will review and update the security of our information systems regularly ensuring that appropriate filtering and monitoring systems are in place when students and team members access any systems or internet provision.
- We will examine and risk assess any social media platforms and new technologies before they are used within the organisation.
- The DSL and leadership team have read the latest guidance on online safety within 'Keeping Children Safe in Education' and adopted safer working practices when working online.
- For further details of our commitments, including use of social media, see [Annex E](#).

#### **5.7. Adopting safer working practices**

- We have adopted relevant codes of conduct for our team members and for participants engaging in our activities. These safer working practices support us in being alert to potential indicators of abuse or neglect and the risks which individual abusers, potential abusers or those with poor professional practice or boundaries may pose (including risks relating to online safety).
- All team members will be made aware of Kindi Education's expectations regarding safe and professional practice and the relevant codes of conduct to be followed.

## **5.8. Supporting, supervising and managing our team**

- Kindi Education will provide effective management for staff, consultants and volunteers through supervision, support and quality assurance measures.

## **5.9. Receiving and responding to complaints, safeguarding disclosures, concerns and allegations.**

- Our team members will use Kindi Education's procedures to manage any complaint, disclosure, concern or allegation promptly and appropriately. We will record and store information professionally and securely.
- Our team members will record any concern that they have about an individual on Kindi Education's Incident Recording Form and pass this without delay to the DSL. Records will be completed as soon as possible after the incident/event, using the individual's words and will be signed and dated by the member of the team. If team members are in any doubt about recording requirements, they should discuss their concerns with the DSL.
- We recognise that those in positions of trust and responsibility may abuse their power and exploit or harm others. We seek to act to deal with any abuse and to challenge any abuse of power, especially by anyone in a position of trust.
- If we become aware of abuse, neglect or harm, we will provide support and make sure that our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole into account.
- For further details of our commitments please see Kindi Education's Procedures for Managing Safeguarding Disclosures, Concerns and Allegations.

## **5.10. Managing and processing data appropriately**

- We will record all safeguarding concerns, discussions and decisions (and justifications for those decisions) promptly and appropriately in writing, recording and storing information professionally and securely and in line with established procedures.
- We will keep any information confidential and proactively share concerns and relevant information (involving children, young people, parents, families and carers) appropriately with agencies who need to know.
- We will ensure that images of children, young people and families are used only after their permission has been obtained, and only for the purpose for which consent has been given.

## **5.11. Learning from our experiences and reviewing**

- Kindi Education will review its policy and good practice at regular intervals and at least once per year.

## **6. Related policies and procedures**

This policy statement should be read alongside Kindi Education's other organisational policies and procedures (which will be made available to team members when beginning their activity with us), as follows:

1. Counter Radicalisation and Extremism Policy
2. Procedures for Managing Safeguarding Disclosures, Concerns and Allegations
3. Safer Recruitment Policy & Procedure
4. Whistleblowing Policy & Procedures

5. Health & Safety Policy & Procedure
6. Feedback, Compliments and Complaints Policy & Procedures
7. Guest Speaker and Events Policy
8. Equality, Diversity and Inclusion Policy
9. Data Protection Policy



## **Annex B: Role of the Designated Safeguarding Lead (DSL)**

The DSL (James Medina) has the overall responsibility for the day to day oversight of safeguarding systems on Kindi Education's short courses.

The DSL will undergo appropriate and specific training to provide staff with the knowledge and skills required to carry out their role. The DSL and any deputy DSLs training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

Deputy DSLs are trained to the same standard as the DSL. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding remains with the DSL and this responsibility will not be delegated.

It is the role of the DSL to:

- Act as the central contact point for all team members to discuss any safeguarding concerns
- Be available for permanent or temporary team members to discuss any safeguarding concerns
- Maintain a confidential recording system for safeguarding incidents, concerns and allegations (known as a "Safeguarding Log")
- Coordinate safeguarding action for individual children and adults at risk of harm
- Liaise with other agencies and professionals in line with relevant statutory guidance
- Ensure that locally established referral procedures are in place and being followed as necessary
- Keep all early help cases under constant review and consider requesting support for Front Door/Early Help assessments if situations do not appear to be improving or are getting worse.
- Represent the company, or ensure that it is appropriately represented, at multi-agency safeguarding meetings (including Child Protection conferences and Adult Safeguarding assessment meetings).
- Ensure all team members access appropriate safeguarding training and relevant updates in line with the most recent statutory guidance relevant to our activities
- Ensure that all new team members are aware of Kindi Education's internal safeguarding processes.
- Ensure that policies are reviewed at least annually and when required.

## **Annex C: Topics to be covered in induction and training**

All team members should be aware of systems which support safeguarding, and these should be explained to them as part of their induction. This includes:

- Receiving copies of policies.
- Receiving appropriate safeguarding training which is regularly updated and relevant to their role.
- Receiving safeguarding updates (for example via email, e-bulletins and staff meetings) as required, and at least annually.
- Being aware of their local early help process and understand their role in it.
- Being aware of the process for making referrals to social care and the relevant organisational policy and procedure for that local area.
- Knowing what to do if a child or adult at risk tells them that he/she is being abused or neglected and how to manage the requirement to maintain an appropriate level of confidentiality.
- Being aware of indicators of abuse and neglect and key safeguarding issues affecting those who Kindi Education works with.
- Being confident to identify cases of children or adults at risk of harm who may be in need of help (welfare support) or protection.
- Being aware that a participant can abuse another participant (often referred to as peer on peer abuse).
- Being aware that safeguarding incidents and/or behaviours can be associated with factors outside the activities that Kindi Education provides and/or can occur between peers outside its activities.
- Considering the context within which incidents and/or behaviours occur when identifying indicators of harm and responding to these.

## Annex D: Safeguarding issues in our context

Concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. Abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label

The warning signs and symptoms of child abuse and neglect can vary with different individuals. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.

Parental and carer behaviours may also indicate abuse or neglect, so team members should also be alert to parent & carer interactions or concerning parental or carer behaviours. Such behaviours could be influenced by drugs or alcohol or a sudden change in mental health.

There are a range of safeguarding issues which may affect those that Kindi Education seeks to safeguard. We will use a risk-based approach to ensure that our team members understand the risks which are most likely to present themselves within the activities that they are undertaking.

Areas of harm that Kindi Education must be aware of include:

- Bullying (including cyberbullying)
- Children with family members in prison
- Children Missing Education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (County Lines)
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Honour based abuse
- Human trafficking and modern slavery
- Mental health
- Missing children and adults
- Online safety
- Peer on peer abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Sexual Violence and Sexual Harassment
- Upskirting
- Youth produced sexual imagery or "Sexting"

Further details on forms of harm are detailed in Kindi Education's Procedures for Managing Safeguarding Disclosures, Concerns and Allegations.

## **Annex E: Local and National Support**

### **Local Support (Birmingham)**

#### **The Children's Advice and Support Service (CASS)**

A single point of contact for professionals and members of the public who want to access support or raise concerns about a child.

Monday to Thursday: 8:45am to 5:15pm

Friday: 8:45am to 4:15pm

Telephone: 0121 303 1888

Emergency out-of-hours

Telephone: 0121 675 4806

<http://www.lscpbirmingham.org.uk/safeguarding-concerns>

Details of local Birmingham policies and procedures:

[https://www.birmingham.gov.uk/info/50045/education\\_early\\_help\\_and\\_safeguarding/1986/policies\\_and\\_procedures\\_for\\_education\\_safeguarding/3](https://www.birmingham.gov.uk/info/50045/education_early_help_and_safeguarding/1986/policies_and_procedures_for_education_safeguarding/3)

Details of Birmingham's Threshold Document for children and families:

<http://www.lscpbirmingham.org.uk/delivering-effective-support>

#### **Family Support and Safeguarding Service**

Birmingham Children Trust (BCT) Family Support teams (FS) lead Early Help support.

Telephone: 0121 303 1888

[https://www.birminghamchildrenstrust.co.uk/info/3/information\\_for\\_professionals/36/referrals\\_to\\_the\\_family\\_support\\_and\\_safeguarding\\_service](https://www.birminghamchildrenstrust.co.uk/info/3/information_for_professionals/36/referrals_to_the_family_support_and_safeguarding_service)

#### **Education: Early Help and Safeguarding Service**

[Area Safeguarding Advisor Birmingham City Council](#)

#### **LADO**

- Telephone: 0121 675 1669
- Email: [Ladoteam@birminghamchildrenstrust.co.uk](mailto:Ladoteam@birminghamchildrenstrust.co.uk)
- <http://www.lscpbirmingham.org.uk/lado>

#### **Birmingham Adults at Risk of Harm**

Email: [ACAP@birmingham.gov.uk](mailto:ACAP@birmingham.gov.uk)

Telephone: 0121 303 1234

Online form: <https://birmingham.mylifeportal.co.uk/form/sgc1-1#!/onbehalfof>

#### **Birmingham Adult Safeguarding Board**

<https://www.bsab.org>

### **Local Support (Kent)**

#### **Children's Social Care**

If you are worried about the safety of a child or young person, please complete the Single Request for Support Form.

<https://www.kscmp.org.uk/guidance/child-in-need-chin>

Out of Hours Number: 03000 419191

Children's Social Work Services

- Front door: 03000 411111

Details of Birmingham's Threshold Document for children and families:

<https://www.kscmp.org.uk/guidance/kent-support-levels-guidance>

<https://www.kent.gov.uk/singlerequestupload>

Contact details for Area Safeguarding Advisor (Education Safeguarding Service)

[www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts](http://www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts)

### **Contact details for Online Safety in the Education Safeguarding Service**

- Rebecca Avery, Education Safeguarding Advisor (Online Protection)
- Ashley Assiter, Online Safety Development Officer
- 03000 415797
- [esafetyofficer@kent.gov.uk](mailto:esafetyofficer@kent.gov.uk) (non-urgent issues only)

### **Contact details for the LADO**

- Telephone: 03000 410888
- Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)

Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

- [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)
- 03000 421126

### **Kent Adults at Risk**

Email [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)

Telephone: 03000 41 61 61

Out of Hours Number: 03000 41 91 91.

Kent Adult Safeguarding Alert Forms

<https://www.kent.gov.uk/social-care-and-health/information-for-professionals/adult-safeguarding/adult-protection-forms>

### **Kent and Medway Safeguarding Adults Board**

<https://www.kent.gov.uk/social-care-and-health/information-for-professionals/adult-safeguarding/kent-and-medway-safeguarding-adults-board>

## **National Support**

### **Support for staff**

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

### **Support for young people**

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)

### **Support for adults**

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)

- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- NAPAC (National Association for People Abused in Childhood): [napac.org.uk](http://napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)

### **Support for learning disabilities**

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

### **Domestic abuse**

- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadviceline.org.uk](http://www.mensadviceline.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)

### **Honour based violence**

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>

### **Sexual abuse and CSE**

- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)

### **Online safety**

- UK Council for Internet Safety: <https://www.gov.uk/government/organisations/uk-council-for-internet-safety>
- Childnet International: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- Net Aware: [www.net-aware.org.uk](http://www.net-aware.org.uk)
- ParentPort: [www.parentport.org.uk](http://www.parentport.org.uk)
- Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)

### **Radicalisation and hate**

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

## **Annex F: ICT Security and Online Safety**

### **1. Responsibilities and Definitions**

These ICT Security guidelines are intended for all Kindi Education team members who are either controllers of the system or who are users and supporters of the systems or data.

For the purposes of this document the terms 'ICT' (or 'ICT system'), 'ICT data' and 'ICT user' are defined as follows:

- 'ICT' (or 'ICT system') means any device or combination of devices used for the storage or processing of data and includes workstation (netbook, notebook, desktop/tower PC), PDA, cash till, server or any other similar device;
- 'ICT data' means any information stored and processed within the ICT system and includes programs, text, pictures and sound;
- 'ICT user' applies to any team member, participants or other authorised person who uses our ICT systems and/or data

The same rules apply when accessing the ICT System or ICT data away from Kindi Education facilities, e.g. at a user's home or visiting another facility.

### **2. Physical Security**

We will ensure that:

- Adequate consideration is given to the physical security of rooms containing ICT equipment (including associated cabling) with any IT equipment locked or stored securely.
- Reasonable care is taken in the siting of computer screens, keyboards, printers or other similar devices. Wherever possible, and depending upon the sensitivity of the data, users should ensure devices are positioned in such a way that information stored or being processed cannot be viewed by persons not authorised to know the information.
- Users will be instructed to avoid leaving computers logged-on when unattended if unauthorised access to the data held can be gained.
- The Managing Director checks that an inventory of all ICT equipment is maintained, and all items are accounted for at least annually.

### **3. Legitimate Use**

- Only persons authorised by the Managing Director are allowed to use the ICT systems.
- Access eligibility will be reviewed continually, including remote access for support. In particular the relevant access capability will be removed when a person leaves the employment of Kindi Education. In addition, access codes, user identification codes and authorisation rules will be reviewed whenever a user changes duties.
- ICT facilities must not be used in any way that breaks the law or breaches acceptable standards. Such breaches include, but are not limited to:
  - making, distributing or using unlicensed software or data
  - making or sending threatening, offensive, or harassing messages
  - creating, possessing or distributing obscene material
  - unauthorised personal use of Kindi Education's computer facilities.
- Any private software permitted to be used on our equipment is acquired from a responsible source and is used strictly in accordance with the terms of the licence. The use of all private hardware for Kindi Education purposes must be approved and recorded by the Managing Director.

#### **4. Passwords**

- The level of password control is based on the value and sensitivity of the data involved, including the possible use of “time out” passwords where a terminal/PC is left unused for a defined period. Passwords should be memorised and if written down **MUST NOT** be kept on the device in any form.
- A password must be changed if it is affected by a suspected or actual breach of security, or if there is a possibility that such a breach could occur (for example when a password holder leaves the employment or is transferred to another post, or when a password may have become known to a person not entitled to know it).

#### **5. Security and Encryption**

- Only devices approved should be permitted to be connected to the network, either through wired or wireless connectivity.
- Encryption is applied to wireless networks
- Encryption keys should be kept secure and remain the property of the system manager and must not be shared without written permission.
- Mobile devices may, with permission, connect to the network but in full compliance with the ICT policies. This permission may be withdrawn at any time. If a mobile device connects to an internet connection supplied directly by Kindi Education, then the device’s online activity will be monitored and logged by Kindi Education’s Internet Service Provider.
- All devices that have access to data attached to the ICT System are fully encrypted.

#### **6. Filtering**

- Access to the internet provided by Kindi Education should be filtered using an approved system.
- Where breaches of internet filtering have occurred, an assessment of the risk of continued access should be made.

#### **7. Back ups**

- In order to ensure that essential services and facilities are restored as quickly as possible following an ICT system failure, back-up copies of stored data will be taken at regular intervals, dependent upon the importance and quantity of the data concerned.
- Data essential for the day to day running and management of activities and for safeguarding purposes should be stored on Kindi Education’s network.
- Backups contain data that must be protected and should be clearly marked to indicate what they are and when they were taken. They should be stored away from the system to which they relate in a restricted access fireproof location, preferably off site.
- Instructions for re-installing data or files from backup should be fully documented and security copies should be regularly tested to ensure that they enable the systems/relevant file to be re-loaded in cases of system failure.

#### **8. Virus Protection**

- Kindi Education will use appropriate Anti-virus/Anti-malware software for all its ICT systems.
- All users should take precautions to avoid malicious software that may destroy or corrupt data. Kindi Education will ensure that every user is aware that any device in the ICT system (PC, laptops, etc) with a suspected or actual computer virus infection must be disconnected from the network and be reported immediately.

## **9. Disposal of Waste and Equipment**

- The Data Protection Act requires that adequate mechanisms be used when disposing of personal data. Any personal data held on a part of the ICT system subject to disposal is to be destroyed.
- Prior to the transfer or disposal of any ICT equipment, Kindi Education will ensure that any personal data or software is obliterated from the machine if the recipient organisation is not authorised to receive the data. Where the recipient organisation is authorised to receive the data, they must be made aware of the existence of any personal data to enable the requirements of the Data Protection Act to be met. Normal write-off rules as stated in Financial Regulations apply.
- Any copies of the software remaining on a machine being relinquished are legitimate. Care should be taken to avoid infringing software and data copyright and licensing restrictions by supplying unlicensed copies of software inadvertently.
- Kindi Education will maintain a regularly updated asset register of licenses and indicate when licenses have been transferred from one part of the ICT system to another.

## **10. Repair and Access to Data**

- If a machine or its permanent storage (usually a disk drive), is required to be repaired by a third party the significance of any data held must be considered. If data is particularly sensitive it must be removed from hard disks and stored on other media for subsequent reinstallation, if possible.
- Kindi Education will ensure that third parties are currently registered under the Data Protection Act (GDPR) as personnel authorised to see data and as such are bound by the same rules as our team members in relation to not divulging the data or making any unauthorised use of it.

## **11. Security Incidents**

- All suspected or actual breaches of ICT security shall be reported to the Managing Director who will ensure a speedy and effective response is made to an ICT security incident, including securing useable evidence of breaches and evidence of any weakness in existing security arrangements. They must also establish the operational or financial requirements to restore the ICT service quickly.

## **12. Personal Use of ICT Systems**

- Kindi Education recognise that there are times when users may use our Systems for non-work-related purposes, and in recognising this need Kindi Education permits them to use the Systems for personal use.
- Kindi Education will ensure that using the systems for personal use during working hours does not interfere with day to day duties. Any non-job-related use of the systems during working hours may be subject to disciplinary action.

## **13. Mobile Technology: Use of Personal Devices and Mobile Phones**

- All use of mobile technology including mobile phones and personal devices such as tablets, e-readers, games consoles and wearable technology (including 'smart watches' and fitness trackers which facilitate communication or have the capability to record sound or imagery) will take place in accordance with Kindi Education's policies. Electronic devices of any kind that are brought on site are the responsibility of the user.

- Individual users should take steps to protect their mobile phones or personal devices from loss, theft or damage. Kindi Education accepts no responsibility for the loss, theft or damage of such items on its premises.
- Mobile phones and personal devices are not permitted to be used in specific facilities or activities within the site such as changing rooms, toilets and swimming pools.
- Team members are advised:
  - that the sending of abusive or inappropriate messages or content via mobile phones or personal devices is forbidden by any member of the Kindi Education community. Any breaches will be dealt with in line with Kindi Education's Student Behaviour Policy and staff Disciplinary Procedures.
  - to ensure that their mobile phones and personal devices do not contain any content which may be offensive, derogatory or would otherwise contravene Kindi Education's Staff Behaviour Policy or Kindi Education's Safeguarding Policy.
- Team members' use of personal phones and devices must always be compatible with their professional role and expectations and their duties to safeguard and promote the welfare of those with whom they work. When working with children and adults at risk, use of personal devices should be in accordance with the following guidelines. Any derogation from these guidelines will be detailed in a risk assessment of that activity or setting:
  - do not use personal devices during teaching or activity time, unless written permission has been given by the Managing Director or in emergency circumstances.
  - keep mobile phones and personal devices in a safe and secure place (e.g. locked in a locker/drawer) during lesson or activity time.
  - keep mobile phones and personal devices switched off or switched to 'silent' mode during lesson or activity time.
  - ensure that Bluetooth or other forms of communication, such as 'airdrop', are hidden or disabled during lesson or activity time.
  - ensure that any content brought on site via mobile phones and personal devices is compatible with professional role and expectations.
- Team members are not permitted to use their own personal phones or devices for contacting participants who are children or adults at risk or their parents and carers. Team members will not use personal devices or mobile phones:
  - to take photos or videos of participants and will only use work-provided equipment for this purpose.
  - directly with participants and will only use work-provided equipment during lessons/educational activities.

#### **14. Participants' use of personal devices and mobile phones**

- Kindi Education expects personal devices and mobile phones to be kept in a secure place, switched off, have certain functions disabled whilst on site, and kept out of sight during lessons and while moving between activities.
- If team members have an educational reason to allow participants to use their mobile phones or personal devices as part of an educational activity, it will only take place following a risk assessment.
- Team members may confiscate a mobile phone or device if they believe it is being used to contravene Kindi Education's Safeguarding Policy or its Participant Behaviour Policy (which includes anti-bullying).
- A mobile phone or device may be searched by a member of Kindi Education's leadership team, with the consent of the learner or a parent/guardian/carer. Content may be deleted or requested to be deleted if it contravenes Kindi Education's policies. Kindi Education will seek to do this in a consensual and fair manner and, wherever practicable, in line

with [Searching, Screening and Confiscation](#) guidance produced by the English Department for Education.

- If there is suspicion that material on a learner's personal device or mobile phone may be illegal, or may provide evidence relating to a criminal offence, the device will be handed over to the police by Kindi Education for further investigation.

## **15. Use of Social Media**

- The term social media may include (but is not limited to) blogs, wikis, social networking sites, forums, bulletin boards, online gaming, apps, video/photo sharing sites, chatrooms and instant messenger apps or services.
- Kindi Education's team members and our participants are advised not to post or share content that may be considered threatening, hurtful or defamatory to others on any social media service.
- Concerns regarding the online conduct of any team member on social media will be reported to the DSL and/or Managing Director and will be managed in accordance with Kindi Education's Procedures for Managing Safeguarding Disclosures, Concerns and Allegations.
- The safe and responsible use of social media sites will be discussed with all team members as part of their induction and will be revisited and communicated via regular training opportunities.
- All team members are advised that their online conduct on social media can have an impact on their role and the reputation of Kindi Education. Civil, legal or disciplinary action may be taken if staff are found to bring the profession or institution into disrepute, or if something is felt to have undermined confidence in their professional abilities.
- Team members are advised to safeguard themselves and their privacy when using social media services. This includes:
  - Setting appropriate privacy levels on their personal accounts/sites.
  - Being aware of the implications of using location sharing services.
  - Opting out of public listings on social networking sites.
  - Logging out of accounts after use.
  - Using strong passwords.
  - Ensuring team members do not represent their personal views as being that of the setting.
- All team members are encouraged to carefully consider the information, including text and images, that they share and post online. Team members are expected to ensure that their social media use is compatible with their professional role and is in accordance with Kindi Education's policies and the wider professional and legal framework.
- Information and content that team members have access to as part of their employment, including photos and personal information about participants and their family members or colleagues, will not be shared or discussed on social media sites.
- Team members will not use any personal social media accounts to contact participants or parents/carers, nor should any contact be accepted.
- Team members are advised not to communicate with or add any current or past participants or their family members as 'friends' on any personal social media sites, applications or profiles.
- Any pre-existing relationships or exceptions which compromise this requirement will be discussed with the DSL. Decisions made and advice provided in these situations will be formally recorded in order to safeguard participants, Kindi Education and members of our team.
- If ongoing contact with participants is required once they have left Kindi Education's activities, team members will be expected to use existing alumni networks, or use official setting provided communication tools.
- Any communication from participants and parents received on personal social media accounts will be reported to the DSL (or Deputy) and/or the Managing Director.

## **16. Official Use of Social Media**

- Kindi Education has a series of official social media channels. They are only used for clear commercial, educational or community engagement objectives and with specific intended outcomes.
- Leadership staff have access to account information and login details for Kindi Education's social media channels in case of emergency (such as staff absence).
- Official social media sites are suitably protected and, where possible, run and/or linked to/from our website.
- All communication on official social media platforms on behalf of Kindi Education will be clear, transparent and open to scrutiny.
- Parents/guardians/carers and participants will be informed of any official social media use, along with expectations for safe use and action taken to safeguard the community.
- Parents/guardians/carers will be informed of any official social media use with participants and written parental consent will be obtained, as required.
- If members of staff are participating in online social media activity as part of their capacity as a member of Kindi Education's team, they will:
  - Be professional, responsible, credible, fair and honest, and consider how the information being published could be perceived or shared.
  - Always act within the legal frameworks that they would adhere to within the workplace including libel, defamation, confidentiality, copyright, data protection and equalities laws.
  - Ensure appropriate consent has been given before sharing images on the official social media channel.
  - Not disclose information, make commitments or engage in activities on behalf of Kindi Education, unless they are authorised to do so.
  - Not engage with any private/direct messaging with current or past parents/carers without discussion with the DSL/Managing Director.
  - Inform their line manager, the DSL (or deputy DSL) and/or the Managing Director of any concerns, such as criticism, inappropriate content or contact from participants.