

## Online Safeguarding Policy Document

This policy should be read alongside HSEL's Safeguarding Policy and Code of Conduct document, which details our policies and procedures on child protection and safeguarding.

Harrow School Enterprises Limited (HSEL) is the commercial trading arm of Harrow School and works with children and young people as part of its activities in five key areas: Education, Events, Sports, Locations, and the Harrow Shop.

The purpose of this policy statement is to:

- ensure the safety and wellbeing of children and young people is paramount when adults, young people, or children are using the internet, social media, or mobile devices
- provide staff and any individual involved with HSEL's activities with the overarching principles that guide our approach to online safety
- ensure that, as an organisation, we operate in line with our values and within the law in terms of how we use online devices.

The policy statement applies to all staff, children and young people, and any professionals, such as agents, group leaders, or self-employed contractors involved in HSEL's activities.

### Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. Summaries of the key legislation and guidance are available on:

- online abuse <https://learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse>
- bullying <https://learning.nspcc.org.uk/child-abuse-and-neglect/bullying>
- child protection <https://learning.nspcc.org.uk/child-protection-system>

### We believe that:

- children and young people should never experience abuse of any kind
- children should be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe at all times

### We recognise that:

- the online world provides everyone with many opportunities; however, it can also present risks and challenges



- we have a duty to ensure that all children, young people, and adults involved in our organisation are protected from potential harm online
- we have a responsibility to help keep children and young people safe online, whether or not they are using HSEL's network and devices
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, have the right to equal protection from all types of harm or abuse
- working in partnership with children, young people, their parents or guardians, and agents is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety

### We will seek to keep children and young people safe by:

- providing clear and specific directions to staff on how to behave online through our Code of Conduct and Staying Safe Online document
- supporting and encouraging the young people studying with us to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others through our Course Rules, Netiquette, and Staying Safe Online documents
- supporting and encouraging parents, guardians, and agents to do what they can to keep children safe online
- developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or a child/young person
- reviewing and updating the security of our information systems regularly
- ensuring that usernames, logins, email accounts and passwords are used effectively
- ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate
- ensuring that images of children and young people are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- providing supervision, support and training for staff and any individual involved with HSEL's online activities about online safety
- examining and risk assessing any social media platforms and new technologies before they are used within the organisation

### If online abuse occurs, we will respond to it by:

- having clear and robust safeguarding procedures in place for responding to abuse (including online abuse)



- providing support and training for all staff on dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation
- making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole into account
- reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term.

## Related policies and procedures

This policy statement should be read alongside our organisational policies and procedures, including:

- our safeguarding and child protection policy, which includes our ICT acceptable use policy
- our code of conduct for online tutors
- our data protection and privacy policy

## Contact Details

### **Designated Safeguarding Lead**

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### **Deputy Safeguarding Lead**

Josh Billinge, Senior Operations Manager  
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### **Safeguarding Support (Level 2)**

Kim Tootill, Operations Coordinator  
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### **HSEL Director**

Harry Ogden  
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## **Child and Family Services of the London Borough of Harrow**

Children's Access Team  
The Golden Number 020 8901 2690

Emergency Duty Team  
020 8424 0999 (24 hours)

**NSPCC Helpline**  
0808 800 5000

We are committed to reviewing our policy and good practice annually.  
This policy was last reviewed on 11 February 2021.