

Lumi Network Safeguarding Policy & Procedures

Lumi Network's Safeguarding Procedures

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These policies should be read in conjunction with the Privacy Notice.

1.0 Introduction

a. Lumi Network is committed to ensuring the highest possible standard of safeguarding. The personal safety and wellbeing of each student and facilitator using Lumi Network is fundamental.

b. Our product is developed with the aim of ensuring that live sessions take place in a safe environment. This is reflected in the use of recognised platforms like Zoom and Slack with defined usage policies and procedures for the students, parents/responsible adults and facilitators/mentors who use this service.

c. The following sections set out the procedures that should be followed if an incident occurs.

d. These procedures aim to ensure a prompt response to any incident and to minimise any further harm to a student or other person.

e. There are differing severities of behaviour which could be witnessed during a live session. Some behaviour would warrant only a report to Lumi Network Safeguarding Lead; other behaviour may be of a more serious nature where a direct report to the police may be necessary.

f. Each section below sets out the recommended procedure which should be followed. It is always the responsibility of the person alerted to the incident to take some action to protect the student or other person. Lumi Network will not be responsible for any non-compliance with the recommended procedure.

g. The procedures are not an exhaustive list; therefore if an incident occurs that is not covered in this document you are advised to contact Lumi Network Safeguarding Lead, or the police if you believe that it may be a criminal matter.

2.0 Facilitators

If a facilitator sees/experiences:

2.1 Inappropriate language

The facilitator will request, in a polite manner, that the student or other persons using inappropriate language refrains from doing so during the live session. If the language continues the facilitator will explain that they will terminate the session for that student due to the language and will report the matter to Lumi Network Safeguarding Lead who will decide on any further use of the service by the student or other person involved. The facilitator will have no further contact with the student unless by mutual agreement with Lumi Network. Any unsolicited contact from the student or other persons following the termination of the session should be reported to Lumi Network Safeguarding Lead.

2.2 Inappropriate behaviour

The facilitator will request, in a polite manner, that the student or other persons involved in the inappropriate behaviour refrains from the behaviour during the live session. If the behaviour continues the facilitator will explain that they will terminate the session for that student due to the behaviour and will report the matter to Lumi Network Safeguarding Lead who will decide on any further use of the service by the student or other person involved. The facilitator should have no further contact with the student unless by mutual agreement with Lumi Network. Any unsolicited contact from the student or other persons following the termination of the session should be reported to Lumi Network Safeguarding Lead.

2.3 Inappropriate or abusive images

a. Any display of adult pornographic images whilst in the presence of a student may constitute an offence under [UK law](#). Any facilitator/mentor witnessing the display of adult pornographic images by or towards a student should explain that the images should not be displayed during a live session, terminate the session for that student and report the matter to Lumi Network Safeguarding Lead.

b. Any display of child abuse images or indecent images of a child (for these purposes, a 'child' is defined as anyone under the age of 18 years) is an offence under [UK law](#). Any facilitator witnessing a display of indecent images of a child by or in the presence of a student should explain that due to the nature of the images they will terminate the session for that student. The facilitator should then inform the UK police. The facilitator should also inform Lumi Network Safeguarding Lead of the incident to ensure any recordings can be preserved and made available for any police investigation. The facilitator should have no further contact with the student or any other person involved in the incident. Any unsolicited contact from the student or other persons following the termination of the session should be reported to the police and Lumi Network Safeguarding Lead immediately.

c. This action should be taken so that the correct authorities can be alerted and can deal appropriately with the incident.

d. The display of any other images perceived to be inappropriate, either due to the age of the student or the content of the image shall be reported to Lumi Network Safeguarding Lead.

2.4 Disclosure of/witness to abuse towards or in the presence of a student

a. Any physical or sexual abuse of a child is an offence under [UK law](#). If a facilitator receives information about such abuse from the student or other person present they should reassure the person that they can get assistance for them. It is the responsibility of the facilitator to contact the UK police and report what has been witnessed.

b. If the facilitator witnesses any such abuse first-hand they should immediately contact the police and report the incident. Any facilitator witnessing a display of any such abuse of a child by or in the presence of a student should explain that due to the nature of the actions they will terminate the session for all students. Facilitator should also inform Lumi Network Safeguarding Lead of the incident to ensure any recordings can be preserved and made available for any police investigation. The facilitator should have no further contact with the student or other person involved in the incident. Any unsolicited contact from the student or other persons following the termination of the session should be reported to the police and Lumi Network Safeguarding Lead immediately.

2.5 Disclosure of inappropriate/sensitive information

a. During a live session sensitive information may be offered by a student or other person present. If the information relates to any kind of abuse, the facilitator should refer to 'Disclosure of/witness to abuse towards or in the presence of a student', above. The student or other person present should be discouraged from disclosing sensitive information by the facilitator. If the information continues to be shared the facilitator will determine the impact of the information and decide whether to continue or terminate the session for that student and/or all students and report the incident to Lumi Network Safeguarding Lead.

b. Any information disclosed regarding the safety of a child should always be reported immediately to the local police and Lumi Network Safeguarding Lead.

3.0 Students

If a student sees/experiences:

3.1 Inappropriate language

a. The student will inform the Lumi Network Safeguarding Lead of the facilitator using inappropriate language. If the language continues the Lumi Safeguarding Lead should explain that they will terminate the session and will report the matter to Lumi's Management, who will decide on any further use of the service by the facilitator. The student should have no further contact with the facilitator. Any unsolicited contact from the facilitator after termination of the session should be reported to the Lumi Network Safeguarding Lead.

3.2 Inappropriate behaviour

a. The student will inform Lumi's Safeguarding Lead of the facilitator using inappropriate behaviour. The Lumi Network's Safeguarding Lead should ask the facilitator to refrain from using inappropriate behaviour during the live session. If the behaviour continues the Safeguarding Lead will explain that they will terminate the session due to the behaviour and will report the matter to Lumi Network's Management who will decide on any further use of the service by facilitator. The student should have no further contact with the facilitator. Any unsolicited contact from the facilitator after termination of the session should be reported to the Lumi Network Safeguarding Lead.

b. If the behaviour is of a sexual nature towards a student by a facilitator, the student should immediately inform the Lumi Network Safeguarding Lead and terminate the session. The Safeguarding Lead should inform the UK police and Lumi Network Management immediately.

3.3 Inappropriate or abusive images

a. Any display of adult pornographic images whilst in the presence of a student may constitute an offence under [UK law](#). Any student witnessing the display of adult pornographic images by a facilitator should immediately terminate the session and report this to the Lumi Network Safeguarding Lead who should inform the UK police.

b. Any display of child abuse images or indecent images of a child (for these purposes, a 'child' is defined as anyone under the age of 18 years) is an offence under [UK law](#). Any student witnessing a display of indecent images of a child should immediately terminate the session and report this to a Lumi Network Safeguarding Lead, who should inform the UK police.

c. The Lumi Network Safeguarding Lead should also inform Lumi Network Management of the incident to ensure that any recordings can be preserved and made available for any police investigation. The student should have no further contact with the facilitator involved in the incident. Any unsolicited contact from the facilitator following the discontinuation of the session should be reported to the police and Lumi Network Safeguarding Lead immediately.

d. This action should be taken so that the correct authorities can be alerted and can deal appropriately with the incident.

e. The display of any other images perceived to be inappropriate either due to age of the student or content of the image shall be reported to Lumi Network Safeguarding Lead.

3.4 Disclosure of/witness to abuse

a. Any physical or sexual abuse of a person is an offence under [UK law](#). If a student receives information about such abuse from the facilitator or other person present they should immediately inform the Lumi Network Safeguarding Lead. It is the responsibility of the Lumi Network Safeguarding Lead to contact the UK police and report what was witnessed.

b. If the student witnesses any such abuse first-hand they should immediately contact the Lumi Network Safeguarding Lead who should immediately inform the UK police. The Lumi Network Safeguarding Lead should also inform Lumi Network Management of the incident to ensure that any recordings can be preserved and made available for any police investigation. The student should have no further contact with the facilitator involved in the incident. Any unsolicited contact from the facilitator following the termination of the session should be reported to the Lumi Network Safeguarding Lead immediately.

c. This action should be taken so the correct authorities can be alerted and can deal appropriately with the incident.

3.5 Disclosure of inappropriate/sensitive information

a. During a lesson session sensitive information may be offered by a facilitator (If the information relates to any kind of abuse the student should refer to 'Disclosure of/Witness to abuse'). The facilitator should be discouraged from disclosing sensitive information by the student. The Lumi Network Safeguarding Lead will determine the impact of the information and decide whether to continue or terminate the session and report the incident to Lumi Network Safeguarding Lead.

b. Any information disclosed regarding the safety of a child should always be immediately reported to the UK police.

c. Any facilitator reported by a student will be suspended from the site until the incident has been investigated by the appropriate authority. The responsible adult may be informed of the resolution if appropriate.

4.0 Parent/Responsible Adults

a. It is the duty of the parent/responsible adult to ensure the wellbeing of the child if they have been affected by anything said or done by the facilitator when they are made aware.

b. If a parent/responsible adult is alerted by the student to any inappropriate behaviour/language or information by the student or they witness any inappropriate behaviour/language or information by the facilitator, they should immediately speak to the facilitator, state their concern and the incident should then be reported to the Lumi Network Safeguarding Lead to take appropriate action. As there is a recording of the session available, the Lumi Network Safeguarding Lead may review the session before taking further action.

c. The parent/responsible adult should have no further contact with the facilitator involved in the incident. Any unsolicited communication from the facilitator should be reported to the police and Lumi Network Safeguarding Lead as soon as possible.

d. If a parent/responsible adult is alerted by the student to any inappropriate or abusive images or they witness any inappropriate or abusive images displayed by the facilitator, they should immediately speak to the facilitator, state their concern and inform them they are reporting the issue to Lumi Network's Safeguarding Lead. The parent/responsible adult should inform the UK

police (if appropriate) and (in all cases) the Lumi Network Management of the incident to ensure that any recordings can be preserved and made available to any police investigation.

e. The parent/responsible adult should have no further contact with the facilitator involved in the incident. Any unsolicited communication from the facilitator should be reported to the police and Lumi Network Safeguarding Lead as soon as possible.

f. As there is a recording of the session available, the Lumi Network Safeguarding Lead may review the session before taking further action.

g. Any facilitator reported by a parent/responsible adult will be suspended from the site until the incident has been investigated by the appropriate authority. The parent/responsible adult will be informed of the resolution if appropriate.

5.0 Schools, Teachers and Schools Representative

a. The teacher or school representative shall follow the procedures outlined for 'Parent/Responsible adult' in Section 4.

b. Additionally the teacher or school representative should inform the parent of the student about the incident and, as appropriate, the school's Child Protection officer.

c. For the purpose of this policy document a 'responsible adult' includes teachers and school representatives.

6.0 Director/management Lumi Network

a. The Safeguarding Policy and Safeguarding Procedures of the Lumi Network platform and services are the responsibility of the Director and management.

b. Any report of a contravention of the Safeguarding Policy will be reviewed by Lumi Network's Safeguarding Lead, who may engage independent Child Protection consultants to ensure that an appropriate course of action is taken.

c. Any incident reported to Lumi Network shall be reviewed as soon as possible to ensure a timely resolution.

d. If a report concerns minor breach of the Safeguarding Policy, Lumi Network's Safeguarding Lead can make a decision as to appropriate action which may include barring the reported person from using the Lumi Network services.

e. If a report is received by Lumi Network which concerns the immediate safety of a student or any illegal activity during a live session, they will be required to contact UK police and report the incident.

7.0 Designated Safeguarding Lead



Lumi Network takes safeguarding children and safety of all persons using our services very seriously. We review our Safeguarding Policy and Safeguarding Procedures on a regular basis. Our designated Safeguarding Lead is Rohit Vaish who can be contacted at Rohit@lumi.network. The Safeguarding Lead is the first point of contact for all situations that could potentially affect the safeguarding of children and young people using the Lumi Network platform.