



# Safeguarding and Child Protection Policy

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## 1.0 Introduction

Lumi Network believes that all matters relating to the safeguarding and protection of the children and young people we work with, their welfare and interests are of utmost importance and are paramount in all circumstances.

Lumi Network has adopted this Safeguarding and Child Protection Policy and expects all staff and adults working with or on behalf of Lumi Network to support and comply with it. This includes all permanent and temporary staff including facilitators, senior leadership team, interns and any other professional contracted by Lumi Network, and students.

Failure to adhere to this policy will be treated as a serious matter. In the case of staff this may result in disciplinary action for gross misconduct. In the case of contracted professionals, this may mean we cease working with them immediately.

Role	Full name and position	Contact Details
Designated Safeguarding Lead (DSL)	Harish Menon, VP International	harish@lumi.network
Designated Deputy Safeguarding Lead (DDSL)	Nefelie Kalavrezou, Senior Associate. Product & Partnerships Delivery	nefelie@lumi.network

The Safeguarding Lead and Deputy Safeguarding Lead can also be contacted by email via **safeguarding@lumi.network**.

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England, including [Keeping Children Safe in Education](#), the [Children Act](#), [Working Together to Safeguard Children](#), [Protection of Freedoms Act](#) and [Providing Remote Education: Guidance for Schools](#).

### Definitions of terms

- Within Lumi, a child or children refers to a person/people aged 10-14
- Within Lumi, a young person or young people refers to 15-18

- Staff refers to anyone working for Lumi Network whether they are permanent or temporary including facilitators, senior leadership team, freelancers, interns and any other professional contracted by Lumi Network
- A Quest, product, session, and programme are all used interchangeably to denote the service Lumi provides to children and young people
- Lumi Network will from here on in be referred to as Lumi

## 2.0 Purpose of the Policy

The purpose of the policy is to:

- protect children and young people who participate and facilitate in Lumi's Quests (programme) from maltreatment
- Provide Lumi staff, contractors and children and young people and their families, with the overarching principles that guide our approach to child protection

This policy works in conjunction with the following policies and documents to ensure the safety and well-being of all children and young people on our programmes:

- Marketing Privacy Notice • Personal Information Policy • Code of Conduct Policy • AI Policy • Safer Recruitment Policy • Equal Opportunities Policy

- a) Lumi is committed to ensuring the highest possible standard of safeguarding. The personal safety and wellbeing of every student and facilitator using Lumi is fundamental.
- b) Lumi's product is developed with the aim of ensuring that live sessions take place in a safe and inclusive environment. This is reflected in the use of recognised platforms like Zoom, Google Meet for Business and Lumi's platform (Insendi), 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 a report to Lumi's Safeguarding Lead only; other behaviour may be of a more serious nature where a direct report to the police or Local Authority Designated Officer (LADO) 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 will not be responsible for any noncompliance 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's Safeguarding Lead, or the police if you believe that it may be a criminal matter.

### **3.0 Organisational Responsibility**

Lumi recognises that everyone has a role in ensuring that Lumi is a safe environment for children and young people. To support this, Lumi will ensure that there are effective measures in place to create safe and inclusive environments for all children and young people participating in Lumi's programmes and activities. This will be achieved through:

- Safer recruitment and selection process to assess the suitability of staff and delivery partners to work safely with children and young people
- The provision of a mandatory safeguarding induction to all members of staff and more in-depth training for staff with additional safeguarding responsibilities
- A clear, accessible reporting mechanism that supports all children, young people and staff to safely report safeguarding concerns or allegations
- Appropriate safeguarding governance arrangements at every level of Lumi including arrangements for evaluating and assessing any new product, service or event being developed for children and young people

### **3.1 Staff Responsibility**

All members of staff, including freelancers and contracted professionals must support Lumi in its commitment to create a safe and inclusive environment. This means:

- All staff, whether permanent or temporary, must sign a Staff Code of Conduct
- Supporting and following this policy and Lumi's procedures and policies that safeguard and protect children and young people from abuse, harm and exploitation
- Completing the mandatory and role-specific safeguarding training relevant to your role, including refresher training. Staff are then required to answer a series of formal questions on the training content to ensure it has been read and understood
- Being prepared for an informal 1:1 meeting at least once a year where a scenario is presented to a facilitator and they are required to articulate how they would respond to it. These safeguarding spot checks help Lumi to ensure that staff knowledge of safeguarding policy and procedures is at the expected standard. If not, Lumi will rectify any gaps in training through their participation in immediate refresher training, etc.
- Acting in the best interests of children and young people at all times to ensure that they are safeguarded
  
- Reporting any concerns about a child or young person, or about the behaviour of a member of staff towards a child or young person that you may have, to the Safeguarding Team
- Seeking advice and guidance from the Safeguarding Team if in any doubt about what action to take, including sharing information about children and young people in order to safeguard them
- Ensuring behaviour and conduct is consistent with Lumi and NSPCC staff training

- Staff working directly with children and young people must communicate the main principles of this policy to them including how to raise any concerns if they have any, and direct them to the condensed policy on Lumi's platform, which they must review and sign, with access to a link to take them to the full policy

## **4.0 Protecting Children and Young People from Abuse and Neglect**

This policy recognises that the welfare and interests of children and young people Lumi works with are paramount in all circumstances. It aims to ensure that regardless of age, gender, race, religion or belief, ability or disability, sex or sexual orientation, socio-economic background that all children and young people:

- have a positive and enjoyable experience working with Lumi in a safe and child centred environment
- Are protected from abuse whilst participating in Lumi's Quests, on the Lumi platform (Insendi) or any other online or in-person events

All safeguarding concerns and allegations of abuse must be taken seriously and responded to swiftly and appropriately.

### **4.1 Forms of Abuse and Neglect**

Abuse is defined by the NSPCC and the Keeping Children Safe in Education document as a form of maltreatment of a child or young person. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children and young people may be abused in a family or an institution or a community setting by those known to them, or more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or other children or young people.

#### **Physical abuse**

A form of abuse that may involve (but is not limited to) hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

#### **Online abuse**

Any type of abuse that happens on the internet, whether through social networks, playing online games or using mobile phones. Children or young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse.

#### **Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all maltreatment of a child, although it may occur alone.

## **Neglect**

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve a parent or carer failing to provide adequate food, clothing or shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of in-adequate care givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate abuse offline. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on-peer abuse) in education and all staff should be aware of it and their schools and college's policy and procedures for dealing with it. The school's safeguarding policy should be read by the facilitators delivering the Quest in advance of the sessions commencing.

## **Child trafficking**

Where children and young people are tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold for a number of reasons.

## **Criminal exploitation**

Child abuse where child and young people are manipulated or coerced into committing crimes.

## **Female genital mutilation**

Also known as FGM is when a female's genitals are deliberately altered or removed for nonmedical reasons. It's also known as 'female circumcision' or 'cutting' but has many other names.

## **Domestic abuse**

Any kind of controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and young people and witnessing domestic abuse is child abuse.

## **Recognising forms of abuse or neglect**

Some children may be more vulnerable to abuse or neglect. All staff should be alert to the possible vulnerability of a child who:

- a) Is disabled and has specific additional needs;

- b)** Has special educational needs (whether or not they have a Statutory Education, Health and Care Plan);
- c)** Is a young carer;
- d)** Is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups;
- e)** Is missing, or frequently goes missing from care or from home;
- f)** Is at risk of modern slavery, trafficking or exploitation;
- g)** Is at risk of being radicalised or exploited;
- h)** Is in a family circumstance presenting challenges for the child such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- i)** Is misusing drugs or alcohol themselves;
- j)** Has returned home to their family from care; and
- k)** Is a privately fostered child.

It is important that all staff working with children and young people can recognise the signs of abuse and neglect. A detailed list of signs and abuse makes up part of the mandatory training for all staff.

If you recognise any signs or are concerned about the wellbeing of a child or young person you must inform the Designated Safeguarding Lead immediately. Remember:

- A young person is never to blame for abuse
- Disabled people are more vulnerable to abuse
- Young people very seldom make false accusations that they have been abused
- Young people who talk about abuse often fear the consequences of telling other people and whether it will get worse
- Young people who are abused can be very good at hiding their unhappiness or distress
- Abuse can have serious long-term effects on young people

## **4.2 Child-on-child abuse, violence or harassment**

All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse). It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports.

All staff should be clear on the school or college's policy and procedures with regard to peer on peer abuse. Peer-on-peer abuse is most likely to include, but may not be limited to:

- a)** Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- b)** Abuse in intimate personal relationships between peers;
- c)** Physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- d)** initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation as a way of initiating a person into a group and may also involve an online element)

Peer-on-peer abuse may also take the form of sexual violence or sexual harassment. This may include, but is not limited to:

- e)** Grabbing of body parts such as buttocks, genitalia, or breasts;
- f)** Pulling down trousers, flicking of bra straps, or lifting up skirts;
- g)** Sexual violence, such as rape, assault by penetration and sexual assault;
- h)** Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- i)** Non-consensual sharing of nude and semi-nude images and/or videos;
- j)** 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;
- k)** Upskirting, which typically involves taking a picture under someone's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.

Sexual violence and sexual harassment can occur between two children of any age and sex. Sexual violence and harassment exist on a continuum and may overlap: they can occur online and face-to-face (both physically and verbally) and are never acceptable.

Addressing inappropriate behaviour - even if it seems to be relatively innocuous - can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

It is important that staff make clear a zero-tolerance policy approach to peer-to-peer abuse, violence, or harassment and that is never acceptable and will not be tolerated.

Peer-on-peer abuse must never be passed off as 'banter', 'just having a laugh', 'part of growing up', or 'boys being boys'. It is important to understand that all of the above can be driven by wider societal factors beyond the school or college, such as everyday sexist language, and all must be challenged.

It is also important to note that the taking and/or sharing of consensual and non-consensual sharing of nude and semi-nude images and/or videos of under 18s, and upskirting, are both criminal offences.

## **5.0 Responding to safeguarding concerns or allegations**

What to do if you are concerned about a child or young person

Lumi believes that safeguarding is the responsibility of everyone in the organisation and this policy recognises that. All members of staff therefore have a responsibility to read, understand, sign and adhere to the requirements of this policy and our supporting documents (see page 2). All safeguarding concerns and allegations of abuse must be taken seriously and responded to swiftly and appropriately.



## 5.1 Definitions of Terminology

**Concerns:** A safeguarding concern is a feeling or worry that a child or adult may be at risk of harm or abuse or may have been harmed or abused. Concerns may relate to things directly seen or heard, or may relate to information which has come to the attention of staff through any other means. A concern is not yet confirmed or fact-checked.

**Disclosures:** A disclosure is the process of revealing information. Disclosures may be a process rather than a single or specific event. Disclosures about abuse can be directly or indirectly communicated, voluntarily or involuntarily. Disclosures may come from the young person(s) involved or from a friend or peer.

**Incidents:** An incident is an act or series of acts of violence or abuse by one perpetrator or group of perpetrators. This may involve multiple types of violence (physical, emotional, sexual etc.); and may involve repetition of violence over a period of time.

## 5.2 The 5 R's Model

When dealing with any disclosures, concerns, incidents or allegations regarding the welfare of a young person, always remember **the 5 R's Model**:

- 1) **Recognise** signs of abuse and neglect
- 2) **Respond** appropriately following the process outlined in this policy
- 3) **Report** to Lumi's Safeguarding Lead (DSL) or Deputy DSL as soon as possible
- 4) **Record** what you have seen, heard, or witnessed in written form using bullet detail (facts only)
- 5) **Refer** your written record to Lumi's Safeguarding Team who will then take the necessary steps

## 5.3 Process for Reporting and Referrals

The procedure for reporting and referrals depends on the type of safeguarding issue. Below is a table outlining who you must contact and when.

Safeguarding Matter	Who to contact and when
If a child or young person is a risk of immediate danger	The relevant emergency service/s by calling 999 immediately
A concern, disclosure or incident of abuse or neglect involving another young person (child-on-child) or an adult who is not a member of school or Lumi staff	The school's Designated Safeguarding Officer (DSL) and Lumi's contact person at the school immediately. The Lumi DSL or Deputy DSL as soon as possible following the incident.



<p>Low level concerns where the concerns do not meet the harm threshold but are still significant (e.g., inappropriate behaviour, language, or discussion amongst children/young people or staff around or with children/young people, behaviour that could potentially be harmful etc.)</p>	<p>Lumi's contact person at the school and/or the school's DSL - depending on who is involved - as soon as possible. The Lumi DSL or Deputy DSL as soon as possible.</p>
<p>Concerns where a young person has not directly disclosed or an incident has not occurred, but further investigation may be required (e.g. overheard conversations between children/young people or staff; witnessed concerning behaviour that may</p>	<p>If the concern is related to school staff, the Headteacher/Principal as soon as possible, and the Lumi SL or Deputy DSL as soon as possible.</p> <p>If the concern is related to Lumi staff, the CEO and DSL as soon as possible.</p>
<p>pose a risk to the wellbeing or safety of children/young people in the future)</p>	
<p>A concern, disclosure or incident of abuse or neglect involving a member of school staff</p>	<p>The Headteacher/Principal immediately. The Lumi CEO and DSL as soon as possible following the incident.</p>
<p>A concern, disclosure or incident of abuse or neglect involving a member of Lumi staff</p>	<p>The most senior member of the Safeguarding Team who is not implicit in the allegation (CEO and/or DSL)</p>

## 5.4 Reporting Process Flow Chart

Are you being told that a child or young person is being abused or is at risk of harm?	Have you recognised signs or symptoms of abuse, or are concerned for a child's or young person's welfare?
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**YES**



**NO or UNSURE**



Is the child or young person (or someone else) in immediate danger?

**YES**



**NO or UNSURE**



Call <b>999</b> and contact the required emergency service/s	As soon as possible and <b>within one day</b> , share information with the <b>Safeguarding Team</b> on <a href="mailto:safeguarding@lumi.network">safeguarding@lumi.network</a> and/or 07792 054226 / 07787 308607
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You must then report the incident to the DSL using the reporting procedures.

Who to contact (role)	When to contact	Contact Details
Harish Menon, Designated Safeguarding Lead (DSL)	Contact Harish immediately in the first instance with any safeguarding concerns regarding children and young people	<a href="mailto:harish@lumi.network">harish@lumi.network</a> <a href="mailto:safeguarding@lumi.network">safeguarding@lumi.network</a>
Nefelie Kalavrezou Designated Deputy Safeguarding Lead (DDSL)	Contact Nefelie if you cannot reach Harish with any safeguarding concerns regarding children and young people	<a href="mailto:nefelie@lumi.network">nefelie@lumi.network</a> <a href="mailto:safeguarding@lumi.network">safeguarding@lumi.network</a>

**All safeguarding concerns should be sent to [safeguarding@lumi.network](mailto:safeguarding@lumi.network) as well as the named Lumi email address**

## 5.5 Responding to a Disclosure

If a child or young person discloses an incident of abuse, neglect, or other safeguarding concern to you, you must:

- As soon as is appropriate, **explain that the information they are sharing will be shared with other appropriate adults within Lumi and their school. You must never promise to keep what they have said a secret.** Make sure to reassure the child or young person that they have done the right thing by telling you.
- **Listen carefully and remain calm.** Do not interrupt or ask leading questions. Try not to show your emotions to the child or young person but allow them to feel safe and comfortable talking to you.
- **Make sure you understand and are clear** on what the child or young person is telling you without asking leading questions. You should ask them to repeat any information you are not clear of, avoiding rephrasing what they have said or putting things into your own words for them,
- At the earliest opportunity, **make careful, brief but direct notes** of the main points of what has been said by the child or young person. Make sure the exact words of the child or young person are noted in quotation marks. If exact words cannot be remembered, make sure bullet points are made of the detail as clearly as can be remembered. Again, avoid rephrasing what was said or putting things into your own words.

Lumi's DSL or Deputy DSL should be contacted as soon as possible to notify them that a disclosure was made, and the appropriate school staff have been informed. This must then be followed up with further detail via completion of Lumi's [Concern, Disclosure, or Incident Form](#).

## 5.6 Reporting and referring a concern, disclosure, or incident:

If an incident has been witnessed or directly disclosed, or if you have any concerns about a child or young person's welfare or safety, it is vital all relevant details are recorded as soon as possible.

When reporting to the school's DSL or safeguarding team, Lumi staff must follow the school's internal process and procedures.

**To report a concern, disclosure, or incident internally with Lumi, the following steps must be followed:**

1. Transfer detailed notes to Lumi's [Concern, Disclosure, or Incident Form](#). The form must include:
  - a. The date, time, place and context in which the matter took place
  - b. Bullet point detail in clear, chronological order
  - c. Where possible, the exact words used by the young person/people in quotation marks
  - d. The behaviour, manner and demeanour of the child/ren or young person/people when the matter occurred

- e. Any questions you asked of them and their responses
- f. Details of any important steps taken prior to the completion of the form e.g. informing the school DSL
- g. Once complete, the form must be emailed to the Lumi DSL and Deputy DSL using the safeguarding email address
- h. Once passed on to Lumi's Safeguarding Team, it will be logged, and they will take any necessary further action. If any updates are necessary, these will be passed on immediately so the log can be updated.

It is important that once the report is made, the person making the referral keeps matters strictly confidential. All records will be securely saved in Lumi's cloud workspace with restricted access.

Under no circumstances should the alleged perpetrator be made aware of suspicions or allegations. The only exception is where you witness something happening and must directly intervene for the immediate safety or wellbeing of a child or young person.

**Once a report has been made to the Lumi Safeguarding Team:**

- Where necessary, the Lumi team will liaise directly with the school's DSL regarding reporting to the local authority
- If the DSL or Deputy DSL is not satisfied that the school has reported to the local authority, they should consult the policies of the relevant local authority and, in accordance with those policies, make a report to the Local Authority Designated Officer (LADO) without delay.
- In exceptional circumstances where speaking to the school's DSL or Safeguarding Team could give rise to harm to a child or young person, the DSL or Deputy DSL should not do so and should report directly to the local authority without delay.
- The DSL or Deputy DSL will report to the CEO as appropriate to enable prompt and appropriate reporting of any serious incidents.

The expectation is that the school is responsible for informing the child or young person's family or carer and when they will be informed, taking advice from the LADO.

Where there are concerns about radicalisation and extremism, the DSL or Deputy DSL will notify the school immediately.

Where a crime has or may have been committed, or there are concerns about gang violence or child criminal exploitation, the DSL or Deputy DSL will report it to the police in consultation with the school.

Disclosures of historical abuse should be treated in the same way as disclosures of current abuse, particularly where there may still be a risk to children or vulnerable adults.

## 6.0 Risk Assessments

A Risk Assessment is to be carried out by the lead facilitator running the sessions ahead of every new Quest and signed off by the DSL or Deputy DSL. This must cover all risks and steps taken to mitigate them. Lumi's online events must also have a separate risk assessment.

### 6.1 Recording sessions and media consent

By signing up and enrolling their child in Lumi's Quest programme, parents are giving their parental consent for their child to use Lumi's chosen video conferencing platform/s and online learning platform to participate in sessions. By design, Lumi's Quests give children and young people an external platform and public exposure of their ideas, therefore parents also consent to the sharing of these recordings and images publically, or with external organisations, for the purposes of giving the children or young people's ideas and innovations more visibility, recognition and potential sponsorships. If parents do not consent to this, then they should not enrol their child in a Quest and they should therefore not participate.

### 6.2 Communicating with children and young people

Communication between children and adults, by whatever method, should take place within clear and explicit professional boundaries.

Adults must not share any personal information with a child or young person, or request or respond to any personal information being shared by a child or young person which is not explicitly connected to their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

#### a. **Mobile phones**

Staff must not give out their personal mobile number to a young person under any circumstances. Lumi staff working with children under 18 years of age must not have any direct contact with children via mobile phones or messaging services. If it is necessary for staff to communicate with children or young people away from Lumi meetings, then conversations should be held through the Lumi platform (Insendi).

#### b. **Social media**

Staff and volunteers must not communicate with any young person directly via social media. Staff should not accept any request from a child or young person to connect or talk to them via any social media platform such as Facebook, Twitter, Instagram, Tik Tok, LinkedIn. This procedure refers to communications with all children and young people participating in Lumi's Quest/s who are registered as school or college students.

#### c. **Email**

Staff must not share their personal email address with young people. If they need to communicate with young people via email this must be done via their work email account and they must copy Lumi's school contact into the email and CC their line manager. Facilitators and students must only communicate with each other through The Lumi Platform. This is to ensure that personal or school email addresses are not shared and used inappropriately by either party.

#### d. **The Lumi Platform (Insendi)**

The Lumi Platform (Insendi) serves as the centralised hub where our immersive quests are hosted. Here, learners are required to log in to engage in a variety of activities that make up the complete Quest experience, including pre- and post- Quest activities. The platform is also designed to be a safe space for learners to engage in rich, peer-led discussions and share ideas. Insendi is a third party platform and their policies can be found below:

[Data Retention and Disposal](#)

[GDPR](#)

[Server Security Policy](#)

[Information Security Policy](#)

To uphold the highest standards of safeguarding:

- 1. Direct Messaging (DM) Restrictions:** To protect the privacy and safety of our learners, the platform has disabled the Direct Messaging feature. Communication is permitted only through common public forums where interactions can be moderated.
- 2. Email Privacy:** All user email addresses are automatically hidden from public view to protect the privacy of our users. Lumi facilitators advise school students to sign up using their school email ID rather than a personal email address.
- 3. Reporting Mechanism:** In exceptional cases where DM is enabled, for instance at the request of stakeholders such as educational institutions, a function is made available for users to report any inappropriate or abusive messages.
- 4. Facilitators:** During a Quest, the number of facilitators required depends on the number and ages of the students (referred to as Luminaries):
  - a)** If there are fewer than 6 students aged between 10 and 17, only one facilitator is needed.
  - b)** If there are more than 6 students aged between 10 and 17, then two facilitators are required.
  - c)** If the students (Luminaries) are above 18 years old, and there are up to 10 students present, then only one facilitator is needed.

#### e. **Lumi's AI Companion**

At Lumi, we have taken great care to ensure that our AI tools, including the Lumi AI Companion, are both safe and beneficial for learners. These tools have undergone rigorous internal stress tests to scrutinise them for any potential biases or harmful implications.

### **1. Ongoing Monitoring and Improvement:**

We are committed to continuous monitoring of the tools and their usage. Should any elements be found to be not functioning as expected, or causing unintended negative effects, immediate changes will be made to address these issues.

Lumi is dedicated to creating an online learning environment that is not only educational but also safe and inclusive for all our learners. We remain vigilant and proactive in updating these measures as needed.

## **7.0 Information sharing**

Sharing information in the right way and at the right time in a timely manner is essential to safeguarding children and young people. Lumi may share information internally, or externally with statutory or non-statutory organisations for the purposes of safeguarding a child or young person.

Staff must always share information with the Safeguarding Team about safeguarding concerns relating to children and young people who interact with Lumi. Confidentiality is never a barrier to sharing information in this way for safeguarding purposes.

Lumi will share information with other agencies and make a referral in writing to statutory agencies when there is a significant risk of harm, or a potential crime has been committed, or when it is in the interests of safeguarding young people or children. If feedback on any such referral has not been received from statutory agencies within five working days then contact will be made by Lumi to confirm the status of the referral.

In relation to safeguarding children when there are concerns over the behaviour of staff then information will be shared with the Local Authority Designated Officer (LADO). In other circumstances the Safeguarding Team may be required to share information with or refer to statutory agencies.

## **8.0 Safeguarding Training**

Lumi is committed to ensuring that all staff are appropriately trained to fulfil the needs of their role. Safeguarding training is designed to create a safe culture. It is delivered during staff induction then refreshed at least annually as part of our commitment to safeguarding.

Staff are trained as per the following:

<b>Staff</b>	<b>Level of training</b>	<b>Current training provider</b>
Facilitators	Introductory	NSPCC



Senior Leadership Team	Introductory Safeguarding and/or Safer Recruitment	NSPCC
Designated Safeguarding Lead and Deputy Lead	Designated Safeguarding Lead (Level 3)	High Speed Training

All Lumi staff, temporary or permanent, must receive refresher training led by the Safeguarding Team. Depending on their role, this will occur between every quarter and every year. All staff must sign a declaration after their induction training and on an on-going annual basis to confirm that they have received and understood the relevant training.

## 8.1 Facilitators

If a facilitator sees/experiences:

### i. 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 the Designated 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. Any unsolicited contact from the student or other persons following the termination of the session should be reported to the Designated Safeguarding Lead.

### ii. 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 the Designated Safeguarding Lead who will decide on any further use of the service by the student or other person/s involved. The facilitator should have no further contact with the student unless by mutual agreement with Lumi. Any unsolicited contact from the student or other persons following the termination of the session should be reported to the Designated Safeguarding Lead.

### iii. 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 the Designated 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 the Designated 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 the Designated Safeguarding Lead.

#### **iv. 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. The facilitator should also inform Lumi's 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.

#### **v. Disclosure of inappropriate/sensitive information relating to Lumi**

**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 by the facilitator from disclosing sensitive information relating to Lumi, the Quest, other participants or facilitators or the technology tools provided to develop their ideas. 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's Safeguarding Lead.

**b.** Any information disclosed regarding the safety of a child should always be reported immediately to the local police and the Designated Safeguarding Lead or Deputy Safeguarding Lead.

## 8.2 Students

If a student sees/experiences:

### i. Inappropriate language

The student will inform the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead of the facilitator using inappropriate language. If the language continues the DSL or Deputy

DSL 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 Safeguarding Team.

### ii. Inappropriate behaviour

**a.** The student will inform the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead of the facilitator using inappropriate behaviour. The DSL or Deputy DSL should ask the facilitator to refrain from using inappropriate behaviour during the live session. If the behaviour continues the DSL or Deputy DSL will explain that they will terminate the session due to the behaviour and will report the matter to Lumi'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 DSL or Deputy DSL.

**b.** If the behaviour is of a sexual nature towards a student by a facilitator, the student should immediately inform the DSL or Deputy DSL and terminate the session. The DSL or Deputy DSL should inform the UK police and Lumi's Management immediately. The student should have no further contact with the facilitator. The facilitator will be immediately removed from the programme. Any unsolicited contact from the facilitator after termination of the session should be reported to the Safeguarding Team.

### iii. 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 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 Safeguarding Lead should also inform Lumi 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's 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's Safeguarding Lead.

#### **iv. 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 Safeguarding Lead. It is the responsibility of Lumi's 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 Lumi's Safeguarding Lead who should immediately inform the UK police. The Lumi Safeguarding Lead should also inform Lumi 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 Lumi's Safeguarding Lead immediately.

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

#### **v. Disclosure of inappropriate/sensitive information relating to Lumi**

**a.** During a lesson session sensitive information relating to Lumi 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 by the student from disclosing sensitive information relating to Lumi, the Quest, other participants or facilitators or the technology tools provided to develop their ideas. The other facilitator in the session should report the incident to Lumi's Safeguarding Lead, who will determine the impact of the information and decide whether to continue or terminate the session.

**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.

### **8.3 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 Lumi's Safeguarding Lead to take appropriate action. As there is a recording of the session available, the Lumi's 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's Safeguarding Lead. The parent/responsible adult should inform the UK police (if appropriate) and (in all cases) the Lumi 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's Safeguarding Lead as soon as possible.

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

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

## **8.4 Schools, Teachers and Schools Representative**

**a.** The teacher or school representative shall follow the procedures outlined for 'Parent/Responsible adult' above.

**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 carers, teachers and school representatives.

## **8.5 Lumi Director and Management**

**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'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 shall be reviewed as soon as possible to ensure a timely resolution.
- d.** If a report concerns minor breach of the Safeguarding Policy, Lumi's Safeguarding Lead can make a decision as to appropriate action which may include barring the reported person from using Lumi's services.
- e.** If a report is received by Lumi 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.

## **9.0 Disclosure and Barring (DBS)**

All UK based facilitators are required to have an Enhanced DBS check. Where a DBS check is required, Lumi requests that staff must obtain their own Enhanced DBS certificate through our third party DBS check provider, Checks Direct, and must share their personal details with them and DBS. Facilitators will not be allowed to deliver or participate in a Quest before a DBS check has been carried out and the certificate shared with Lumi. For applicants applying outside of the UK (usually facilitators) and facilitators based internationally, Lumi requests a formal police certificate plus a credible third party verification, such as a character reference from a University professor or supervisor who knows the candidate well. Lumi hires facilitators from trusted third parties and via referrals where Lumi can do independent background checks as listed above. Lumi does not hire facilitators through cold recruitment.

As an organisation working with children and young people, Lumi has a legal duty to make a referral to the DBS in cases when the employer has dismissed or removed a person from working with children or vulnerable adults (or would or may have if the person had not left or resigned) because of concerns over their behaviour towards children. The CEO will make this referral with advice and support from the DSL.

## **10.0 Programme content**

Lumi's programme operates a topic-based approach, and currently covers four main topics: Health, Future Cities, Climate Change, Inequality. Lumi recognises that these topics are broad and it is often open to interpretation as to which local or global sub-issues fall within these categories. As part of Lumi's staff safeguarding training, facilitators are trained in which issues are and aren't appropriate for children/young people to cover at Lumi. This is to ensure that children and young people are fully safeguarded.

Once the teams of children/young people have shown an interest in and identified a subissue, Lumi will communicate this with the school to ensure the school is happy for the team to proceed with the topic and it doesn't raise any concerns for the school. Should the school

disagree with the chosen topic then, where appropriate, Lumi facilitators will encourage the team/s to take their project in a different direction.

Every school will be provided with a brief weekly update from the lead facilitator to Lumi's key school contact/link teacher which outlines progress and to act as a way of spotting and/or deescalating any potential safeguarding issues.

## **10.1 Global/local issues to avoid during Quests**

Some of the issues that are inappropriate for children and young people to create a project around at Lumi include child abuse, violence or neglect (of any form), peer on peer abuse, violence or neglect (of any form) as listed above in the Forms of Abuse and Neglect section. A full list can be found in our Safeguarding training materials for staff.

## **10.2 Virtual sessions and remote facilitation**

Lumi's programme is fully online, and uses either Zoom, Google Meet (Business account) or MS Teams to facilitate and host sessions and events with children and young people. By signing up and enrolling their child in Lumi's Quest programme, parents are giving their parental consent for their child to use Lumi's chosen video conferencing platform/s and online learning platform to participate in sessions. By design, Lumi's Quests give children and young people an external platform and public exposure of their ideas, therefore parents also consent to the sharing of these recordings and images publically, or with external organisations, for the purposes of giving the children or young people's ideas and innovations more visibility, recognition and potential sponsorships. If parents do not consent to this, then they should not enrol their child in a Quest and they should therefore not participate.

Lumi's preferred video conferencing is Google Meet (Business version). The following guidance must be followed:

- Staff and facilitators must only use business accounts (Google, Zoom or MS Teams) to facilitate sessions and events. These accounts are accessed via a paid subscription and comply with GDPR regulations for the storage of children and young people's data.
- Staff and facilitators must have a Lumi background during the session. If this is not possible due to a technical issue, the facilitator must let a member of Lumi's Senior Leadership Team know prior to the session. In this instance it will be necessary for the facilitator to have a plain or neutral background and with no external interruption.
- If a session takes place in a child's home, a parent or guardian should be asked to come on the screen at the beginning of the session to show their presence. They would confirm they/another trusted family member (or close family friend) were going to be in the house for the duration of the session. This can also be used as an opportunity to briefly outline what their children are doing during the session.
- If the child is alone in a room, especially if they are in their bedroom, the door must be left open at all times and ideally in view. If not in view, the parent should confirm it is open and if possible the student would show the facilitator the door.



- Staff must know how to set up and apply controls relating to young peoples' interactions, including microphones and cameras
- Staff must ensure that sessions are password protected and include a 'waiting room' from which participants are manually admitted into the sessions. Attendance lists must be set up in advance of the session to do so effectively.
- Staff must use video conferencing rooms as they would real-life rooms, making sure that children and young people are not left unsupervised for long periods of time. Staff should frequently go in and out of all breakout rooms whilst they are in use.
- Sessions and events must be recorded and saved in a designated folder for safeguarding and monitoring purposes. These can be shared with the school on request.
- Chats on Google Meet, Zoom or MS Teams must be monitored by the facilitator/s delivering the session and anything inappropriate must be reported to the DSL immediately.
- Guidance notes must be shared with schools, young people, and external stakeholders who will attend or participate in online sessions or events in advance.

## 11.0 Child Protection Record Retention and Storage Guidelines

According to Data Protection principles, records containing personal information should be: adequate, relevant and not excessive for the purpose(s) for which they are held; accurate and up-to-date, and only kept for as long as is necessary.

Lumi's Data Protection and Privacy Policy outlines the retention, storage and destruction of all records that relate to concerns about a child's welfare and safety, and/or concerns about possible risks posed by people working with children.

All incidents are recorded via an Incident and Disclosure Form and are logged centrally and securely on the Incident and Disclosure Tracker. These are saved on Lumi's cloud workspace and can be accessed by the Safeguarding Team.

Records relating to concerns about an adult's behaviour should be stored in the person's confidential personnel folder. A copy will be given to the individual.

## 11.1 Monitoring and Reviewing of Policies

The Safeguarding Incident Tracker is under constant review by the DSL and the Deputy DSL. The CEO, supported by the DSL, has responsibility for the implementation and review of this policy and will consider the record of incidents as part of the ongoing monitoring of safeguarding procedures, to consider whether existing security and online safety practices within the organisation are adequate. The Safeguarding Team leads an annual full review of policy and procedure.

## 12.0 Contacts

The Safeguarding Policy is owned by the Safeguarding Team. Any queries about the policy should be sent to the following email address: **[safeguarding@lumi.network](mailto:safeguarding@lumi.network)**

## **12.1 Author**

This policy was written by Rosie Nicholas, Designated Safeguarding Lead & Partnerships Lead on 5th June 2023. It was finalised on 10th October 2023.

This policy was next updated on Wednesday, 6th March 2024.

## **Reviewed and approved by**

Prashant Raizada, CEO & Founder, on 16th October 2023.