



Adapting to new learning environments

How to keep students safe and protect their well-being

This briefing has been prepared by the Council of International Schools (CIS) in consultation with the International Centre for Missing & Exploited Children (ICMEC), Childnet International, the International School Counseling Association (ISCA), International Child Protection Advisors (ICPA) and 9ine.

Introduction

This briefing provides an overview of the key safeguarding considerations to keep in mind when implementing a virtual or remote learning program and includes links to leading resources. It was prepared in response to the many questions we have received from schools and universities in recent weeks, as institutions consider how best to keep students safe in new learning environments.

Please take from this briefing what is helpful for your community. Any actions taken to safeguard students should be tailored to the unique challenges and contexts that your institution faces. You can only do what your resources allow in this difficult time of change.

We will continue to update this article in response to your questions on how to keep students safe in new learning environments and welcome your feedback on emerging practice in your community, both what is working and what is not working.

Share your questions/feedback:

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Terminology

The term 'safeguarding' is used in this briefing to describe actions that a school or university can take to prevent, identify and respond to the harm and abuse of students.

The term 'institution' is used to describe early years settings, primary and secondary schools and universities.

The term 'staff' is used to describe adults working or volunteering in schools and universities. It includes, but is not limited to, teachers and teaching assistants, school counsellors, university psychologists, faculty members, lecturers and professors.

IMPORTANT QUESTIONS FOR SCHOOLS AND UNIVERSITIES

1. Are you making it easy for students to share concerns with any member of staff with whom they feel comfortable?
2. Do your policies provide clear steps for staff to take if:
 - ✓ they think that a student is at risk of harm or abuse, in distress or struggling with their mental health?

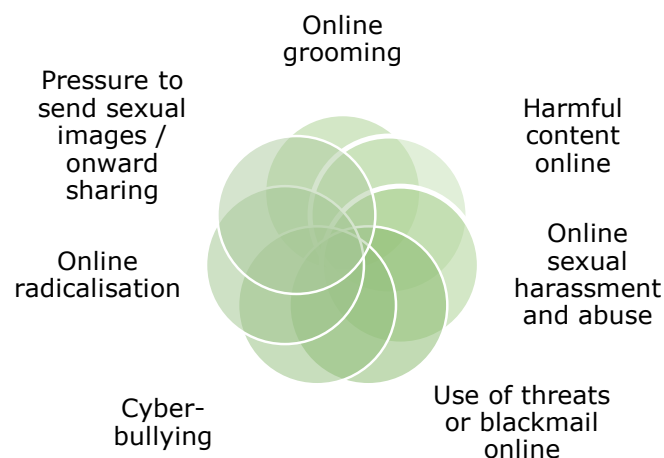
- ✓ they think that a staff member poses a risk of harm to students, or
 - ✓ they identify inappropriate, harmful or illegal material online?
3. Have you reviewed your reporting lines to ensure that contact details are up to date and any designated staff are in an accessible time zone?
 4. Do your policies explain how your institution is keeping young people safe from online harm?
 5. Do your codes of conduct address online behaviour and communications, use of social media, appropriate dress code and location for joining any virtual learning sessions?
 6. Do you have the contact details of key law enforcement and support agencies?
 7. Have you considered what a reasonable and proportionate monitoring regime looks like in your institution?
 8. Have you put in place reasonable and proportionate safeguards for any one-to-one sessions, including any counselling sessions? **Please note that we do not recommend that institutions record counselling sessions.**
 9. Are you considering how to provide information about online safety and any of the above to your students, staff and parents, as appropriate?
 10. How will you obtain feedback from students and staff for later review to update and ensure your policies and procedures remain effective?


ANSWERS TO KEY QUESTIONS FROM SCHOOLS AND UNIVERSITIES

What are the key safeguarding risks to our students during this time?

The safeguarding risks associated with *virtual* and *remote* learning are similar to those associated with *in-person* learning. These include peer on peer harm, which is the physical, emotional or sexual harm between students and grooming and abuse by a member of staff. Most forms of harm can take place online as well as offline. In remote working environments and situations of self-isolation or quarantine, online harm and harm to students living in abusive home environments are particular considerations.

Figure 1 - Examples of different forms of online harm





Well-being considerations are also important. Fears around the COVID-19 outbreak and challenges associated with self-isolation, disruption to daily lives or unknown carers are likely to put an additional strain on the mental health of members of your community. For most people, this might result in moderate levels of anxiety at most. This is normal and can help us to manage challenging situations. Students and staff already suffering from baseline anxiety disorders or other mental ill-health; these challenges may be particularly difficult to manage.

Should we update our institution's existing policies or introduce new guidelines?

Most institutions will already have strong policies in place to support safeguarding actions and online safety. Institutions should review these policies and update them if necessary, for example, by checking that any designated staff are in accessible time zones. Depending on individual circumstances, institutions might also choose to implement specific guidelines.

What should the reporting lines be for students?

Institutions should encourage students to let their teacher, professor or counsellor know if they feel unsafe in a virtual classroom, session or forum and to report wider concerns to any staff member with whom they feel comfortable.

Which areas should our institution's online safety policies address?

Online safety policies should set out how the institution works to *prevent* and *respond* to inappropriate, harmful and illegal content online. These policies can be helpful in:

- ✓ keeping young people safe from online harm,
- ✓ making sure that the institution's online and virtual activities align with its values and comply with relevant laws, and
- ✓ ensuring parents, staff and students are aware of expected and appropriate behaviours, and reporting mechanisms.

How can our institution prevent inappropriate and harmful material from being shared online?

Having clear expectations around online behaviour and providing policies, education and training to reinforce these are essential.

In a virtual learning environment, specific steps might include ensuring that staff have the ability to mute online platform participants, moderate online discussion groups, disable users' videos and/or remove or ban a participant from a virtual classroom.

Please note that content which would ordinarily be blocked by an institution's filtering system in a school or university setting will not normally be blocked when individuals are working remotely.

How should staff respond if they see inappropriate or harmful content being shared online?

The appropriate response will depend on individual circumstances. Action could include, for example, deleting inappropriate comments, removing content from an online forum, removing all participants from a class and/or escalating concerns in accordance with the institution's policies. Having clear and centralised reporting lines in these policies enables institutions to spot patterns and identify harm at an early stage.

In addition to any internal reporting lines, criminal content should also be reported to the relevant in-country law enforcement agency. Institutions can also:

- ✓ Report online child sexual abuse material to international hotlines: <https://www.icmec.org/education-portal/reporting-mechanisms/>
- ✓ Report inappropriate, harmful or illegal material directly to the service provider on their website. See the following link for reporting routes: [Reporting routes](#)

Many countries have in place specific laws which criminalize the viewing, copying and sharing of offensive, illegal or menacing content online, and the taking, viewing, possessing or sharing of indecent images of children. If you do not already know what the law is in your country, find out and make sure that your policies comply with these.

See the following link for a summary of over 60 countries' national laws relating to child abuse and institutional responsibilities: <https://www.icmec.org/education-portal/international-national-law/>


What action should our institution be taking to support our students who might be vulnerable to abuse?

Students previously identified as vulnerable to abuse by the safeguarding team, or those with existing child protection concerns or safety plans, should continue to be monitored or risk assessed. A staff member, such as a counsellor, can continue or initiate regular check-ins with the student, parent and/or carer as appropriate.

How can our institution support a student who is distressed or struggling with anxiety?

Institutions should consider what action staff should take if a student becomes distressed during a virtual session. For schools, having parents contactable and nearby is important. Providing education to students about what to do if they witness something harmful online and having readily available contact details of emergency and support organizations are also important. All institutions should also have a way for students to remove themselves from a virtual session and indicate to a teacher, professor or counsellor that they are worried, upset or feel unsafe.

The current fears around COVID-19, disruptions to daily life and social isolation may cause many of us to experience moderate levels of anxiety. This is normal and to be expected. It is our natural response to challenging circumstances and will help us to manage these circumstances more effectively.



Young people already suffering from baseline anxiety disorder or other mental ill-health may find the current circumstances particularly challenging. Some young people may experience high or acute anxiety. Some signs to be aware of include:

- Preoccupation and excessive worry;
- Showing emotional and behavioral interference/paralysis and showing signs of not being able to cope;
- Avoidance of responsibilities or relationships;
- Perseverance - meaning that the student cannot move away from their thoughts or are chronically thinking about risk and threat; and
- Ruminates - thinking too deeply about the situation.

If students are showing these signs, then staff should consult and follow the channels of communication set out in any relevant policy and update any risk assessments or safety plans accordingly. As part of this, staff might decide to refer the student to counselling that can be delivered virtually, whether by the institution's or an external service.

Helplines and counselling agencies for students requiring additional support or intervention

- Find a trusted child helpline in your country: <https://www.icmec.org/education-portal/reporting-mechanisms/>
- The following organizations offer virtual counselling:

Amwell: <https://business.amwell.com/>

Better help: <https://www.betterhelp.com/>

Expatriate Nest: <https://www.expatriatenest.com/>

RNG International: <https://rnginternational.com/>


Truman Group: <https://truman-group.com/>

William & Associate Counselling Services: www.wacs.ca

Which areas should our institutional Codes of Conduct and Acceptable Use policies cover?

Online communications can increase the blurring of boundaries and it is important that staff maintain professional boundaries at all times when conducting remote learning. Codes of conduct, behaviour codes and acceptable use policies for students and staff should include guidelines that apply equally to *in-person* and *online* behaviour. These will continue to apply and might address, for example:

- ✓ **Online interactions** – specific guidelines could address, for example, the sharing of content on online platforms and during virtual classrooms;
- ✓ **Professional boundaries** – staff should maintain the same professional boundaries with students *online* as they are required to maintain *in person*;
- ✓ **Appropriate location to join a virtual classroom** – a neutral location (i.e. not a bedroom or bathroom) in a common area in the house is preferable and,



for school students and any non-confidential one-to-one sessions, somewhere that is within earshot of parents or other people in the student’s residence (see below);

- ✓ **Appropriate dress code when joining a virtual classroom** – this should mirror any guidelines that institutions already provide;
- ✓ **Use of social media for professional and personal purposes** – institutions might already have in place guidelines for staff around their use of social media and the information that they post about themselves online. These normally include rules preventing the sharing of any personal contact details online and, for schools at least, prohibiting the befriending of students on social media; and
- ✓ **Digital communications between students and staff** – these should mirror the rules regulating *in-person* communications and are normally restricted to messages which have an educational purpose. Some institutions might require all digital communications between students and staff to be conducted via an institutional email, video-conferencing account or telephone number. Where this is not possible, consider having a system where at least two staff members have access to these communications.

Resources: Guidance on Codes of Conduct and Behaviour Codes for staff in schools [Guidance for Safer Working Practices](#)

Should we keep our institutional policies under review?

The institution should keep its policies under review and update these at the appropriate time in light of any feedback from students and staff.

How should our school/university monitor student and staff activities during remote and online learning?

Most institutions already take proactive steps to check that staff and students are acting in line with expected behaviours, and that harm is not occurring. For example, staff in schools might periodically drop into or observe a class; and schools and universities will both provide some level of supervision for student-only areas on campus. Any monitoring of *virtual* educational sessions should mirror the monitoring that institutions already have in place in relation to *in-person* sessions. For most schools, this means making virtual educational sessions interruptible and observable, i.e. having a system where designated staff can periodically enter a virtual classroom. Institutions should also consider whether and to what extent they will monitor student-only groups and discussion forums.

Are there additional steps that we can take to safeguard students and staff during virtual one-to-one sessions?

Online communications, remote learning and virtual one-to-one sessions can increase the blurring of professional boundaries. Institutions should assess the risks associated with one-to-one settings and consider what actions to take to mitigate these risks.

These actions might include:

- ✓ Postponing any non-essential one-to-one educational sessions. **Please note that counselling sessions should not be postponed;**

- ✓ Letting a designated staff member know the timing, location and reason of the session in advance and sending confirmation of it after;
- ✓ Requiring the session to take place in a common area that is within earshot of another person in the student's residence. For counselling or other confidential sessions, the student should, where possible, be located in a room which is private, but which is not a bedroom or bathroom. If a student cannot avoid taking a counselling session from their bedroom, the counsellor should consider holding the session with audio only, not video;
- ✓ Making sure that the student knows that they can stop the session at any time and how to raise a concern or get help if needed;
- ✓ Making sure that staff know how to raise a concern about the session, and that it is their responsibility to maintain appropriate professional boundaries;
- ✓ Making sure that the institution complies with any legal, regulatory and policy requirements to obtain appropriate consent from students and/or parents of children under a certain age to engage in virtual one-to-one sessions with staff or counsellors.

For counselling sessions, the age at which young people are legally able to consent to counselling differs between countries;

- ✓ Ensuring that counsellors have a safety plan in place for students in distress or at risk of harm, which sets out what steps should be taken to support the student in this online environment.

Resources: For additional guidance on one to one working, whether in person or virtual, see this NSPCC Guidance on [Safeguarding Children for Lone Workers](#).


Should counsellors take an audio or video-recording of virtual counselling sessions?

We recommend that institutions do **not** record any virtual *counselling* sessions.

Given the confidential and personal nature of counselling sessions, there are high risks associated with recording sessions, such as:

- Recording sessions removes privacy and confidentiality and could lead to students opting out of much needed support.
- Recording sessions could also lead students to withhold information, which could restrict the ability of the school counsellor or university psychologist to support the student.
- If a recording were disclosed to others it could have serious implications for the student, counselor and institution.
- As licensed professionals, school counselors and university psychologists are required to abide by the Code of Ethics issued by their licensing body. The American School Counselor Association's (ASCA) Ethical Standards for School Counselors emphasizes:
 - A.2.j. Protect the confidentiality of students' records and release personal data in accordance with prescribed federal and state laws and school board policies.
 - A.2.k. School counsellors recognize the vulnerability of confidentiality in electronic communications and only transmit student information electronically in a way that follows currently accepted security standards and meets federal, state and local laws and board policy.

Sources: [ISCA Position Statement](#)
[ASCA Code of Ethics](#)



There may be exceptional circumstances which require counselling sessions to be recorded. For example, for licensing supervision or training purposes. If a recording is necessary for licensing, the counsellor must follow official procedures from the relevant university or licensing body.

Resources: For additional guidance on the role of the school counsellor, please see this [Position Statement](#) issued by ISCA.

Should our institution require staff to take an audio or video-recording of our virtual educational sessions?

If institutions wish to record virtual *educational sessions* (such as an English or mathematics class), we would suggest that they only do so if they consider it necessary and proportionate, after conducting a written risk assessment. They should also make sure that they have the appropriate policies and systems in place to make and store the recording in accordance with the relevant data protection laws in their country. Any risk assessment should weigh up the risks of recording against the risks of not recording. The inadvertent recording or disclosure of confidential information should be included in the risks associated with recording.

A word about data protection and the European General Data Protection Regulation (GDPR)

GDPR does not require institutions to take audio or video recordings of educational or counselling sessions.

GDPR and other equivalent privacy laws regulate how institutions process and store personal data. Both audio and visual recordings of educational and counselling sessions are likely to contain personal data and may contain sensitive or 'special category' data.

Before an institution makes an audio or video-recording of any virtual educational session, it should ensure that it has in place appropriate data protection and information security policies and systems, enabling it to record and store the information securely and retain the recording for no longer than is necessary. If its data protection policies and privacy notices do not currently allow the institution to record sessions, then these should be updated as appropriate. The institution should also make sure that its students and, where appropriate, their parents or carers, have been informed and are aware that some educational sessions will be recorded, and how the recordings will be used.

How can we help our community to interact well online and to identify and respond to online harm?

Institutions should consider carefully how they can educate students about online safety and communicate information during this challenging period.

There is a wealth of excellent online safety resources available. If institutions would like to use some of these resources while remote or virtual learning is in place, they should carefully select those that can and are appropriate to be delivered virtually, taking into account the restricted ability of staff to safeguard any students who become distressed or disclose harm as a result of an online safety session.

Areas to cover might include:

- ✓ how to support the student's learning or remote learning environment;

- ✓ how to handle a virtual disclosure of abuse from a student;
- ✓ positive and healthy online interactions;
- ✓ the institution’s code of conduct and, for staff, any safeguarding and online safety policies; and
- ✓ how to identify and report inappropriate behaviour and harm online.

Online Safety Resources:

The ICMEC Education Portal contains a full list of resources: <https://www.icmec.org/education-portal/online-safety/> and <https://www.icmec.org/education-portal/lesson-resources/>

Childnet International develops and raises awareness of excellent resources for children of all ages: <https://www.childnet.com/resources>.

This Digital Leadership Programme empowers students to have agency to promote online safety: <https://digital-leaders.childnet.com/>

This parents and carers toolkit offers practical online safety advice for parents and carers: <https://www.childnet.com/parents-and-carers/parent-and-carer-toolkit>

Feedback and further questions

We will continue to update this article in response to your questions on how to keep students safe in new learning environments, and welcome your feedback on emerging practice in your community, both what is working and what is not working.

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Further Resources

[ICMEC Safer Schools Infographic](#)

[Safe Remote Learning](#)

Education Portal

Resources, training materials and tools in support of institutional safeguarding and child protection programs may be found at the International Centre for Missing & Exploited Children EdPortal.ICMEC.org.

QR code for EdPortal.ICMEC.org



Education Portal button with short link

