Appropriate Filtering for Education settings



May 2023

Filtering Provider Checklist Reponses

Schools (and registered childcare providers) in England and Wales are required "to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering". Furthermore, it expects that they "assess the risk of [their] children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology". There are a number of self review systems (eg www.360safe.org.uk) that will support a school in assessing their wider online safety policy and practice.

The Department for Education's statutory guidance 'Keeping Children Safe in Education' obliges schools and colleges in England to "ensure appropriate filters and appropriate monitoring systems are in place and regularly review their effectiveness" and they "should be doing all that they reasonably can to limit children's exposure to [Content, Contact, Conduct, Contract] risks from the school's or college's IT system" however, schools will need to "be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding."

By completing all fields and returning to UK Safer Internet Centre (enquiries@saferinternet.org.uk), the aim of this document is to help filtering providers to illustrate to education settings (including Early years, schools and FE) how their particular technology system(s) meets the national defined 'appropriate filtering standards. Fully completed forms will be hosted on the UK Safer Internet Centre website alongside the definitions

It is important to recognise that no filtering systems can be 100% effective and need to be supported with good teaching and learning practice and effective supervision.

Company / Organisation	LGfL
Address	9th Floor, 10 Exchange Square, Primrose Street, London, EC2A 2BR
Contact details	Safeguarding and compliance related: safeguarding@lgfl.net Technology queries: schoolprotect@lgfl.net and homeprotect@lgfl.net
Filtering System	SchoolProtect-WebScreen and HomeProtect are our products for network and remote filtering respectively (both based on Netsweeper technologies; other Netsweeper variants may at times be available) Details via filtering.lgfl.net Advice for DSLs via safefiltering.lgfl.net
Date of assessment	July 2022

Where a supplier is able to confirm that their service fully meets the issue identified in a specific checklist the appropriate self-certification colour for that question is GREEN.	
Where a supplier is not able to confirm that their service fully meets the issue identified in a specific checklist question the appropriate self-certification colour for that question is AMBER.	

Illegal Online Content

Filtering providers should ensure that access to illegal content is blocked, specifically that the filtering providers:

Aspect	Rating	Explanation
Are IWF members		LGfL is an active member of the IWF to help shape and inform this vital institution. We sit on the IWF Funding Council where Mark Bentley is currently vice chair.
and block access to illegal Child Abuse Images (by actively implementing the IWF URL list)		This list is implemented for all our filtering customers and cannot be bypassed. Even the very few customers which require a raw internet feed without filtering still cannot access sites on the IWF blocklist. We also go beyond the IWF URL list in that the IWF's Image Hash List is also enforced by the Netsweeper engine on which all our filtering is based. This ensures any sites are blocked which may be hosting new instances of child sexual abuse images that have been reuploaded onto a new website in order to avoid a block.
Integrate the 'the police assessed list of		This list is also implemented for
unlawful terrorist content, produced on		all our filtering customers and
behalf of the Home Office'		cannot be bypassed.
Confirm that filters for illegal content cannot leadingly described by the actual.		These lists cannot be bypassed
be disabled by the school		or accidentally turned off

Further illegal content blocked by LGfL:

LGfL was the <u>first UK internet service provider</u> to implement the City of London Police's Infringing Website List (IWL) from the Police Intellectual Property Crime

Unit (PIPCU). This blocklist contains websites which have been proven to include illegal pirated content (such as Hollywood films). Each site has been independently verified as containing illegal content by a police officer. The list is particularly useful for schools as these sites are not only often linked to criminal gangs, but often include malware, so it is important to protect staff and students form the illegal material and potential viruses and security breaches. What is more, schools may otherwise be held to account for breach of copyright if this material is downloaded on their network, leading to thousands of pounds of fines from the copyright owners.

Inappropriate Online Content

Recognising that no filter can guarantee to be 100% effective, providers should both confirm, and describe how, their system manages the following content

Content	Explanatory notes – Content that:	Rating	Explanation
Discrimination	Promotes the unjust or prejudicial treatment of people on the grounds of race, religion, age, or sex.	Ü	As with all categories listed here, combatting this category cannot be achieved through blocking alone, and it is crucial that education forms part of the same conversation as filtering and blocking. Safe search can be enforced in search engines and the moderate or strict restricted DNS modes within YouTube help to remove many videos which are inappropriate for children that fall into this or any other of the categories listed here. Schools can choose to whitelist a site that is in an otherwise blocked category, or block a site from an otherwise allowed category (and do this per group/IP/time etc).
			This category of discrimination is most likely to be covered by the category of Hate Speech. See also Extremism section below for education support.
Drugs / Substance abuse	displays or promotes the illegal use of drugs or substances		See above for general notes. Schools can choose to block or allow three categories relating to drugs debate, illegal drugs and prescription drugs. We offer county lines support and training via countylines.lgfl.net

Extremism	promotes terrorism and terrorist		
LACI CITIISIII	ideologies, violence or intolerance	See above for g	general notes.
	races of state of sta	many of these on which school hoc or custom any other categ addition to the Office terrorist	egory into which sites will fall and ols can compile ad reports (as with gory). This is in CTIRU Home
		work in this are viewed via <u>prev</u> including a new	v joint resource support critical eguarding, ot limited to Going too Far
Gambling	Enables gambling		cated gambling we would expect lock.
Malware / Hacking	promotes the compromising of systems including anonymous browsing and other filter bypass tools as well as sites hosting malicious content	of viruses/infect further support list (see back 1 LGfL technolog core filtering se	e to our categories cted hosts. It is ted by the PIPCU page) and other ies beyond the ervice which are ur schools, such as
Pornography	displays sexual acts or explicit images	See above for g Further to this support and sig pornography.lg	we provide gnposting at
Piracy and copyright theft	includes illegal provision of copyrighted material	See above for g	general notes. weeper category also the PIPCU lied as per the
Self Harm	promotes or displays deliberate self harm (including suicide and eating disorders)	See above for g Self-harm sites into the 'extrer	general notes. will usually fall me' category. They d by site theme or

		Netsweeper classification engine or LGfL keywords. The collection of resources at bodyimage.lgfl.net may be
		helpful further support in this area for schools.
Violence	Displays or promotes the use of physical force intended to hurt or	See above for general notes.
	kill	This may fall into the categories of violence/extreme/web storage/criminal/adult.
		LGfL education support in this area includes <u>countylines.lgfl.net</u> , <u>syv.lgfl.net</u> and <u>survive.lgfl.net</u> .

This list should not be considered an exhaustive list. Please outline how the system manages this content and many other aspects

The categories which exist for granular block/allow rules can be applied to different users, groups, times, IP ranges, etc within SchoolProtect-WebScreen and HomeProtect; they are listed below this box for information. Users can see definitions of each category within the portal. They can be applied at a school or MAT/LA level for user groups (per Active Directory or USO login, and from September 23 via Chromebook authentication too), and/or by time or IP address.

'Bundles' also exist to allow groups of URLs to be treated together, either because a school or MAT wishes to group regular websites or for those such as the LGfL Facebook bundles which includes the 6 or 7 different web addresses which must work in order for the facebook site to work (and vice versa).

Proxies and VPNs are handled in their own easily blocked categories.

https://www.bbc.co.uk/news).

https://www.bbc.co.uk/news).

Over the summer of 2023 we are rolling out a new system to allow much more widespread decryption for the 23/24 year and are encouraging schools to install certificates in preparation for this.

** NB, the filtering categories we use are pasted for reference at the end of this document.

Regarding the duration and extent of logfile (Internet history) data retention, providers should outline their retention policy, specifically including the extent to the identification of individuals and the duration to which all data is retained.

SchoolProtect-WebScreen system logs are retained for the period of 1 year after the end of the academic year and then disposed of. This not only complies with the Investigatory Powers Act 2016 which requires ISPs to retain this data for 12 months, but also allows schools the opportunity to run investigations after the fact during an extended period. Where these files have been downloaded by a school for a safeguarding record, the school can apply DfE recommended retention periods to the downloaded files. There is no justification for LGfL to retain these logfiles over a longer period without justification, hence the application of this 'academic year-end + 1 year' approach.

The extent to which an individual can be identified by the reports will vary from school to school depending on the extent to which they have set up per-user filtering. Where per user policies are applied, logs and reports will identify usernames allocated by school accounts.

Providers should be clear how their system does not over block access so it does not lead to unreasonable restrictions

- When pupils use their parents' or their own devices at home (as opposed to school managed wones which can have HomeProtect applied), they do not have the protections offered by a schoolsafe connection often parents are not aware of the basic family protections available on home broadband connections of games consoles and mobile phones. Accordingly, we encourage schools to focus on educating pupils/students about how to use devices and the internet safely and securely, and above all what to do if they see or experience something which worries or harms them or makes them uncomfortable. Strong filtering must go hand-in-hand with strong education and safeguarding at all times to prepare young people for a digital world.
- There is a fine line between under- and over-blocking, and of course this depends on the school, context and specific user. That is why we encourage schools to customise the default strict policy settings we give them when they join there are templates for primaries and secondaries according to the needs of the school and its community. With the exception of the illegal content lists, a school can choose to allow or block any category for a particular group/s in line with its own needs and risk assessment.
- This is further supported by the ability to provide different policies for different user
 groups using Active Directory integration or USO account browser logins (LGfL's
 Shibboleth-compliant IdP is Unified Sign On or USO), as well as IP and time-based policies
 to add further flexibility. In September 23 Chromebook authentication will be added for
 further flexibility and there are plans for more granularity with 365 and other Google
 logins shortly afterwards.
- We provide a range of training courses and resources to support teaching young people
 about how to stay safe online, and this supports the aims of not overblocking but ensuring
 adequate protections and backing it up with firm policies and educational messaging.
- We encourage schools to make the most of the relationship between filtering and
 monitoring. Many of our schools receive a monitoring service from another provider. The
 two are important because if you use monitoring to see why a child or young person took
 a particular route to a piece of content or website, you will learn much more but also be
 able to have slightly less strict filtering. We give more information on the differences
 between filtering and monitoring and how not to overblock in our information page for
 DSLs at safefiltering.lgfl.net

- Training on our solutions is not only offered for technical teams, but also via a 30 minute course for safeguarding leads to help them understand what filtering can do and how it can be used as part of a wider contextual safeguarding approach. These help all parties understand the system and the importance of not overblocking.
- The use of Netsweeper classifications mean that LGfL takes advantage of the artificial intelligence systems used to categories AND constantly reassess sites to ensure overblocking does not take place due to categorisation errors.
- Customisable block pages allow schools to give more information to users about the route to unblock a page and to why it is blocked in the first place.
- We recommend that YouTube is not blocked but that restricted modes are set via DNS, and also provide guidance on how to work within the constraints of the YouTube system to make these more flexible and appropriate at <u>youtube.lgfl.net</u> (recently updated after changes made by Google).

We recommend a graduated approach to exposing children to technology as they develop; an example might be the use of safe search engines with younger pupils rather than relying on the enforced safe search in school that may not be turned on at home; or to having different filtering policies for different year groups. As pupils get older and develop, it is appropriate to relax restrictions and the flexibility of our filtering systems allow this throughout.

Filtering System Features

How does the filtering system meet the following principles:

Principle	Rating	Explanation
Context appropriate differentiated filtering, based on age, vulnerability and risk of harm – also includes the ability to vary filtering strength appropriate for staff		As detailed in the box above, schools can apply and then customise policy templates to the needs of their users. They can apply these to groups of users (e.g. individual/class/year group, pupil, teaching staff, admin staff, etc) using Active Directory or USO login, or by time and/or IP address. In September 23 Chromebook authentication will be added for further flexibility and there are plans for more granularity with 365 and other Google logins shortly afterwards. Schools can choose to whitelist a site that is in an otherwise blocked category, or block a site from an otherwise allowed category (and do this per group/IP/time etc).

	The system is highly flexible to allow schools to exercise their own judgement in line with their expertise, local knowledge and risk assessment.
 Circumvention – the extent and ability to identify and manage technologies and techniques used to circumvent the system, specifically VPN, proxy services and DNS over HTTPS. 	LGfL filtering is not a DNS-based filter, so efforts to circumvent the system using DNS over https or changing DNS server will have no impact on the system. VPNs and Proxy sites can be blocked.
	Google Translate is allowed per se but the function to translate an entire website is blocked as this is a classic way to avoid filtering by translating an adult site, for example.
	Safe search is enforced by default for google, bing and yahoo and the search engine category can be used to block others.
	The active management of firewalls also plays a key role in the avoidance of techniques and technologies to bypass protection.
 Control – has the ability and ease of use that allows schools to control the filter themselves to permit or deny access to specific content. Any changes to the filter system are logged enabling an audit trail that ensure transparency and that individuals are not able to make unilateral changes 	With the exception of illegal sites, schools can change/apply any policy or group or whitelist or blacklist any site regardless of genera policy application. They have full control of the system. MATs / LAs can also appoint admins to apply policy changes on behalf of a school where appropriate.
	The admin portal can be accessed anywhere, anytime, by authorised

admins within the school and where appropriate LA/MAT. This applies equally to the SchoolProtect-WebScreen and HomeProtect portals. Contextual Content Filters – in addition to URL Netsweeper has developed or IP based filtering, the extent to which (http an AI system that is and https) content is analysed as it is constantly scanning the streamed to the user and blocked, this would internet to analyse the include AI generated content. For example, content of all websites – it being able to contextually analyse text on a does not simply work at the page and dynamically filter. domain level but is scanning all pages and making ongoing changes to categorisations throughout the day. This is well illustrated by the stats on changes made during the past 24 hours by the Netsweeper categorisation engine at netsweeper.co.uk/live-stats LGfL also recommends the use of monitoring tools to understand more about the journey of young people online and on devices as these tools can monitor text as it is input on the page. Most AI tools are not designed for use by children and extreme care should be taken. There will be soon an Al category and we would recommend this is blocked so that schools can allow AI tools one by one if they choose to do so. Filtering Policy – the filtering provider publishes a rationale that details their We would like schools to approach to filtering with classification and take this document as our categorisation as well as over blocking policy, as it outlines our approach to various areas especially overblocking.

Group / Multi-site Management – the ability for deployment of central policy and central oversight or dashboard	There are further details at WebScreeninfo.lgfl.net https://homeprotect.lgfl.net https://safefiltering.lgfl.net and YouTube.lgfl.net. Category listings and definitions are also given within the admin portal itself. We recommend that schools fully review all settings to ensure it is appropriate and safe for their setting's needs without overblocking. We help them do so with separate training for DSLs and tech teams and our guidance at https://safefiltering.lgfl.net as well as our online safety policy which outlines a whole-school approach and rationale for combining technology, safeguarding, curriculum and more. Local authorities / Multi-academy trusts can make all the same changes that their school admins can make and easily change between all the schools they have
	permission to manage for reporting or to make changes.
	We recommend that bundles/shared lists are used to enforce blocking or allowing across an LA or MAT.
Identification - the filtering system should have the ability to identify users	Where Active Directory or USO login is used, the identification of users for filtering or reporting is by nature easiest. Where a school opts for IP based filtering, reporting will be limited to IP address but can

be easily narrowed down to time and behaviour to help identify users. Reporting is very detailed for both regular, scheduled and ad hoc reports.

In September 23, Chromebook authentication will be added for further flexibility and there are plans for more granularity with 365 and other Google logins shortly afterwards.

 Mobile and App content – mobile and app content is often delivered in entirely different mechanisms from that delivered through a traditional web browser. To what extent does the filter system block inappropriate content via mobile and app technologies (beyond typical web browser delivered content). Providers should be clear about the capacity of their filtering system to manage content on mobile and web apps

LGfL filters any content accessed by http and https protocols, regardless of whether content is browser or application (app) accessible and is equally applicable to 'mobile' content accessed via an establishment's filtered infrastructure.

Where apps use these protocols, filtering works in a similar way to web browser filtering and schools can choose to allow or block each app on a per-app basis. This is best done using a mobile-device management (MDM) system (many LGfL schools use the Meraki licences offered by LGfL).

As with all elements of filtering, it is vital that schools also engage with the education side of online safety to equip students for when they are on their family home or mobile connections with little or no filtering.

Where apps use certificate pinning or different firewall ports and non https/s traffic, we recommend the use of

 Multiple language support – the ability for the system to manage relevant languages Network level - filtering should be applied at 'network level' ie, not reliant on any software on user devices whilst at school (recognising that device configuration/software may be required for filtering beyond the school infrastructure) 	MDMs to block use of these apps or adoption of a third-party monitoring service to monitoring these in real time. All our filtering benefits from the 46 languages in the Netsweeper dynamic categorisation. In school, yes the filtering is all network level and so applies to any device used on the network.
Remote devices – with many children and staff working remotely, the ability for school owned devices to receive the same or equivalent filtering to that provided in school Remote devices – with many children and staff working remotely, the ability for school owned devices to receive the same or equivalent filtering to that provided in school	At home, HomeProtect, the LGfL webfilter for school managed devices deployed for use in the home, is by design a client based filter in order to make sure it filters all internet whether at home, in a café, a library or wherever. It is available for Windows (.msi file), Chrome/Google Workspace (chrome extension), Android and iPad (both via a browser app). Out of the box, schools are asked to choose between 'Safe with Social Media and Gaming Allowed' and 'Safe with Social Media and Gaming Blocked' (given that social media and gaming are the two areas where school approaches vary the greatest, especially for use outside the home). These can then be fully customised according to school needs but the categories and sites are designed to allow the types of sites most likely to be used for homework or remote learning (e.g. all video sites are allowed eg iPlayer, YouTube etc as

	homework is likely to be set this way – instructions on how to set YouTube modes on a device level are shared as part of the installation process). Generally a home policy will be less strict than a school one, hence the defaults take this into consideration, and that most schools will be happy for students to use devices for their own ends, as long as this is possible safely and away from the most harmful sites. However, as before, education is key and parental engagement.
Reporting mechanism – the ability to report inappropriate content for access or blocking	School admins can report an incorrectly categorised site within the admin portal or flag a site that should be blocked. The can also change policies instantly for their school to allow or block a site. Any errors, queries and other reports can also be filed to our helpdesk. We encourage schools as they do their 'regular checks' under the new standards to set up a mechanism for staff to internally report content that needs to be blocked (or allowed, which is just as
Reports – the system offers clear historical information on the websites users have accessed or attempted to access	important to avoid overblocking). Detailed reports can be run by admins within the admin portal. These can be scheduled or ad hoc, can be per AD or USO user/policy group/IP/URL/category group/category. Chromebook authentication in September 2023 will enhance this user information further and this

	will soon be enhanced with further authentication systems.
	Log files are retained as detailed above for the remainder of the academic year plus 1 year.
Safe Search – the ability to enforce 'safe search' when using search engines	Safe search is enforced by default and we encourage schools to check this as part of their regular check regime.

Filtering systems are only ever a tool in helping to safeguard children when online and schools have an obligation to "consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum".¹

Please note below opportunities to support schools (and other settings) in this regard

LGfL's SafeguardED team ensures that the infrastructure and technology we deliver to LGfL schools serves the safeguarding agenda, for example through web filtering (we scan over one billion URLs each day) and <a href="mailto:m

We run a national safeguarding centre of excellence to support schools as they keep children safe online and beyond. This support includes live training (<u>safetraining.lgfl.net</u>) for staff, support for parents (<u>parentsafe.lgfl.net</u>) <u>blogs</u>, <u>newsletters</u> and <u>social media feeds</u> and other communications to make sure that schools are up to date with legislation and practice.

We operate a <u>resource portal</u> to save teachers time and help them quickly access the best of the support available for pupils, parents and school staff, and we give schools to our expertise through policy templates for them to adapt and apply in their schools.

LGfL also contributes to various national bodies that shape safeguarding policy and practice, inform government and carry out research to ensure that we are always up to speed with the latest threats and opportunities online, e.g. pupil focus groups and pupil surveys.

We work with partners to produce unique materials such as the recent collaboration with the Department for Education 'Going Too Far – Extremism and the Law', a critical thinking resource to help young people understand the law online and not cross it themselves or be sucked in by others trying to mislead or groom them.

We also support schools implementing the new online safeguarding focus within the new statutory National Curriculum subject RSHE/PSHE, and continue to support specialist safeguarding areas, such as gangs/youth violence, county lines, incels and MASH referrals. The broader commitment to safeguarding is shown in that all our online support materials are made available open access for the whole education community, such as translations of Keeping Children Safe in Education Part 1 into 10 community languages.

¹ https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

PROVIDER SELF-CERTIFICATION DECLARATION

In order that schools can be confident regarding the accuracy of the self-certification statements, the supplier confirms:

- that their self-certification responses have been fully and accurately completed by a person or persons who are competent in the relevant fields
- that they will update their self-certification responses promptly when changes to the service or its terms and conditions would result in their existing compliance statement no longer being accurate or complete
- that they will provide any additional information or clarification sought as part of the selfcertification process
- that if at any time, the UK Safer Internet Centre is of the view that any element or elements of a provider's self-certification responses require independent verification, they will agree to that independent verification, supply all necessary clarification requested, meet the associated verification costs, or withdraw their self-certification submission.

Name	Mark Bentley
Position	Safeguarding & Cybersecurity Manager
Date	20 July 2023
Signature	

Please see overleaf for our filtering categories for reference

SchoolProtect-WebScreen categories

Abortion -Extreme Medication Self Help File Sharing Misc. Protocols Prochoice Sex Education Abortion - Prolife Music Downloads **Forums SMS** Messaging **Abortions** Freeware Network Social Issues and Activist/Advocacy **Downloads** Unavailable Support New URL Groups Gambling

Social Networking Games No Text Ad Blocking Sport - Hunting **Adult Content** Gay & Lesbian Nudity and Gun Clubs Occult Adult Image Issues **Sports** Online Sales Advertising General Streaming Media

Open Resource Adware **General News** Substance Abuse Alcohol Hate Speech Sharing Tasteless/Illegal/Q Alternative Host is an IP Parked uestionable Lifestyles Humour Pay to Surf **Technology**

Arts & Culture Images Peer to Peer Tobacco
Bad Link Infected Hosts Phishing Travel
Banner/Ad Servers Instant Messaging Phone Cards Under

Blogging (IM) Piracy Construction
Bullying Internet Auction Political URL Translation

Bullying Internet Auction Political URL Translation
Business Intimate Apparel Portals Vehicles
Classifieds Intranet Servers Privacy Violence

Classifieds Intranet Servers Privacy Violence
Computer Security Investing Profanity Viruses
Criminal Skills Job Search Proxy Anonymizer Voice Over IP

Culinary Journals and Blogs Real Estate (VOIP)
Directory Legal Redirector Page Weapons

Drugs - DebateMalformed URLReferencesWeb ChatDrugs - IllegalMalicious WebReligionWeb E-mailDrugs - PrescribedObfuscationRingtonesWeb Hosting

Education Malware Safe Search Web Storage
Educational Games Match Making Sales Web-Based Chat &

Email Matrimonial Search Engine Email

Entertainment Media Protocols Search Keywords

Environmental Medical Security Threat

For HomeProtect these categories are slightly different:

General News Lifestyle Choices Abortions Content Server Ad Blocking Government Malformed URL Copyright Malicious Web Adult Mixed Infringement Hacking Content **Criminal Skills** Hate Speech Obfuscation Culinary Health Malware Advertising Adware Host is an IP **Malware Hosts** Directory Age Restriction Education HTTP Errors Marijuana Alcohol **Educational Games** Humor Match Making Arts and Culture Entertainment **Images** Matrimonial **Body Modification** Medication Environmental Infected Hosts **Bullying** Extreme Intimate Apparel Military

Business Financial Services Intranet Servers Network Timeout

Child EroticaGamblingJob SearchNetworkChild Sexual AbuseGamesJournals and BlogsUnavailableClassifiedsGeneralLegalNew URL

No Text
Nudity
Occult
Open Mixed
Content
Parked
Pay to Surf
Payment Gateway
Peer to Peer
Phishing
Phishing Hosts
Phone Cards

PIPCU
Pornography
Portals
Privacy
Profanity
Real Estate
Redirector Page
References
Religion
Remote Access
Tools
Safe Search

Sales
Search Engine
Search Keywords
Self Harm
Sex Education
Social Networking
Sports
Streaming Media
Substance Abuse
Technology
Terrorism
Tobacco

Translation
Travel
Under
Construction
Vehicles
Viruses
Weapons
Web Chat
Web Email
Web Hosting
Web Proxy
Web Storage