



Rt Hon Nadhim Zahawi MP
Secretary of State

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Dr Henderson
Assistant Coroner

21 January 2022

Dear Dr Henderson

I received your Prevention of Future Deaths Report, regarding the tragic death of Frances Rose Thomas, on 6 December 2021.

This is a heart-breaking case, and I share your concerns about the widespread availability of content online that promotes and advertises methods for suicide and self-harm. My thoughts are with Frances' family and everyone that knew her.

I would like to assure you that the department takes the issues raised in the report very seriously.

My department's *Keeping Children Safe in Education* (KCSIE) statutory guidance places a legal obligation on all schools and colleges to safeguard and promote the welfare of children. The breadth of issues classified within online safety is considerable but can be categorised into four areas of risk which are: Content, Contact, Conduct and Commerce. KCSIE is clear that schools and colleges should consider how online safety is reflected as required in all relevant policies and procedures and that governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to risks from the school's IT system. As part of this requirement, governing bodies and proprietors should ensure their school has appropriate filters and monitoring systems in place. To help schools understand what 'appropriate' might look like, KCSIE signposts to further detailed guidance from the [UK Safer Internet Centre](https://www.gov.uk/guidance/keeping-children-safe-in-education-2021). KCSIE is also clear on the options open to schools when considering monitoring. This ranges from physical monitoring, to log file information monitoring, to active (school led) and pro-active (third party led) monitoring.

The appropriateness of any filter and monitoring systems is rightly a matter for individual schools. The needs of individual schools will be unique to their own local circumstances. For example, a small rural school's filtering and monitoring needs will be different to that of a large urban school and the needs of primary schools will be different to the

needs of secondary schools. School leaders are best placed to decide what will be appropriate for their school and the needs of their children having regards to the strong expectations set out in KCSIE.

However, I am very aware that technology in this area evolves and changes rapidly and it is important that schools do not lose sight of this. As such, KCSIE is clear on the importance of a whole school approach to online safety. As well as filtering and monitoring, schools and colleges should also consider staff training, annual risk assessments reflecting the risks children face, educating children to navigate the online world safely, and a clear policy on the use of mobile technology. KCSIE signposts schools to tools and additional advice in this space. This includes, the “360 safe website”, which provides a free online safety self-review tool (12,575 schools in England are signed up), it can be found here: <https://360safe.org.uk/>. In addition, the UK Council for Internet Safety has published “[Online safety in schools and colleges: Questions for the governing board](#)” which helps governors to challenge their senior leadership teams on the effectiveness of their schools online safety approach.

We have significantly strengthened online safety in KCSIE in recent years - especially in 2021. This includes considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

We continue to review what more we can do to support schools and colleges and see where we can strengthen the guidance further. On 11 January, we launched a public consultation on KCSIE which runs until 8 March. To help us build the evidence base, we have included a question specifically relating to filtering and monitoring systems, which asks schools if they *feel able to make informed decisions on which filtering and monitoring systems your school or college should use?* Following consultation, we plan to publish revised guidance later this year.

Furthermore, to support schools to have the appropriate safeguarding systems in place, under both child and data protection legislation, we will also be launching a set of digital, data and technology standards from Spring 2022, including standards on data and cyber security, and how to support more robust monitoring and filtering. Through consultation with the education and technology sector, we will explore options on how to ensure schools meet these standards to support system-wide safeguarding policies and how we can further support them to understand and improve their digital environments.

In May 2021, the government published the draft Online Safety Bill, which will give tech companies new responsibilities to protect their users. It will apply to services which host user-generated content or

facilitate user-to-user interactions, as well as to search services. Services in scope will have to remove and limit the spread of illegal content, such as content which assists or encourages suicide. The strongest protections in the Bill are for children. Where in-scope companies are likely to be accessed by children, they will be required to do far more to protect children from content and activity which is legal but may be harmful to them, such as bullying and the promotion of self-harm online.

We have confirmed our decision to appoint Ofcom as regulator and our intention to give them a range of enforcement powers which will include substantial fines and, where appropriate, business disruption measures (including blocking). There will also be a criminal offence for senior managers who fail to ensure their company complies with Ofcom's information requests, to push strong compliance in this area.

The Bill was subject to pre-legislative scrutiny by a Joint Committee of MPs and Peers, who reported with their recommendations on 14 December 2021. We are considering fully and carefully these recommendations and are committed to introducing the Bill as soon as possible. In the meantime, we are working closely with Ofcom to ensure that the implementation of the framework is as short as possible, following passage of the legislation. We are also clear that companies should not wait for the legislation to protect their users online.

We are also working with the Children's Commissioner to support parents to help their children navigate the internet safely and recently met with technology companies to ask them to do more to keep young people safe, ahead of the Online Safety Bill coming into effect. The Children's Commissioner is working on her final recommendations to us and to DCMS, which we will fully consider and respond to in due course.

Let me turn now to your concerns about the periods Frankie was left unsupervised. There is an expectation that when in school, children should be in class. We do, however, recognise that there may be occasions where an exception is made for some children as it may not be in their best interests to be in class. That said, even when not in class, children should still have access to suitable learning with appropriate support and supervision. In deciding what was appropriate we would expect a school or college to take account of any vulnerabilities and complex needs that a child might have.

The government recognises that more broadly the current Special Educational Needs and Disabilities (SEND) system could be improved, we are therefore currently conducting a SEND Review covering a wide range of SEND issues and expect to publish proposals from that Review for public consultation in a Green Paper in the first 3 months of 2022.

Finally, with regards to the concerns raised specifically in relation to WATTPAD, I must advise that this issue falls outside of this department's remit but has been passed to DCMS for its consideration, I am also aware that DCMS is working closely with DHSC on tackling harmful suicide/self-harm content online.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'N. Zahawi', with a large, stylized initial 'N' and a long horizontal stroke.

Rt Hon Nadhim Zahawi MP
Secretary of State for Education