

Summary of proposed changes for the 2026 Filtering and Monitoring definitions

These updates are intended to **clarify and align existing expectations**, not to introduce new requirements. They respond to changes in technology, device use, and statutory safeguarding expectations, while maintaining consistency with current DfE guidance.

1. Mobile and app based content (Filtering and Monitoring)

What we are changing

- We are clarifying that filtering and monitoring apply to **content delivered through mobile devices and applications**, not only through traditional web browsers.
- The wording now explicitly reflects:
 - content delivered within apps
 - embedded in-app browsers
 - in-app link handling that may bypass a standard browser experience
- Providers are expected to be clear about **what coverage exists on mobile devices and apps**, and where limitations apply.

Why this is necessary

- The majority of pupil online activity now occurs through apps rather than browsers.
- Schools often assume filtering and monitoring coverage is broader than it is in practice.
- This change improves accuracy and supports informed safeguarding decisions without expanding scope.

2. App behaviour, permissions, and technical limitations

What we are changing

- We have reflected that some app functionality relies on **user-granted permissions** and may involve cloud or device-side processing.
- The guidance now makes clearer that filtering and monitoring **may have limitations once permissions are granted**, and that these limitations should be understood and documented.
- Provider transparency about capability and configuration is reinforced.

Why this is necessary

- Safeguarding risk increasingly arises from *how* apps operate rather than from access to clearly harmful websites.

- This supports realistic expectations of technical controls and avoids over-reliance on filtering or monitoring alone.

3. Testing filtering and monitoring effectiveness

What we are changing

- We have clarified that confidence checks and testing should:
 - include mobile devices and installed apps
 - not be limited to browser-based testing
- We have also clarified that **some tests depend on configuration**, such as managed devices, certificates, or managed browsers.

Why this is necessary

- Schools are increasingly asked to evidence filtering and monitoring effectiveness.
- This change helps schools understand what testing can and cannot demonstrate, without overstating capability or creating false assurance.

4. Alignment with DfE expectations on illegal content

What we are changing

- We have incorporated the proposed DfE wording to make clear that:
 - filtering systems must not allow anyone within a school, **including system administrators**, to disable filtering for illegal content.

Why this is necessary

- This reflects statutory safeguarding expectations.
- It removes ambiguity about administrative override and ensures consistent interpretation across schools and providers.
- The wording has been integrated proportionately, without altering the structure of the document.

5. Monitoring specific clarifications (no structural change)

What we are changing

- We have made **sentence-level clarifications** (not new sections) to ensure it is clear that:
 - monitoring alerts require safeguarding interpretation

- responsibility sits with designated safeguarding roles
- technical staff may administer systems but should not hold safeguarding decision-making responsibility
- We have reinforced that monitoring systems have limitations, including false positives, and must be used proportionately.

Why this is necessary

- This aligns with current statutory guidance and inspection expectations.
- It addresses a known sector risk where safeguarding responsibility can be unintentionally delegated to technical roles.

6. Consistency between filtering and monitoring guidance

What we are changing

- Equivalent updates have been made in **both documents** where the same issue applies (apps, mobile devices, testing).
- This avoids mixed messages and supports schools in understanding how the two controls work together.

Why this is necessary

- Filtering and monitoring are published and used as a pair.
- Inconsistency creates confusion for schools, providers, and inspectors.

7. What we are *not* doing

It may be helpful to be explicit that we are **not**:

- introducing new safeguarding duties
- expanding monitoring into surveillance
- adding inspection or compliance thresholds
- changing the overall structure of either document

All changes are **clarifications to keep the guidance accurate and current**.