



E-Safeguarding Policy

Policy:	E-Safeguarding Policy	
Approved by:	SNMAT Board of Directors	
Date:	May 2023	
Review cycle:	v cycle: Annual	

VERSION CONTROL			
VERSION	DATE	AUTHOR	CHANGES
2020	March 2020	DO – IT Director	No changes.
2021	April 2021	DO – IT Director	No changes.
2022	May 2022	BD & TTL	Changed I.T. Director to Trust Technical Lead (TTL) IT Technical Guidance and Cyber Security Policy added to Links with Other Policies Paragraphs numbered throughout the policy.
2023	April 2023	MJH – IT Coordinator	 E-Safety to E-Safeguarding. Redesign of document. Split policy rationale into individual statements. Added Keeping Children Safe In Education (2022) Statutory Guidance references throughout. Added Meeting Digital Technology Standards in Schools and Colleges (2023) guidance references throughout. Added DSL as co-responsible of management and operation of E-Safeguarding policy and updated responsibilities. Removed responsibility of IT Support to evaluate the effectiveness of senior staff role responsibilities. Added use and functionality of classroom management tools throughout the policy. Expanded Trust IT Teams and IT Service Provider responsibilities. Added parental responsibilities for ensuring children's personal devices, social media usage and internet connections at home are filtered and configured with parental controls. Added Removing Evidence from Digital Devices guidance for staff and IT Support teams. Added Internet Access section covering filtering configurations. Removed responsibility from IT Support Teams for active monitoring of filtering reports. Added Microsoft 365 section.

Executive Summary

1. The requirement to ensure that children and young people are able to use the internet and related communications technologies appropriately and safely is addressed as part of the wider duty of care to which all who work in academies are bound. Academies must, through their E-Safeguarding Policy, ensure that they meet their statutory obligations to ensure that children and young people are safe and are protected from potential harm, both within and outside the academy. The policy also forms part of the Trust's/academy's protection from legal challenge, relating to the use of digital technologies.

Scope

2. This policy applies to all members of the Trust/academy community (including staff, pupils/students, volunteers, parents / carers, visitors, community users) who have access to and are users of trust/academy ICT systems, both in and out of the trust/academy.

Rationale

- 3. The Education and Inspections Act 2006 empowers Principals/Headteachers to such extent as is reasonable, to regulate the behaviour of pupils/students when they are off the academy site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of cyber-bullying or other E-Safeguarding incidents covered by this policy, which may take place outside of the academy, but are linked to membership of the trust/academy.
- 4. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data if the Principal/Head Teacher believes it contains any material that could be used to bully or harass others or used to commit a crime.
- 5. The DfE Keeping Children Safe in Education (2022) statutory guidance provides clear instruction to academies to take an effective whole school approach to ensuring that children are safeguarded from potential harm and inappropriate material online.
- 6. The Government's Meeting Digital Technology Standards in Schools and Colleges (2023) provides guidelines for schools to provide a safe environment to learn and work when online.
- 7. The Counter Terrorism and Securities Act 2015 requires academies to ensure that children are safe from terrorist and extremist material on the internet.
- 8. The academy will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents/carers of incidents of inappropriate E-Safeguarding behaviour that take place out of school.

Objectives

The SNMAT E-Safeguarding Policy aims to:

9. To educate all SNMAT stakeholders to take a responsible approach to E-Safeguarding;

- 10. To help and support children and young people to recognise and avoid online safety risk and build their resilience:
- 11. To reinforce E-Safeguarding messages and make E-Safeguarding a focus in all areas of the curriculum;
- 12. To provide information and awareness to parents to help them understand these issues through parents' evenings, all communication channels and provide information about national/local online safety campaigns/literature;
- 13. To provide effective E-Safeguarding training and guidance for staff to ensure they understand their responsibilities;
- 14. To ensure that children are safeguarded from potential harmful and inappropriate material online as required by the Keeping Children Safe in Education (2022) statutory guidance.
- 15. To ensure that children are safe from terrorist and extremist material on the internet as required under the Counter Terrorism and Securities Act 2015.

Roles and Responsibilities

Board of Directors

16. The Board of Directors is accountable for the effective operation of the E-Safeguarding policy overall. Regular reports around safeguarding in the academies are received by the Board. These include reference to E-Safeguarding where appropriate.

Local Governing Body

17. The responsibility for the effective operation of the policy in the academy has been delegated to the Local Governing Body who will monitor and review its operation at the academy by receiving regular reports about E-Safeguarding incidents and monitoring filtering and change control logs. It is suggested that the Safeguarding Governor includes the monitoring of E-Safeguarding within their remit.

Principal/Headteacher and Designated Safeguarding Lead

- 18. The responsibility for the 'day to day' management and operation of the E-Safeguarding policy has been delegated to the Principal/Headteacher and DSL. The Principal/Headteacher is responsible for:
 - Shaping and applying this policy;
 - Ensuring that all the staff have read and understand the policy;
 - Ensuring that staff receive regular, relevant and suitable training and continued development to enable them to carry out their roles using IT;
 - Ensuring that all staff are aware of the procedures that need to be followed in the event of an E-Safeguarding incident taking place;
 - Reviewing and responding to any E-Safeguarding incidents escalated to senior leaders, as well as reviewing reports from the MAT's appropriate IT Teams and Service Providers;
 - Liaising with MAT/Academy/School IT Teams and Service Providers.

<u>Staff</u>

19. All staff are responsible for ensuring that:

- They have an up-to-date awareness of E-Safeguarding matters and of the current academy E-Safety Policy and practices;
- They have read, understood and signed the Academy Acceptable Use Policy;
- They report any suspected misuse or problem to the Principal/Headteacher or DSL;
- They embed into all aspects of the curriculum and other activities wherever possible;
- Pupils/students understand and follow the E-Safeguarding Policy and Academy Acceptable Use Policy;
- Pupils/students have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations appropriate to the age of the pupils/students;
- They use good classroom management and the provided classroom management software tools where available to monitor and manage the use of digital technologies, mobile devices, cameras etc in lessons and other school activities (where allowed) and implement current policies with regard to these devices;
- In lessons where internet use is pre-planned students/pupils are guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.

The Designated Safeguarding Lead

- 20. The Academy DSL should be trained in E-Safeguarding issues and be aware of the potential for serious child protection/ safeguarding issues to arise from:
 - Sharing of personal data;
 - Access to illegal / inappropriate materials;
 - Inappropriate on-line contact with adults/strangers;
 - Potential or actual incidents of grooming;
 - Cyber-bullying.

IT Support Teams and IT Service Providers

21. Academy IT Support Teams and Service Providers should:

- Ensure that SNMAT IT infrastructure and devices are secure, compliant and not open to misuse or malicious attacks in-line with this guidance and policy;
- Liaise with Academy/School DSL and Principals in providing technical assistance and expertise where appropriate.

Pupils/Students

22. Pupils/Students are responsible for:

- Using the academy digital technology systems in accordance with the Pupil/Student Acceptable Use Policy;
- Having a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations appropriate to their age;

- Understanding the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so;
- Knowing and understanding policies on the use of mobile devices and digital cameras, taking and the use of images and video and the impact of illegal activities such as hacking and on cyber-bullying;
- Understanding the consequences of breaching E-Safeguarding policies and why the policies are in place;
- Understanding the importance of good online safety when using digital technologies and social media platforms out of school and realising that the academy's E Safety Policy covers their actions out of school, if related to their membership of the academy.

Parents/Carers

- 23. Parents/Carers play a crucial role in ensuring that their children understand the need to use the internet, computing, gaming and mobile devices in a responsible and safe way. Parents/Carers will be encouraged to support SNMAT in promoting good E-Safeguarding practises and following guidelines on the appropriate use of:
 - Internet, computing, gaming and mobile devices at home, ensuring that children's internet connections are filtered, and devices and consoles are correctly configured with parental controls to restrict appropriate age-related apps, social media, games and content;
 - Digital and video images taken at school events;
 - Access to parents' sections of the website/Learning Platform and on-line pupil/student records;
 - Their children's personal devices in the academy (where this is allowed).

Links with Other Policies

24. The E-Safeguarding Policy must be read in conjunction with the other following policies:

ICT Policy IT Technical Guidance Cyber Security Policy Bring Your Own Device (BYOD) Policy Data Protection Policy Social Media Policy Child Protection Policy

Guidance for Implementation

<u>Curriculum</u>

- 25. The E-Safeguarding curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:
 - A planned online safety curriculum should be provided as part of Computing/PHSE/other lessons and should be regularly revisited;
 - Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial/pastoral activities;
 - Pupils/Students should be taught in all lessons to be critically aware of the materials/ content they access on-line and be guided to validate the accuracy of information;

- Pupils/students should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet;
- Pupils/students should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making;
- Pupils/students should be helped to understand the need for the pupil/student Acceptable Use Policy and encouraged to adopt safe and responsible use both within and outside the academy;
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices;
- Pupils/students should be guided to sites checked as suitable for their use in lessons where internet use is pre-planned;
- Processes should be in place for dealing with any unsuitable material that is found in internet searches;
- Staff should be vigilant in monitoring the content of the websites the young people visit where pupils/students are allowed to freely search the internet;
- Pupils/students with special educational needs should be appropriately supported according to their specific needs and their personal understanding of the e-safety risks;

Parents/Carers

- 26. The academy should seek to provide information and awareness to parents and carers through:
 - Curriculum activities
 - Social media, letters, newsletters, its websites and learning platforms
 - Parents / Carers evenings / sessions
 - High profile events / campaigns e.g. Safer Internet Day
 - Reference to the relevant web sites / publications

<u>Staff</u>

27. SNMAT and its Academies should ensure that:

- An audit of the E-Safeguarding training needs of all staff should be carried out and a planned programme of formal E-Safeguarding training made available to staff which is regularly updated and reinforced;
- All new staff should receive online safety training as part of their induction programme including ensuring that they fully understand the SNMAT E-Safeguarding Policy and Academy Acceptable Use Policy;
- Staff identify E-Safeguarding as a training need within the performance management process where appropriate;
- The nominated person receives regular updates through attendance at external training events and by reviewing guidance documents released by relevant organisations;
- The E-Safeguarding Policy and its updates are presented to and discussed by staff in staff meetings/INSET days;
- The nominated person provides advice/guidance/training to individuals as required.

Directors/Governors

28. The Trust/academy should ensure that:

Directors/members of the Local Governing Body take part in E-Safeguarding training/awareness sessions, particularly those who are members of any subcommittee/group involved in technology/online safety/health and safety/safeguarding.

Internet Access

- 29. SNMATs internet web filtering policy has been developed to help our schools maximise the safety of our students as they use the internet, whilst at the same time retaining the flexibility needed for effective teaching and learning. The policy implements appropriate filtering that fulfils the DfE's statutory requirements for schools and colleges in regard to Keeping Children Safe In Education (2022) and PREVENT duties.
- 30. SNMAT appreciates that supervision and education in the use of the internet is paramount, and undertaken as part of our E-Safeguarding training, as the filtering of internet connections alone cannot guarantee the absolute safety of students and staff. We do all that we reasonably can to limit children's exposure to the 4 areas of risk:
 - content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;
 - contact: being subjected to harmful online interaction with other users;
 - conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying;
 - commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. Report concerns to the Anti-Phishing Working Group (https://apwg.org/). (KCSE p 135).

Primary Filtering

31. SNMAT school internet connections are filtered using leading hardware manufacturer firewalls and filtering systems; Smoothwall, Sophos, FortiGate and EXA SurfProtect.

Secondary Filtering

- 32. Some Academies utilise remote and classroom management tools such as Senso Cloud, Impero or AB Tutor that are fully compliant with the UK Safer Internet Centre's Appropriate Monitoring standards for schools, as referenced in the Annex of the governments Keeping Children Safe in Education (2022) statutory guidance.
- 33. These tools monitor content accessed by staff and students and use a keyboard detection solution to monitor, capture, block and report inappropriate content. Impero for example develops its policies in conjunction with specialist organisations and charities, such as the Anti-Bullying Alliance, Beat, Hope Not Hate, the Internet Watch Foundation (IWF), the UK Government's Counter Terrorism Internet Referral Unit, iKeepSafe, Hey Ugly, and ANAD.

Bespoke Filtering

34. In line with the Goverments Meeting Digital and Technology Standards in Schools and College Guidance (2023), the responsibility for internet safety and the configuration of filtering lies with the Principal with support from the DSL (the filtering solution can be tailored to meet the needs of individual schools if required) as administered by the school's IT Support Team.

Testing, Monitor and Reporting

- 35. Filtering testing will be regularly undertaken by IT Support Teams and will be tested in partnership with SWGfl and the UK Safer Internet Centre to apply restrictions from the relevant lists CSA context, Sexual Content, Terrorist content, etc.
- 36. Internet traffic monitoring will be regularly undertaken by site IT Teams and reviews of filtering capabilities and categories will be conducted in line with reviews to this policy and government legislation.
- 37. SNMAT and its Academies have a clearly defined procedure for reporting breaches or failures in filtering. All staff and students will be aware of this procedure by reading the Acceptable Use Policy and by receiving the appropriate awareness training.
- 38. If users discover a website with inappropriate or potentially illegal content, this should be reported to a member of staff who will inform the DSL and the relevant IT Team. All incidents should be documented and, if necessary, reported to appropriate agencies.
- 39. Although staff will monitor students' use of the internet in lessons, there will be a degree of independence when completing work using the internet.

MICROSOFT 365 SHAREPOINT & TEAMS

- 40. SNMAT promotes the use of Microsoft's Office 365 suite to enhance teaching and learning and to enable learning anywhere via shared resources, email, SharePoint and classroom hubs in Team sites. Where possible, no meetings should be held using Zoom or other non-Microsoft platforms.
- 41. It is the responsibly of any member of staff who creates a SharePoint site, Microsoft Team or shared resource to ensure the correct sharing/access security is set, to monitor and moderate that resource, and to use the tools available to them to deal with inappropriate behaviour or content.
- 42. All Microsoft Teams are set to expire between 30 and 60 days in line with Microsoft defaults.

Storage

- 43. Office365 provides each staff member and student with a storage mechanism called OneDrive that can be used to create, access and edit files from any internet-enabled device.
- 44. Use of OneDrive should be limited to documents such as Word, Excel and Powerpoint, but can store and manipulate images, videos and sound clips under the direction of

teaching staff with permission from the Principal. When using Office 365, staff and students must abide by this policy and all relevant laws regarding the storage and sharing of illegal content.

Other Services

45. To enhance E-Safeguarding, some Microsoft 365 services are restricted to students, including the use of Skype, Chat, Yammer and Kaiza.

REMOVING EVIDENCE FROM DIGITAL DEVICES

46. In accordance with the DfE Searching and Screening Guidance and this policy, if a member of staff has grounds to suspect that a digital device contains inappropriate material, or material that has been used in an incident of misuse or breach of E-Safeguarding Policy, they will seek consent from the student that the material is removed from the device or in some circumstances shared with the school before it is removed. If the information cannot be shared for technical reasons prior to deletion, then a written description should be taken of the offering material. If staff believe that a law may have been broken, then the phone should be turned off, confiscated, and stored securely until police advice is sought.

47. <u>IMPORTANT: If it is believed that the image/recording is of a sexual nature, it MUST NOT</u> be shared with school – this is illegal. The device should be turned off, confiscated, stored securely and the issue should be referred immediately to the DSL.

- 48. Staff should seek the relevant responsible Pastoral Team or member of the executive team to accompany the student to the IT Support Team and connect their device to an appropriate secured computer. To mitigate exposure to potential illegal or other inappropriate or private material, the student should locate the required file(s) and move them from the device to a secure location on the school's network.
- 49. A member of the IT Team will remain present to assist if required, and to act as witness.
- 50. It is the responsibility of the Pastoral Team, or member of the executive team to retain an accurate record of evidence that has been taken from digital devices.

EMERGING TECHNOLOGIES

- 51. SNMAT is keen to harness any emerging technologies (such as Virtual Reality, Augmented Reality, AI) that could benefit work practices and teaching and learning. Any new technology will be assessed and evaluated for benefit and security risks before its use is allowed in school.
- 52. The academy will periodically review which technologies are available within the school for any security vulnerabilities that may have been discovered since deployment.
- 53. Prior to deploying any new technologies within the school, staff and students will have appropriate awareness training regarding safe usage and any associated risks.
- 54. The school will monitor IT equipment usage to establish if the E-Safeguarding policy is adequate and that the implementation of the E-Safeguarding policy is appropriate.

55. Methods to identify, assess and minimise risks will be reviewed regularly.

Review

56. The application and outcomes of this policy will be monitored to ensure it is working effectively using:

57.

- Logs of reported incidents;
- Monitoring logs of classroom technology, internet activity and filtering;
- Internal monitoring for network activity;
- Surveys/questionnaires with pupils/students, parents/carers and staff.

58. This policy is reviewed annually by SNMAT in consultation with recognised trade unions.