

Policy/Procedure Name:	E-safety Policy
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Review by Date:	May 2022
Policy/Procedure Author:	Head of Learning Technology
Policy/Procedure Owner:	Principal
Management Committee Approved By:	TLT
Governor Committee (where appropriate) Approved By:	N/A0
For Action By:	All Staff
For Information to:	Staff, Students, Parents, Governors
Approval requested to upload on the Treloar Website:	Yes ✓
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Impact Assessment was carried out by:	Jo Cox, Head of Quality

## **Aim**

Information and communication technology (ICT) has changed the way we learn, work and live and will continue to do so. The future impact of ICT on students, staff and volunteers working at Treloar's and on families and students as they move into adulthood, cannot be foreseen. What is certain is that young people with disabilities must be given the confidence, motivation and skills to harness technology if they are to benefit from its advances and not be disadvantaged by comparison with their non-disabled peers. This procedure aims to provide levels of protection appropriate to age, vulnerability and cognitive skills and complying with all legal requirements.

### **1. The Range of the Policy**

This policy applies to the Treloar's ICT network. There are three key elements of the e-safety policy:

- Whole organisation awareness, designated responsibilities, policies and procedures
- An effective range of technological tools
- A comprehensive Internet safety education programme

### **2. Whole organisation awareness**

Awareness of eSafety issues and their potential impact is raised through annual staff training and a comprehensive eSafety education programme for students. These respond to specific incidents and issues and are updated periodically to take account of changing technologies.

#### ***2.1 Designated Roles and Responsibilities***

E-Safety is an essential aspect of SMT and the Governors who ensure that they embed safe practices into the culture of each of their areas of responsibility.

#### ***2.2 Filtering***

The Trust takes all reasonable precautions to ensure that users access only appropriate material. It cannot accept liability for the material accessed, or any consequences of Internet access.

The Trust's network is filtered by Smoothwall and protected from virus attack by commercial software. If staff or students discover unsuitable sites, the URL (website address) and content must be reported to the Network Manager or Head of Learning Technology.

#### ***2.3 Misuse of ICT services and/or resources***

Despite the filtering and the integrity of the system there may still be occasions when misuse of the network or other electronic media occurs. For students, in most cases, the designated member of curriculum staff responsible for ICT should deal with minor incidents. For staff, incidents are reported to the Head of Safeguarding and passed to the staff member's line manager. A warning or suspension of access to the system may be the most appropriate response unless the behaviour is repeated or escalates.

The incident and its response should be recorded using IRIS and monitored so that any trends can be identified and necessary action taken. This might include raising awareness among students, staff or parents by meetings, notices or training.

### **3. Cyber bullying**

Cyber bullying is defined as the deliberate use of ICT, particularly mobile phones and the Internet, to harass and bully another individual.

#### **3.1 Prevention**

Essential elements of prevention are by raising awareness of the issues and promoting understanding about cyber bullying through staff development, liaison with parents, and curriculum delivery.

#### **3.2 Intervention**

Incidents of cyber bullying and action taken will be recorded on IRIS and monitored so that policies and procedures can be evaluated and updated. Any evidence such as texts or emails should be kept to assist in an investigation. Additional sources of evidence may be available through Computer Services, Internet Service providers, Mobile Phone Company or social network sites. Once bullying has been disclosed, it should be dealt with through existing anti-bullying and behaviour policies and the perpetrator identified and sanction applied. Cyber bullying, like all forms of bullying should be taken seriously and is never acceptable.

### **4. Use of Digital Images**

Treloar's is very proud of the achievements of all its learners in their academic, artistic and sporting endeavours. We celebrate our diversity and achievements in many ways, such as displaying photographs of learner's work, team photographs, and trips in which our learners have participated. We make full use of digital signage screens inside the school and college to enhance our displays and our website is updated regularly. Learners are always properly supervised when professional photographers visit the school. Parents are given the opportunity to purchase copies of these photographs. All new staff are given guidance on Trust's policy on taking, using and storing images of learners. Current staff will be reminded of this guidance at the start of each academic year as follows:

#### **4.1 The School and College will:**

- Require parents/guardians or students over 16 who have capacity to provide documented consent before images can be stored or used.
- Images of a young person, who is a looked after child or otherwise subject to a court order, will not be recorded or published without explicit consent.
- The naming of published images of students will be avoided wherever possible. Where named images must be used then specific written permission from parents or guardians of students under eighteen must be obtained. Documented consent will also be obtained from students over 16 who are competent to give it.

- Recording images of children participating in extracurricular events that are taken for personal use are exempt from the Data Protection Act. These include uses such as parents taking photographs of sports day or videoing a school play. The School and College will monitor the use of cameras and anyone behaving inappropriately at extracurricular events will be challenged to cease using the camera or leave the premises.
- All students featured must be appropriately dressed with outer clothing garments covering their torso from at least the bottom of their neck to their thighs, (i.e. a minimum of vest/shirt and shorts). It is not appropriate to take images of students in their swimming costumes/trunks.

**NB: Staff are forbidden to upload images of students to their social networking sites or to take images of students using their personal mobile phones or personal camera equipment.**

### ***Storage and Review***

Our images are securely kept on the Trust network, in line with GDPR these are all named with the student's full name. They are reviewed annually and are deleted when no longer required.

**All photographs/videos on cameras and shared devices should be downloaded to the network, named with the student's full name and stored in the appropriate folder on the shared drive. The photographs should then be permanently deleted from the device**

**If a camera, tablet, SD card or USB drive with photographs and or videos on is lost by you, this must be reported immediately or as soon as reasonably possible to Computer Services and Head of Technology**

## **5. Video conferencing and webcams**

Webcams are small digital cameras that work with computers and are found on all tablets and smartphones.

### **5.1 Risks**

- Young people can be persuaded to take or send inappropriate photographs or video of themselves, to people they have only had contact with online. Once someone else has the content the young person is at risk of being further manipulated or threatened.
- Webcams use can be difficult to supervise if the computer is in the learner's bedroom or private space.
- Other learners may be videoed inadvertently by walking past the camera.
- Although fairly rare, there have been cases of people using virus programmes that can hijack the output of a remote webcam and send the images to their own computers.

- All staff need to ensure that when delivering care to the student's that all webcams are turned off and any Facetime or Skype conversations are finished.
- All webcams used in class or an open area should be turned off when the session is finished.
- Students and staff supporting them should check whether webcams are enabled prior to offering any care (including medication or nutrition), and establish with the student what their wishes are (or make a best interests decision). This would also include webcams more generally in use in a classroom environment.

**The misuse of Webcam, Skype or video conferencing equipment by any learner or member of the Trust will result in disciplinary procedures**

## **6. Internet safety education**

E-safety is incorporated into the curriculum for every student at a level appropriate to his or her understanding. In their first year students will take part in Internet Safety sessions, in subsequent years they will undertake a refresher course.

All new staff undertake eSafety training which is updated every three years. Staff are kept apprised of any significant eSafety developments which are passed them at staff at monthly staff meetings.

### **6.1 Prevent Strategy**

Treloar's School and College has a duty to prevent radicalisation that can lead to violent extremism or terrorism. The internet is a medium that is often used to radicalise people through blogs, social media and other websites and apps. These can be used on fixed and mobile devices that do not always go through Treloar's network and therefore may not be picked up by filters. The duty to prevent will be embedded in esafety as well as safeguarding training. Staff need to be vigilant and report any incident where they see or hear about students access any online (or offline) material that advocates extremist ideas or incites violence and hatred in any way.

## **7. Social Networking**

Social networking refers to a broad range of websites and services that allow people to connect with friends, family, and colleagues online, as well as meet people with similar interests or hobbies.

In line with the Mental Capacity Act, students are considered to have capacity unless the staff supporting the learner, assess that **at the time**, the student has not got the capacity to do so, and a "Best Interests decision is made by supporting staff, not to

allow access". In order to comply with the Mental Capacity Act recording requirements, this decision must be recorded in writing with the reason why the access has been denied, signed and dated by the person making that decision. A further capacity assessment must be undertaken if later in that day the student asks again to access a social networking site. It is beyond the authority of a member of staff to deny access to a learner on the grounds of a previously conducted mental capacity assessment

## 7.1 Student Policy

No access to Social Networking Sites will be given to any learner until:

- They have completed their eSafety programme
- They are over the age of 13.

Action will be taken if any student is found to be using a Social Networking site (either on their phone or on a PC/laptop) to bully another student or staff member.

In the event of a student being contacted by the press about posts on their social networking site that relates them to Treloar's, a member of the SMT must be immediately informed.

If on completion of the eSafety course the tutor delivering the course feels that the student has not fully comprehended or does not have the capacity to understand the issues around eSafety, then, in consultation with the MDT team a tutor will make a professional judgement as to the level of the student's esafety competence using the following scale:

- 0 – 'None' student has no independent access
- 1 – 'Full' student has independent computer access but needs full monitoring to enable safe access
- 2 – 'Significant' – student has independent access but needs regular monitoring and support in ensuring safety
- 3 – 'Moderate' – student has independent access and needs occasional support to ensure safety
- 4 – 'Independent' – student has independent access and is fully aware of e-safety

This information will be documented on Databridge.

If a student who has been assessed at level 1 or 2 wants to access Facebook then a parent/guardian/Social worker will be asked to go through the policy and sign to say that access to Facebook may be given.

## **7.2 Staff Policy**

Staff using social networking or social media websites in a manner that can be seen as representing the Trust are required to keep their work and private use of social networking sites separate.

It is against Trust policy to invite current school or college students and or their parents to be a “friend” on their personal social networking site, or accept a friend request from a student or parent. This applies for the first year after they leave Treloars and for any ex-student whilst they remain a child. Staff should be aware that former students, and their friends and families, may themselves be social media friends with current students, and consider appropriate privacy settings

It is also against policy to upload photographs of students to their personal sites.

Staff should ensure that they do not conduct themselves in a way that is and/or could be seen as bringing the Trust into disrepute.

Staff should take care that any activity in which they engage involving ICT, particularly, but not exclusively, on social media websites does not risk bringing Treloar’s into disrepute or attract adverse publicity towards Treloar's. In the event of a staff member being contacted by the press about posts on their social networking site that relates them to Treloar's, a member of the SMT must be immediately informed.

Some newly recruited staff may have students as existing friends or contacts on social networking sights such as Facebook. These staff are *not* required to remove the students as friends, but must not add students once they have accepted an offer of employment. Matters relating to work should not be posted on private social networking sites.

A guide for staff on the safe use of social media can be found here: <http://www.childnet.com/ufiles/Social-networking.pdf>

Any member of staff who has a concern about the potentially inappropriate use of social networking sites should contact their line manager, the ILT Manager or Computer Services.

## **8. Blogging**

Staff must not use their personal blogs to discuss their work at Treloar’s, they must ensure that confidential information is not revealed. This might include aspects of Trust policy or details of internal Treloar discussions.

If a blog makes it clear that the author works for the Trust, it should include a simple and visible disclaimer such as “these are my personal views and not those of Treloar Trust”.

Staff members who already have a personal blog or website which indicates in any way that they work for Treloar's, should discuss any potential conflicts of interest with their line manager.

If they are contacted by the press about posts on their blog that relate to the Trust, a member of SMT must be informed.

## **9. Incident Reporting**

E-Safety depends on staff, schools, governors, advisers, parents, and - where appropriate - the pupils themselves taking responsibility. Staff have a particular responsibility to supervise use, plan access and set good examples. The balance between educating pupils to take a responsible approach and the use of regulation is judged carefully.

### **9.1 Incidents involving others**

Any incident involving a member of staff or student is a potentially serious and complex issue. There may be implications for the safety of students, colleagues and the learning environment, and for the reputation of the Trust. ICT related incidents should be recorded and monitored in IRIS and the e-safety and ICT policies reviewed as necessary.

### **9.2 Safeguarding and dealing with serious incidents**

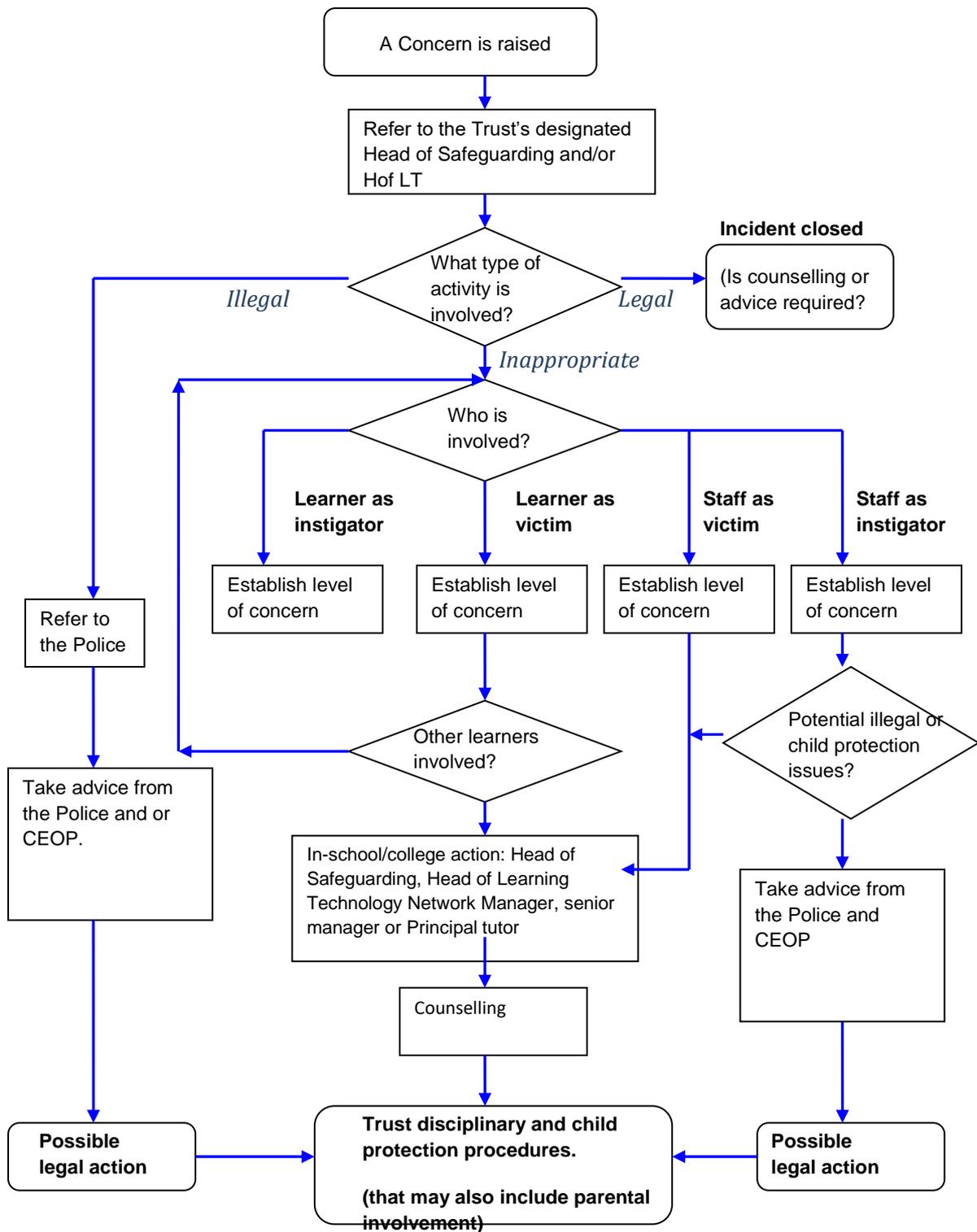
More serious incidents relating to e-safety should be reported to the Head of Safeguarding who will inform the Head of Learning Technology and Network Manager. The incident must be documented as quickly as possible and involve the Head of Safeguarding and other senior managers as appropriate. They will decide whether to involve the Police and Children's or Adult Social Care.

Serious incidents are likely to involve illegal material – the viewing, possessing, making or distribution of indecent images of children – serious stalking or harassment, or communication with children or vulnerable adults which amounts to abuse or 'grooming'.

### **9.3 Action**

Discovery of indecent material or incriminating text or voicemail must always be reported to the Head of Safeguarding who will then inform the police. It is vital that the material is not downloaded, printed or sent by email because doing so may be an offence in itself. If at all possible, absolutely nothing should be done to the suspect computers or equipment, including turning them on or off. Ensure that everyone is kept away and nothing is touched and do not shut down the Network unless told to do so by the Police. The Police will be interested in obtaining 'best evidence' which will entail forensically copying hard drives or memory that may contain evidence of offences. A suspect computer or other equipment must not be viewed or used and advice must be sought from the local Police Hi-tech Crime Unit. Under no circumstances should an internal investigation be carried out. This could compromise evidence if a legal case should be the outcome.

## 9.4 Workflow



## 10. Further Action

A tutor may deal with a minor transgression of the rules, but the Head of Safeguarding will still be informed. A senior member of staff will deal with more serious complaints of Internet misuse. Any complaint about staff misuse must be referred to the Principal. Other situations could potentially be serious and a range of sanctions will be required, linked to the Trust's disciplinary policy. Potential safeguarding or illegal issues must be referred to the Trust's Head of Safeguarding and/or ILT Manager. Advice on dealing with illegal use could be discussed with the local Police Public Protection Unit to establish procedures for handling potentially illegal issues.

Measures for students within the Trust discipline policy include:

- Interview with senior member of staff;;
- Informing parents or carers;
- Removal of Internet or computer access for a period.

**Disciplinary procedures will be initiated if staff do not follow the Trust E-safety policy.**

## 11. Links to other related policies, procedures or documents (internal)

- Safeguarding Policy and procedures
- ICT Policy

## 12. Revision History

Listed below is a brief audit trail, detailing amendments made to this policy procedure in last 4 years

Page/para No.	Brief description of the change(s)	Change made by	Date
All	Minor amendments to reflect current management structure	Head of Safeguarding	April 2016
Para 7.3	Addition of reference to Twitter	Head of Safeguarding	April 2016
Para 7.2	Change to allow new recruits to keep existing social media friends and link to guide for staff safe usage.	Head of Safeguarding	April 2016
Annex A	Content removed and replaced with reference to different policy to avoid risk of synchronization error	Head of Safeguarding	April 2016
Para 11	Add links to other policies	Head of Safeguarding	April 2016
Throughout	Updated made throughout the document	Head of ILT Head of Technology Head of	Oct 21

		Safeguarding	
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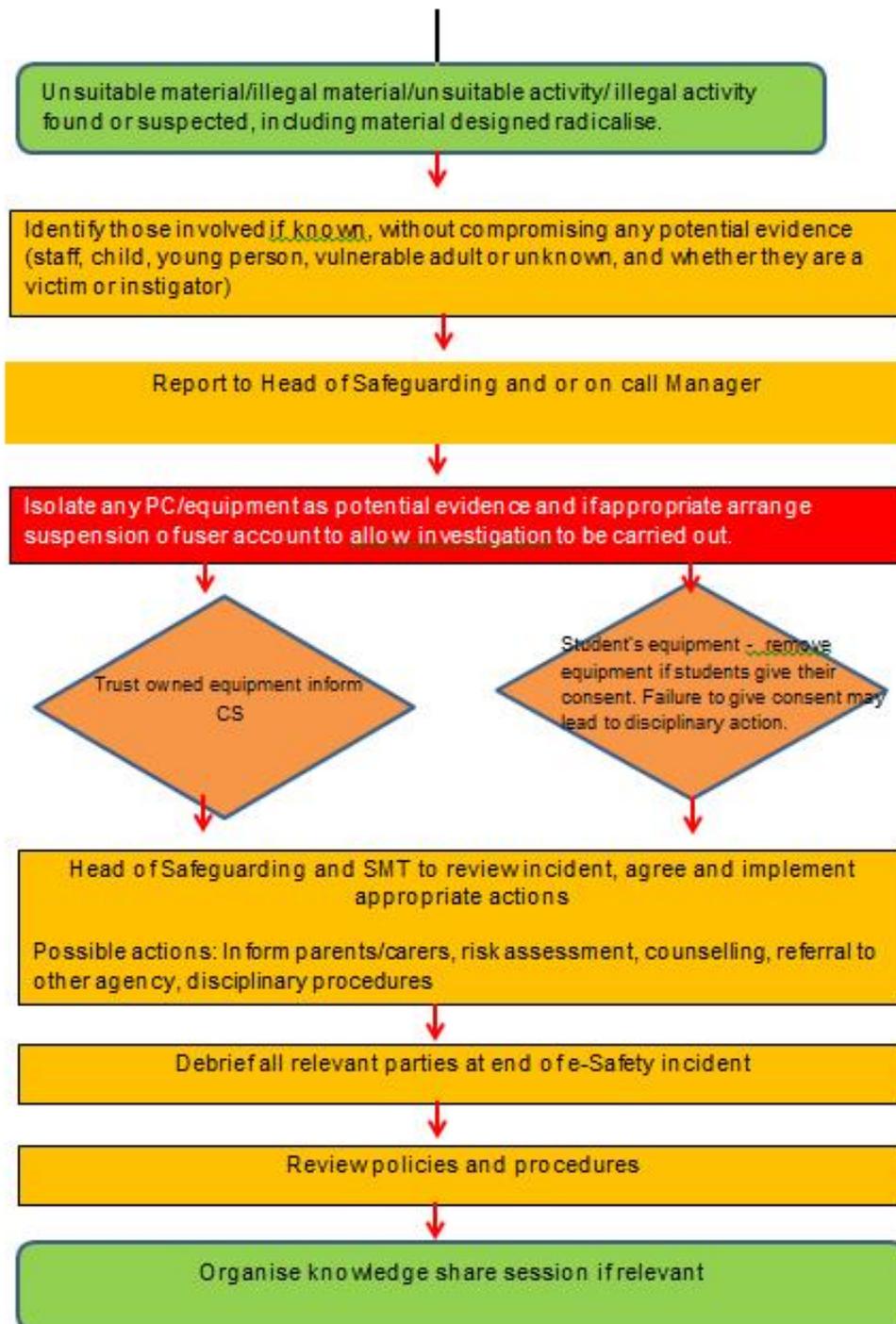
**IMPORTANT NOTES:**

It is essential for those with designated responsibilities to familiarise themselves with the sources of information, referred to above.

Policy documents describe mandatory minimum standards and will be subject to audit and review. Line managers are required to ensure suitable and sufficient arrangements are in place to meet policy requirements, including the provision of information and instruction to staff.

## Annex A

### eSafety Incident Procedure



## **Student Acceptable Use Policy**

The computers are provided at the School and College for use whilst you are a student. You must abide by the following rules in order to access the system.

Access to the Wifi is a privilege not a right, if you are identified as passing on the code to other staff or students this privilege may be removed. This is in place to prevent viruses on devices that have not been checked from being transferred to the network and also to ensure that students who should not have access to certain sites for legal and other reasons do not gain access to these.

### **You must not:**

- Log on to the network with another user's account
- Reveal the Wifi code
- Use the computers to send offensive or unpleasant things to others
- Alter the settings of the computers or make changes which make them unusable by others
- Damage the equipment
- Install software from the Internet or from any other source.
- Hack into unauthorised areas of the network
- Access inappropriate web sites or trying to bypass the College filtering system
- Attempt to spread viruses via the network
- Using College computers for any form of illegal activity , including software and music piracy
- Obtain material in any format (including text, graphics, moving images, photographs, sound files etc.) which is illegal under the terms of the Obscene Publications Act, the Race relations Act or any other applicable UK legislation. Any such material downloaded accidentally must be deleted immediately.
- Print material unrelated to work. Users should be aware that printing is monitored and any private work can be charged for.

### **You need to be:**

- Responsible for keeping your password confidential
- Aware that from time to time Computer Services may audit files, communications and Internet activity to ensure the safety of the system.

- Respect the work and ownership rights of people outside the Trust, as well as other students and staff. This includes abiding by copyright laws.
- Report to Computer Services, your Tutor or a member of staff any email containing material of a violent, dangerous, racist or inappropriate content.
- Follow the guidance in this document

**Disciplinary action will be taken against those found to be in breach of the Acceptable Use Policy.**

Signed or witnessed

(student): \_\_\_\_\_

Date: \_\_\_\_\_

Print Name

(student): \_\_\_\_\_