

### **Online Safety Policy**

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Related policies or procedures or parent policy if applicable:

Data Breach Policy
Data Protection Policy

Information Security Policy
Staff IT Acceptable Use Policy
Student IT Acceptable Use Policy

IT Security Policy

Groups/bodies consulted in the development of the policy:

Keeping Children Safe in Education 2024

Privacy and Electronic Communications Regulations

(PECR)

The Byron Review (2008) and the Byron Progress

Review (2010)

What academies, free schools and colleges must or

should publish online (DfE, 2016) Children and Families Act 2014

Equality Act 2010

Protection of Children Act 1978 Protection from Harassment Act 1997

Sexual Offences Act 2003 Public Order Act 1986

Racial and Religious Hatred Act 2006 Criminal Justice & Public Order Act 1994 Copyright, Designs and Patents Act 1988 Regulation of Investigatory Powers Act 2000

The Data Protection Act 2018 Computer Misuse Act 1990 Freedom of Information Act 2000

Communications Act 2003

Malicious Communications Act 1988 Telecommunications Act 1984

Trade Marks Act 1994

Obscene Publications Act 1959 and 1964

Human Rights Act 1998

The Education and Inspections Act 2011
The Protection of Freedoms Act 2012



Serious Crime Act 2015 Criminal Justice and Courts Act 2015

To be published on College Website:

Yes

To be published on Student

Yes



### **Online Safety Policy**

### 1. Purpose

The use of new and emerging technologies in teaching, learning and assessment is paramount to the success of our learners; the College will have to recognise the potential risks associated with this use. The purpose of this policy is therefore to safeguard and protect our learners from risks associated with the use of new and emerging technologies through security measures and training.

### 2. Scope

This Online Safety Policy outlines the commitment of Macclesfield College to safeguard members of our learning community online in accordance with statutory guidance and best practice.

This policy applies to all members of the college learning community (including staff, students, volunteers, parents and carers, visitors, community users) who have access to and are users of the college digital systems, both in and out of the college. It also applies to the use of personal digital technology on the college campus (where allowed).

The College 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 online safety behaviour that take place out of college.

### 3. Responsibilities

To ensure the online safeguarding of members of our learning community it is important that all members of that community work together to develop safe and responsible online behaviours, learning from each other and from good practice elsewhere, reporting inappropriate online behaviours, concerns, and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals and groups within the College.

### 3.1. Principal and Executive Leadership Team (ELT) are responsible for:

- 3.1.1. A duty of care for ensuring the safety (including online safety) of members of the learning community and fostering a culture of safeguarding, though the day-to-day responsibility for online safety is held by the Designated Safeguarding Lead, as defined in Keeping Children Safe in Education.
- 3.1.2. Be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff.
- 3.1.3. Be responsible for ensuring that the Designated Safeguarding Lead / Online Safety Lead, IT provider/technical staff, and other relevant staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.
- 3.1.4. Ensure that there is a system in place to allow for monitoring and support of those in college who carry out the internal online safety monitoring role.
- 3.1.5. Receiving regular monitoring reports from the Designated Safeguarding Lead/Online Safety Lead.
- 3.1.6. Work with the responsible Governor, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring.



### 3.2. Governors are responsible for:

- 3.2.1. The approval of the Online Safety Policy and for reviewing the effectiveness of the policy.
- 3.2.2. This review will be carried out by the Safeguarding Committee whose members will receive regular information about online safety incidents and monitoring reports. A member of the governing body will take on the role of Online Safety Governor to include:
  - 3.2.2.1. Membership of the Safeguarding Committee with the Designated Safeguarding Lead and Head of IT.
  - 3.2.2.2. reporting back to relevant governing body meetings.
  - 3.2.2.3. Receiving (at least) basic cyber-security training to enable the governors to check that the College meets the DfE Cyber-Security Standards.
- 3.2.3. Support the College in encouraging parents/carers and the wider community to become engaged in online safety activities.

### 3.3. Designated Safety Lead (DSL) will:

- 3.3.1. Hold the lead responsibility for online safety, within their safeguarding role.
- 3.3.2. Receive relevant and regularly updated training in online safety to enable them to understand the risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online.
- 3.3.3. Meet regularly with the Safeguarding Committee and designated Governor to discuss current issues, review (anonymised) incidents and filtering and monitoring logs and ensuring that annual (at least) filtering and monitoring checks are carried out.
- 3.3.4. Attend relevant governing body meetings/groups.
- 3.3.5. Report regularly to the ELT team.
- 3.3.6. Be responsible for receiving reports of online safety incidents and handling them, and deciding whether to make a referral by liaising with relevant agencies, ensuring that all incidents are recorded.
- 3.3.7. Liaise with staff and the Head of IT on matters of safety and safeguarding and welfare (including online and digital safety).
- 3.3.8. Receive reports of online safety issues, being aware of the potential for serious child protection concerns and ensure that these are logged to inform future online safety developments.
- 3.3.9. Have a leading role in establishing and reviewing the online safety policies/documents.
- 3.3.10. Promote an awareness of and commitment to online safety education / awareness raising across the college and beyond
- 3.3.11. Liaise with curriculum leaders to ensure that the online safety curriculum is planned, mapped, embedded and evaluated
- 3.3.12. Ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents.
- 3.3.13. Provide (or identify sources of) training and advice for staff/governors/parents/carers/learners.
- 3.3.14. Liaise with the İT Support team, Safeguarding Officers and support staff (as relevant).



3.3.15. Receive regularly updated training to allow them to understand how digital technologies are used and are developing (particularly by learners) with regard to the areas defined In Keeping Children Safe in Education: Content, Contact, Conduct and Commerce.

### 3.4. Centre Principals will:

- 3.4.1. Work with the DSL to develop a planned and coordinated online safety education programme.
- 3.4.2. This will be provided through mapped cross-curricular programme, and tutorial programmes and relevant national initiatives and opportunities (e.g. Safer Internet Day and Anti-bullying week)

### 3.5. Curriculum and Business Support staff will ensure that:

- 3.5.1. They have an awareness of current online safety matters/trends and of the current Online Safety Policy and practices.
- 3.5.2. They understand that online safety is a core part of safeguarding.
- 3.5.3. They have read, understood, and signed the Staff IT Acceptable Use Policy.
- 3.5.4. They immediately report any suspected misuse or problem to the DSL for investigation/action, in line with the College's safeguarding procedures.
- 3.5.5. All digital communications with learners and parents/carers are on a professional level and only carried out using official and trusted College platforms and systems.
- 3.5.6. Online safety issues are embedded in all aspects of the curriculum and other activities.
- 3.5.7. Ensure learners understand and follow the Online Safety Policy and Student IT Acceptable Use Policy, have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations.
- 3.5.8. They supervise and monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other college activities (where allowed) and implement current policies regarding these devices.
- 3.5.9. In lessons where internet use is pre-planned learners are guided to sites checked as suitable for their use and report any unsuitable accessed materials to the IT Support team immediately for investigation.
- 3.5.10. Where lessons take place using live-streaming or video-conferencing, there is regard to the Remote working agreement.
- 3.5.11. There is a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc.
- 3.5.12. They model safe, responsible, and professional online behaviours in their own use of technology, including out of college and in their use of social media.

### 3.6. Head of IT is responsible for ensuring:

- 3.6.1. They are aware of and follow the Online Safety Policy and IT Security Policy to carry out their work effectively in line with college policy.
- 3.6.2. The College's technical infrastructure is secure and is not open to misuse or malicious attack.
- 3.6.3. The College meets the required online safety technical requirements as identified by the DfE Meeting Digital and Technology Standards in Schools & Colleges and guidance from other relevant bodies.
- 3.6.4. There is clear, safe, and managed control of user access to networks and devices.



- 3.6.5. They keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant.
- 3.6.6. The use of technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported to the DSL for investigation and action.
- 3.6.7. The filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person.
- 3.6.8. Monitoring systems are implemented and regularly updated as agreed in college policies.

### 3.7. Students:

- 3.7.1. Are responsible for using the College's digital technology systems in accordance with the Student IT Acceptable Use Policy and this Online Safety Policy, this includes if they are using their personal devices on the College network.
- 3.7.2. Should understand the importance of reporting abuse, misuse or access to inappropriate materials to the IT Student Helpdesk.
- 3.7.3. Should know to report to their tutor or a College Safeguarding Officer if they or someone they know feels vulnerable when using online technology.
- 3.7.4. Should understand the importance of adopting good online safety practice when using digital technologies out of college and realise that the College's Online Safety Policy covers their actions out of college, if related to their enrolment at the College.

#### 3.8. Parents and carers:

- 3.8.1. Play a crucial role in ensuring that their children understand the need to use the online services and devices in an appropriate way.
- 3.8.2. The College will take every opportunity to help parents and carers understand these issues through:
  - 3.8.2.1. Publishing the Online Safety Policy on the college website.
  - 3.8.2.2. Seeking their permissions at enrolment concerning use of digital images.
  - 3.8.2.3. Website and social media information about national/local online safety campaigns and literature.
- 3.8.3. Parents and carers will be encouraged to support the College in:
  - 3.8.3.1. Reinforcing the online safety messages provided to learners in college.
  - 3.8.3.2. The safe and responsible use of their children's personal devices in the College (in areas where this is allowed).

There is an expectation that required professional standards will be applied to online safety as in other aspects of college life i.e., policies and protocols are in place for the use of online communication technology between the staff and other members of the College and wider community, using officially sanctioned College mechanisms.



### 4. Safeguarding Committee

The Safeguarding Committee has the following members:

- Designated Safeguarding Lead
- Head of IT
- Member of ELT
- Governor
- Centre Principals
- Student Service Lead

Members of the Safeguarding Committee assist the DSL and Head of IT with:

- The review of the Online Safety Policy/documents.
- The review and monitoring of the college filtering policy and requests for filtering changes
- Mapping and reviewing the online safety education provision ensuring relevance, breadth and progression and coverage.
- Reviewing network/filtering/monitoring/incident logs, where possible.

### 5. Objectives

Our Online Safety Policy:

- Sets expectations for the safe and responsible use of digital technologies for learning, administration, and communication.
- Allocates responsibilities for the delivery of the policy.
- Is regularly reviewed in a collaborative manner, taking account of online safety incidents and changes/trends in technology and related behaviours.
- Establishes guidance for staff in how they should use digital technologies responsibly, protecting themselves and the college and how they should use this understanding to help safeguard learners in the digital world.
- Describes how the college will help prepare learners to be safe and responsible users of online technologies.
- Establishes clear procedures to identify, report, respond to and record the misuse of digital technologies and online safety incidents, including external support mechanisms
- Is supplemented by a series of related acceptable use agreements.
- Is made available to staff at induction and through the Staff Intranet
- Is published on the college website.



# 6. Acceptable use

The College has defined what it regards as acceptable/unacceptable use and this is shown in the tables below.

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated	Jnacceptable	Unacceptable and illegal
Users shall not access online content (including apps, games, sites) to make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	<ul> <li>Any illegal activity for example:</li> <li>Child sexual abuse imagery*</li> <li>Child sexual abuse/exploitation/grooming</li> <li>Terrorism</li> <li>Encouraging or assisting suicide</li> <li>Offences relating to sexual images i.e., revenge and extreme pornography</li> <li>Incitement to and threats of violence</li> <li>Hate crime</li> <li>Public order offences - harassment and stalking</li> <li>Drug-related offences</li> <li>Weapons / firearms offences</li> <li>Fraud and financial crime including money laundering</li> </ul>	Acc	Acc	Acc	U <sub>k</sub>	Una And
Users shall not undertake activities that might be classed as cyber-crime under the Computer Misuse Act (1990)	<ul> <li>Using another individual's username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised)</li> <li>Gaining unauthorised access to college networks, data and files, through the use of computers/devices</li> <li>Creating or propagating computer viruses or other harmful files</li> <li>Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords)</li> </ul>					X



User actions				L		
		Acceptable	Acceptable at certain times	Acceptable for nominated	Unacceptable	Unacceptable and illegal
	<ul> <li>Disable/Impair/Disrupt network functionality through the use of computers/devices</li> <li>Using penetration testing equipment (without relevant permission)</li> </ul> Serious or repeat offences will be reported to the police.					
Users shall not undertake activities that are not illegal but are classed as	Accessing inappropriate material/activities online in a college setting including pornography, gambling, drugs. (Informed by the college's filtering practices and AUPs)			Х	X	
unacceptable in college	Promotion of any kind of discrimination				Х	
policies:	Using College systems to run a private business				Χ	
	Using systems, applications, websites or other mechanisms that bypass the filtering/monitoring or other safeguards employed by the College				X	
	Infringing copyright				Χ	
	Unfair usage (downloading/uploading large files that hinders others in their use of the internet)			Х	Χ	
	Any other information which may be offensive to others or breaches the integrity of the ethos of the College or brings the College into disrepute				Х	



	Staff				Stuc	lents		
Consideration should be given for the following activities when undertaken for non-educational purposes:	Not allowed	Allowed	Allowed at certain times	Allowed for selected courses	Not allowed	Allowed	Allowed at certain times	Allowed for relevant courses
Online gaming								
Online shopping/commerce								
File sharing								
Social media								
Messaging/chat								
Entertainment streaming e.g. Netflix, Disney+								
Use of video broadcasting, e.g. YouTube, Twitch, TikTok								
Mobile phones may be brought to college								
Use of mobile phones for learning at college								
Use of mobile phones in social time at college								



Taking photos on non-College managed mobile phones/cameras				
Use of other personal devices, e.g. tablets, gaming devices				
Use of personal e-mail for college data, or on the college network/wi-fi				
Use of College e-mail for personal e-mails				
Cryptocurrency Mining				

The Online Safety Policy and IT Acceptable Use Policies define acceptable use at the College. The acceptable use agreements will be communicated/re-enforced through:

- Student Online Portal
- Student Induction
- Splash Screens whilst accessing online platforms
- Digital Signage
- Posters and notices where technology is used.
- Built into tutorial and education sessions.
- College website

When using communication technologies, the College considers the following as good practice:

- When communicating in a professional capacity, staff should ensure that the technologies they use are officially sanctioned, auditable, secure and trusted by the College.
- Any digital communication between staff and learners or parents/carers (e-mail, social media, learning platform, etc.) must be professional in tone and content. Personal email addresses, text messaging or social media must not be used for these communications.
- Staff should be expected to follow good practice when using personal social media regarding their own professional reputation and that of the College and its community.
- Users should immediately report to their tutor or a Safeguarding Officer the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Relevant policies and permissions should be followed when posting information online e.g., college website and social media. Only College e-mail addresses should be used to identify members of staff and learners.



### 7. Reporting and Responding

The College will take all reasonable precautions to ensure online safety for all College users but recognises that incidents may occur inside and outside of the College (with impact on the College) which will need intervention. The College will ensure:

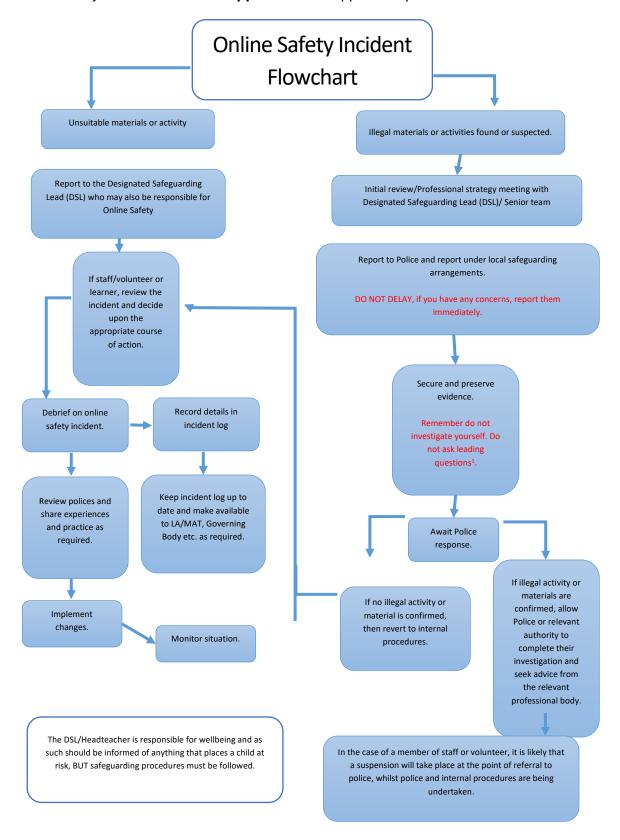
- There are clear reporting routes which are understood and followed by all members
  of the learning community which are consistent with the college safeguarding
  procedures, and with the whistleblowing, complaints and managing allegations
  policies.
- All members of the learning community will be made aware of the need to report online safety issues/incidents.
- Reports will be dealt with as soon as is practically possible once they are received.
- The DSL, Head of IT and other responsible staff have appropriate skills and training to deal with online safety risks.
- If there is any suspicion that the incident involves any illegal activity or the potential for serious harm, the incident must be escalated through the agreed safeguarding procedures, this may include:
  - Non-consensual images
  - Self-generated images
  - o Terrorism/extremism
  - Hate crime/ Abuse
  - Fraud and extortion
  - Harassment/stalking
  - Child Sexual Abuse Material (CSAM)
  - Child Sexual Exploitation Grooming
  - Extreme Pornography
  - Sale of illegal materials/substances
  - o Cyber or hacking offences under the Computer Misuse Act
  - Copyright theft or piracy
- Any concern about staff misuse will be reported to Human Resources.
- Where there is no suspected illegal activity, devices may be checked using the following procedures:
  - One or more senior members of staff should be involved in this process.
     This is vital to protect individuals if accusations are subsequently reported.
  - Conduct the procedure using a designated device that will not be used by students and, if necessary, can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). Use the same device for the duration of the procedure.
  - Ensure that the relevant staff have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
  - Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed, and attached to the form.
  - Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:
  - Internal response or discipline procedures



- involvement by local authorities (as relevant)
- o police involvement and/or action
- It is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively.
- There are support strategies in place e.g., peer support for those reporting or affected by an online safety incident.
- Incidents should be logged by the DSL on the information management system.
- Relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority; police.
- Those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions.
- Learning from the incident (or pattern of incidents) will be provided to:
  - The Safeguarding Committee for consideration of updates to policies or education programmes and to review how effectively the report was dealt with
  - Staff, through regular staff briefings
  - o Learners, through tutorials/classes
  - o Parents/carers, through newsletters, social media, website
  - o Governors, through regular safeguarding updates
  - Local authority/external agencies



The College will follow the flowchart below to support the decision-making process for dealing with online safety incidents. Refer to **Appendix 1** to support this process.





It is more likely that the College will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the College community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour/disciplinary procedures as follows:

# 7.1. Responding to Learner Actions

Incidents	Refer to class tutor	Refer to Centre Principal	Refer to Principal	Refer to Safeguarding Team	Refer to Police/Social Work	Refer to trusted IT Partners	Inform parents/carers	Remove device/ network/internet access	Issue a warning	Further sanction, in line with behaviour policy
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on User Actions on unsuitable/inappropri ate activities).	Х	Х	X	X	X			X	Х	X
Attempting to access or accessing the college network, using another user's account (staff or learner) or allowing others to access college network by sharing username and passwords	X	Х						X	X	Х
Corrupting or destroying the data of other users.		Х				Х		Х	Х	Х
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature		X		Х				Х	Х	Х



Unauthorised downloading or uploading of files or use of file sharing.	X	Х					X	X	Х
Using proxy sites or other means to subvert the college's filtering system.	X	Х		X			X	X	Х
Accidentally accessing offensive or pornographic material and failing to report the incident.				X				X	
Deliberately accessing or trying to access offensive or pornographic material.				Х			Х	Х	Х
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act.	X	X					X	X	Х
Unauthorised use of digital devices (including taking images)	X	Х		X			X	X	Х
Unauthorised use of online services	X	X		X			Х	X	Х
Actions which could bring the college into disrepute or breach the integrity or the ethos of the College.	Х	Х	Х			X	Х	Х	Х
Continued infringements of the above, following previous warnings or sanctions.		Х	Х	Х		X	Х	Х	Х



# 7.2. Responding to Staff Actions

Incidents	Refer to line manager	Refer to Principal	Refer to HR \ Safeguarding	Refer to Police	Refer to trusted IT partner	Issue a warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities)		X	X	X		X	X	х
Deliberate actions to breach data protection or network security rules.	Х		Х			Х	Х	Х
Deliberately accessing or trying to access offensive or pornographic material			Х				Х	Х
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	x				X	X	X	х
Using proxy sites or other means to subvert the college's filtering system.	Х		Χ			X	Χ	х
Unauthorised downloading or uploading of files or file sharing	Х		X			X	Х	х
Breaching copyright or licensing regulations.	Х					Х	Х	Х
Allowing others to access college network by sharing username and passwords or attempting to access or accessing the college network, using another person's account.	Х		Х		Х	Х	Х	Х
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature	X		X			X	X	х
Using personal e-mail/social networking/messaging to carry out digital	Х		Х			Х		



communications with learners and parents/carers							
Inappropriate personal use of the digital technologies e.g. social media / personal e-mail	Х		Х		Х		
Careless use of personal data, e.g. displaying, holding or transferring data in an insecure manner	Х		Х		Х		Х
Actions which could compromise the staff member's professional standing	Х		Х		X	Х	Х
Actions which could bring the college into disrepute or breach the integrity or the ethos of the college.	Х	Х	Х		Х	Х	х
Failing to report incidents whether caused by deliberate or accidental actions	Х		Х		Х		
Continued infringements of the above, following previous warnings or sanctions.	Х	Х	Х			Х	Х

### 8. Training Programme

Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities.

Students will be able to give feedback and their opinions of online safety through the regular Student Voice meetings.

Staff and Governors take part in Online Safety and Data Protection training at induction and also throughout the year.

### 9. Technology

The College is responsible for ensuring that the infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. The college should ensure that all staff are made aware of policies and procedures in place on a regular basis and explain that everyone is responsible for online safety and data protection.

### 9.1. Filtering & Monitoring

The College filtering and monitoring provision is agreed by the Designated Safeguarding Lead, the Safeguarding Committee and the IT Support team and is regularly reviewed (at least annually) and updated in response to changes in technology and patterns of online safety incidents/behaviours.



Day to day management of filtering and monitoring systems requires the specialist knowledge of both Safeguarding and IT Support to be effective. The DSL will have lead responsibility for safeguarding and online safety and the IT Support team will have technical responsibility.

Weekly checks on the filtering and monitoring system alerts are carried out by the IT Support team.

# 9.1.1. Filtering

The College manages access to content across its systems for all users and on all devices using the College's web filtering solution. The filtering provided meets the standards defined in the DfE Filtering standards for schools and colleges and the guidance provided in the UK Safer Internet Centre Appropriate filtering.

Illegal content (e.g., child sexual abuse images) is filtered by filtering solution Content lists are regularly updated.

Users can request to unblock or report inappropriate content to the IT Helpdesks, recognising that no system can be 100% effective.

Filtering logs are regularly reviewed and alerted to Designated Safeguarding Lead and relevant Centre Principal to breaches of the filtering policy, which are then acted upon.

The College has provided enhanced/differentiated user-level filtering (allowing different filtering levels for different abilities/ages/stages/times and different groups of users: staff/learners, etc.).

The College BYOD / guest network is also subject to filtering policies.

### 9.1.2. **Monitoring**

The College has monitoring systems in place to protect the college, systems and users:

- The College monitors all network use across all its devices and services.
- Monitoring reports are urgently picked up, acted on and outcomes are recorded and all users are aware that the network (and devices) are monitored at point of access.
- There are effective protocols in place to report abuse/misuse through the IT Helpdesks. There is a clear process for prioritising response to alerts that require rapid safeguarding intervention.
- Management of serious safeguarding alerts is consistent with safeguarding policy and practice.

The College follows the UK Safer Internet Centre Appropriate Monitoring guidance and protects users and systems through the use of the appropriate blend of strategies informed by the College's risk assessment. These may include:



- physical monitoring (adult supervision in the classroom)
- internet use is logged, regularly monitored and reviewed
- filtering logs are regularly analysed and breaches are reported to senior leaders
- pro-active alerts inform the college of breaches to the filtering policy, allowing effective intervention.

# 9.1.3. Responsibilities around Filtering and Monitoring

Identified and assign roles and responsibilities to manage out filtering and monitoring systems include:

Role	Responsibility						
Safeguarding Committee Lead Governor Information Security Committee Lead Governor	Strategic responsibility for filtering and monitoring and need assurance that the standards are being met.						
ELT Team	Responsible for ensuring these standards are met and:						
Designated Safeguarding Lead	Lead responsibility for safeguarding and online safety, which could include overseeing and acting on:  • filtering and monitoring reports  • safeguarding concerns  • checks to filtering and monitoring systems						
Head of IT	Technical responsibility for:						
All staff	All staff need to be aware of reporting mechanisms for safeguarding and technical concerns. They should report if:  • they witness or suspect unsuitable material has been accessed  • they can access unsuitable material  • they are teaching topics which could create unusual activity on the filtering logs  • there is failure in the software or abuse of the system  • there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks						



they notice abbreviations or misspellings that allow access to restricted material

# 10. Security

The College IT systems will be managed in ways that ensure that they meet the requirements of the following relevant College policies:

- IT Security Policy
- Data Protection Policy
- Information Security Policy

### 11. Mobile Technologies

The IT Acceptable Use Policies for Staff and Students outline the expectations around the use of mobile technologies.

The College allows the following in terms of device access to the network:

	College devices		Personal devices			
	College owned for individual use	College owned for multiple users	Student owned	Staff owned	Visitor owned	
Allowed in College	Yes	Yes	Yes	Yes	Yes	
Full network access	Yes	Yes	No	No	No	
Internet only	No	No	Yes	Yes	Yes	

### 11.1. College owned/provided devices

All College devices are managed though the use of Mobile Device Management software

There is an asset log that clearly states whom a device has been allocated to.

Personal use (e.g. online banking, shopping, images etc.) on college owned devices is clearly defined and expectations are well-communicated.

Signed loan agreements are in place for liability for damage, return/replacement of equipment and responsible use.

### 11.2. Personal devices

Use of personal devices are segregated effectively from college owned systems and data.



The expectations for taking/storing/using images/video aligns with the College's acceptable use policy and Social Media policy. The non-consensual taking/using of images of others is not permitted.

Liability for loss/damage or malfunction of personal devices is with the owner of that device.

Staff and students are encouraged to keep their personal devices up-to-date with the latest security updates to ensure they are safe online.

#### 12. Social Media

The College provides the measures in the College's IT Acceptable Use - Social Media Policy to ensure reasonable steps are in place to minimise risk of harm to learners on social media platforms.

### 13. Online Publishing, Images and Video

The College will inform and educate staff and students about the risks of publishing photos and videos online.

- The College may use live-streaming or video-conferencing services in line with remote working/learning and safeguarding guidance / policies.
- When using digital images, staff will inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images.
- Staff/volunteers must be aware of those learners whose images must not be taken/published.
- Those images should only be taken on college owned devices. The personal devices of staff should not be used for such purposes.
- In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at college events for their own personal use (as such use in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other learners in the digital/video images.
- Staff and volunteers are allowed to take digital/video images to support educational aims on college owned devices, but must follow college policies concerning the sharing, storage, distribution and publication of those images.
- Care should be taken when sharing digital/video images that learners are appropriately dressed.
- Students must not take, use, share, publish or distribute images of others without their permission.
- Photographs published on the College website, or elsewhere that include students will be selected carefully and will comply with this Online Safety Policy.
- Students' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Permission will be obtained during enrolment before photographs of students are taken for use in college or published on the College website/social media.
   Permission is not required for images taken solely for internal purposes.
- Parents/carers will be informed of the purposes for the use of images, how they will be stored and for how long – in line with the Data Protection and Retention policy.
- Student work can only be published with the permission of the student.



The College website is managed/hosted by LDA. The College Marketing team ensures that this Online Safety Policy has been followed in the use of online publishing e.g., use of digital and video images, copyright, identification of young people, publication of calendars and personal information - ensuring that there is least risk to members of the learning community, through such publications.

### 14. Data Protection

Personal data will be recorded, processed, transferred, and made available according to the current data protection legislation. Please refer to the College's Data Protection Policy for more information.

### 15. Review and Monitoring

The relevance, efficacy and effectiveness of this Online Safety Policy will be reviewed in line with the cycle of strategic management activities to facilitate continuous improvement. The results of the review process will be analysed and changes made to the policy where appropriate.

The Head of IT and Designated Safeguarding Lead as well as key members of staff make up the Safeguarding Committee. The impact of the policy will be reviewed at this committee and monitored regularly as any incidents occur.



# Appendix 1: Record of reviewing devices/internet sites (responding to incidents of misuse)

Group/Course:	
Date:	
Reason for investigation:	
Details of first reviewing pers	on
Name:	
Position:	
Signature:	
Details of second reviewing p	erson
Name:	
Position:	
Signature:	
Name and location of compu	er used for review (for web sites)
	`
Web site(s) address/device	Reason for concern
Conclusion and Action prop	osed or taken