

Online Safety Policy

Expanse Learning Group

October 2023

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Version 5

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1. Scope

This policy applies to:

- all staff at Expanse Learning who have access to IT systems, both on the premises and remotely
- to all use of the internet, and electronic communication devices, such as e-mail, mobile phones, games consoles, social networking sites, and any other systems that use the internet for connection and providing of information.

2. Introduction

Expanse Learning recognises the benefits and opportunities which new technologies offer to teaching and learning. Our approach is to implement safeguards within the organisation, and to support staff and students to identify and manage risks. We believe this can be achieved through a combination of security measures, training, guidance, and implementation of our associated policies.

In furtherance of our duty to safeguard students, we will do all that we can to make our students and staff 'e-safe' and to satisfy our wider duty of care. This e-safety policy should be read in conjunction with other relevant organisation policies and procedures such as Safeguarding and Child Protection, Social Networking, Anti Bullying, and Disciplinary Policies.

3. Definition of E-Safety

The term e-safety is defined, for the purposes of this document as:

"The process of limiting the risks to children, young people and vulnerable adults when using Internet, Digital and Mobile Technologies (IDMTs) through a combined approach to policies and procedures, infrastructures and education, including training, underpinned by standards and inspection"

Young people's extensive use of e-technologies leaves no doubt over the importance of e-safety and the need for young people, and those who care for or work with them, to be able to take appropriate preventative action to minimise the associated risks.

These risks have been defined in various ways and are becoming more commonly categorised as follows:

	Content Child engages with or is exposed to potentially harmful content	Contact Child experiences or is targeted by potentially harmful adult content	Conduct Child witnesses, participates in or is a victim of potentially harmful peer conduct	Contract Child is party to or is exploited by potentially harmful contract
Aggressive	Violent, gory, graphic, racist, hateful, or extremist information and communication	Harassment, stalking, hateful behaviour, unwanted or excessive surveillance	Bullying, hateful, or hostile communication or peer activity e.g., trolling, exclusion, shaming	Identity theft, fraud, phishing, scams, hacking, blackmail, security risks
Sexual	Pornography (harmful or illegal), sexualisation of culture, oppressive body image norms	Sexual harassment, sexual grooming, sextortion, the generation and sharing of child sexual abuse material	Sexual harassment, non-consensual sexual messaging, adverse sexual pressures§	Trafficking for purposes of sexual exploitation, streaming (paid-for) child sexual abuse
Values	Mis/disinformation, age-inappropriate marketing, or user-generated content	Ideological persuasion or manipulation, radicalisation, and extremist recruitment	Potentially harmful user communities e.g., self-harm, anti-vaccine, adverse peer pressures	Gambling, filter bubbles, micro-targeting, dark patterns shaping persuasion or purchase
Cross-cutting	Privacy violations (interpersonal, institutional, commercial) Physical and mental health risks (e.g., sedentary lifestyle, excessive screen use, isolation, anxiety) Inequalities and discrimination (in/exclusion, exploiting vulnerability, algorithmic bias/predictive analytics)			

4. Aims

The aims are to:

- To ensure safeguards on IT-based systems are strong and reliable
- To ensure user behaviour is safe and appropriate
- To assure that the storage and use of images and personal information on IT-based systems is secure and meets all legal requirements
- To educate Staff and students in e-safety
- To ensure any incidents which threaten e-safety are managed appropriately

5. Outcomes

Security

Networks are safe and secure, with appropriate and up-to-date security measures and software in place, as listed below:

- Microsoft Defender for Endpoint
- WAN Firewall (Web Content Filter)
- Net support School & Tutor
- Proxies protected by Agilisys (Wigan Councils approved security provider)

Risk assessment

- When making use of new technologies and online platforms, risk assessments are carried out.

Behaviour

- All users of technology adhere to the standards of behaviour set out in the IT Acceptable Use Policy.
- All users of IT adhere to IT Acceptable Use Policy and when using email, mobile phones, social networking sites, games consoles, chat rooms, video conferencing and web cameras, etc.
- Any abuse of IT systems and any issues of cyber bullying are dealt with seriously, in line with staff and student disciplinary procedures.
- Any conduct considered illegal is reported to the police.

Use of images and video

- The use of images or photographs is encouraged in teaching and learning, providing there is no breach of copyright or other rights of another person.
- Staff and students are trained in the risks in downloading, posting, and sharing images, and particularly in the risks involved in posting personal images onto social networking sites.
- Staff provide information to students on the appropriate use of images, and on how to keep their personal information safe.
- Advice and approval from a senior manager are to be sought in specified circumstances or if there is any doubt about the publication of any materials.

Personal information

- Processing of personal information is done in compliance with the Data Protection Act 2018
- Personal information is kept safe and secure and is not passed on to anyone else without the express permission of the individual.
- No personal information is posted to the organisation's website/intranets without the permission of a senior manager.
- Staff always keep students' personal information safe and secure.
- When using an online platform, all personal information is password protected.
- All personal information sent electronically should follow the password protected and encrypted using Microsoft office 365 security.
- Every user of IT facility logs off on completion of any activity, or ensures rooms are locked if unsupervised, where they are physically absent from a device.
- Organisation mobile devices are encrypted, and password protected.
- Personal data no longer required, is securely deleted.
- Make sure you do not discuss sensitive information in inappropriate venues, e.g., public areas. When you take a phone call, ask the caller to confirm their personal information to you rather than you read their details aloud.
- Only transfer personal information to removable media such as CDs, DVDs, and floppy disks if you have been authorised to do so. Unauthorised access to the information should be prevented using encryption. (taken from the Information Security Guide)
- Look after portable equipment such as laptops, PDAs, and memory sticks. If you are travelling with them ensure you

always keep them within your sight. Where possible attach a memory stick to a key ring.

Education and Training

- Staff and students are supported through training and education to develop the skills to be able to identify risks independently and manage them effectively.
- Student inductions and the tutorial programme contains sessions on e-safety.
- Students are guided in e-safety across the curriculum and opportunities are taken to reinforce e-safety messages.
- Students should discuss with their tutors when they have concerns about inappropriate content, either where that material is directed to them, or where it is discovered as part of a random search.
- In classes, students are encouraged to question the validity and reliability of materials researched, viewed, or downloaded. They are encouraged to respect the copyright of other parties and to cite references properly.
- Any new or temporary users receive training on the organisation IT system, they are also asked to sign the (staff) AUP.

6. Incidents and response

- A clear and effective incident reporting procedure though Databridge is maintained and communicated to staff.
- Students should discuss with their teachers when they have concerns about an incident.
- Reports of e-safety incidents are acted upon immediately to prevent, as far as reasonably possible, any harm or further harm occurring.
- Action following the report of an incident might include disciplinary action, sanctions, reports to external agencies (e.g., the police), review of internal procedures and safeguards, tutor support for affected students, etc.

7. Responsibilities

The Executive Leadership Team are responsible for maintaining this policy and maintaining best practice in IT procedures and practices to manage any e-safety risks effectively.

The following are responsible for implementing it:

- Corporate Services for all e-safety matters in relation to staff.
- Teaching and Learning Staff for providing pastoral and practical support for students dealing with issues related to e-safety and for incorporating e-safety in student induction, supporting the tutorial scheme of work, and for providing an appropriate range of resources.
- All teachers for embedding e-safety education and practice into their teaching programme.
- All Heads of Departments for implementing good e-safety practice and safeguards consistent with this policy in their area of responsibility.
- The Safeguarding Team for overseeing and reviewing e-safety arrangements.
- All members of staff for staying alert to and responding appropriately to any potential or actual e-safety issue.

8. Legal Framework

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| • Racial & Religious Hatred Act 2006 | • Copyright, Design & Patents Act 1988 |
| • Sexual Offences Act 2003 | • Public Order Act 1986 (s17-29) |
| • Police & Justice Act 2006 | • Protection of Children Act 1999 (s1) |
| • Computer Misuse Act 1990 (s1-3) | • Obscene Publications Act 1959 & 1964 |
| • Communications Act 2003 (s127) | • Protection from Harassment Act 1997 |
| • Data Protection Act 2018 | • Regulatory of Investigatory Powers Act 2000 |
| • Malicious Communications Act 1988 (s1) | |

9. Monitoring arrangements

The impact of the policy will be monitored regularly with a full review being carried out at least once every year. The policy will also be reviewed where concerns are raised by the Safeguarding Officer, or where an e-safety incident has been recorded.

Impact of non-compliance:

Staff:	Disciplinary action
Student:	Suspension, Temporary Exclusion, Permanent Exclusion
Legislation/organisational:	Reputational damage, statutory and non-regulated compliance.
Compliance lead:	Headteacher/Director of Schools

Policy Reference: ELGR-ISTM-POL-0004

Version: 5

Agreed policy location: PeopleHR, Company Intranet and Webpage

Policy Schedule: Annual

Does the policy require Governor approval? No

Approval

Prepared by Scott Roberts (Assoc. CIPD) 20/10/2023  Head of shared Services	Approved by Tony Brown 20/10/2023  CEO	Counter Signatory Richard King 20/10/2023  Director
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Version Control

Version	Date	Revision	Review Date
1	01/03/2021	First Issue	28/02/2022
2	12/10/2021	Reviewed in-line with KCSIE 2021	11/10/2022
3	12/10/2022	Reviewed in-line with KCSIE 2022	11/10/2023
4	10/02/2023	Policy reviewed and security section 5 updated	10/02/2024
5	20/10/2023	Reviewed and updated	20/10/2024