Online Safety

1. Purpose and content

The purpose of this appendix of the College Safeguarding Policy is to provide a clear set of guidelines to staff regarding the actions they must take if they become aware that a learner is at risk of harm because of using the internet.

2. Definitions

The key terms in this document are defined as:

- **Child:** Those under the age of eighteen

- **Vulnerable Adult**: For the purpose of safeguarding, and the College duty of care, a vulnerable adult is defined as any adult considered to be at risk

- **Education and Health Care Plan (EHCP):** From September 2014 EHCPs began to replace Statements of special educational needs and Learning Difficulty Assessments from those under the age of 25. An EHCP outlines information about the person including how they communicate, what support they need and what they would like to achieve

- **Cyber-bullying**: 'Virtual' bullying using technology (e.g. chat rooms, instant messaging, email & mobile phone) which can occur in or outside College. Cyber-bullying can happen at all times of the day, with a potentially bigger audience, as people can forward on content very quickly and easily

- **Sexting:** Whilst professionals refer to the issue as 'sexting' there is no clear definition. Many professionals consider sexting to be sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet but learners may be more likely to interpret sexting as writing and sharing explicit messages with people they know. Creating and sharing sexual photos and videos of under-18s, including selfies, is illegal

- **Online Harassment:** Any conduct which is unwanted by a learner, which affects the dignity of the learner or group of learners in the College. Harassment may be repetitive or an isolated occurrence against one or more learners and may take place online

- **Sexual Harassment:** Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include;

- o Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- o Sexual "jokes" or taunting;
- o Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - Non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges);
  - Sexualised online bullying;
  - Unwanted sexual comments and messages, including, on social media; and
  - Sexual exploitation; coercion and threats.

3. External guidance

As technology develops, the internet and its range of content services can be accessed by children, young people and adults through various devices including mobile phones, tablets, text messaging and mobile camera Smart Phones as well as computers and game consoles. As a consequence the Internet has become a significant tool in exposing children to possible risks and dangers including the distribution of indecent/pseudo photographs and video clips of children and young people.

Department for Education (DfE) September 2019: Keeping children safe in education; statutory guidance for schools and colleges, makes it clear that schools and colleges should be aware of the risks and teach young people how to stay safe online.

The Breadth of Issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content**: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views
- **Contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children and young adults
- **Conduct:** personal online behaviour that increases the likelihood of, or causes harm; for example, making, sending and receiving explicit images, or online bullying

Whilst the college has a filtering system for its internet access to the world wide web, staff must consider that almost all young people have access to the internet via their phones.

Online abuse is often motivated by prejudice or ignorance due to actual or perceived differences between people or groups or people. People who are lesbian, gay, bisexual or transgender (LGBT), those from minority ethnic groups, or those with disabilities and/or

learning difficulties can be more vulnerable to this form of abuse and the College takes it duty to protect more vulnerable learners very seriously.

Any online abuse must be addressed as a child or vulnerable adult protection concern when there is reasonable cause to suspect that a child or vulnerable adult is suffering, or is likely to suffer, significant harm. Sexting involving those under the age of 18 must always be referred to a Safeguarding Officer.

4. Actions

The following actions must be taken by all staff:

- All staff and learners have a responsibility to work together to ensure that abuse does not occur, or where it is found, action is taken
- Staff must ensure ground rules are set in induction and that learners are made aware of the college response to online abuse, what constitutes abuse and how any incidents will be addressed through the Student Misconduct Procedure
- Course leaders/personal tutors for under 18s, and those under the age of 25 in receipt of an EHCP and/or high needs funding, must ensure learners understand how to stay safe online through the tutorial programme
- Staff receiving reports of online safety concerns , including incidents that take place off College premises, must take appropriate action to follow up all allegations/incidents and trigger an investigation which will be managed in line with the Behaviour Management Procedure. Sanctions against perpetrators may include suspension whilst an investigation takes place
- Staff must ensure appropriate managers are notified. This includes the 14-16 Manager for a learner who is under the age of 16 (e.g. Y10/11) at the start of the academic year and the Head of Foundation Skills for a learner under the age of 25 who is in receipt of an EHCP and/or high needs funding
- All staff involved must carefully consider the potential impact of the abuse on both the perpetrator/s and the victim/s and refer those involved for additional support from the welfare team as appropriate. Significant concerns must be referred to a Designated Person for safeguarding following the referral routes outlined in Appendix A (child and adult protection) of the Safeguarding Policy
- The welfare team and/or Safeguarding Officer will consider referring learners and their parents/carers to other agencies where appropriate. This may include referral for counselling and to the police as some types of online behaviour (e.g. sending or receiving indecent images) are criminal offences in the UK.
- All allegations/incidents must be recorded and learners involved told what is being recorded, in what context, and why
- Any incident of abuse must be discussed with the learners' parents/carers for under 18s and those under the age of 25 in receipt of an EHCP and/or high needs funding, and with the appropriate school where appropriate (for Y10/Y11s) by the Skills

Academy Manager. An agreement must be reached as to what action should be taken subject to compliance with the Student Misconduct Procedure

Advice for Staff in the event of a young person telling you that they have received indecent images:

- Do not ask to view the images
- Never copy, print or ask for them to be shared (it's illegal)
- Ask if they know the person who sent it and their age
- If the image was sent by another young person you may want to help the young person to speak to the sender in order to stop future messages. If they agree, you could also help them to block the sender on social media
- If the image was sent by an adult, contact a Safeguarding Officer as this may be part of the grooming process.
- If it is decided there will be no outside agency involvement, ask that the images are deleted and record the date and time this happened

The basic safeguarding principle is, if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to children's social care;

5. Useful Information

Thinkuknow – NCA CEOPs advice on online safety

Disrespectnobody – Home Office advice on healthy relationships, including sexting and pornography

UK safer internet centre – Contains specialist helpline for UK Schools and Colleges

Internet matters – Help for parents on how to keep their children safe online

Parentzone - Help for parents on how to keep their children safe online

Childnet cyberbullying – Guidance for schools on cyberbullying

Pshe association – Guidance and useful teaching resources covering online safety issues including pornography and the sharing of sexual images