Bristol Tuition Centre

E-Safety Policy

Policy name	Owned by	Ratified by	Date	Review date
Tutee Attendance Policy	Bristol Tuition Centre	J.Vertannes	20.10.2022	20.10.2023

Policy Updates

Review date	Update Summary	Reviewed by:	Next Review:
30.09.24	Policy Review	S.Alsop	30.09.25

1. Policy Aims

This online safety policy takes into account the DfE statutory guidance "Keeping Children Safe in Education" 2018 and Bristol City Council's Safeguarding Children Board procedures.

In this policy, the term 'the Bristol Tuition Centre community' refers to all staff, volunteers, service users, parents, carers and external contractors.

• The purpose of Bristol Tuition Centre's online E- safety policy is to:
- o Safeguard and protect all members of the Bristol Tuition Center community online.
- o Identify approaches to educate and raise awareness of online safety throughout the community.
- o Enable all staff to work safely and responsibly, to role model positive behaviour online and to manage professional standards and practice when using technology.
- o Identify clear procedures to use when responding to online safety

concerns.

• Bristol Tuition Centre identifies that the issues classified within online E-safety are considerable, but can be broadly categorised into three areas of risk:

- o **Content:** being exposed to illegal, inappropriate or harmful material

- o **Contact:** being subjected to harmful online interaction with other users

- o **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.

2. Policy Scope

• Bristol Tuition Centre believes that online E- safety is an essential part of safeguarding and acknowledges its duty to ensure that all service users and staff are protected from potential harm online.

• Bristol Tuition Centre identifies that the internet and associated devices, such as computers, tablets, mobile phones and games consoles, are an important part of everyday life.

• Bristol Tuition Centre believes that young people should be empowered to build resilience and to develop strategies to manage and respond to risk online. • This policy applies to all staff (including volunteers, the Senior Leadership Team, external contractors and other individuals who work for, or provide services on behalf of the organisation collectively referred to as 'staff' in this policy) as well as young people and parents/carers.

• This policy applies to all access to the internet and use of technology, including personal devices, or where young people, staff or other individuals have been provided with organisation issued devices for use off-site, such as a work laptops, tablets or mobile phones.

Links with other policies and practices

• This policy links with a number of other policies, practices and action plans including:
- o Anti-bullying policy
- o Behaviour policy
- o Confidentiality policy
- o Data protection policy
- o Disciplinary policy
- o Safeguarding policy

3. Monitoring and Review

• Bristol Tuition Centre's Senior Leadership Team will review this policy at least annually. The policy will also be revised following any national or local policy requirements, any child protection concerns or any changes to the technical infrastructure.

• We will ensure that we regularly monitor internet use and evaluate online E-safety mechanisms to ensure that this policy is consistently applied. • To ensure they have oversight of online E- safety, the CEO will be informed of online E-safety concerns, as appropriate.

• The named persons for safeguarding and the CEO will report on a regular basis to the Board on online E- safety incidents, including outcomes.

• Any issues identified will be incorporated into the organisation's action planning

4. Roles and Responsibilities

• The Organisation has appointed Lucy March, as Designated Safeguarding Lead to be the online E- safety lead.

• Bristol Tuition Centre recognises that all members of the organisation have important roles and responsibilities to play with regards to online E- safety.

4.1 The leadership and management team will:

• Ensure that online E- safety is viewed as a safeguarding issue and that practice is in line with national and local recommendations and requirements.

• Ensure there are appropriate and up-to-date policies regarding online E safety.

• Ensure that suitable and appropriate filtering and monitoring systems are in place.

• Monitor the safety and security of the organisation's systems and networks. • Ensure that online E- safety is embedded within Bristol Tuition Centre, enabling young people to develop an age-appropriate understanding of online safety.

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• Support the Designated Safeguarding Lead by ensuring they have sufficient time and resources to fulfill their online E- safety responsibilities.

• Ensure there are robust reporting channels for concerns relating to online E- safety with access/links to internal, local and national support.

• Ensure that appropriate risk assessments are undertaken regarding the safe use of technology.

4.2 The Designated Safeguarding Lead (DSL) will:

• Act as a named point of contact on all online safeguarding issues and liaise with other members of staff or other agencies, as appropriate.

• Keep up-to-date with current research, legislation and trends regarding online E-safety and communicate this with the Bristol Tuition Centre community, as appropriate.

- Ensure all members of staff receive regular, up-to-date and appropriate online E- safety training.

  - Work with staff to coordinate participation in local and national events to promote positive online behaviour, such as Safer Internet Day.

- Ensure that online safety is promoted to parents, carers and the wider community, through a variety of channels and approaches.

- Maintain records of online E- safety concerns, as well as actions taken, as part of the organisation's safeguarding recording mechanisms.

- Monitor online E- safety incidents to identify gaps and trends, and use this data to update the education response, policies and procedures.

- Report online E- safety concerns, as appropriate, to the Senior Leadership Team.

- Work with the Senior Leadership Team to review and update online E- safety policies on a regular basis (at least annually) with stakeholder input.

- Discuss regularly with the persons with the lead responsibility for safeguarding.

4.3 It is the responsibility of all members of staff to:

- Contribute to the development of online E- safety policies.

- Read and adhere to the online E- safety policy.

- Take responsibility for the security of the organisation's systems and the data they use or have access to.

- Model good practice when using technology and maintain a professional level of conduct in their personal use of technology, both on and off site.

- Embed online E- safety education in Bristol Tuition Centre delivery, wherever possible.

- Have an awareness of a range of online E- safety issues and how they may be experienced by the young people accessing services.

- Identify online E- safety concerns and take appropriate action by following the organisation's safeguarding policies and procedures.

- Know when and how to escalate online E- safety issues, including signposting to appropriate support, internally and externally.

- Take personal responsibility for professional development in this area.

4.4 It is the responsibility of the staff managing the technical environment to: •

Provide technical support and perspective to the DSL and Senior Leadership Team, especially in the development and implementation of appropriate online E safety policies and procedures.

• Implement appropriate security measures *(including password policies and encryption)* to ensure that the Bristol Tuition Centre's IT infrastructure/system is secure and not open to misuse or malicious attack, whilst allowing learning opportunities to be maximised.

• Ensure that the organisation's filtering policy is applied and updated on a regular basis; responsibility for its implementation is shared with the Senior Leadership Team.

• Report any filtering breaches to the DSL and Senior Leadership Team, as well as, the organisation's Internet Service Provider or other services, as appropriate. • Ensure that any safeguarding concerns, identified through monitoring or filtering breaches are reported to the DSL, in accordance with the organisation's safeguarding procedures.

4.5 It is the responsibility of Bristol Tuition Centre's service users (children & young people) - at a level that is appropriate to their individual age, ability and vulnerabilities to:

• Engage in age appropriate online E- safety education opportunities.

• Contribute to the development of online E- safety policies.

• Respect the feelings and rights of others both on and offline.

• Take responsibility for keeping themselves and others safe online.

• Seek help from a trusted adult, if there is a concern online, and support others that may be experiencing online E- safety issues.

4.6 It is the responsibility of parents and carers to:

• Support the organisation in their online E- safety approaches by discussing online E - safety issues with their children and reinforce appropriate, safe online behaviours at home.

• Role model safe and appropriate use of technology and social media. • Identify changes in behaviour that could indicate that their child is at risk of harm online.

• Seek help and support from Bristol Tuition Centre, or other appropriate agencies, if they or their child encounter risk or concerns online.

• Take responsibility for their own awareness in relation to the risks and opportunities posed by new and emerging technologies.

• The Bristol Tuition Centre will support children and young people in a way that supports their age and ability by:
  o Displaying acceptable use posters in all rooms with internet access. o Informing service users that internet use will be monitored for safety and security purposes and in accordance with legislation.
  o Rewarding positive use of technology.
  o Implementing appropriate peer education approaches.

- o Providing online E- safety education.
- o Seeking the voice of young people when writing and developing online E safety policies and practices.
- o Using support, such as external bodies, where appropriate, to complement and support online E- safety education approaches.

5. Vulnerable children and young people.

• Bristol Tuition Centre is aware that some service users are considered to be more vulnerable online due to a range of factors. This may include, but is not limited to children in care, children with Special Educational Needs and Disabilities (SEND) or mental health needs, children with English as an additional language (EAL) and children experiencing trauma or loss.

• Bristol Tuition Centre will ensure that differentiated and ability appropriate online E- safety education, access and support is provided to vulnerable service users.

5.1 Training and engagement with staff
The Organisation will:

• Provide and discuss the online E- safety policy with all members of staff as part of induction.

• Provide up-to-date and appropriate online E- safety training for all staff on a regular basis, with at least annual updates, as part of the existing safeguarding and child protection training and updates. This will cover the potential risks posed to young people (Content, Contact and Conduct) as well as our professional practice expectations.

• Make staff aware that systems are monitored and activity can be traced to individual users; staff will be reminded to behave professionally and in accordance with the organisation's policies when accessing work systems and devices.

• Make staff aware that their online conduct out of work, including personal use of social media, could have an impact on their professional role and reputation within the organisation.

• Highlight useful educational resources and tools which staff should use, according to the age and ability of the young people they are working with. • Ensure all members of staff are aware of the procedures to follow regarding online E- safety concerns affecting young people, colleagues or other members of the Bristol Tuition Centre.

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5.2 Awareness and engagement with parents and carers

• Bristol Tuition Centre recognises that parents and carers have an essential role to play in enabling children to become safe and responsible users of the internet and associated technologies.

• Bristol Tuition Centre will build a partnership approach to online E- safety with parents and carers by:

- Providing information and guidance on online E- safety in a variety of formats.
- Drawing their attention to the organisation's online E- safety policy and expectations in newsletters, letters and on our website.

6. Reducing Online Risks

- Bristol Tuition Centre recognises that the internet is a constantly changing environment with new apps, devices, websites and material emerging at a rapid pace. We will:
  - Regularly review the methods used to identify, assess and minimise online risks.
  - Ensure that appropriate filtering and monitoring is in place and take all reasonable precautions to ensure that users can only access appropriate material.

Due to the global and connected nature of the internet, it is not possible to guarantee that unsuitable material cannot be accessed via a Bristol Tuition Centre computer or device.

- All members of the Bristol Tuition Centre community are made aware of the organisation's expectations regarding safe and appropriate behaviour online and the importance of not posting any content, comments, images or videos which could cause harm, distress or offence to others.

7.1 Technology Usage

- Bristol Tuition Centre uses a wide range of technology. This includes access to:
  - Computers, laptops and other digital devices
  - Internet which may include search engines and educational websites o Digital cameras, web cams and video cameras

- All Bristol Tuition Centre owned devices will be used in accordance with appropriate safety and security measures in place such as up to date security software and the use of blocking controls where appropriate.

- Bristol Tuition Centre will ensure that the use of internet-derived materials, by staff and service users, complies with copyright law and acknowledge the source of information.

- Service users will be appropriately supervised when using technology, according to their ability and understanding

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7.2 Filtering and Monitoring

7.2.1 Decision Making

- Bristol Tuition Centre's Senior Leadership Team have ensured that the charity has

age and ability appropriate filtering and monitoring in place, to limit children's exposure to online risks.

• The organisation's decision regarding filtering and monitoring has been informed by a

   risk assessment, taking into account our organisation's specific needs and circumstances.

• Changes to the filtering and monitoring approach will be risk assessed by staff with

   educational and technical experience and, where appropriate, with consent from the Senior Leadership Team; all changes to the filtering policy are logged and recorded.

• The Senior Leadership Team will ensure that regular checks are made to ensure

that the filtering and monitoring methods are effective and appropriate.

• All members of staff are aware that they cannot rely on filtering and monitoring

alone to safeguard service users; supervision and regular discussion about safe and responsible use is essential.

7.2.2 Filtering

• The organisation uses broadband connectivity through a number of providers.

• The organisation uses filtering systems which blocks sites which can be categorised

as: pornography, racial hatred, extremism, gaming and sites of an illegal nature. The organisation's filtering system blocks all sites on the Internet Watch Foundation (IWF) list.

Dealing with Filtering breaches

• The organisation has a clear procedure for reporting filtering breaches.

o If young people discover unsuitable sites, they will be required to turn off the screen and immediately report the concern to a member of staff.

o The member of staff will report the concern (including the URL of the site if possible) to the Designated Safeguarding Lead.
o The breach will be recorded and escalated as appropriate.
o Parents/carers will be informed of filtering breaches involving their child.

• Any material that Bristol Tuition Centre believes is illegal will be reported immediately

   to the appropriate agencies, such as: Avon & Somerset Police.

7.2.3 Monitoring

- The organisation will appropriately monitor internet use on all its owned or provided internet enabled devices. This is achieved by:
  - o Physical monitoring (supervision) of use.

- Any concerns identified via monitoring approaches will be reported to the Designated Safeguarding Lead who will respond in accordance with the appropriate policy e.g. behaviour policy, disciplinary policy etc.

- All users will be informed that use of the organisation's systems can be monitored and that all monitoring will be in line with data protection, human rights and privacy legislation.

7.2.4.Security and Management of Information Systems
The organisation takes appropriate steps to ensure the security of our information systems, including:

- Virus protection being updated regularly. Encryption for personal data sent over the Internet or taken off site (such as via portable media storage) or access via appropriate secure remote access systems.

- Not downloading unapproved software to work devices or opening unfamiliar email attachments.

- Regularly checking files held on the organisation's devices.

- The appropriate use of user logins and passwords.

- All users are expected to log off or lock their screens/devices if systems are unattended.

7.2.5 Password policy
All members of staff will have their own unique username and private passwords to access systems; members of staff are responsible for keeping their password private.

We require all users to:
  - o Use strong passwords for access into our system.
  - o Change their passwords regularly.
  - o Always keep their password private; users must not share it with others or leave it where others can find it.
  - o Not to login as another user at any time.

7.3 Managing the Safety of the Organisation Website
7.3.2 The organisation will ensure that our website complies with guidelines for publications including: accessibility; data protection; respect for intellectual property rights; privacy policies and copyright.
7.3.3 Staff or young people's personal information will not be published on our website; the contact details on the website will be the organisation address, email and telephone number.

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7.3.4 The administrator account for the website will be secured with an appropriately strong password.

7.3.5 The organisation will post appropriate information about safeguarding, including online safety, on the website for members of the community.

7.4 Publishing Images and Videos Online

7.4.1 Bristol Tuition Centre will ensure that all images and videos shared online are used in accordance with the organisation's Data Protection Policy and Privacy Notices.

7.5 Managing Email

7.5.1 Access to the organisation's email systems will always take place in accordance with Data protection legislation and in line with other policies

- The forwarding of any chain messages/emails is not permitted.Spam or junk mail will be blocked and reported to the email provider.

- Any electronic communication which contains sensitive or personal information will only be sent using secure and encrypted email.

- Organisation email addresses and other official contact details will not be used for setting up personal social media accounts.

7.5.2 Members of the Bristol Tuition Centre community will immediately tell the Designated Safeguarding Lead if they receive offensive communication, and this will be recorded in the organisation's safeguarding files/records.

7.6.1 Staff

- The use of personal email addresses by staff for any official Young Bristol business is not permitted.
    o All members of staff are provided with a specific Bristol Tuition Centre email address, to use for all official communication.

- Members of staff are encouraged to have an appropriate work life balance when responding to email.

8.Social Media
8.1 Expectations

- The expectations' regarding safe and responsible use of social media applies to all members of the Bristol Tuition Centre community.

- The term social media may include (but is not limited to): blogs; wikis; social networking sites; forums; bulletin boards; online gaming; apps; video/photo sharing sites; chatrooms and instant messenger.

- All members of the Bristol Tuition Centre community are expected to engage in social media in a positive, safe and responsible manner, at all times.
    o All members are advised not to publish specific and detailed private thoughts, concerns, pictures or messages on any social media services, especially content that may be considered threatening, hurtful or defamatory to others.

• .Concerns regarding the online conduct of any member of the Bristol Tuition Centre community on social media, should be reported to the Chief Executive Officer and will be managed in accordance with our Anti-bullying, Disciplinary, Behaviour and Safeguarding policies.

8.2 Staff Personal Use of Social Media

• The safe and responsible use of social networking, social media and personal publishing sites will be discussed with all members of staff as part of staff induction and will be revisited and communicated via regular staff training opportunities.

• Safe and professional behaviour will be outlined for all members of staff (including volunteers).

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Reputation

• All members of staff are advised that their online conduct on social media can have an impact on their role and reputation within Bristol Tuition Centre. Civil, legal or disciplinary action may be taken if they are found to bring the charity into disrepute, or if something is felt to have undermined confidence in their professional abilities.

• All members of staff are advised to safeguard themselves and their privacy when using social media sites. Advice will be provided to staff via staff training and by sharing appropriate guidance and resources on a regular basis. This will include (but is not limited to):
  o Setting the privacy levels of their personal sites as strictly as they can. o Being aware of location sharing services.
  o Opting out of public listings on social networking sites.
  o Logging out of accounts after use.
  o Keeping passwords safe and confidential.
  o Ensuring staff do not represent their personal views as that of the charity.

• All members of staff are encouraged to carefully consider the information, including text and images, they share and post online and to ensure that their social media use is compatible with their professional role and is in accordance with Bristol Tuition Centre's policies and wider professional and legal framework.
  o Information and content that staff members have access to as part of their employment, including photos and personal information about young people and their family members or colleagues will not be shared or discussed on social media sites.

• Members of staff will notify the Chief Executive Officer immediately if they consider that any content shared on social media sites conflicts with their role.

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Communicating with young people and parents and carers

• Staff, volunteers and Senior Leadership Team must give serious consideration as to the appropriateness of accepting 'friend' or 'follow' requests from service users, parents/carer and other service users. If you are in any doubt, seek advice from the Chief Executive Officer.

• Staff will not use personal social media accounts to make contact with young people or parents/carers in an 'official' capacity, nor should any contact be accepted, except in circumstance whereby prior approval has been given by the Chief Executive Officer.

• Any communication from service users and parents received on personal social media accounts must be reported to the organisation's Designated Safeguarding Lead.

8.3 Bristol Tuition Centre's Service Users Personal Use of Social Media • Safe and appropriate use of social media will be taught to service users as part of an embedded and progressive approach, via age appropriate sites and resources.

• Any concerns regarding service users' use of social media, both at home and at Bristol Tuition Centrel, will be dealt with in accordance with existing policies including anti-bullying and behaviour. Concerns will also be raised with parents/carers as appropriate, particularly when concerning underage use of social media sites or tools.

• Service Users will be advised:

    o To consider the benefits and risks of sharing personal details on social media sites which could identify them and/or their location. Examples could include real/full name, address, mobile or landline phone numbers, Bristol Tuition Centre attended, other social media contact details, email addresses, full names of friends/family, specific interests and clubs.

    o To only approve and invite known friends on social media sites and to deny access to others by making profiles private/protected.

    o Not to meet any online friends without a parent/carer or other responsible adult's permission and only when a trusted adult is present.

    o To use safe passwords.

    o To use social media sites which are appropriate for their age and abilities.

    o How to block and report unwanted communications and report concerns both within Bristol Tuition Centre and externally.

8.4 Official Use of Social Media

Bristol Tuition Centre's official social media channels are:

- o Twitter @Young_Bristol
- o Facebook@worksforyoungpeople
- o Instagram @Young_Bristol

• The official use of social media sites, by the organisation, only takes place with

clear community engagement objectives, with specific intended outcomes.
   o The official use of social media as a communication tool has been formally risk assessed and approved by the Chief Executive Officer.
   o Leadership staff have access to account information and login details for the social media channels, in case of emergency, such as staff absence.

• Official organisation social media channels have been set up as distinct and

dedicated social media sites or accounts for educational or engagement purposes only.
   o Staff use Bristol Tuition Centre provided email addresses to register for and manage any official Bristol Tuition Centre social media channels.
   o Official social media sites are suitably protected and, where possible, linked to and from the organisation's website.
   o Public communications on behalf of the organisation will, where appropriate and possible, be read and agreed by at least one other colleague.

• Official social media use will be conducted in line with existing policies, including:

Anti-bullying, Data protection, Confidentiality and Safeguarding.
   o All communication on official social media platforms will be clear, transparent and open to scrutiny.

• Parents, carers and young people will be informed of any official social media use,

along with expectations for safe use and action taken to safeguard the community.

• Parents and carers will be informed of any official social media use with young people

and written parental consent will be obtained, as required.

Staff expectations

• If members of staff are participating in online social media activity as part of their

capacity as an employee of the organisation, they will:
   o Be professional at all times and aware that they are an ambassador for the organisation.
   o Disclose their official role and/or position but make it clear that they do not necessarily speak on behalf of the organisation.
   o Be responsible, credible, fair and honest at all times and consider how the information being published could be perceived or shared.

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   o Always act within the legal frameworks they would adhere to within the workplace, including: Libel, Defamation, Confidentiality, Copyright, Data protection and Equalities laws.

- o Ensure that they have appropriate written consent before posting images on the official social media channel.
- o Not disclose information, make commitments or engage in activities on behalf of the Bristol Tuition Centre unless they are authorised to do so.
- o Not engage with any direct or private messaging with service users, parents and carers.
- o Inform their line manager, the Designated Safeguarding Lead of any concerns, such as criticism, inappropriate content or contact from service users or other service users.

9. Use of Personal Devices and Mobile Phones

a. Bristol Tuition Centre recognises that personal communication through mobile technologies is an accepted part of everyday life for young people, staff and parents/carers, but technologies need to be used safely and appropriately.

9.1 Expectations

• All use of personal devices and mobile phones will take place in accordance with the law and other appropriate Bristol Tuition Centre policies, including, but not limited to: Anti-bullying, Behaviour and Safeguarding.

• Electronic devices of any kind that are brought onto site are the responsibility of the user at all times.
- o All members of Bristol Tuition Centre community are advised to take steps to protect their mobile phones or devices from loss, theft or damage; the organisation accepts no responsibility for the loss, theft or damage of such items on their premises.
- o All members of the Bristol Tuition Centre community are advised to use passwords/pin numbers to ensure that unauthorised calls or actions cannot be made on their phones or devices; passwords and pin numbers should be kept confidential and mobile phones and personal devices should not be shared.

• The sending of abusive or inappropriate messages/ content via mobile phones or personal devices is forbidden by any member of the community; any breaches will be dealt with as part of our Behaviour policy.

• All members of the Bristol Tuition Centre community are advised to ensure that their mobile phones and personal devices do not contain any content which may be considered to be offensive, derogatory or would otherwise contravene the Behaviour or Safeguarding policies.

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9.2 Staff Use of Personal Devices and Mobile Phones

• Members of staff will ensure that use of personal phones and devices takes place in

accordance with the law, as well as, relevant organisational policy and procedures, such as: Confidentiality, Safeguarding, Data Protection and Acceptable use.

- Staff will be advised to:

    o Keep mobile phones and personal devices in a safe and secure place. o Keep mobile phones and personal devices switched off or switched to 'silent' mode during working hours unless otherwise agreed by their Line Manager.

    o Ensure that Bluetooth or other forms of communication (such as 'airdrop') are hidden or disabled during working hours.

    o Ensure that any content bought onto site via mobile phones and personal devices are compatible with their professional role and expectations.

- Members of staff are not permitted to use their own personal phones or devices for contacting service users or parents and carers.

    o Any pre-existing relationships, which could undermine this, will be discussed with the Designated Safeguarding Lead and/or Chief Executive Officer.

- If a member of staff breaches the organisation's policy, action will be taken in line with the Disciplinary Policy.

    o If a member of staff is thought to have illegal content saved or stored on a mobile phone or personal device or have committed a criminal offence, the police will be contacted.

9.3 Bristol Tuition Centre Service Users Use of Personal Devices and Mobile Phones

- Service Users will be made aware regarding the safe and appropriate use of personal devices and mobile phones and will be made aware of boundaries and consequences.

- If a service user breaches these boundaries, the phone or device will be confiscated and will be held in a secure place.

    o Bristol Tuition Centre staff may confiscate a service users mobile phone or device if they believe it is being used to contravene the organisation's Behaviour or Bullying policy, or could contain youth produced sexual imagery (sexting).

    o Searches of mobile phone or personal devices will only be carried out in accordance with the organisation's Behaviour policy.

    o Mobile phones and devices that have been confiscated will be released to the service user at the end of the session.

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- If there is suspicion that material on a service users personal device or mobile phone may be illegal or may provide evidence relating to a criminal offence, the device will be handed over to the police for further investigation. www.gov.uk/government/publications/searching screening-and-confiscation)

9.4 Officially provided mobile phones and devices

- Members of staff will be issued with a work phone number and email address, where contact with service users or parents/ carers is required.

- Mobile phones and devices will be suitably protected via a passcode/password/pin and must only be accessed or used by members of staff.

10. Responding to Online E- Safety Incidents and Concerns

- All members of the Bristol Tuition Centre community will be made aware of the reporting procedure for online E- safety concerns, including: breaches of filtering, youth produced sexual imagery (sexting), cyberbullying and illegal content.
- All members of the community must respect confidentiality and the need to follow the official organisation procedures for reporting concerns.
  - Service users, parents and staff will be informed of Young Bristol's complaints procedure and staff will be made aware of the whistleblowing procedure.
- Bristol Tuition Centre requires staff, parents, carers and young people to work in partnership to resolve online safety issues.
  - After any investigations are completed, the organisation will debrief, identify lessons learnt and implement any policy or changes as required.
- If the Senior Leadership Team are unsure how to proceed with an incident or concern, the DSL will seek advice from the Multi Agency Safeguarding Hub.

- Where there is suspicion that illegal activity has taken place, Bristol Tuition Centre will contact Avon & Somerset Police using 101, or 999 if there is immediate danger or risk of harm.
- If an incident or concern needs to be passed beyond the Young Bristol community (for example the public may be at risk), the DSL will speak with Avon & Somerset Police and/or the Multi Agency Safeguarding Hub first, to ensure that potential investigations are not compromised.

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10.1 Concerns about the Welfare of Young People

- The DSL will be informed of any online E- safety incidents involving

safeguarding or child protection concerns.

  o The DSL will record these issues in line with the organisation's
    Safeguarding policy.

• The DSL will ensure that online E- safety concerns are escalated and reported to
  relevant agencies in line with the Bristol's Safeguarding Children Board thresholds
  and procedures.

  • A member of the organisation's staff will inform parents and carers of any
    incidents or concerns involving their child, as and when required.

10.2 Staff Misuse

• Any complaint about staff misuse will be referred to the Chief Executive Officer,
  according to the Disciplinary policy.

• Any allegations regarding a member of staff's online conduct will be discussed with the
  LADO (Local Authority Designated Officer).

• Appropriate action will be taken in accordance with the Disciplinary policy.

11. Procedures for Responding to Specific Online Incidents or Concerns

11.1 Youth Produced Sexual Imagery or "Sexting"

• Bristol Tuition Centre recognises youth produced sexual imagery (known as
  "sexting") as a safeguarding issue; therefore all concerns will be reported to and
  dealt with by the Designated Safeguarding Lead.

• The organisation will follow the advice as set out in the non-statutory UKCCIS
  guidance: 'Sexting and Bristol Tuition Centre: responding to incidents and
  safeguarding young people'.

• Bristol Tuition Centre will ensure that all members of the community are made aware
  of the potential social, psychological and criminal consequences of 'sexting' by
  implementing preventative approaches, via a range of age and ability appropriate
  educational methods including information displays.

• The organisation will ensure that all members of the community are aware of sources
  of support regarding youth produced sexual imagery.

11.1.1 Dealing with 'Sexting'

• If the organisation is made aware of an incident involving the creation or distribution of youth produced sexual imagery, the organisation will: o Act in accordance with our Safeguarding policy and the relevant Bristol's Safeguarding Child Board's procedures.

- o Immediately notify the Designated Safeguarding Lead.
- o Store the device securely.
    - ▪ If an indecent image has been taken or shared on the organisation's network or devices, the organisation will take action to block access to all users and isolate the image.
- o Carry out a risk assessment which considers any vulnerability of young people involved; including carrying out relevant checks with other agencies.
- o Inform parents and carers, if appropriate, about the incident and how it is being managed.
- o Make a referral to Specialist Children's Services and/or the Police, as appropriate.
- o Provide the necessary safeguards and support for young people, such as offering counselling.
- o Implement appropriate sanctions in accordance with the organisation's Behaviour policy, but taking care not to further traumatise victims where possible.
    - o Consider the deletion of images in accordance with the UKCCIS: <u>'Sexting and Bristol Tuition Centres: responding to incidents and safeguarding young people'</u> guidance.
        - ▪ Images will only be deleted once the organisation has confirmed that other agencies do not need to be involved; and are sure that to do so would not place a child at risk or compromise an investigation.
- o Review the handling of any incidents to ensure that best practice was implemented; the Senior Leadership Team will also review and update any procedures, where necessary.

• The organisation will take action regarding youth produced sexual imagery, regardless of whether the incident took place on/off our premises, using Bristol Tuition Centre or personal equipment.

• The organisation will not:

- o View any images suspected of being youth produced sexual imagery, unless there is no other possible option, or there is a clear need or reason to do so.
    - ▪ In this case, the image will only be viewed by the Designated Safeguarding Lead and their justification for viewing the image will be clearly documented.
- o Send, share, save or make copies of content suspected to be an indecent image of children (i.e. youth produced sexual imagery) and will not allow or request young people to do so.

11.2 Online Child Sexual Abuse and Exploitation

• Bristol Tuition Centre will ensure that all members of the community are aware of online child sexual abuse, including: exploitation and grooming; the consequences; possible approaches which may be employed by offenders to target children and how to respond to concerns.

• Bristol Tuition Centre recognises online child sexual abuse as a safeguarding issue and, as such, all concerns will be reported to and dealt with by the Designated Safeguarding Lead.

• The organisation will implement preventative approaches for online child sexual abuse via a range of age and ability appropriate education for young people, staff and parents/carers.

• The organisation will ensure that all members of the community are aware of the support available regarding online child sexual abuse, both locally and nationally.

11.2. 1 Dealing with Online Child Sexual Abuse and Exploitation • If the organisation is made aware of an incident involving online sexual abuse of a child, the organisation will:

- o Act in accordance with the Safeguarding policy and the relevant Bristol's Safeguarding Child Board's procedures.
- o Immediately notify the Designated Safeguarding Lead.
- o Store any devices involved securely.
- o Immediately inform Avon & Somerset Police via 101 (or 999 if a child is at immediate risk)
- o Carry out a risk assessment which considers any vulnerabilities of young people involved (including carrying out relevant checks with other agencies).
- o Inform parents/carers about the incident and how it is being managed. o Make a referral to Specialist Children's Services (if required/ appropriate).
- o Provide the necessary safeguards and support for young people, such as, offering counselling.
  - o Review the handling of any incidents to ensure that best practice is implemented; the Senior Leadership Team will review and update any procedures, where necessary.

• Bristol Tuition Centre will take action regarding online child sexual abuse, regardless of whether the incident took place on/off our premises, using the organisation's or personal equipment.
- o Where possible young people will be involved in decision making and if appropriate, will be empowered to report concerns via Click CEOP www.ceop.police.uk/safety-centre/

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• If the Senior Leadership Team is unclear whether a criminal offence has been committed, the Designated Safeguarding Lead will obtain advice immediately through the Multi Agency Safeguarding Hub and/or Avon & Somerset Police.

• If the organisation is made aware of intelligence or information which may relate to child sexual exploitation (on or offline), it will be passed through to Avon & Somerset Police by the Designated Safeguarding Lead.

11.3 Indecent Images of Children (IIOC)

• Bristol Tuition Centre will ensure that all members of the community are made aware of the possible consequences of accessing Indecent Images of Children (IIOC).

• Bristol Tuition Centre will take action regarding IIOC on the organisation's equipment and/or personal equipment, even if access took place off site.

• The organisation will take action to prevent accidental access to IIOC by using an internet Service provider (ISP) which subscribes to the Internet Watch Foundation block list and by implementing appropriate filtering, firewalls and anti-spam software.

• If the organisation is unclear if a criminal offence has been committed, the Designated Safeguarding Lead will obtain advice immediately through Avon & Somerset Police and/or the Multi Agency Safeguarding Hub.

• If made aware of IIOC, the organisation will:
- o Act in accordance with the Safeguarding policy and the relevant Bristol Safeguarding Child Boards procedures.
- o Immediately notify the Designated Safeguard Lead.
- o Store any devices involved securely.
  - o Immediately inform appropriate organisations, such as the Internet Watch Foundation (IWF), Avon & Somerset Police or the LADO.

• If made aware that a member of staff or a young person has been inadvertently exposed to indecent images of children whilst using the internet, the organisation will:
- o Ensure that the Designated Safeguard Lead is informed.
- o Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via www.iwf.org.uk .
- o Ensure that any copies that exist of the image, for example in emails, are deleted.
- o Report concerns, as appropriate to parents and carers.

• If made aware that indecent images of children have been found on the organisation's devices, Bristol Tuition Centre will:
- o Ensure that the Designated Safeguard Lead is informed.
  - o Ensure that the URLs (webpage addresses) which contain the suspect

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images are reported to the
Internet Watch Foundation via
www.iwf.org.uk .
- o Ensure that any copies that exist of the image, for example in emails, are deleted.
- o Inform the police via 101 (999 if there is an immediate risk of harm) and children's social services (as appropriate).
- o Only store copies of images (securely, where no one else has access to them and delete all other copies) at the request of the police only.

o Report concerns, as appropriate to parents and carers.

• If made aware that a member of staff is in possession of indecent images of children on the organisation's devices, the organisation will:
  o Ensure that the Chief Executive Officer is informed.
    o Inform the Local Authority Designated Officer (LADO) and other relevant organisations in accordance with the Bristol Tuition Centres managing allegations policy.
    o Quarantine any devices until police advice has been sought.

11.4 Cyberbullying

• Cyberbullying, along with all other forms of bullying, will not be tolerated at Bristol Tuition Centrel.

• Full details of how the organisation will respond to cyberbullying are set out in the Anti-bullying policy.

11.5 Online Hate

• Online hate content, directed towards or posted by, specific members of the community will not be tolerated at Bristol Tuition Centre and will be responded to in line with existing policies, including Anti-bullying and Behaviour.

  • All members of the community will be advised to report online hate in accordance with relevant organisation policies and procedures.

• The Police will be contacted if a criminal offence is suspected. • If the Senior Leadership Team is unclear on how to respond, or whether a criminal offence has been committed, the Designated Safeguarding Lead will obtain advice through the Multi Agency Safeguarding Hub and/or Avon & Somerset Police.

11.6 Online Radicalisation and Extremism

• Bristol Tuition Centre will take all reasonable precautions to ensure that children are safe from terrorist and extremist material when accessing the internet on site. • If the Bristol Tuition Centre is concerned that a child or parent/carer may be at risk of radicalisation online, the Designated Safeguarding Lead will be informed immediately and action will be taken in line with the Safeguarding policy.

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• If the organisation is concerned that a member of staff may be at risk of radicalisation online, the Chief Executive Officer will be informed immediately and action will be taken in line with the Safeguarding and Disciplinary policies.

12. Useful Links

Bristol Tuition Centre Deputy Designated Lead – Lucy March

Email: lucy@swindontuitioncentre.co.uk Tel: 07458313106

First Response
Tel: 0117 9036444 – if urgent referral, immediate risk of significant harm. Otherwise refer at www.bristol.gov.uk/social-care-health/report-concern-about child-for-professionals

Outside Office hours
Emergency Duty Team: 01454 615165

Avon & Somerset Police:
www.avonandsomerset.police.uk
In an emergency (a life is in danger or a crime in progress) dial 999. For other non-urgent enquiries contact Avon & Somerset Police via 101

National Links and Resources

• Action Fraud: www.actionfraud.police.uk

• CEOP:
   ○ www.thinkuknow.co.uk
   ○ www.ceop.police.uk

• Childnet: www.childnet.com

• Get Safe Online: www.getsafeonline.org

• Internet Matters: www.internetmatters.org

• Internet Watch Foundation (IWF): www.iwf.org.uk

• Lucy Faithfull Foundation: www.lucyfaithfull.org

• NSPCC: www.nspcc.org.uk/onlinesafety

• ChildLine: www.childline.org.uk

• Net Aware: www.net-aware.org.uk

• The Marie Collins Foundation: www.mariecollinsfoundation.org.uk • UK

Safer Internet Centre: www.saferinternet.org.uk

• Professional Online Safety Helpline: www.saferinternet.org.uk/about/helpline