PADWORTH COLLEGE

Safeguarding risk assessment for online teaching	
Audience:	Staff who want to provide an online/mobile social media or interactive service (e.g. online lessons, a social network, messaging, Q&A site, interactive game, cloud service or ephemeral messaging service) to users who are under 18 years old.
Purpose:	The primary objective of this tool is to protect children from online risk by enabling staff to self-assess online products/services and inform them of mitigation strategies which must be put in place to reduce the risk of harm to children.
Online Risks:	**Online risk can be classified in three ways:**
	Conduct risk: children participating in an interactive situation. This includes bullying, sexting, harassing, being aggressive or stalking; or promoting harmful behaviour such as self-harm, suicide, pro-anorexia, bulimia, illegal drug use or imitating dangerous behaviour. A child's own conduct online can also make them vulnerable - for example, by over-sharing their personal information or by harassing or bullying others.
	Contact risk: children being victims of interactive situations. This includes being bullied, harassed or stalked; meeting strangers; threats to privacy, identity and reputation (for example, through embarrassing photos shared without permission, a home location being identified, someone impersonating a user, users sharing information with strangers); and violence, threats and abuse directly aimed at individual users and/or groups of users.
	Content risk: children receiving mass-distributed content. This may expose them to age-inappropriate material such as pornography, extreme violence, or content involving hate speech and radicalisation.
Illegal contact, conduct and content	**Some online risks cannot only lead to harm, but also result in illegal activity such as:**
	* sexual grooming and sexual exploitation
	* creation and distribution of child abuse images
	* online aspects of child trafficking
	* online radicalisation
	* physical and mental abuse of children
	* selling and distributing illegal drugs
	* revenge pornography, harassment and malicious communications.

Core Principles:	1. Informed parental consent
	2. Educating and raising awareness of e-safety
	3. Effective moderation
	4. Ensuring privacy and controls
	5. Dealing with child sexual abuse content and other illegal contact
	6. Managing inappropriate or harmful content
	7. Dealing with inappropriate or harmful behaviour

Name of College:	Padworth College		
Online activity being risk assessed:	Online Teaching and Learning		
DSL / manager responsible for this document:	Lorraine Atkins		
Document created: April 2020	Document reviewed: September 2021		Next review due: September 2022

1. Informed parental consent
Written parental consent gained at enrolment.

Risk description	Risk rating before control measures	Risk management	Persons at risk	Action to be taken	status	Residual Rating
Why? Consent allows parents to make an informed decision about whether to	*High*	*How?* The consent must contain specific details of the activities and safeguards being put in place. Provide parents with links to the site/app parental guidance (if this exists) for any platform(s) to be used, so they can make informed decisions about whether their	Students, Staff	All parents/guardians and students sent the Online Home Learning Student Responsible User agreement form	Done September 2021	Low

| allow their child to participate. It is also an outward signal to parents that we take online safety seriously. | | child should use the site/app. If it is a platform where parents can be given access, this should be made explicit here, including guidance on how to contribute appropriately and safely. | | Parents and Guardians have signed a parental permission form and a copy of the student ICT agreement form.

The College uses Microsoft Teams as a platform and can only be accessed using students' college emails.

Behaviour Policy
Anti-Bullying Policy
Child protection and Safeguarding policy | On acceptance of place

Done
Done
Done | |

2.   Education and awareness raising
Young learners (YLs) educated on how to stay safe online and in how to use the particular platform(s) safely.

Risk description	*Risk rating before control measures*	*Risk management*		*Action to be taken*	*status*	*Residual Rating*
Why? It is critically important to give users, especially children the space and opportunities where they can develop their e-safety knowledge. For the digital space, this includes educating them about how to recognise and report things which concern them, and areas such as privacy and risky behaviour. They can then reap the	*High*	*How?* For general e-safety awareness use an age-appropriate video; there are many available online, for example, https://learnenglishteens.britishcouncil.org/uk-now/video-uk/online-safety-tipsraising For specific platform safety advice see the site/app's 'safety centre'. Most platforms have created guides for children and parents/teachers on how their site can be used safely. Or access advice from the NSPCC and O$_2$ https://www.net-aware.org.uk/online-safety-lockdown/	Students	Online safety induction for all students via boarding team in MS Teams College ICT Policy Online Home Learning Student Responsible User Agreement Parental permission with expectations of the College made clear Student ICT agreement Child protection and safeguarding policy (September 2021) Online safety training	Ongoing Done Done Done Done Done Done Refresher for staff Jan 2022	Low

benefits of the digital age and keep themselves safe online.						

3. Moderation
More than one (police checked) moderator or administrator in place to monitor the platform and detect potential child abuse or breach of language centre rules.

Risk description	Risk rating before control measures	Risk management		Action to be taken	status	Residual Risk Rating
Why? Moderation is an activity or process whereby a person is responsible for reviewing content posted by users. It is used to try and help keep chat and interactive services safe for children and provide a positive user experience by removing unsafe, inappropriate and offensive posts. Although the fact	*Medium*	*How?* Content posted by a user must be reviewed by the moderator who can, for example, remove inappropriate posts or even bar a user from using the service. Human moderation can be done in different ways, and these different ways have implications for the level of safety. With pre-moderation all material is seen and checked before it is published.	Students	DSL/DDSL to be available throughout the teaching day	Ongoing	Low
				DSL/DDSLs can drop in on lessons at random	Ongoing	
				College ICT Policy	Done	
				Online Home Learning Student Responsible User Agreement	Done	
				Parental permission with expectations of the College made clear	Done	
				Student ICT agreement	Done	
				Child protection and safeguarding policy (September 2021)	Done	
				Online safety training	Done	

that a service is moderated is not a guarantee of a child's safety, it does provide an important service to improve the online environment.

4. Privacy and controls
Privacy tools and controls activated to keep children safe when they're using the platform.

Risk description	Risk rating before control measures	Risk management	Perosn at risk	Action to be taken	status	Residual Risk
Why? 1.Privacy tools and controls are crucial for keeping young users safe on digital platforms. Children and young people are often excited to post personal information such as their name and contact details, or pictures and videos of what they are doing. But they need to understand that	**High**	**How?** Ensure privacy settings are enabled to the most secure setting. Any geolocation capabilities must be switched off and users instructed not to share photos, last names, addresses or other personal information. One-to-one contact between teachers and children is not allowed. It should be made clear that teachers should never contact students privately, and there should be measures in place to enable moderation of communications, including random spot checks. All users should be made aware of how to report concerns regarding the misuse of digital/online products.

Unexpected contact, unreported concerns and issues. Students missing lessons. | Staff, Students | College ICT Policy Online Home Learning Student Responsible User Agreement Parental permission with expectations of the College made clear Student ICT agreement Child protection and safeguarding policy (September 2021) Online safety training Principal and Deputy Principal to take the lead on staff training using Teams Staff to be trained how to mute all students during lessons Staff to be trained how to stop students recording lessons | Done Done Done Done Done Done September 2021 Done April 2020 Done April 2020 | Low |

protecting their online identities and reputation is very important. 2.Accidental inappropriate use of the College systems - such as sharing personal contact details between Staff and Students, sharing of inappropriate materials. Using programs other staff/ students do not have access to.		Staff sharing personal details with students or vice versa.	Staff to check the suitability of all online materials before using them or linking to them Sharing of tips via regular staff meetings *Ensure staff have all signed and returned a copy of the Acceptable use agreement.* *Session on Online safety to be completed by all teaching staff 16/04/2020 to be refreshed in Jan 2022* *Support Booklet produced in house to help- April 2020* All changes to be communicated to staff and students via their college email accounts and/or via Teams. Notices to parents will be sent by email to the agent, guardian or parent – details to be kept on Engage and spreadsheet (i.e. normal procedures). Student views will be sought via tutorials and a record will be kept Students are able to report concerns via academic and pastoral tutorial sessions a during the week. Parental concerns can be sent via email as normal. Whole College Team to be created for notices to all students Ensure parental contacts are kept up to date Create whole College Team- Wellbeing Team Sharing of personal data to be avoided as all communication must take place via the College approved system - Microsoft Teams.	Done Done

					Communication to parents/guardian and agents will take place from a College email account		
					Staff are not to save/download sensitive student data to personal equipment.		

5. Child sexual abuse content or illegal contact
Dedicated resources in place to detect and prevent child sexual abuse content and child sexual exploitation.

Risk description	Risk rating before control measures	Risk management	Persons at risk	Action to be taken	status	Residual Risk
Why? To a child sex offender, online platforms represent an opportunity to gain virtual access to children to sexually exploit them and/or to share child sexual abuse content with others. By using digital platforms with children we have a vital role to play in protecting them	**High**	**How?** Ensure all of the standards of the risk assessment are in place and the risk around child sexual abuse content and illegal contact should be significantly reduced. However, it is essential children know how to report any concerning activity they encounter and that such reports are escalated in line with language centre policy. Teachers, moderators and administrators must complete relevant training to ensure they understand online risk and know how and when to report concerns.	Students	Online Teaching Risk assessment Child Protection and Safeguarding Policy (September 2021) Whistleblowing policy (September 2021) Staff Code of Conduct (September 2021)

Online safety training | Done Done Done Done

March 2020 refresher Jan 2022 | Low |

6. Managing content
'House rules' created which give a clear definition of what is acceptable and what is not acceptable on the platform.

Risk description	Risk rating before Control Measures	Risk management	Persons at risk	Action to be taken	status	Residual Risk

Risk description	Risk rating before control measures	Risk management	Persons at risk	Action to be taken	status	Residual Risk
Why? 'House rules' allow users to interact in a safe environment which protects them from inappropriate material and abuse.	*High*	**How?** Set 'House rules' with YL's at the beginning of the activity which clearly outline what is acceptable and not acceptable conduct and what sanctions will be enacted if these rules are broken. Ensure the 'House rules' prohibit behaviour such as threats or harassment of others, hate speech, threats of violence, and posting someone else's private information. Behaviour Management Policy (September 2021) Whistleblowing Policy (September 2021) College ICT Policy Online Home Learning Student Responsible User Agreement Parental permission with expectations of the College made clear Student ICT agreement Child protection and safeguarding policy (September 2021)	Staff, Students	Principal and Deputy Principal to take the lead on staff training using Teams Staff to be trained how to mute all students during lessons Staff to be trained how to stop students recording lessons Staff to check the suitability of all online materials before using them or linking to them Sharing of tips via regular staff meetings *Ensure staff have all signed and returned a copy of the Acceptable use agreement.*	Done Session on Online safety to be completed by all teaching staff 16/04/2020 refresher Jan 2022 Ongoing Ongoing Done	Low

7.   Dealing with inappropriate behaviour or 'abuse'
Mechanism in place for dealing with inappropriate behaviour by YLs (including cyber bullying) or by staff. Including anything which makes children or staff feel uncertain, uncomfortable or fearful.

Risk description	Risk rating before control measures	Risk management	Persons at risk	Action to be taken	status	Residual Risk
Why? Inappropriate behaviour or abuse has the power to cause distress or harm, exacerbating problems such as poor self-image,	*High*	**How?** YL's and staff are informed at the beginning of the activity through 'House rules' and again through reminders, what content or behaviours constitute abuse and inappropriate behaviour. Make sure you enforce the rules and be very clear about the reasons for your decisions. Make sure children and staff know how to report abuse and that there is a system in place for sanctioning those who break the 'House rules'. Follow these	Staff and Students	Child Protection and Safeguarding policy to be shared on Teams, email and website. Any changes to Child Protection and Safeguarding procedure to be notified to staff: Concerns to be shared electronically.	Done	Low

isolation and loneliness. It can lead to, among other things, self-harm and even suicide.		consistently and ensure all staff involved in the activity understand the process and are equipped to identify abusive or potentially abusive scenarios.		Consent form to be signed and returned by parents Student User Agreement to be sent to students. Student usernames and passwords to be sent out by the office if they have not already got access.	
		College safeguarding procedures to be followed as set out in current College policy and procedure, *but with some differences in the returning of Concerns now electronic rather than hard copy.* Concerns to be noted and reported to D/DSLs D/DSLs to be available throughout the teaching day D/DSLs to meet weekly via Teams Student behaviour policy still applies to online courses Students provided with online expectations to follow via Student User Agreement Staff to reinforce and clarify these expectations in lessons Staff to support students via tutorials Parents to be provided with online consent form setting out expectations for appropriate study space/ behaviour etc. D/DSLs able to drop in on lessons at random Unacceptable behaviour to be dealt with using current College policies and sanctions (amended for online course) Behaviour Policy (September 2021) All communication between staff and students to take place through College accounts using Teams and Office 365. Students and staff told not to share passwords with anyone. Students and staff are not to allow anyone who is not a member of the College community to access their account, or make contact with other members of the College community via Office 365. Whistleblowing Policy (September 2021) Staff Code of Conduct (September 2021)		Copy of 'If you need help' poster to be made available to students Students who need help to email LA (as DSL) she will be joined in a Teams with a DDSL and that student College safeguarding procedures to be followed - any concerns staff have to be reported to a D/DSL	Share 'If you need help' poster on Teams
8. Staff absences/ cover **Mechanism for dealing with illness cover**					

Risk description	Risk rating before control measures	Risk management	Persons at risk	Action to be taken	Status	Residual Risk
Why? Lessons unable to be provided by the College.	*Medium*	**How?** Normal cover procedures to be applied, internal cover to be provided where possible.	Staff, students	LA/RC to keep in touch with teachers LA/RC to report sickness absence	Ongoing Ongoing	Low

9. Issues caused by loss of Internet connectivity
Potential for exploitation/bullying by someone

Risk description	Risk rating before control measures	Risk management	Persons at risk	Action to be taken	Status	Residual Risk

| Why?
Practical Issues with internet connectivity | *Medium* | How?
Loss of contact with students and staff. | Students, Staff | All teaching to be done via a College approved platform - currently Microsoft Teams, using College accounts
Appropriate permissions have been applied to staff and student accounts via IT Support
Classes are set up by class teachers on Teams who also add the students and Senior members of staff (MC and LA)
Senior members of staff are added to all Teams in order to be able to drop in
Parents to be advised to check their home internet filters
Office 365 to be available online only – no need for students to have VPN/RDS, to make system more accessible.
Office 365 products, such as Word, Excel etc. available via the Office 365 account
Students who are in quarantine abroad will join classes when they can (as notified by agent or parent). Work can be emailed to them in the meantime.
Staff with poor internet connection to be provided with WiFi booster/ CAT 5 Cable to increase strength
Students able to turn cameras off when advised by a teacher to help with bandwidth issues
Students having trouble connecting will have individual session with a member of staff to walk through processes.
Staff to report any student technical issues so these can be investigated and resolved. | Ask IT Support company to create student accounts

Create and assign classes (MC)

Email parents about home filters ? | Low |
| **10. Ensuring appropriate protocols are followed in the online lessons with relation to behaviour, dress and attendance** | | | | | | |

Risk description	Risk rating before control measures	Risk management	Persons at risk	Action to be taken	Status	Residual Risk
Teaching	High	Inappropriate behaviour/dress etc., not 'attending' lessons, not prepared for lessons,	Students, Staff	Student behaviour expectations to be set out in User Agreement and reinforced by teachers in lessons. Timetable to be communicated to all staff and students Register to be taken Absences to be followed up by the College in writing Inappropriate dress/ working spaces to be noted and reported to RC and LA so they can be followed up with students and parents *1-1 lessons will not occur. RC and LA asked to join.* *Lessons may be recorded with the consent of the students for absent students.* *Teachers to produce and follow agreed schemes of work as directed by Deputy Principal* Senior staff able to drop into lessons at any time	Create Register Email regarding absences	Low
Inappropriate use of recorded lesson material						
Risk description	Risk rating before control measures	Risk management	Persons at risk	Action to be taken	Status	Residual Risk
Recording Lesson content	Medium	Students/ Staff recording lessons without consent	Students, Staff	Student advised via User Agreement not to record lessons	Teachers to be trained how to make	Low

					Students to be made attendees in lessons so as not to be able to record Sanctions to be applied to students who record lessons Parents to be advised student are not to record lessons *Staff only able to record lessons where they deem appropriate* *Any recording made by staff is with the consent of the students* Recording are to be stored.	students 'attendees' in a meeting so as not to be able to record lessons	