Learn. To Change.

Online Safety Policy

Prepared by:	Stephen Smith
Prepared for:	QA group
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Internal
This document must not be disclosed outside of the QA group of companies without Director, InfoSec or Legal Team member approval.

Version control

This policy applies to all Apprenticeships

Document information	
Version 1.1	New and updated policy. Separated from In Learning Code of Conduct to clarify the purpose of both policies as covering similar but separate topics.

Document Approval		
Name	**Position**	**Viewed / comments**
Stephen Smith	Safeguarding Manager	Approved
Mike Brown	Director of Technology and Security Services / CISO	Approved
Simon Kent	Head of Operations	Approved

Revision History			
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Contents

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1. Introduction and Scope

While new technologies are enhancing communication and creativity some are also challenging the definitions and boundaries of the adult education environment. As active participants in a digital world, our broad curriculum and our learners' personal goals requires regular use of a variety of IT systems and communication tools. Our aim is to provide learners and staff with the knowledge, skills and confidence to become safe and responsible users of technology.

This policy relates the QA's learners who have access to and are users of IT systems and resources, and applies to all electronic devices and services provided, including the use of computers, mobile phones and related equipment, regardless of ownership, where they are used on premises for which QA has responsibility or use an internet or other network connection for which QA has responsibility.

For security reasons, use of the internet and e-mail services provided by QA may be recorded by QA. This may include details of sites visited and addresses of emails sent. However, QA will **not** monitor details entered into secure web pages, or the content of e-mails where provided by another Internet Service Provider.

Privacy and confidentiality: Because equipment may be used by several different people, QA cannot guarantee the privacy of personal data, including e-mails. It is the responsibility of users to ensure they correctly log out of any websites, e-mail packages or other programmes before leaving the computer/device.

QA learners and staff may use QA equipment for legitimate activities related to a learning programme run by or for QA. These activities must be within the law and must not be prohibited elsewhere in this policy.

2. Aims

QA aims to:

- Have robust processes in place to ensure the online safety of learners, staff, volunteers and Board Members
- Deliver an effective approach to online safety, which empowers us to protect and educate the QA learning community in its use of technology
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate
- Ensure learners, staff, volunteers and Board Members are responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use

3. Legislation and guidance

This policy is based on the Department for Education's (DfE) statutory safeguarding guidance, Keeping Children Safe in Education, and its advice for schools, colleges and training providers.

It reflects existing legislation, including but not limited to the Education Act 1996 (as amended), the Education and Inspections Act 2006 and the Equality Act 2010. In addition, it reflects the Education Act 2011, which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on learners' electronic devices where they believe there is a 'good reason' to do so.

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Prevent Duty - There is a duty on authorities under the *Counter Terrorism and Security Act 2015* to have due regard to the need to prevent people from being drawn into terrorism. As with other online harms, every tutor needs to be aware of the risks posed by the online activity of extremist and terrorist groups.

QA has a vital role to play in protecting its learners from the risks of extremism and radicalisation. Keeping learners safe from risks posed by terrorist exploitation of social media will be approached in the same way as safeguarding learners from any other abuse.

If you have a concern for the safety of a learner at risk of radicalisation, you should follow the steps in QA's Safeguarding Policy & procedures, including discussing your concerns with QA's designated safeguarding lead (DSL).

4. Roles and responsibilities

4.1. The Quality Director

The Board has overall responsibility for the successes of this policy and ensuring the DSL team have the tools required for its implementation. The board will co-ordinate regular meetings with senior leaders taking oversite and monitoring of filtering safety logs, as provided by the designated safeguarding lead (DSL).

All Board Members will:

- Ensure that they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the QA's IT systems and the internet. This can be found in the Computer User Agreement Policy, within governance section.

4.2. The Designated Safeguarding Lead

The Designated Safeguarding Lead and deputies are responsible for ensuring that staff are aware of the policy, and that it is being implemented consistently throughout the organisation.

4.3. The role of the Designated Safeguarding Lead

Details of QA's DSL and deputies are set out in our safeguarding policy and Procedure. The DSL takes lead responsibility for online safety in at QA, in particular:

- Ensure that staff understand this policy and that it is being implemented consistently throughout the organisation
- Working with the IT team and other staff, as necessary, to address any online safety issues or incidents
- Ensuring that any online safety incidents are logged and dealt with appropriately in line with this policy and the Safeguarding Policy and Procedure
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the QA's behaviour policy
- Liaising with other agencies and/or external services if necessary

This list is not intended to be exhaustive.

4.4. IT Service desk

The IT team works with the Designated Safeguarding Lead and are responsible for:

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- Putting in place appropriate filtering and monitoring systems, which are updated on a regular basis and keep learners safe from potentially harmful and inappropriate content and contact online while at QA, including terrorist and extremist material
- Ensuring that QA's IT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring QA's IT systems on an agreed basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring any online safety incidents are logged in line with IT procedures
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with QA's learner Bullying policy

This list is not intended to be exhaustive.

4.5. All staff and volunteers

All staff, including contractors and agency staff, and volunteers are responsible for:

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the QA's IT systems and the internet, and ensuring that learners follow the QA's terms on acceptable use (appendix 1)
- Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with QA's Safeguarding Policy and Procedures
- This list is not intended to be exhaustive.

4.6. Learners

Learners are expected to:

- Notify a member of QA staff with any concerns or queries regarding this policy
- Ensure they have read, understood and agreed to the terms on acceptable use of QA's IT systems and internet which can be provided by your regular QA contact.
- Recognise the dangers and threats that are apparent from being online
- Understand and engage with this policy to enhance their own safety online

5. Educating learners about online safety

Learners will be taught about online safety as part of continued updates and information sharing, in line with QA Safeguarding obligations.

Learners will be taught to:

- Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
- Recognise inappropriate content, contact and conduct, and know how to report concerns

Learners should know:

- Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online

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- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- How information and data is generated, collected, shared and used online
- How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours
- It is not permitted to record or photograph staff or learners without the tutor and the subject’s express permission

The safe use of social media and the internet will be covered where relevant.

QA will use a range of platforms to raise learners’ awareness of the dangers that can be encountered online.

6. Cyber-bullying

6.1. Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power. (See also QA’s Anti-Bullying policy and Safeguarding Policy and Procedure.). Available via your regular QA contact.

6.2. Preventing and addressing cyber-bullying

To help prevent cyber-bullying, we will ensure that learners understand what it is and what to do if they become aware of it happening to them or others. We will ensure that learners know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

QA will actively discuss cyber-bullying with learners, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Tutors are encouraged to find opportunities to use aspects of their course to cover cyber-bullying.

All staff, Board Members and volunteers (where appropriate) receive updates on cyber-bullying, its impact and ways to support learners, as part of safeguarding training.

In relation to a specific incident of cyber-bullying, QA will follow the processes set out in the QA Safeguarding Policy & Procedure.

Where illegal, inappropriate or harmful material has been spread among learners, QA will use all reasonable endeavors to ensure the incident is contained. It is not permitted to record or photograph staff or learners without the tutor and the subject's express permission.

The DSL will consider whether the incident should be reported to the police if it involves illegal material and will work with external services if it is deemed necessary to do so.

7. Acceptable use of the internet at QA

All learners are expected to agree to the acceptable use of the QA's IT systems, details can be found in the Computer User agreement Policy or QA Learner Code of Conduct (Appendix 1). Visitors will be expected to read and agree to QA's terms on acceptable use if relevant.

Use of QA's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role.

QA will monitor the websites visited by learners, staff, volunteers, Board Members and visitors (where relevant) to ensure they comply with the above.

More information is set out on acceptable use within the Code of conduct & QA Computer User Agreement.

8. Monitoring arrangements

The DSL logs behaviour and safeguarding issues related to online safety. Any Incidents or reports are stored within an area accessible to the Safeguarding Team only.

This policy will be reviewed every year by the DSL team.

9. Links with other policies

This online safety policy is linked to our:

- Safeguarding policy and Procedure
- QA Anit-Bullying policy
- Staff disciplinary procedures
- QA User Computer user agreement
- QA In Learning Code of Conduct
- QA Learner Code of Conduct
- IT and internet acceptable use policy

10. Policy Review

This policy will next be reviewed in July 2025.

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