

INSPIRED SUPPORT

E-SAFETY POLICY



INSPIRED SUPPORT

Effective from:	September 2022	Review Date:	September 2025
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Inspired Support's Autism Consultant and Deputy Safeguarding Lead receives email updates from Skills for Care, 39 Essex Chambers and the Social Care Institute for Excellence and will update this policy as needed prior to the review date.

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Introduction:

Inspired Support recognises the benefits and opportunities which new technologies offer to people's learning, development and progression. We provide internet access to all customers and mentors and encourage the use of technologies in order to enhance skills, promote achievement and enable lifelong learning. However, the accessibility and global nature of the internet and different technologies mean that we are also aware of potential risks and challenges associated with such use. Our approach is to implement appropriate safeguards while supporting mentors and customers to identify and manage risks independently and with confidence. We believe this can be achieved through a combination of security measures, training, guidance and implementation of our policies. In furtherance of our duty to safeguard customers, we will do all that we can to make our customers and mentors stay safe online and to satisfy our wider duty of care.

Scope:

The policy applies to all customers and mentors and all members of the Inspired Support community who have access to the services IT systems. The e-Safety Policy applies to all use of the internet and forms of electronic communication such as email, mobile phones, social media, instant messaging, webinar and video conferencing etc.

1. Definition:

The term e-safety is defined for the purposes of this document as the process of limiting the risks to young people and vulnerable adults when using Internet, Digital and Mobile Technologies (IDMTs) through a combined approach to policies and procedures, infrastructures and education, including training, underpinned by standards and inspection. E-safety risks can be summarised under the following three headings:

Content

- Exposure to inappropriate material.
- Exposure to inaccurate or misleading information.
- Exposure to socially unacceptable material, such as that inciting violence, hate or intolerance, sites promoting radicalisation or pornography.
- Exposure to illegal material, such as images of child abuse.
- Illegal downloading of copyrighted materials e.g. music and films.

Contact

- Grooming using communication technologies, potentially leading to sexual assault, child sexual exploitation and radicalisation.
- The use of assumed identities on gaming platforms.
- Bullying via websites, mobile phones or other forms of communication device.
- Recording/taking photographs of people without their consent.

- Spyware, e.g. use of Remote Access Trojans/Tools to access private information or spy on their victim.

Commerce

- Exposure of minors to inappropriate commercial advertising.
- Exposure to online gambling services.
- Commercial and financial scams.

2. Responsibilities:

The Director is responsible for maintaining this policy.

The following are responsible for implementing it:

- The Director and head of Information Technology are responsible for keeping up to date with new technologies and their use. They will update mentors, record incidents, report any developments and incidents and ensure mentors promote e-safety within Inspired Support.
- Mentors will provide pastoral and practical support for customers dealing with issues related to e-safety.
- The Head of Information & Technology for championing good e-safety practice in the service's IT facilities and processes, and for providing technical expertise when issues are being investigated.
- All mentors for embedding e-safety education and practice. into their teaching programme.
- All mentors for implementing good e-safety practice and safeguards consistent with this policy in their area of responsibility.
- All mentors for staying alert to and responding appropriately to any potential or actual e-safety issue.

3. Security

Inspired Support will do all that it can to make sure the network is safe and secure. Every effort will be made to keep security software up to date. Appropriate security measures will

include the use of enhanced filtering and protection of firewalls, servers, routers, workstations to

prevent accidental or malicious access of systems and information. Digital communications, including email and internet postings, over the network, will be monitored in line with the Acceptable Use Policy.

Inspired Support complies with guidelines set out by the Counter Terrorism Internet Referral Unit (CTIRU) and has a statutory duty to ensure their systems cannot be used to access any of the websites on the CTIRU list.

4. Behaviour

Inspired Support will ensure that all users of technologies adhere to the standard of behaviour as set out in the Acceptable Use Policy. Inspired Support will not tolerate any abuse of IT systems. Whether offline or online, communications by mentors and customers should be courteous and respectful at all times. Any reported incident of bullying or harassment or other unacceptable conduct will be treated seriously and in line with procedures, and may result in police action.

5. Cyberbullying

Central to Inspired Supports anti-bullying policy is the principle that ‘bullying is always unacceptable’ and that ‘all customers have a right not to be bullied’. Inspired Support also recognises that it must take note of bullying perpetrated outside of the service which spills over into the service; therefore once aware we will respond to any cyber-bullying we become aware of carried out by customers when they are away from the service.

Cyber-bullying is defined as ‘an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself.’

By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile ‘phones’.
- The use of mobile ‘phone cameras to cause distress, fear or humiliation.
- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites.
- Using e-mail to message others.
- Hijacking/cloning e-mail accounts
- Making threatening, abusive, defamatory or humiliating remarks in online forums.

Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory information in any media including internet sites.

Communications Act 2003

Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.

Malicious Communications Act 1988

Section 1 of the Malicious Communications Act 1988 states that it is an offence for any person to send a communication that is “indecent” or “grossly offensive” for the purpose of causing “distress or anxiety to the recipient”. The Act also extends to threats and information which is false and known or believed to be false by the sender of the communication.

Protection from Harassment Act 1997

The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment. This could include sending a person multiple abusive emails with the intention of causing alarm or distress.

Section 4 of the Protection from Harassment Act 1997 provides the protection for greater punishment to those found guilty of causing another person to fear on at least two occasions, that violence will be used against them.

The 1997 Act also gives courts the power to grant restraining orders against those found guilty of an offence in order to protect the victim.

Obscene Publications Act 1959

The Obscene Publications Act 1959 makes it an offence to publish an obscene article. An obscene article is classed as one whose effect is to deprave and corrupt persons likely to read, see or hear the matter contained or embodied in the article. Publishing includes circulating, showing, playing or projecting the article or transmitting data.

Public Order Act 1986

Under section 5 of the Public Order Act 1986, it is an offence to use threatening, abusive or insulting words, behaviour, writing or any visual representations likely to cause harassment, alarm or distress within the hearing or sight of a person. With regards to cyberbullying, this offence could apply where a camera or mobile phone video functionality is used as a way of causing such harassment, alarm or distress.

Computer Misuse Act 1990

If in the course of cyberbullying a person hacks into the victim's online accounts or personal computer, they may be committing an offence under the Computer Misuse Act 1990.

If we become aware of any incidents of cyberbullying, we will need to consider each case individually as to any criminal act that may have been committed. Inspired Support will pass on information to the police if it feels that it is appropriate or is required to do so.

6. Sexting

'Sexting' often refers to the sharing of naked or 'nude' pictures or video through mobile phones and/or the internet. It also includes underwear shots, sexual poses and explicit text messaging.

While sexting often takes place in a consensual relationship between two young people, the use of sexted images in revenge following a relationship breakdown is becoming more commonplace.

Sexting can also be used as a form of sexual exploitation and take place between strangers.

As the average age of first smartphone or camera enabled tablet is 6 years old, sexting is an issue that requires awareness raising across all ages.

Inspired Support will use appropriate educational material to raise awareness, to promote safety and deal with pressure. Parents/carers should be aware that they can come to the school for advice.

7. Gaming

Online gaming is an activity in which many people get involved. We will raise awareness of the risks involved by:

- Talking to people about the games they play and help them identify whether they are appropriate.
- By supporting people to identify the most effective way to safeguard themselves by using privacy settings.
- By talking to parents about setting boundaries and time limits when games are played.
- By highlighting relevant resources.

8. Online Reputation

Online reputation is the opinion others get of a person when they encounter them online. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that customers and mentors are aware that anything that is posted could influence their future professional reputation. The majority of organisations and work establishments now check digital footprint before considering applications for positions or places on courses.

9. Grooming

Online grooming is the process by which one person with an inappropriate sexual interest in vulnerable people will approach someone online, with the intention of developing a relationship with that individual, to be able to meet them in person and intentionally cause harm.

We will build awareness amongst customers and their carers about ensuring that the individual:

- Is advised to only have friends online that they know in real life.
- Is aware that if they communicate with somebody that they have met online, that relationship should stay online.
- Recognise the signs of grooming.
- Have regular conversations with their customers about online activity and how to stay safe online.

10. Use of Images and Video

The use of images, or photographs, is popular and should be encouraged where there is no breach of copyright or other rights of another person (e.g. images rights or rights associated with personal data). This will include images downloaded from the internet and those belonging to mentors or other customers, and the covert recording or sharing of any images or videos taken without the person's consent.

All customers and mentors should receive training on the risks when taking, downloading and posting images online and making them available to others. There are particular risks where personal images of themselves or others are posted onto social networking sites and Inspired Support will provide information to customers on the appropriate use of images as detailed in the Acceptable Use Policy. This includes photographs of customers and mentors as well as using third party images. Our aim is to reinforce good practice as well as offer further information for all users on how to keep their personal information safe.

No image/photograph can be copied, downloaded, shared or distributed online without permission from the owner. Photographs of activities within the service should be considered carefully before being published. Approved photographs should not include names of individuals without consent.

11. Education and Training

With the current unlimited nature of internet access, it is impossible for Inspired Support to eliminate all risks for staff and students. It is our view therefore, that we should support mentors and customers to stay e-safe through regular education and support. This will provide individuals with skills to be able to identify risks independently and manage them effectively.

Customers should know what to do and who to talk to were they have concerns about inappropriate content, either where that material is directed to them, or where it is discovered as part of a random search. Within sessions, customers will be encouraged to question the validity and reliability of materials researched, viewed or downloaded. They will also be encouraged to respect the copyright of other parties.

For customers:

Appendix A shows E-Safety Guidelines

Appendix B shows Guidelines for customers (Social Media)

Appendix D shows Guidelines for customers using webinar / video conferencing software.

For mentors:

Appendix A shows E-Safety Guidelines

Appendix C shows Guidelines for Staff (Social Media)

Appendix E shows Guidelines for staff using webinar / video conferencing software.

12. Incidents and Response

Where an e-safety incident is reported, this matter will be dealt with very seriously. Inspired Support will act immediately to prevent, as far as reasonably possible, any harm or further harm occurring. If a customer wishes to report an incident, they can do so to their mentor, any other mentor, or one of the Directors. Where a mentor wishes to report an incident, they must contact their area lead or director as soon as possible. Following any incident, Inspired Support will review what has happened and decide on the most appropriate and proportionate course of action. Sanctions may be put in place, external agencies may be involved or the matter may be resolved internally depending on the seriousness of the incident. Serious incidents will be dealt with by the directors in consultation with appropriate external agencies.

13. Equality Impact Statement

We have a duty to consider the impact of changes on groups with Protected Characteristics (race, disability, age, sexual orientation, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership).

What are the overall aims of the change? Why are you proposing it?	The aim of this policy is to provide a framework to ensure that the guidelines are in place to support all stakeholders.
Given the aims of your proposal, what issues does your data/information highlight?	Everybody is included within this policy, and all groups are given equability in regards to their needs and provisions.
How could the proposed change affect positively/negatively on groups with protected characteristics?	This has a positive impact on all groups with protected characteristics, as they are ensured equal treatment and provision based on their needs. Risk assessments may be carried out to ensure that this is the case and provisions maybe altered to accommodate specific needs.
What actions will you take to mitigate any negative impact?	No negative impact to having this policy.
Is there any potential negative impact justified in light of wider benefits of the proposal?	No negative impact to having this policy.
Recording final decision.	This policy requires Directors approval.
Has the policy taken into consideration the requirements of GDPR regulations? Are there any actions that need addressing, e.g.; data sharing agreement; has data consent been considered; data retention timescales?	GDPR regulations have been considered and actions comply with data protection requirements.

APPENDICES

Appendix A - E-Safety Guidelines

- Keep your personal information private - avoid sharing personal information such as your phone number, home address or photographs with people you don't know in person and trust.
- Check whether the social media networks you use allow you to create friend lists. These lists let you manage who sees what. For example, you may only want your closest friends to see some information.
- Use private messages for people you know in person and trust; be careful of private messaging people you don't know.
- Use a strong and unique password for all of your online accounts - a combination of letters, numbers and symbols (and if you've ever shared it in the past, CHANGE IT).
- Know how to block someone if they make you feel uncomfortable or upset.
- Learn how to save chat logs and texts so that if someone does make you uncomfortable or upset, you have evidence to report them.
- Remember to log out of a site properly after use, especially on a shared computer.
- Keep your clothes on when using webcam - images of you could end up in the wrong hands!
- Think very carefully about meeting someone face to face who you only know online - **NEVER** do this alone, always talk to your parents or carers before you go ahead with this and take a trusted adult friend along with you.
- Customers or mentors should report any abusive behaviour immediately to the Directors.

Appendix B - Guidelines for Customers (Social Media)

As part of our duty of care to our customers, Inspired Support sets out guidelines, below, for when using social media. The purpose of including them here is to make mentors aware of the guidelines and to encourage them to discuss them with customers.

Customers should follow the guidelines below at all times:

- Do not enter into a "friends" relationship online with someone you do not know.
- Do not use social media to harass, threaten, insult, defame or bully another person or entity; to violate any Inspired Support policy; or to engage in any unlawful act, including but not limited to gambling, identity theft or other types of fraud.
- Do not access or participate in social media which incites hatred or promotes radicalisation.
- Set up privacy settings carefully, ensure you are not sharing any information that you do not want to and check these on a regular basis.
- Discussions on Inspired Support's branded social media should be appropriate and content related.
- When posting on sites linked to Inspired Support or when mentioning or referring to Inspired Support on social media do not:

- Use foul or abusive language.
 - Harass, threaten, insult, defame, blackmail or bully another person.
 - Refer to any other member of Inspired Support, whether customer or mentor, in a derogatory or insulting manner.
 - Refer to Inspired Support, its facilities or any other aspect of its offering, in a derogatory or insulting manner.
 - Post or comment in any way that reflects poorly on Inspired Support or is deemed to interfere with the conduct of the organisation.
- The posting of messages that are deemed inappropriate and copies of inappropriate posts may be reported to parents/carers and the appropriate authorities. Before you post a message, think carefully about its content and ask yourself how you would feel if you received that message or know that it may be disclosed in court.
 - Any form of abuse or cyber-bullying will be dealt with and may result in a loss of service.
 - Customers should report any abusive behaviour immediately to their mentor, area lead or a director.

Appendix C - Guidelines for staff (Social Media)

This policy sets out guidelines for staff (mentors and volunteers), below, for the use of social media. These guidelines apply to:

- Posting to any Inspired Support social media site;
- communicating with members of Inspired Support community including other mentors or customers;
- discussing Inspired Support on any site; whether in the service and using the network and equipment or through a personal account or using a personal phone, computer or other device from any other location.

Staff should follow the guidelines below at all times:

- Be professional; as a sub contractor for Inspired Support you are an ambassador for the organisation. Protect the Inspired brand and values at all times, do not make derogatory comments about Inspired Supports products, services, management, mentors or systems.
- It is advised not to have a “friend” relationship with a student online, where personal details are shared.
- If the Social Media requires a login, create a separate “work” login and ensure any privacy settings are set appropriately so that no personal information can be viewed.
- Staff should not share any personal information online
- Discussions on social media sites linked to Inspired Support should be appropriate and be service related.
- Staff should not comment on anything related to legal matters, litigation, or any parties the service may be in dispute with or anything that may be considered a crisis situation.
- Do not access or participate in social media which insights hatred or promotes radicalisation.

- Do not post a person's photograph or video image without first obtaining permission.
- Protect confidential and sensitive information at all times (e.g. referring to sickness absence of others etc.)
- When posting on sites linked to Inspired support or when mentioning or referring to Inspired Support on social media do not:
 - Use foul or abusive language.
 - Harass, threaten, insult, defame or bully another person.
 - Refer to any other member of the Inspired Support community, whether customer or mentor in a derogatory or insulting manner.
 - Refer to the service, its facilities or any other aspect of its offering, in a derogatory or insulting manner.
 - Post or comment in any way that reflects poorly on Inspired Support or is deemed to interfere with the conduct of the business.
- Staff should not spend an excessive amount of time while at work using social media websites in a personal capacity. They should ensure that use of social media does not interfere with their other duties as this is likely to have a detrimental effect on their customers and the service they receive.
- Any breach in this Policy could result in an investigation and serious breaches of this policy, for example incidents of bullying of colleagues or social media activity causing reputational damage to the service, may constitute gross misconduct and lead to losing their contract.

Appendix D - Guidelines for customers using webinar / video conferencing software

This policy sets out guidelines for customers using webinar/video conferencing software:

Do:

- Conduct yourself in a professional manner throughout calls.
- Attend video calls from a desk or other appropriate location as much as possible.
- Make sure you are dressed appropriately.
- Be punctual and courteous. Language must be professional and appropriate. Turn your phone to silent.
- Pay attention to others when they are speaking.
- Use the 'blur background option' to hide any background if needed.
- Check what you can see when you first log in as this is what others will see.
- Mute your microphone when not needing to talk to avoid any background noise.
- Position yourself away from where your family members or pets are.
- Only post chat messages relevant to the discussion.

Don't:

- Conduct/attend a video call if it would be improper for a face-to-face meeting.
- Shout; the other participants will tell you if they cannot hear.
- Click your pen, tap on your desk or anything else annoying or distracting.
- Leave multiple applications open during the call as it may affect the quality.

Appendix E - Guidelines for staff using webinar / video conferencing software

This policy sets out guidelines for staff using webinar/video conferencing software:

Do:

- All 1:1 online activity with under 18s or vulnerable adults MUST be agreed beforehand and take place only at the days / times agreed.
- If at any time you feel uncomfortable during a 1:1 call, with something done or said, you should end the call as soon as possible and report any concerns to your area lead/director.
- Encourage customers to maintain an awareness of employability skills in how they conduct themselves in online sessions.
- Conduct yourself in a professional manner throughout calls with colleagues or customers - you remain a contractor to Inspired Support throughout the call.
- Conduct video calls to customers or colleagues from a desk or other appropriate location. If you do work from your bedroom, you MUST blur your background.
- Remind customers that all calls/videos may be recorded - this is to safeguard both parties and wouldn't routinely be shared.
- Be punctual and courteous. Language must be professional and appropriate. Introduce yourself and take note of other attendees' so you can address them by name. Turn your phone to silent. Treat this just like you would a face to face meeting.
- Test your audio and/or video before a scheduled call.
- Look at your screen, pay attention to others and when speaking make sure to look at your camera.
- Use the 'blur background option' to hide any background if needed.
- Check what you can see when you first log in as this is what others will see.
- Mute your microphone when not needing to talk to avoid any background noise.
- Position yourself away from where your children, spouse, or pets are.

Don't:

- Conduct a video call if it would be improper for a face-to-face meeting.
- Multi-task; your audience will be aware.
- Shout; the other participants will tell you if they cannot hear.
- Click your pen, tap on your desk or anything else annoying or distracting.
- Eat or drink, other than water / tea / coffee.
- Leave multiple applications open during the call as it may affect the quality.
- Wear stripes or heavy patterns creating pixilation of images.