

## **E-SAFETY RISK ASSESSMENT:**

Date of Assessment: 21.1.14, updated 17.3.14, updated 27.11.16, 3.5.18, 6.11.19, 29.3.20, 5.6.20 Assessed by: Kate Slatcher and staff (Stewart McSmythurs and Chelsie Nelmes)

Section: Holymead Primary School Review date: Sept 2020

### Section 1

What is the Task/Activity or Environment You Are Assessing?	What <b>Hazards</b> Are Present or May Be Generated?	Who is <b>affected</b> or <b>exposed</b> to hazards	What <b>Degree of</b> Injury Can Reasonably be Expected (Risk Rating Matrix Table 1)?	What <b>Precautions</b> are Already in Place to Either Eliminate or Reduce The Risk of an Accident Happening ( <b>Existing Controls</b> )?	What Likelihood/ Probability is there of an Accident occurring? (Risk Rating Matrix Table 1)?	What is The Risk Rating (See Note Below & Risk Rating Matrix Table 2)?
Using computers, smartboards, PCs, net books,	Physical issues eg repetitive strain injury, Eye strain.	Pupils, staff, Volunteers,	Serious	Follow H&S policies and procedures for using IT equipment, including interactive white boards eg not looking into bright projector lights.  Take regular breaks from the computer, have appropriate	Low	Low risk
iPads	Theft.			furniture eg chairs at correct height. Follow school procedures for looking after assets eg lock away at night. Don't leave valuables lying around. See Display Screen Equipment / Office staff risk assessments.		



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Content	Ι	T	T = .		T	T
Online searching. Downloading photos and information	Viewing unsuitable material.  Downloading inappropriate material.  Illegal downloads/ copyright infringement.	Pupils	Serious	<ol> <li>School has firewall protection whereby unsuitable sites are blocked.</li> <li>Pupils cannot download apps or access YouTube on devices which are managed through central system</li> <li>Follow school Acceptable Usage of IT policy. Make parents aware of internet use by sending an internet agreement home for parents and pupils to read and sign.</li> <li>Inform parents of possible dangers through the newsletter / email updates.</li> <li>PSHC curriculum covers e-safety eg teaching pupils what to do if they find material they think is unsuitable, worrying.</li> <li>Teach pupils to have an awareness of ownership of their own work and not to plagiarise.</li> <li>Teach pupils to cross check websites to check the validity of information.</li> <li>Reporting incidents to staff and recording in the incident book on site. Reporting searches that throw up indecent images. Keep in log book.</li> <li>Staff initially mute sound or use blank screen to open online clips and disable autoplay on YouTube to reduce the risk of</li> </ol>	Medium	Medium risk



Staff / Volunteers	New staff have to sign the E-safety policy to confirm     they have read and understood the document.
	Ensure GBM (technicians) set up new equipment with     suitable safety protection / filtering via school wifi
	3) Staff record any instances where inappropriate material can be accessed with IT leader / SLT / Incident log
	4) Staff laptops can access You Tube – password protected access via device passcode
	5) All online clips checked for content beforehand
	6) Staff can investigate/monitor searches with Bristol IT, by recording dates and the IP address of the machine – Bristol can provide an emailed copy of all searches within time frames as required.
Device Security	Kindles Not enabled on school wi-fi network to prevent purchase/viewing of unsuitable material.
	iPads – connected to Wifi in school, IT leader updates iOS remotely to ensure latest security settings downloaded.



Use of social media videos to share pupil work.	Inappropriate material published by pupil  Reputational damage to school	<mark>Риріі</mark>	Medium / reputational damage	School recognises some pupils are likely share video or multimedia content via You Tube or Vimeo, Facebook  Holymead can host video content on the website, and also post links to external content (but accept no responsibility for this external content). Where possible we will host content on our year group pages to share with peers.  Links can be posted to external You Tube content on the blog, ONLY if the account is in the parent/carer name. Any content in the child's own name or other account name, will not be linked on the blog to share with their peers.	Low	Low
Use of Zoom / Microsoft Teams	Inappropriate material shared online  Reputational damage to school	Staff	Low / reputational damage	SEE SEPARATE ZOOMRISK ASSESSMENT and Pupil Charter  If required, pre-recorded content e.g. Videos, media, presentations with audio, can be published on the website or blog.  Zoom / Microsoft Teams managed by IT technicians, linked to professional school email address, and meetings booked by School Business Manager who is super user of the educational account.  Staff to conduct themselves following Code of Conduct, and consider surroundings if based at home are appropriate, and consider if headphones are used to maintain any confidential or sensitive information being shared if using a shared space, open classroom after school, or if meeting can be overheard from speakers.	Low	Low
Use of Loom Software	Inappropriate material shared online	Staff/Pupils	Low	Turn off comments on Loom  Turn off ability to download  Staff to consider appropriate filming locations, clothing, conduct and content.	Low	Low



	Reputational				
	damage to				
	school				
1					



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Using mobile Phones/	Bullying Grooming	Pupils / Staff	Serious	erious PSHC curriculum covers e-safety eg teaching pupils what to do if they find material they think is unsuitable, worrying.	Medium	Medium
tablets/ i-pads	Sexting Taking			Assemblies on contact with people we don't know and the possible dangers and what to do ie tell a trusted adult.		
	inapprorpiate pictures			Follow mobile phone policy whereby phones/tablets are not allowed to be used in school by pupils.		
	Trolling Inappropriate			Acceptable use policy / Staff handbook signed by pupil and parents		
	use of internet searches			Record in incident books on site. Report to other agencies as necessary (follow e-safety flow chart for reporting).		
Use of cameras	Upskirting	All	Serious	Pupils will use device cameras as part of their curriculum work.	Low	Medium
on devices	(KSCIE 2019) Consent for			Pupils reminded about right to safe learning environment and will only take pictures if given verbal consent and only as part of curriculum work (see E-safety charters)		
	photographs being breached			E-Safety leader to monitor and delete photographs on iPads		
	Sexting Trolling			Pupil iPad are locked down so that social media cannot be accessed through the filtering system, thereby reducing risk of publication of any materials.		
				Class teachers ensure NO pupil takes inappropriate photographs		
				NOTE that Keeping Children Safe in Education defines Up skirting and advises on Safeguarding procedures		
				Staff and visitors to utilise school equipment to take photos both on and off site.		
				No personal devices to be used  Photograph permissions lists held in office.		



				Teacher monitor that pupils full names are not published alongside images on the blog when approving posts.  Teachers monitor that vulnerable children without permission e.g. Children in Care do not appear on events pages, or blog posts unintentionally (see Photo Permissions agreement)		
Misuse or unauthorised access to pupil accounts	Hacking pupil accounts (internally)  Publishing false information on blog under different name	Pupils / Staff	Medium	As part of computing curriculum, pupils shown how to log out of devices and apps e.g. blog and TTRockstars, to avoid accounts being accessed by other pupils.  E-safety charter details not to share passwords with peers / friends  Any breaches to be investigated by E-safety leader / Curriculum leads, pupil passwords changed on request from staff / parents.  Staff MUST use secure passwords. If compromised contact DSL, SLT, SBM to secure accounts immediately  {Also see School system hacking / security below)	Low	Low
Use of school and personal (BYOD) technology		Staff/ Governors/ Volunteers	Serious	Staff reminded regularly about code of conduct/acceptable use policies. Do not post anything that will bring themselves or the school into disrepute. Avoid tagging individuals without their consent. Disciplinary action will be taken if there is inappropriate use of social media.  Don't use own phone/equipment with pupils.  Don't take photos of children on own phone — use a school iPad.  Devices should be kept in drawers/bags with a secure passcode  Staff have access to mobile phones for emergencies during the day and on trips for keeping in touch with school.  Volunteers need to be reminded not to use their devices on trips unless for approved/emergency use.  Regular visitors/Holymead Hub users/staff have access to Holymead Guest Wifi (Bring Your Own Device) — This requires password and security certificate — emailed in advance/on arrival to site — this ensures correct filters are used in building.  Staff discouraged from using 3G/4G mobile data to bypass security settings within school e.g. to access social media	Low	Medium



		Staff and Visitors follow Mobile Phone policy in school, phones on silent, and if required only use devices in Holymead Hub, Staffroom or office spaces when pupils are not present in out of hours times.		
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Social networking and emailing. Gaming, X- boxes, Moshi Monsters, Snapchat, WhatsApp etc.	Contact with inappropriate people and material.  Online bullying	Риpils	Serious	Follow safe- guarding policies and procedures.  Links to PSHC and IT curriculum, Safer Internet Day  PSHC curriculum covers e-safety eg teaching pupils what to do  if they find material they think is unsuitable, worrying.  Teaching pupils how to keep safe eg not giving out phone numbers and addresses.  Teaching pupils to realise the person they are talking to may not be the person they think they are eg adults posing as children.  Inform parents of possible dangers by highlighting on newsletters. Make parents aware of cyber-bullying and sexting (and new technologies as they arise).  Record in incident books on site. Report to other agencies as necessary (follow e-safety flow chart for reporting).  Teaching pupils how to use email / 'Comment' fetures on forums on the blog website in a monitored environment.  Teaching pupils that what they put out online can affect others.  Esafety leader gets information on latest threats from the UK Safer Internet Centre incorporates: SwGFL, Childnet International & Internet Watch Foundation.	Medium	Medium



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Contact						
Emails / Social Media / Twitter	/ contact	Staff	Serious	Do not disclose personal or work email addresses. Direct all enquiries to office@holymeadprimary.co.uk  Passwords changed regularly for laptops, email accounts, online	Medium	Medium
	Phishing emails	All email co		services e.g. blog. Staff advised on secure passwords.		
			All email communication to be professional in nature			
				Emails use secure filtering / Clutter filter. Ensure that you do not follow hyperlinks that then require further input of passwords.		
				Email can be scanned / read by the school if suspicious activity is reported/suspected.		
				Blogging leader monitor use of Twitter by staff to promote their blog.		
				Do NOT have pupils as friends on social media. Report any pupil friend requests to Head teacher – as pupils under 13, should not be using social media platforms.		
				Staff living within the local community may have parents as friends, however staff reminded that everything they post, can reflect on them as an employee of the school — see code of conduct.		



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Online purchases	Misuse of school funds.	Staff	Serious Reputational damage	Follow school financial procedures in school policy.  Delegation of duties in ordering, authorising and checking off deliveries.  ITunes accounts for iPads NOT linked to the school credit card—top cards used as cash to prevent misuse / prevent accidental purchases. Staff request app purchases through subject leader / IT technician.	Low	Low
School website School blog School twitter accounts	Publishing inappropriate material.  Data protection.  Use of images.	Staff  Pupils (particularly Looked After Children or Vulnerable children)	Serious Reputational damage	Apple VPP payments processed by School Business Manager / Bursar.  Follow school's website and blogging policy including not naming children in images, checking pupils have completed acceptable use policy.  Don't include any data or images covered by data protection rules/copyright.  School Business Manager / SLT monitor posts on website Colleagues within Year groups self-monitor each other for errors in grammar and spelling.  Twitter Feeds/Website/Blog: Teaching staff are "Gatekeepers" that control and approve content for publication.  "Super users" hold a central copy of access passwords / enhanced administration rights so that posts can be removed (including out of hours/holiday periods) — Head, Deputy heads, IT Leader, Blog Leader, School Business Manager and Esafety	Low	Low



				Leader.		
				Limited staff have enhanced access rights to all blogs.  Messages regarding school closures or Social Media / Press release approved by Head teacher only.		
School systems being hacked remotely	Inappropriate material published by third party  Data breach  Website address hi- jacked to another site	Staff	Serious	Use of secure platforms for websites that have up to date security measures.  Limited number of users for websites, passwords regularly changed. Super users (see above)  Third party companies are responsible for updating the security of their platforms e.g. external holders of parent data / payment methods. Third party responsible for systems secure from hacking attacks.	Low	Low
	Online payment systems compromised resulting in financial loss or identify theft or card details lost to users of service			Regular website monitoring and if hacking suspected or reported, report to website provider and close/suspend site.  Use IT website systems that are paid services that protects as far as possible against hacking, and also have a point of contact for emergency out of hours support.		



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GDPR				Privacy Notice Published on School website & school offices		
				Protocols followed for access requests for information		
Data breach	Personal data breach including	All stakeholders	Low/Medium	Data Asset Register . Information Assest Register held – monitored by Data Controller / Governors	Low	Low
	financial information		Reputational	All third party suppliers must be GDPR compliant and		
	MIDIMATION		damage	recorded on Information Asset Register (IAR)		
				Secure passwords used by all office staff for systems e.g. SIMS, ParentMail, after school club: staff should log out or lock computer.		
				Data breach protocols followed by Data Processors who report		
				to Data Controller (appointed Integra March 2018) – 72 hour reporting time is always applicable including school holidays and weekends.		
				Autoreply set for "office email" and school answerphone stating that systems are not monitored.		
Data storage	Loss / unauthorised	All stakeholders	Low/Medium	Secure systems provided by 3 <sup>rd</sup> parties that are GDPR compliant e.g. SIMS, Target Tracker	Low	Low
	access to pupil/staff/sta keholder data		Reputational damage	Monitor device use across Wifi network to check for unauthorised / Bring your own device (BOYD) items should be on Holymead Guest Wifi		
				All laptops / iPads password/passcode protected		
				Use of cameras only for trips (photos removed from SD card after trip and not kept on insecure data storage). Photos taken on iPads with a secure code.		
				All staff NOT permitted to store pupil data on unencrypted memory sticks		
				Sensitive paper documents: Staff should consider if they need		



				to be printed. Shredder available to destroy near photocopier once documents no longer needed. Shredding reminders on display near photocopiers.  Separate drives and different levels of access e.g., Pupil / Teachers / Admin / Management / Head — managed by IT contractor  Staff Performance Management Documents & Monitoring feedback are NOT to be sayed on the central Teacher Drive — email to Head/Deputies and keep a copy in My Documents.		
Cloud Computing	Unauthorised access to sensitive pupil / staff data	Staff	Low / Reputational damage	2 factor authentication enabled on staff using Cloud technology (e.g. Google Drive that is GDPR compliant) Advise staff NOT to keep personal content in a work cloud  Governor Hub used to share documentation — access set up via emails (School Business Manager/Clark monitor). Governor Hub GDPR compliant.	Low	Low
Medical Information	Pupil allergies / medication / sensitive information accessed	Pupils with medical needs	Low/Medium	Parents made aware by letter that photographs of their child WILL be held on staffroom display board to ensure that staff are aware of any allergies and emergency medication.  Parents/Carers made aware that this personal information may be seen by volunteers in the staffroom — the school consider this advantageous in the event of a medical emergency and not to the detriment of the child	Low	Low
Religious dietary guidelines and restrictions	Discrimination	Individuals following religious dietary restrictions	Low/Medium	School office staff, kitchen staff and lunchtime supervisors aware of individual pupil's dietary requirements e.g. no pork, Halal – information stored in SIMS database and photos of pupils in kitchen areas	Low	Low
Remote access	Unauthorised access to sensitive pupil/	All stakeholders	Medium / Reputational Damage	Secure remote access arrangements using GDPR compliant companies	Low	Low



	staff data					
Sending and sharing information	Unauthorised access to sensitive pupil / staff data	Staff: particularly Family Link Worker / SENCO / SLT	Medium / Reputational Damage	Communication with outside agencies should be via Holymead email and Bristol-schools.uk / official work email address.  Do not send sensitive data by email unless authorised by Head/Designated Safeguarding Lead. All items kept in sent items box.  Staff advised not to click REPLY ALL by mistake to emails	Low	Low
Awareness of GDPR	Failure to comply with new Data Protection Regulations	Staff/ Governors	Medium / Reputational Damage	Work with Integra / Data Protection Officer to ensure compliance and identify best practice.  Attend training / complete online training recommended by Integra or Trading with Schools/Governor Hub.  Have GDPR as a standing item for Finance and Infrastructure Committee / FGB.	Low	Low
Data Breach	Unauthorised access to sensitive pupil/staff data	Staff	Medium / Reputational Damage	Microsoft Teams used to record details of call logs to parent/carers/families. Teachers to record dates and times of calls, and any concerns shared with Designated Safeguarding Lead using exisiting procedures / then CPOMs for SLT.  Details of Phone numbers have been sent to staff using Microsoft Email Accounts, with initials of pupils only. Staff advised not to print these lists and view on screen when in use.  If using SIMS, staff to log out or lock screen if away from machine for any period of time to maintain security of this data.	Low	Low



#### E-Safety Risk Assessment Section 2 - ACTION PLAN

What is the <b>Hazard</b> You Need to Control?  Inappropriate blog posts and moderating posts	What Additional Precautions do You Need to Either Eliminate or Reduce the Risk to an acceptable level.  -Teacher training on blog moderation -Risk: photos attached to first names on home blog postsTraining for children about copyright free pictures / use for education purposes licencing using google filters -Each teacher / year team has a Twitter account to promote blogging -Staff Professional Identity – How we conduct ourselves and do not link personal accounts, opinions etc (Link to teaching standards and Code	Who is Responsible For Implementing These Controls  Computing Leader Computing Leader Class teachers Class teachers E-safety leader	When Are These Controls to be Implemented (Date)?  January 2017 December 2016 January 2017 March 2017 February 2017	When <b>Were</b> These Controls Implemented (Date)?
GDPR	of Conduct for Employees)  Staff received GDPR leaflet from data controller to begin raising awareness of GDPR	School Business Manager / IT leads	May 2018	April 2018
Use of You Tube by pupils	Families received emails via Parent Mail about how they use You Tube, monitor pupil use and how we will process requests to post external content on the blog. Staff advised to check that any You Tube or media is posted by the parent/carer, not the pupil.	Class teacher IT Leads E-safety leader	May 2020	May 2020

The school has a direct point of contact with these companies for technical support out of hours where possible:

- Holymead website hosted by E-schools Ltd, 0845 557 8070, support@eschools.co.uk
- Parent Mail: 01733 595962 / online contact form
- Holymead Blog: hosted by Creative Blogs Ltd, Mill House, Hornby Road, Claughton, Lancashire, LA2 9LA Office: 01524 222099, Mobile: 07894 222671. support@creativeblogs.zendesk.com; John Sutton & David Mitchell @deputymitchell @me.com
- Bristol City Council IT Services: 0117 90 37999, <u>schools.it.helpdesk@bristol.gov.uk</u>
- Integra Carole Brown. <a href="mailto:GDPR@integra.co.uk">GDPR@integra.co.uk</a> / 01454 863950
- GBM (IT systems support): 07867 120 950 (Nigel Sluman), Office: 0161 605 3838
- Bill Crocker: Delegated Services. M: 07795 190 130; <a href="mailto:bill.crocker@delegatedservices.org">bill.crocker@delegatedservices.org</a>



# **RISK RATING MATRIX**

(Notes to aid completion of the risk assessment form)

## Table 1

Potential Severity of Harm	Meaning	Likelihood of Harm	Meaning
Fatal/Major Injury	Death, major injuries or ill health causing long-term disability/absence from work.	High (Frequent)	Occurs repeatedly / event only to be expected
Serious Injury	Injuries or ill health causing short-term disability/absence from work (over three days absence)	Medium (Possible)	Moderate chance/could occur sometimes
Minor Injury	Injuries or ill health causing no significant long-term effects and no significant absence from work	Low (Unlikely)	Not likely to occur.

Table 2

Risk Rating - Degree of Injury by Likelihood/Probability					
	High (Likely)	Medium (Possible)	Low (Improbable)		
Fatal/Major Injury	Very High Risk	High Risk	Medium Risk		
Serious Injury	High Risk	Medium Risk	Low Risk		
Minor Injury	Medium Risk	Low Risk	No Significant Risk		

Table 3

Action Required : I	Action Required : Key To Ranking				
High or Very	STOP ACTIVITY! Action MUST be taken as soon as possible to reduce the risks and				
High Risk	before activity is allowed to continue.				
Medium Risk	<b>Proceed with Caution!</b> Implement all additional precautions that are not unreasonably costly or troublesome.				
Low Risk	<b>Proceed with Caution!</b> Implement any additional precautions that are not unreasonably costly or troublesome.				
No Significant Risk	No further action required. The risk is no more than is to be encountered in normal every day life & is, therefore, regarded as being acceptable.				