



## E-SAFETY RISK ASSESSMENT:

**Date of Assessment:** 21.1.14, updated 17.3.14, updated 27.11.16, 3.5.18

**Section:** Holymead Primary School

**Assessed by:** Kate Slatcher and staff

**Review date:** Sept 2018

### Section 1

What is the <b>Task/Activity</b> or <b>Environment</b> 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 Injury</b> Can Reasonably be Expected ( <i>Risk Rating Matrix Table 1</i> )?	What <b>Precautions</b> are Already in Place to Either Eliminate or Reduce The Risk of an Accident Happening ( <b>Existing Controls</b> )?	What <b>Likelihood/Probability</b> is there of an Accident occurring? ( <i>Risk Rating Matrix Table 1</i> )?	What is The <b>Risk Rating</b> (See Note Below & <i>Risk Rating Matrix Table 2</i> )?
Using computers, smartboards, PCs, net books, iPads	Physical issues eg repetitive strain injury, Eye strain. Theft.	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 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.	Low	Low risk



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<b>Content</b>						
On line searching. Downloading photos and information	Viewing unsuitable material.  Downloading inappropriate material.  Illegal downloads/ copyright infringement.	<b>Pupils</b>	Serious	<ol style="list-style-type: none"> <li>1) School has firewall protection whereby unsuitable sites are blocked. The school uses SWGFL as regional provider.</li> <li>2) 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>3) Inform parents of possible dangers through the newsletter / email updates.</li> <li>4) PSHE curriculum covers e-safety eg teaching pupils what to do if they find material they think is unsuitable, worrying.</li> <li>5) Teach pupils to have an awareness of ownership of their own work and not to plagiarise.</li> <li>6) Teach pupils to cross check websites to check the validity of information.</li> <li>7) Reporting incidents to staff and recording in the incident book on site. Reporting searches that throw up indecent images. Keep in log book.</li> </ol>	Medium	Medium risk

		<b>Staff / Volunteers</b>		<ol style="list-style-type: none"> <li>1) New staff have to sign the Code of Practice for employees – see staff handbook</li> <li>2) Ensure Vyssion (technicians) set up new equipment with suitable safety protection / filtering via school wifi</li> <li>3) Staff record any instances where inappropriate material can be accessed with IT leader / SLT / Incidnet log</li> <li>4) Staff laptops can access You Tube – password protected access via device passcode</li> <li>5) All online clips checked for content beforehand</li> <li>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.</li> </ol>		
		<b>Device Security</b>		<p>Kindles Not enabled on school wi-fi network to prevent purchase/viewing of unsuitable material.</p> <p>iPads – connected to Wifi in school, IT leader updates iOS remotely to ensure latest security settings downloaded.</p>		

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<b>Conduct</b>						
Using mobile phones/ tablets/ i-pads	Bullying Grooming Sexting Taking inappropriate pictures Trolling Inappropriate use of internet searches	Pupils	Serious	<p>PSHE curriculum covers e-safety eg teaching pupils what to do if they find material they think is unsuitable, worrying.</p> <p>Assemblies on contact with people we don't know and the possible dangers and what to do ie tell a trusted adult.</p> <p>Follow mobile phone policy whereby phones/tablets are not allowed to be used in school by pupils.</p> <p><b>Acceptable use policy</b> / Staff handbook signed by pupil and parents</p> <p>Record in incident books on site. Report to other agencies as necessary (follow e-safety flow chart for reporting).</p>	Medium	Medium
		Staff / Governors/ Volunteers	Serious	<p>Staff reminded regularly about <b>code of conduct/acceptable use</b> 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.</p> <p>Don't use own phone/equipment with pupils.</p> <p>Don't take photos of children on own phone – use a school iPad.</p> <p>Devices should be kept in drawers/bags with a secure passcode</p> <p>Staff have access to mobile phones for emergencies during the day and on trips for keeping in touch with school.</p> <p>Volunteers need to be reminded not to use their devices on trips unless for approved/emergency use.</p> <p>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.</p> <p>Staff discouraged from using 3G/4G mobile data to bypass security</p>		



				settings within school.		
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Contact						
Social networking and emailing. Gaming, X-boxes, Moshi Monsters, Snapchat, WhatsApp etc.	Contact with inappropriate people and material.  Online bullying	Pupils	Serious	Follow safe- guarding policies and procedures. Links to PSHE and IT curriculum, Safer Internet Day PSHE 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	Inappropriate contact  Phishing emails	Staff	Serious	<p>Do not disclose personal or work email addresses. Direct all enquiries to <a href="mailto:office@holymeadprimary.co.uk">office@holymeadprimary.co.uk</a></p> <p><b>Passwords changed regularly.</b></p> <p>All email communication to be professional in nature</p> <p>Emails use secure filtering / Clutter filter. Ensure that you do not follow hyperlinks that then require further input of passwords.</p> <p>Email can be scanned / read by the school if suspicious activity is reported/suspected.</p> <p><b>Blogging leader monitor use of Twitter</b> by staff to promote their blog.</p> <p>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.</p> <p>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.</p>	Medium	Medium

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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.  Apple VPP payments processed by School Business Manager / Bursar.	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	Follow school's <b>website and blogging policy</b> 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. <b>School Business Manager / SLT monitor</b> posts on website Colleagues within Year groups self-monitor each other for errors in grammar and spelling.  Twitter Feeds/Website/Blog: "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 Leader.  Limited staff have enhanced access rights to all blogs. Messages regarding school closures or Social Media / Press release approved by Head teacher only.	Low	Low
School systems	Inappropriate	Staff	Serious	Use of secure platforms for websites that have up to date security	Low	Low



being hacked remotely	<p>material published by third party</p> <p>Data breach</p> <p>Website address hi-jacked to another site</p> <p>Online payment systems compromised resulting in financial loss or identify theft or card details lost to users of service</p>			<p>measures.</p> <p>Limited number of users for websites, passwords regularly changed. Super users (see above)</p> <p>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.</p> <p>Regular website monitoring and if hacking suspected or reported, report to website provider and close/suspend site.</p> <p>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.</p>		
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GDPR				<b>Privacy Notice Published on School website &amp; school offices</b>  <b>Protocols followed for access requests for information</b>		
Data breach	Personal data breach including financial information	All stakeholders	Low/Medium  Reputational damage	<b>Data Asset Register . Information Asset Register</b> held – monitored by Data Controller / Governors  All third party suppliers must be GDPR compliant and recorded on <b>Information Asset Register (IAR)</b>  Secure passwords used by all office staff for systems e.g. SIMS, ParentMail, after school club: staff should log out or lock computer.  <b>Data breach protocols followed by Data Processors who report to Data Controller (appointed Integra March 2018)</b> – 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.	Low	Low
Data storage	Loss / unauthorised access to pupil/staff/stakeholder data	All stakeholders	Low/Medium  Reputational damage	Secure systems provided by 3 <sup>rd</sup> parties that are GDPR compliant e.g. SIMS, Target Tracker  <b>Monitor device use across Wifi network to check for unauthorised / Bring your own device (BOYD) items should be on Holymead Guest Wifi</b>  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. <b>Shredding reminders on display near</b>	Low	Low

				<p><b>photocopiers.</b></p> <p>Separate drives and different levels of access e.g, Pupil / Teachers / Admin / Management / Head – managed by IT contractor</p> <p>Staff Performance Management Documents &amp; Monitoring feedback are NOT to be saved on the central Teacher Drive – email to Head/Deputies and keep a copy in My Documents.</p>		
Cloud Computing	Unauthorised access to sensitive pupil / staff data	Staff	Low / Reputational damage	<p>2 factor authentication enabled on staff using Cloud technology (e.g. Google Drive that is GDPR compliant)</p> <p>Advise staff NOT to keep personal content in a work cloud</p> <p>Governor Hub used to share documentation – access set up via emails (School Business Manager/Clark monitor). Governor Hub GDPR compliant.</p>	Low	Low
Medical Information	Pupil allergies / medication / sensitive information accessed	Pupils with medical needs	Low/Medium	<p>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.</p> <p>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</p>	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 / staff data	All stakeholders	Medium / Reputational Damage	Secure remote access arrangements using GDPR compliant companies	Low	Low
Sending and sharing information	Unauthorised access to sensitive pupil / staff data	Staff: particularly Family Link Worker / SENCO / SLT	Medium / Reputational Damage	<p>Communication with outside agencies should be via Holymead email and Bristol-schools.uk / official work email address.</p> <p>Do not send sensitive data by email unless authorised by Head/Designated Safeguarding Lead. All items kept in sent items box.</p>	Low	Low

				Staff advised not to click REPLY ALL by mistake to emails		
Awareness of GDPR	Failure to comply with new Data Protection Regulations	Staff / Governors	Medium / Reputational Damage	<p>Work with Integra / Data Protection Officer to ensure compliance and identify best practice.</p> <p>Attend training / complete online training recommended by <b>Integra</b> or Trading with Schools/Governor Hub.</p> <p>Have GDPR as a standing item for Finance and Infrastructure Committee / FGB.</p>	Low	Low

## E-Safety Risk Assessment

### Section 2 - ACTION PLAN

What is the <b>Hazard</b> You Need to Control ?	What <b>Additional Precautions</b> do You Need to Either Eliminate or Reduce the Risk to an acceptable level.	Who is <b>Responsible</b> For Implementing These Controls	When Are These Controls to be Implemented (Date)?	When <b>Were</b> These Controls Implemented (Date)?
Inappropriate blog posts and moderating posts	-Teacher training on blog moderation -Risk: photos attached to first names on home blog posts. -Training 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 of Conduct for Employees)	Computing Leader Computing Leader Class teachers Class teachers E-safety leader	January 2017 December 2016 January 2017 March 2017 February 2017	
GDPR	Staff received GDPR leaflet from data controller to begin raising awareness of GDPR	School Business Manager / IT leads	May 2018	
<p>The school has a direct point of contact with these companies for technical support out of hours where possible:</p> <ul style="list-style-type: none"> <li>• Holymead website hosted by E-schools Ltd, 0845 557 8070, support@eschools.co.uk</li> <li>• Parent Mail: 01733 595962 / online contact form</li> <li>• 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 &amp; David Mitchell @deputymitchell <a href="mailto:deputymitchell@me.com">deputymitchell@me.com</a></li> <li>• Bristol City Council IT Services: 0117 90 37999, <a href="mailto:schools.it.helpdesk@bristol.gov.uk">schools.it.helpdesk@bristol.gov.uk</a></li> <li>• Integra Carole Brown <a href="mailto:GDPR@integra.co.uk">GDPR@integra.co.uk</a> / 01454 863950</li> <li>• Vyssion 01249 454600</li> <li>• Bill Crocker: Delegated Services. M: 07795 190 130; <a href="mailto:bill.crocker@delegatedservices.org">bill.crocker@delegatedservices.org</a></li> </ul>				

## 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 : Key To Ranking	
High or Very High Risk	<b>STOP ACTIVITY!</b> Action MUST be taken as soon as possible to reduce the risks and 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.