Excalibur Academies Trust

Safeguarding Remote Learning

Annex to Child Protection and Safeguarding Policy

Date of approval   February 2021

Approved by   Head of Safeguarding

Review date   As required

The aim of any safeguarding guidance and advice is to ensure the safety of both staff and students during this time of remote learning. This practice is for all schools across Excalibur Academies Trust.

Remote teaching and learning and safeguarding

Live webcams in teaching and learning and safeguarding measures -

- 1:1s – these should be avoided if possible just as you would avoid being in classroom with a closed door by yourself with a student – the same principle applies. If a 1:1 is needed then the permission of SLT is needed, ensure a risk assessment has been completed, a member of SLT is invited to the meeting so they can access it and the meeting is recorded.
- Any recording of 1:1 must be recorded in the cloud (this is done as default if you record in Teams) and not on a personal device hard drive. These recordings will be kept for a year when central IT will clear the recordings from the system. If a member of staff fails to make a recording of a 1:1 they must ensure SLT are aware as soon as possible and SLT will consider whether they will be able to continue with any further 1:1 meetings.
- SLT need to determine if it is appropriate for the member of staff requesting to conduct a 1:1 and will determine if the action can go ahead.
- Staff will clarify and adhere to staff pupil ratios in every lesson, including in breakout rooms, so staff, parents and pupils are aware of when 1 staff member might be alone with 1 pupil and appropriate assessment and monitoring can take place.
- Staff and children must wear suitable clothing, as should anyone else in the household who may be seen on camera
- Any computers used should be in appropriate areas, for example, not in bedrooms; and where possible against a neutral background – there should be no family photographs on display to the camera for example.
- Any live lessons could be recorded and backed up elsewhere, so that if any issues were to arise, the video can be reviewed; access and retention policies need to be in place.
- Live classes should be kept to a reasonable length of time and children and staff, for mental health and wellbeing there should not be an expectation that children will be online for 5 hours per day and that staff teach live remotely a full timetable.
- Language must be appropriate and professional, including any family members in the background
- Schools should risk assess the use of livestreaming using webcams
- Data controllers need reassure themselves that any teaching/learning software and/or platforms are suitable and raise no privacy issues; or use cases against the providers terms and conditions
- Consent is needed for the live-streaming or recording of children and adults in the images.

The South West Grid for Learning has created an in depth support page, with information about the following topics:

- Policy
- Systems
- Technology
- Location/Environment
- Education
- Behaviour

- Recording
- Personal data
- Safeguarding
- Further reading

See https://swgfl.org.uk/coronavirus/

Retention policy for video recordings –

The guidance from NSPCC etc is that online conversations with pupils may be recorded there is no definite guidance on how long to retain these recordings for. These recordings constitute personal data because they contain personal images of identifiable people. This means that under GDPR, keeping these recordings should be considered under data protection. There is a need to assess what data is being captured, why it is held, who can access it, for what reason and how long it will be kept. Data should only be retained as long as it is necessary to meet the needs of the reason for recording it.

There are four tiers to be considered (DFE, 2018)

- Short term – date of first recording plus 1 month
- Medium term – 1 year
- Long term – 5 years
- Very long term – until pupil is 25 years or older

The recording of Teams calls should **ONLY** be made to investigate any complaints that might arise, or for crime prevention, safeguarding and investigation. All parties need to know and agree to the recording. It would be determined that such a recording should be 6-9 months maximum 1 year. EAT will keep recordings for 1 year minimum and then these will be wiped from the system unless they are needed due to the above reasons.

Communication with parents

There is no priority for online meetings to be held with parents. Phone calls are just as effective.

Schools using a form of online learning via video or livestream it is important to explain to parents what tools are being used, including why you might be making recordings of a video call. The key reason for doing this is to guard against staff grooming or other inappropriate or unprofessional behaviour and this is not about recording the behaviour of children. One way to ensure that no recording should be necessary is to have two staff members on the call.

Potential Safeguarding Risks

The risks to consider are mainly about inappropriate actions by the adult leading the learning session. Also it is important to remember that students may also behave inappropriately and need to be reported regarding safeguarding concerns.

Key risks include:

- Not maintaining professional standards
- Grooming behaviours
- Attempts to move the child onto another platform, account or to access them by phone or text
- Setting up a separate, unmonitored lesson time or account

- Inappropriate use of chat messaging on the platform and deleting those messages
- Inviting unauthorised adults onto the platform
- Contacting teachers out of lesson time
- Stalking type behaviours
- Inappropriate conduct during lesson time
- Inviting other students in to the 1:1 lesson who then behave inappropriately
- Unauthorised making and/or sharing recordings
- Cyberbullying

Guidance for Safer Working Practices

Use of technology for online/virtual to ensure safeguarding: Key points

Wherever possible staff should use school devices and contact pupils only via the pupil school email address/log in. This ensures that the setting's filtering and monitoring software is enabled.

Virtual lessons should be timetabled and senior staff, DSL and/or heads of department should be able to drop in to any virtual lesson at any time – the online version of entering the classroom.

Staff engaging in online learning should display the same standards of dress and conduct that they would in the real world; they should also role model this to pupils and parents. The following points should be considered:

- Think about the background; photos, artwork, identifying features, mirrors – ideally the backing should be blurred
- Staff and pupils should be in living/communal areas – not in bedrooms
- Staff and pupils should be fully dressed in daytime clothing (no pyjamas)
- Filters at a child's home may be set at a threshold which is different to the school
- Resources/videos must be age appropriate – they child may not have support immediately at hand at home if they feel distressed or anxious about content.

Recording lessons does not prevent abuse. If staff wish to record the lesson they are teaching, consideration should be given to data protection issues.

Senior leaders should:

- Review and amend their, remote learning, online safety and acceptable use policies to reflect the current situation
- Ensure that all relevant staff have been briefed and understand the policies
- The standards of conduct of the staff have been clearly defined and there are clear operating times for virtual learning
- Consider the impact that virtual teaching may have on children and their parents/carers/siblings and staff under duty of care of mental health and wellbeing
- Determine if there are alternatives to virtual teaching in "real time"
- Be aware of virtual learning timetable and create a rota for senior staff to join a range of lessons
- Quality assure all aspects of remote learning, including lessons, less formal class sessions (such as story time) and feedback interactions.
- Maintain quality assurance records.

Staff should:

- Adhere to their school policies
- Be fully and appropriately dressed
- Ensure that a senior member of is aware that an online meeting/lesson is taking place and for what purpose
- Avoid one to one situations – request parent is present or another colleague
- Record a lesson or meeting online with pupils where this has been agreed with senior staff and the pupil and their parent/carer have given explicit consent to do so.
- Be able to justify any images of pupils in their possession.

Adults should not:

- Contact pupils outside the operating times defined by senior leaders
- Tape or record images of pupils for their own personal use
- Record virtual lessons or meetings onto personal equipment
- Engage online while children are in a state of undress or semi undress

Risk Assessment for Livestreaming School Content

Safeguarding

Risk	Mitigation
Inappropriate behaviour or conduct from adults	
Inappropriate behaviour or conduct from children	
Unauthorised recording by pupils, parents or staff	
Unauthorised sharing of content	
Inappropriate contact with pupils outside lesson time	
Inappropriate contact with pupils in a different account or a different platform	
1-to-1 sessions not always being the most appropriate choice of format	We'll decide on a case-by-case basis whether a session needs another adult present, and only run 1-to-1 sessions where both appropriate and necessary. 1-to-1 sessions will need approval by the senior leadership team before taking place. We'll clarify and adhere to staff pupil ratios in every lesson, including in breakout rooms, so staff, parents and pupils are aware of when 1 staff member might be alone with 1 pupil.
1-to-1 sessions not being appropriate for certain members of staff and/or pupils	Our leadership team has identified any staff for which 1-to-1 sessions may not be appropriate (for example NQTs) and works to ensure they are not left alone with pupils. If this cannot be

	avoided, the SLT regularly monitors interactions between these staff and pupils online.
	Where any vulnerable pupils are learning remotely, our DSL has identified which pupils these are, and monitors any sessions with them [add details of how this happens].
Inappropriate language in chat function	
Inappropriate dress, conduct or location	
Unauthorised people invited into the video call	
Unauthorised people crushing into video call	
Unauthorised streaming to another platform	
Unauthorised streaming to the wide public	
Data breach. For example, showing pupils on camera without permission, sharing personal data	
Data breach showing confidential information whilst online	
Unauthorised sharing of inappropriate content via share screen	
Unauthorised lessons that SLT are unaware of	
Accidentally being online early or afterwards without being aware	
Unauthorised chats or video whilst monitoring adult is offline	
Use of livestream platform by unauthorised staff or untrained staff	
What action is to be taken if a disclosure or concern is raised by pupil whilst online?	
How will concerns be raised about any livestream issues by pupils, parents or staff?	
Errors, mistakes or concerns should be self reported. How should this be done?	

Policy written by: - Head of Safeguarding