



Online Safety Policy

Date:

7th October 2024

Review date:

7th October 2025

Approved by:

Rob Grays – Chief Executive Officer

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Definitions

- **Client** – an organisation, which engages with Prospero Group to purchase Work-Finding Services. This includes, amongst others: Schools, Local Authorities, Care Homes, Universities, Parents/Carers and private sector organisations.
- **Internal Employee** – is defined to mean a full or part time employee of Prospero Group.
- **Prospero Group** – is comprised of three entities, Prospero Group Teaching, Prospero Group Health & Social Care and Prospero Group Integrated.
- **Pupil(s), Student(s) or Individual(s) Receiving Services** – the beneficiary of the education or care delivered by the Temporary Worker. This includes, amongst others: individuals under 18, individuals over 18, Looked after Children and Adults at Risk.
- **Temporary Worker** – an individual receiving Work-Finding Services, delivered by Prospero Group. This includes, amongst others: Teachers, Tutors, Teaching Assistants, Care Assistants, Support Workers and Nurses.
- **Work-Finding Services** – taken to mean recruitment activity, advertising of roles and provision of work related training, provided by Prospero Group.

Introduction and Overview

The purpose of this policy is to:

- Set out the key principles expected by Prospero Group Temporary Workers when using the internet and other IT/communication based technologies.
- Safeguard and protect children, vulnerable adults and Prospero Group Temporary Workers.
- Provide guidance to Prospero Group Temporary Workers and Internal Employees on how to safely and responsibly use the internet and other IT/communication technologies.
- Set clear expectations of behaviour and/or codes of practice to Prospero Group Temporary Workers when when/if using the Internet and other IT/communication technologies during placements, bookings and tuition sessions.
- Ensure that all Prospero Group Temporary Workers are aware that unlawful or unsafe behaviour is unacceptable.
- Minimise the risk of misplaced or malicious allegations made against Prospero Group Temporary Workers.

The main areas of online risk Prospero Group look to mitigate are summarised as:

Content

- Exposure to inappropriate content
- Lifestyle websites promoting harmful behaviours
- Hate content

Contact

- Grooming (sexual exploitation, radicalisation etc.)
- Online bullying in all forms
- Social or commercial identity theft, including passwords

Conduct

- Aggressive behaviours (bullying)
- Privacy issues, including disclosure of personal information
- Sexting

Roles and Responsibilities

Role	Key Responsibilities
Prospero Group Leadership Team	<ul style="list-style-type: none">○ Must be adequately trained in off-line and online safeguarding.○ Maintain a 'safeguarding' culture, ensuring that online safety is fully integrated with safeguarding.○ To take responsibility for online safety provision.○ To take responsibility for data management and information security.○ Responsibility for ensuring that all Prospero Group Temporary Workers receive suitable training to carry out their safeguarding and online safety roles. <p>To be aware of procedures to be followed in the event of a serious online safety incident.</p>
Designated Safeguarding Lead	<ul style="list-style-type: none">○ Overall responsibility for online safety issues and a leading role in establishing and reviewing Prospero Group's online safety policy/documents.○ Promote an awareness and commitment to online safety throughout Prospero Group.○ To ensure that all Prospero Group Temporary Workers are aware of the procedures that need to be followed in the event of an online safety incident.○ To ensure that online safety incidents are logged as a safeguarding incident.○ Alongside Prospero Group's Head of Training & Development, facilitate training and advice for all Temporary Workers.○ Keep regularly updated in online safety issues and legislation, and be aware of the potential for serious child protection concerns.
Temporary Workers	<ul style="list-style-type: none">○ To supervise and guide Pupils carefully when engaged in learning activities involving online technology.○ To ensure that Pupils are aware of research skills and are aware of legal issues relating to electronic content such as copyright laws.
All Temporary Workers and Internal Employees	<ul style="list-style-type: none">○ To report any suspected misuse or problem to the Designated Safeguarding Lead.○ To maintain an awareness of current online safety issues and guidance e.g. through CPD.○ To model safe, responsible and professional behaviours in their own use of technology.

Role	Key Responsibilities
Pupils, Students or Individuals Receiving Services	<ul style="list-style-type: none"> ○ To be educated in the importance of reporting abuse, misuse or access to inappropriate materials. ○ To know what action to take if they or someone they know feels worried or vulnerable when using online technology. ○ To understand the importance of adopting safe behaviours and good online safety practice when using digital technologies.

Communication

This policy will be accessible to Prospero Group Temporary Workers in the following ways:

- Via Prospero Group's website.
- Via email to current Prospero Group Temporary Workers.
- Via Prospero Group's registration pack for any new Temporary Workers.

Handling Incidents

- Prospero Group will take all reasonable precautions to ensure online safety.
- Prospero Group's Designated Safeguarding Lead acts as first point of contact for any incident.
- Any suspected online risk or infringement is reported to Prospero Group's Designated Safeguarding Lead on the same day who will then liaise with the LADO (Local Authority Designated Officer) if necessary.

Handling a sexting / nude selfie incident

- Any Prospero Group Temporary Worker who is made aware of a sexting or nude selfie incident should report this immediately to Prospero Group's Designated Safeguard Lead, who will then liaise directly with the Client's Designated Safeguarding Lead.

Reviewing and Monitoring Online Safety

The online safety policy is part of Prospero Group's Safeguarding Children & Adults at Risk Policy.

- The online safety policy will be reviewed annually or when required in line with legislation and statutory guidance.
- All amendments to this policy will be agreed by Prospero Group's Directors and then disseminated to all Temporary Workers and Internal Employees.

Education Content

Pupil Online Safety

Prospero Group ensure:

- All Temporary Workers are trained in online content selection for specific curriculum areas to ensure lessons are age-appropriate and regularly monitored as part of Prospero Group's quality assurance processes.
- Internal Employees, Temporary Workers and Pupils understand issues around plagiarism; how to check copyright and also know that they must respect and acknowledge copyright/intellectual property rights.

- All Temporary Workers will ensure that at the start of every lesson, tutorial or session pupils are aware of how to report online content that makes them feel inappropriate, how to block content and how to report abuse that they may receive or witness online.
- All Temporary Workers will ensure that they alert the named DSL in the education setting they are working in, and Prospero DSL in the event that they are concerned about a pupil who may be suffering misuse or abuse of online content, or using online platforms inappropriately.

Training

Prospero Group ensure:

- Regular training about online safety is available to all Prospero Group Temporary Workers.
- Provides, as part of the registration process, all new Temporary Workers with a copy of Prospero Group's Safeguarding Children & Adults at Risk Policy, Online Safety Policy and Safe Use of Social Media guide.
- Mentoring is provided for all Internal Employees and Temporary workers who have witnessed, been subjected too, or are concerned about pupils who have witnessed or been subjected too online abuse or inappropriate images/content.

The T&D team at Prospero will share regular updates, communication, coaching and mentoring for all teachers, TAs and tutors who are using online services to deliver lessons to pupils.

Expected Conduct and Incident Management

Expected Conduct

Prospero Group expect ensure all Temporary Workers and internal employees to:

- Understand the significance of misuse or access to inappropriate materials, and are aware of the consequences.
- Understand it is essential to report abuse, misuse or access to inappropriate materials, and know how to do so.
- Understand the importance of adopting good online safety practice when using the Internet and other IT/communication technologies.
- Know to be vigilant in the supervision of children at all times, as far as is reasonable, and use common-sense strategies in learning resource areas where older Pupils have access that is more flexible.
- Know to take professional, reasonable precautions when working with Pupils, previewing websites before use; using age-appropriate (Pupil friendly) search engines where more open Internet searching is required with younger Pupils.

Incident Management

Prospero Group:

- Encourage all Temporary Workers and Internal Employees to be vigilant in reporting issues.
- Ensure Temporary Workers and internal employees understand the escalation processes, so that any issues are addressed with quickly and sensitively.
- Actively seek support, where applicable, from other agencies when dealing with online safety issues.

- Ensure monitoring and reporting of any online safety incident, which then contributes to developments in policy and practice.
- Will contact the Police if notified that a Temporary Worker or Pupils has received online communication that we consider is particularly disturbing or breaks the law.
- Will immediately refer any suspected illegal material to the appropriate authorities.

Managing IT and Communication System

Site Management

Prospero Group ensure:

- Storage of all data within Prospero Group's secure CRM system conforms to the EU and UK data protection requirements.

Prospero Group:

- Ensure this online safety policy is accessible to all Temporary Workers and Internal Employees.
- Ensure each user has their own password protected log on which cannot be access by another user.
- Requires all users to log off when they have finished working or are leaving the computer unattended.
- Ensures all equipment owned by Prospero Group has up to date virus protection.
- Maintains equipment to ensure Health and Safety is followed.
- Has a clear disaster recovery system in place that includes a secure, remote off site back up of data.
- Ensure all IT/communication technologies and systems are installed professionally and regularly reviewed to ensure they meet health and safety standards.
- Maintain all processes, equipment and training in line with Cyber Essentials certification.

Password Policy

- All Internal Employees have their own unique username and private passwords to access Prospero Group's secure CRM system.
- Prospero Group require all Internal Employees to use strong passwords.

Social Media and Networking

Prospero Group Temporary Workers will ensure that in private use:

- No reference is made in social media to Students/Pupils, Clients, Temporary Workers or Internal Employees.
- They must not be online friends with any Students/Pupils.
- They do not engage in online discussion on personal matters relating to members of the Prospero Group community.
- Personal opinions should not be attributed to Prospero Group and personal opinions must not compromise the professional role of the Client, Temporary Worker or Internal Employee, nor bring Prospero Group into disrepute.

- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.
- They follow Prospero Group's Safe Use of Social Media guide.

Data Security: Management Information System Access and Data Transfer

Strategic and Operational Practices

At Prospero Group:

- The Managing Director is the Senior Information Risk Officer (SIRO).
- Both Temporary Workers and Internal Employees are clear who the right point of contact(s) are for key information.
- Both Temporary Workers and Internal Employees know how to report an incident where data protection may have been compromised.
- All Temporary Workers are subject to a full compliance procedure, including DBS check, and records are held in a single central record.

Technical Solutions

- Prospero Group require all users to log-out of systems when leaving their computer.
- All servers are in lockable locations.
- Disposal of any equipment will conform to UK regulation and is managed by Prospero Group's IT provider.

Equipment and Digital Content

Mobile Devices (Mobile phones, tablets and other mobile devices)

- Prospero Group Temporary Worker's personal mobile devices must not be used during lessons unless approved prior by the Client.

Consequences

Failure to adhere to this policy may result in termination of the Temporary Worker's Work-Finding Services and referral to the Disclosure and Barring Service / relevant professional body, if applicable.

Data Protection

Prospero Group will treat all Temporary Workers' data confidentially and in accordance with the requirements of the Data Protection Act 2018 and the General Data Protection Regulations 2018.

Enforcement

This policy will be enforced by Prospero Group's CEO, Managing Director, Operations Directors, Head of Compliance & Safeguarding, Head of HR and Data Protection Officer.

Failure to adhere to this policy may result in suspension / termination of the Temporary Worker's Work-Finding Services and referral to the Disclosure and Barring Service / relevant professional body, if applicable.

Review

This policy will be reviewed annually and may be updated in line with government guidance.