

ONLINE SAFETY- INC. USE OF MEDIA POLICY

ADO RIVER VALLEY Services C.I.C

Incorporating ADO RIVER VALLEY River Valley

Version 3.3 ©2023

2023-2024

Last Ratification By Governance Committee	September 2023
Next Ratification By Governance Committee	March 2024
Latest Update by ADO RIVER VALLEY River Valley	September 2023

1. Online Safety and Use of Media Policy Overview

It is the policy of ADO River Valley to address the Online Safety measures in place whilst at school. Every student in our care deserves to be protected from the misuse of the online/digital dangers whilst they attend school. The internet forms an integral part of learning within programmes and to ensure ADO River Valley conform to the minimum requirements we use the Department of Education's, '**Teaching Online Safety**' as a guidance. This policy focuses on the impact of online and media access by the student, and the measures we have in place to safeguard them.

This policy is closely linked to the [Privacy Policy](#), [Safeguarding Policy](#) and the [Mobile Phone and Smart Device Policy](#).

2. Types of Devices and Scope

The portable devices and their scope of use is covered in detail within the [Mobile Phone and Smart Device Policy](#). This document is regularly updated as and when new technologies pose a change in policy or require a new set of procedures when in use. A full technical specification of internal systems, email and data storage can be found within the [Privacy Policy](#).

3. Internet & Internal Networks Overview.

ADO River Valley has installed standard broadband services but with their own, not supplier proprietary, ADSL routers. This allows us to add additional levels of controls to accessing our main data network attached storage systems. Our two main sites are connected via a secure VPN connection. Each user has their own unique username and password. Each site has its own internet connection, monitored centrally. Our outdoor site has clear line of sight boosters, all individually secured with their own passwords. Internal data is stored and accessed through an additional password layer and access rights are user restricted dependent on the authorisation levels within the company. All systems are protected by both anti-virus, malware software, along with filtering and monitoring systems too.

For this moment in time, the current technology and the size of our operation, these network controls provide ADO River Valley with all the security that we require. As the company grows and new systems are implemented, the policies and procedures will be updated accordingly.

It is important to note, that whilst we acknowledge the importance of technology in today's world, we also are here trying to nurture students in a way that gives them fundamental distance from the online world. This is a huge part of our ethos, we want to teach through Wildlife, Animals, Nature, with a spark of adventure. We of course use technology, and

embed it into our curriculum however we imagine it is relied on less in our provision compared to other more traditional settings.

3.1 Student Access and Agreements

Students each have their own ADO River Valley device in the way of a laptop to access the internet and complete their work. Each student therefore has their own individual usernames and passwords. We are implementing software which alerts us to any concerning factors such as internet searches, it will also allow us to run reports on all devices across the company, we ensure students work under strict staff supervision when online presently whilst implementation is being carried out. We will also be carrying out half termly manual checks with the devices in case the software for filtering and monitoring fails. Students are given generic usernames and passwords with the basic access to either software programmes, installed Apps or restricted internet access. Staff are not allowed to let students choose their own username and passwords. Students do not have any access to ADO River Valley staff emails or filesystems. Students are not permitted to use any of their own devices within the school day (mobiles iPad and so on).

Each student is restricted by the policies as set out in the **Mobile Phone and Smart Device Policy**. If they want to bring to site their mobile phone or smart device, they must, in addition, be prepared to sign **The Mobile Phone & Smart Device Agreement Form**. There are strict regulations set out in the aforementioned policy and although we expect a level of trust if they are learning online, there are also many safeguards to stop them gaining access to any ADO River Valley internal networks or data.

3.2 Filtering and Monitoring

We recognise that students use of the internet is an important part of their education but that there are risks of harm associated with its use. This policy addresses how we seek to minimise those risks across our services and teach all students how to stay safe when using the internet in their lives, outside of the ADO River Valley community.

We also recognise that all members of staff must always be mindful of the need to follow our policy of acceptable use of our technology equipment, including our filtering and monitoring systems to help keep students safe. The school has in place policies and protocols for the use of online communication technology between the staff and other members of the school and wider community.

Members of staff understand that communication with young people, parents / carers and members of the community should only take place through officially sanctioned school mechanisms. We use a variety of sanctioned tools including Arbor/CPOMS/Egress/ChatPro The nature of these communications must be professional.

We ensure that the DSL and the OSL have a broad understanding of these systems and that we follow the [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges-filtering-and-monitoring-standards-for-schools-and-colleges).

Our Safeguarding lead and deputy lead are also working with a member of our governance committee to ensure that our filtering and monitoring procedures meet the national guidance (KCSIE 2023).

ALL staff at ADO River Valley must complete 'Prevent' and Channel training as part of their induction and will receive regular briefings and update training. Furthermore, all staff must engage in relevant training involving filtering and monitoring. We have one allotted staff member who is responsible for embedding online safety into the curriculum in as many ways as possible, who is supported by our OSL (Online Safety Lead).

The DSL takes lead responsibility for safeguarding and child protection, including online safety and ensuring the schools' filtering and monitoring systems are effective. Our staff are aware of the reporting lines to share concerns / suggestions and we have a culture of openness between colleagues to ensure child protection is of the highest standard.

The Senior Leadership Team are responsible for:

- Procuring filtering and monitoring systems
- Documenting decisions on what is blocked or allowed and why
- Reviewing the effectiveness of our provision
- Overseeing reports

They are also responsible for making sure that all staff:

- Understand their role
- Are appropriately trained
- Follow policies processes and procedures
- Act on reports and concerns

Senior leaders work closely with governors and proprietors, the DSL and IT service providers in all aspects of filtering and monitoring. We have instructed our IT Supplier which is contracted to Kylanja Limited (our own separate company that leads some of our back office functions and trades as ADO Therapy) and other third party IT providers to identify, purchase and implement the filtering and monitoring software to protect our students and all devices owned by the school. All devices will then be reported on to what they have accessed and this will be regularly reviewed and any concerns reported to the DSL within the school.

Our IT service provider is responsible for:

- Technical responsibility of maintaining filtering and monitoring systems
- Providing filtering and monitoring reports
- Completing actions following concerns or checks to systems

Our IT service provider will also:

- Work with senior leadership/ DSL/ OSL to identify risks, carry out reviews, carry out checks, procure systems

We ensure that each student who has a school laptop / device at school has its history checked regularly in addition to implementation of thorough monitoring to prevent risk of accessing harmful content

We will ensure that our filtering provider:

- Is member of Internet Watch Foundation
- Is signed up to Counter-Terrorism Internet Referral Unit (CTIRU)
- Blocking access to illegal content including child sex abuse material (CSAM)
- Pays strict attention to blocking harmful content relating to self-harm and suicide, due to our remit and the students that we are working with.

Furthermore, we have ensured that ADO River Valley has conducted its own Data Protection Impact Assessment (DPIA), which has allowed us to identify gaps and the impact of the DPIA. We are conducting an annual review of our online quality Assurance by using the '360 Safe Tool' which is the recommended software which will support our next steps to develop our online safety program. We will also use this tool when:

- A safeguarding risk is identified
- There is a change in working practice
- When new technology is introduced

4. Media Arrangements

Media plays an important part in recording service users progress and achievements. ADO River Valley complies with the GDPR guidelines on all data that is kept on ADO River Valley networks. A complete guide to this and our compliance can be found in our [Privacy Policy](#).

4.1 Photographic Images and Purpose

These are taken solely for the purpose of ADO River Valley or our students with full permission. We never share images with third party or partner organisations, except in exceptional circumstances and only when agreed with all parties involved. It is our policy to only use photographic images or video taken to support, but not limiting to;

- The visibility of ADO River Valley as a brand
- Marketing purposes
- Media presence
- Highlight good work in the community.

In addition, our students and stakeholders benefit from images for the purposes of record keeping as part of OFSTED regulations, or supportive evidence for learning. Images may be taken and stored on secure software and company devices for any one of these reasons;

- For the benefit of parent-carers to view their children or young person (CYPs) progress.
- Support the learning of each CYP individual record.

- To highlight our students' activities and experiences.
- A record of outcomes, or any other recorded analysis that are agreed to.
- Supportive and evidence-based learning records for qualifications
- Supportive and evidence-based learning records for authorities

These images or videos are then subject to Release Management to ensure that full permissions are given before publishing. The Office Administration team hold a record of those students with agreed permissions to publish.

4.2 Image Use Permissions

All students will at some point agree to terms, or contractual agreements with the choice of allowing photographs or video to be used or refuse permission accordingly.

Permission for standard photographic images or video is obtained in a number of ways via Online Referral Forms, as part of the 'New Starter Process' or through paper records. Parent-carers can advise at this stage that they do not provide permission for any photographic images or video to be used for marketing or social media purposes, for example, which forms part of our data protection policy ongoing.

For ADO River Valley, the default stance on permission to use images is set to prohibited. This is to say that no images will be used of children and young people by default unless express permission is gained from the parent-carers or authorities and for reasons of special conditions or for supportive-educational circumstances.

In the case of the ADO River Valley staff team or outside agencies taking photographs for promotional and marketing purposes at outside one –off trips, the company will seek written, parental-carer-organisation permission to agree for students to be included at the time. Should a Parent-Carer prefer their CYP not to take part, then any images taken will be deleted within 24 hours. Individual CYP will not be included in a group image if written permission is not given by the CYPs designated guardian.

4.3 Storage and Security of Images

The Staff team operate ADO River Valley controlled smart devices capable of taking photographic images or video. These are locked away when not in use within the company demise in an offline position. Images are taken using official company equipment only. Once a month all images or video on these devices is removed and backed-up on the ADO River Valley data network. The devices are then returned cleaned of old images.

4.4 Security Images and Purpose

There is no CCTV security system currently installed on any sites. If CCTV is ever installed, this policy will be updated accordingly. We do however have wildlife cameras set up in our trees.

4.5 Retractions

If a Parent-Carer-organisation would like to retract their permission for the use of images or video, they should do so in writing to the main office, details to be found in the General Terms and Conditions of ADO River Valley.

5. Secure Image Capture and Storage

ADO River Valley uses **Arbor** software for its record keeping imagery for the River Valley School Parent-carers can view the images remotely but are unable to then copy them or download them for distribution.

Arbor software is secure from third party distribution of images or abuse of duplication. It is cloud based, therefore not on the ADO River Valley network.

6. Review

All ADO River Valley policies and procedures follow ITIL guidelines to ensure version control, change control and release management of any documents. As a matter of policy, documents can be updated at any time to reflect changes to ADO River Valley procedures, legal changes, OFSTED directives or any other reason to ensure the policies and procedures are accurate and correct. This involves consultation with stakeholders and approval from the directors and the ADO Governance Committee. All policies and procedures are reviewed at the very least on an annual basis. Regular communication through newsletters, social media, text systems and through our website within the ADO River Valley Library is part of our Release Management.

7. Contact

This document was produced by the ADO River Valley Operations Consultancy Team. This version supersedes any previous versions and will be reviewed annually.

All correspondence with regard to this policy, or any other operational policy and procedure should be directed to the ADO River Valley Business Operations and Support Executive by e-mailing gmp@adoservices.co.uk or calling 0208 855 6778, requesting to speak to Gary McHolland-Pilcher or in writing, ADO Services CIC, Main Office, 126 Upper Wickham Lane, Welling, Kent, DA16 3DP.

8 Table of Changes

Table of changes from September 2023. This table explains where we made changes, under version control.

Summary	About the Guidance
Throughout	Change from Management Committee to Governance Committee
Page 1	All systems are protected by both anti-virus, malware software, along with filtering and monitoring systems too.
Page 1	It is important to note, that whilst we acknowledge the importance of technology in today's world, we also are here trying to nurture students in a way that gives them fundamental distance from the online world. This is a huge part of our ethos, we want to teach through Wildlife, Animals, Nature, with a spark of adventure. We of course use technology, and embed it into our curriculum however we imagine it is relied on less in our provision compared to other more traditional settings.
Page 3	3.1 re written section based on student access
Page 3	3.2 added section (KCSIE 23) on filtering and monitoring
Page 6	There is no CCTV security system currently installed on any sites. If CCTV is ever installed, this policy will be updated accordingly. We do however have wildlife cameras set up in our trees.