

Example Safeguarding risk assessment online

Audience:	Staff who want to provide an online/mobile social media or interactive service (e.g. online lessons, a social network, messaging, Q&A site, interactive game, cloud service or ephemeral messaging service) to users who are under 18 years old.
Purpose:	The primary objective of this tool is to protect children from online risk by enabling staff to self-assess online products/services and inform them of mitigation strategies which must be put in place to reduce the risk of harm to children.
Online Risks:	Online risk can be classified in three ways:
	Conduct risk: children participating in an interactive situation. This includes bullying, sexting, harassing, being aggressive or stalking; or promoting harmful behaviour such as self-harm, suicide, pro-anorexia, bulimia, illegal drug use or imitating dangerous behaviour. A child's own conduct online can also make them vulnerable - for example, by over-sharing their personal information or by harassing or bullying others.
	Contact risk: children being victims of interactive situations. This includes being bullied, harassed or stalked; meeting strangers; threats to privacy, identity and reputation (for example, through embarrassing photos shared without permission, a home location being identified, someone impersonating a user, users sharing information with strangers); and violence, threats and abuse directly aimed at individual users and/or groups of users.
	Content risk: children receiving mass-distributed content. This may expose them to age-inappropriate material such as pornography, extreme violence, or content involving hate speech and radicalisation.
Illegal contact, conduct and content	Some online risks cannot only lead to harm, but also result in illegal activity such as:
	<i>* sexual grooming and sexual exploitation</i>
	<i>* creation and distribution of child abuse images</i>
	<i>* online aspects of child trafficking</i>
	<i>* online radicalisation</i>
	<i>* physical and mental abuse of children</i>
	<i>* selling and distributing illegal drugs</i>
	<i>* revenge pornography, harassment and malicious communications.</i>
Core Principles:	1. Informed parental consent
	2. Educating and raising awareness of e-safety
	3. Effective moderation
	4. Ensuring privacy and controls
	5. Dealing with child sexual abuse content and other illegal contact
	6. Managing inappropriate or harmful content
	7. Dealing with inappropriate or harmful behaviour

Name of language centre:	EXAMPLE – if using as a basis for your risk assessment, it must be reviewed and customised to be relevant to your provision, policies, procedures. This is not exhaustive and should not be taken as a definitive list.	
Online activity being risk assessed:	Questions and examples are based on use of a web-based video conference tool to teach synchronous classes of young learners (YLS). Action to be taken needs to be specific to mitigating the risks of the planned activity and the specific digital platform(s) used.	
DSL / manager responsible for this document:		
Document created:	Document reviewed:	Next review due:

1. Informed parental consent
Written parental consent gained at enrolment.

Risk description	Risk management	Action to be taken: (things to think about)	status
<p>Why? Consent allows parents to make an informed decision about whether to allow their child to participate. It is also an outward signal to parents that we take online safety seriously.</p>	<p>How? The consent must contain specific details of the activities and safeguards being put in place. Provide parents with links to the site/app parental guidance (if this exists) for any platform(s) to be used, so they can make informed decisions about whether their child should use the site/app. If it is a platform where parents can be given access, this should be made explicit here, including guidance on how to contribute appropriately and safely.</p>	<p>How will you ensure that parents have given informed consent? What should the Code of conduct include?</p> <p><i>Code of conduct might include include:</i> <i>How platform works technically</i> <i>Information on the safeguarding features of the platform</i> <i>Guidelines on how to stay safe online</i> <i>Information on the language centre's measures to protect students</i></p> <ul style="list-style-type: none"> - Safer recruitment - Staff codes of conduct - Monitoring <p><i>How to report/raise any concerns (who to contact and how).</i></p>	

2. Education and awareness raising
Young learners (YLS) educated on how to stay safe online and in how to use the particular platform(s) safely.

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<p>Why? It is critically important to give users, especially children the space and opportunities where they can develop their e-safety knowledge. For the digital space, this includes educating them about how to recognise and report things which concern them, and areas such as privacy and risky behaviour. They can then reap the benefits of the digital age and keep themselves safe online.</p>	<p>How? For general e-safety awareness use an age-appropriate video; there are many available online, for example, https://learnenglishteens.britishcouncil.org/uk-now/video-uk/online-safety-tipsraising For specific platform safety advice see the site/app's 'safety centre'. Most platforms have created guides for children and parents/teachers on how their site can be used safely. Or access advice from the NSPCC and O2 https://www.net-aware.org.uk/online-safety-lockdown/</p>	<p>How will you ensure that children/young people have the knowledge and awareness to stay safe online?</p> <p><i>Things you might consider:</i> <i>Code of conduct shared by parent with their child.</i> <i>First lesson includes:</i> <i>How to stay safe online and in this platform (safeguarding features)</i> <i>How to behave with each other (online etiquette)</i> <i>What to do in the event of a problem or any inappropriate behaviour</i> <i>Consequences of inappropriate behaviour.</i> <i>[As with similar lesson in face-to-face setting – activity could include creating and agreeing class rules.]</i></p>	

3. Moderation

More than one (police checked) moderator or administrator in place to monitor the platform and detect potential child abuse or breach of language centre rules.

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<p>Why? Moderation is an activity or process whereby a person is responsible for reviewing content posted by users. It is used to try and help keep chat and interactive services safe for children and provide a positive user experience by removing unsafe, inappropriate and offensive posts. Although the fact that a service is moderated is not a guarantee of a child's safety, it does provide an important service to improve the online environment.</p>	<p>How? Content posted by a user must be reviewed by the moderator who can, for example, remove inappropriate posts or even bar a user from using the service. Human moderation can be done in different ways, and these different ways have implications for the level of safety. With pre-moderation all material is seen and checked before it is published.</p>	<p>The application of safer recruitment procedures. How will you monitor online activity to ensure that teachers are acting safely and appropriately? How will student conduct be managed? What features of the platform(s) can help you manage interactions safely?</p> <p><i>Things you might consider:</i> <i>Unannounced, drop-in, monitoring of classes by DSL/academic manager to ensure that teaching is in line with the code of conduct.</i> <i>Chat from the session is moderated by the teacher during the lesson.</i> <i>Chat from the session is saved automatically and sent to the host.</i> <i>Breakout room features include 'Ask for help' button.</i> <i>Reporting procedures in place, known to all staff, students and parents.</i> <i>Teachers must put students 'on hold' or back to waiting room if they have to leave the meeting for any reason, and must end the meeting when the class finishes.</i></p>	

4. Privacy and controls

Privacy tools and controls activated to keep children safe when they're using the platform.

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<p>Why? Privacy tools and controls are crucial for keeping young users safe on digital platforms. Children and young people are often excited to post personal information such as their name and contact details, or pictures and videos of what they are doing. But they need to understand that protecting their online identities and reputation is very important.</p>	<p>How? Ensure privacy settings are enabled to the most secure setting. Any geolocation capabilities must be switched off and users instructed not to share photos, last names, addresses or other personal information. One-to-one contact between teachers and children is not allowed. It should be made clear that teachers should never contact students privately, and there should be measures in place to enable moderation of communications, including random spot checks. All users should be made aware of how to report concerns regarding the misuse of digital/online products.</p>	<p>Is the platform used suitable for the mode of delivery? What security features are available in the platform(s) used to help you safeguard students? How will you ensure the security features are used? How will teacher and student conduct be managed to minimise risk?</p> <p><i>Some of the factors to consider:</i> <i>Different levels of security according to version of application used.</i> <i>The need to ensure updates are applied to enable latest safeguards.</i> <i>Language centre account (not teacher's personal account).</i> <i>Settings managed by appropriately trained person.</i> <i>Lessons scheduled by language centre, not teachers.</i> <i>Meeting link (unique for each lesson) embedded in language centre's learning platform or sent to parents by email.</i> <i>Virtual Classroom Teacher's Guide and Code of Conduct.</i></p>	

		<p><i>Student and Parent Guide, including the 'House rules' and code of conduct, shared with students and parents.</i></p> <p><i>Teachers trained in online teaching and safety for children, including platform features which can be used for safeguarding, and how to report concerns.</i></p> <p><i>Different rules for any one-to-one activity (lessons/tutorials etc), e.g. a parent or guardian must be present.</i></p>	
<p>5. Child sexual abuse content or illegal contact Dedicated resources in place to detect and prevent child sexual abuse content and child sexual exploitation.</p>			
Risk description	Risk management	Action to be taken: (things to think about)	status
<p>Why? To a child sex offender, online platforms represent an opportunity to gain virtual access to children to sexually exploit them and/or to share child sexual abuse content with others. By using digital platforms with children we have a vital role to play in protecting them.</p>	<p>How? Ensure all of the standards of the risk assessment are in place and the risk around child sexual abuse content and illegal contact should be significantly reduced. However, it is essential children know how to report any concerning activity they encounter and that such reports are escalated in line with language centre policy. Teachers, moderators and administrators must complete relevant training to ensure they understand online risk and know how and when to report concerns.</p>	<p>How will you secure the online environment to prevent infiltration of an outsider in meeting, or sharing of inappropriate material? What security features are available in the platform(s) used to help you safeguard students? What training will teachers or other users need?</p> <p><i>Some platform features that might be used to limit access/manage environment:</i> <i>Lesson-specific link; password access; waiting room (admit only named class members as per the register); ability to lock meeting once all participants have arrived.</i> <i>Option to exclude a participant or put them in the waiting room; 'end meeting for all' if there is an urgent need and at the end of lesson.</i></p>	
<p>6. Managing content 'House rules' created which give a clear definition of what is acceptable and what is not acceptable on the platform.</p>			
Risk description	Risk management	Action to be taken: (things to think about)	status
<p>Why? 'House rules' allow users to interact in a safe environment which protects them from inappropriate material and abuse.</p>	<p>How? Set 'House rules' with YL's at the beginning of the activity which clearly outline what is acceptable and not acceptable conduct and what sanctions will be enacted if these rules are broken. Ensure the 'House rules' prohibit behaviour such as threats or harassment of others, hate speech, threats of violence, and posting someone else's private information.</p>	<p>How will student conduct be managed to ensure safe and appropriate behaviour? How will language centre/classroom rules be applied or adapted?</p> <p><i>Some suggestions to consider:</i> <i>First lesson introduction for all students including 'House rules', staying safe online and consequences of inappropriate behaviour.</i> <i>What about students joining part way through a course?</i> <i>Code of conduct sent to parents for sharing with child (in local language where possible) before lessons start.</i> <i>Teachers trained on what to do in the event of a problem (e.g. stop video, stop group chat, exclude a person and put them in the waiting room, end meeting for all).</i> <i>Share screen function only for host. Or host can invite a student to become co-host to share student's screen to display work.</i></p>	

7. Dealing with inappropriate behaviour or 'abuse'

Mechanism in place for dealing with inappropriate behaviour by YLs (including cyber bullying) or by staff. Including anything which makes children or staff feel uncertain, uncomfortable or fearful.

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<p>Why? Inappropriate behaviour or abuse has the power to cause distress or harm, exacerbating problems such as poor self-image, isolation and loneliness. It can lead to, among other things, self-harm and even suicide.</p>	<p>How? YL's and staff are informed at the beginning of the activity through 'House rules' and again through reminders, what content or behaviours constitute abuse and inappropriate behaviour. Make sure you enforce the rules and be very clear about the reasons for your decisions. Make sure children and staff know how to report abuse and that there is a system in place for sanctioning those who break the 'House rules'. Follow these consistently and ensure all staff involved in the activity understand the process and are equipped to identify abusive or potentially abusive scenarios.</p>	<p>How will staff and student conduct be managed to ensure appropriate behaviour and a safe environment? How will language centre/classroom rules be applied or adapted? How will the language centre's procedures for identifying problems and reporting concerns need to be adapted for the virtual environment?</p> <p><i>Some suggestions to consider:</i> <i>First lesson introduction for all students including 'House rules', staying safe online and consequences of inappropriate behaviour.</i> <i>'What about students joining part way through a course?</i> <i>Code of conduct sent to parents for sharing with child (in local language where possible) before lessons start.</i> <i>Teachers trained on what to do in the event of a problem (e.g. stop video, stop group chat, exclude a person and put them in the waiting room, end meeting for all).</i> <i>Training for teachers in identifying and reporting concerns.</i> <i>Effective process for teachers to ask for help from the DSL and report a concern.</i> <i>Easy to use mechanism for students/parents to raise concerns.</i></p>	