

**Digital Safeguarding** 

A Complete Guide to Active Monitoring for Local Authorities and Multi-Academy Trusts

What is monitoring, why do Ofsted require it, and how can you and your schools integrate it into your safeguarding strategies?

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## About this document

This practical document has been produced to help Local Authorities and Multi-Academy Trusts understand their obligations around monitoring and how to approach an implementation programme across their schools.

Written by Smoothwall's Online Safety Experts, it answers the key questions organisations like yourselves are raising and shares real case scenarios of monitoring in action.

**Essential reading for:** Multi-Academy Trust Leaders, Local Authority Safeguarding Partners, and any other professionals responsible for ensuring safeguarding compliance within a school cluster.

If you have any questions about monitoring, its implementation or digital safeguarding in general please do not hesitate to contact the Smoothwall team.

We'd be happy to help.

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### 1.0 Introduction

Children's safety online is a growing problem and is one of the reasons why the Department for Education has introduced, and continues to update, its requirements for online safeguarding within schools, including the role of safeguard monitoring.

Although monitoring was a requirement in Keeping Children Safe in Education (KCSIE) 2016, there is even more focus in the September 2018 update.

As a Local Authority or Multi-Academy Trust it is your responsibility to ensure the children and young people in your schools are suitably safeguarded, and this includes appropriate monitoring.

Despite this many governing organisations are still unclear about what monitoring actually is, why it's needed and how to approach an implementation. This document addresses all three factors.

If you require further information or have any questions, please contact us on +44 (0)870 1999 500 or email us at enquiries@smoothwall.com. We'd be happy to help.



# Only one in eight children in England who are sexually abused come to the attention of statutory authorities.

Ofsted. 'Guidance for joint targeted area inspections: child sexual abuse in the family environment.' August 2018



## 2.0 Your Statutory Obligations Around Monitoring

As we know there are a number of legislative and statutory guidelines, including several recent and important changes, that necessitate some form of monitoring within your schools. Below is a summary.

#### **KCSIE 2018**

- Schools and colleges in England are obliged to "ensure appropriate filters and appropriate monitoring systems are in place".
- Monitoring systems are there to safeguard children and the responsibility should lie with the school leadership/ Governors and Designated Safeguarding Lead (DSL).
- Monitoring systems require capable and competent staff to sufficiently manage them, together with the support and knowledge of the entire school.
- Schools must have their own safeguarding policy based on their setting and needs. This means identifying the risks most specific to them and showing how they effectively intervene and help students when a problem arises. Even schools within a Multi-Academy Trust are now expected to have their own individual policy.
- Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

- The DSL will likely have a "complete safeguarding picture".
- The DSL should take lead responsibility for safeguarding and protecting young people, including online safety.
- DSLs must be up to date in training for online safety.
- DSLs must understand the vulnerability of children with SEN and disabilities in the online environment with everything from online bullying, to grooming and radicalisation.
- DSLs must be confident they have the capability to support SEND children to stay safe online.
- DSLs should understand the risks associated with online safety and be confident they have the relevant knowledge and up to date capability to keep children safe whilst they are online at school.
- Data protection and GDPR should not interfere with the ability to share information relating to safeguarding.
  - "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children".

## Working Together to Safeguard Children 2018

- Communication between institutions and multi-agency safeguarding partners is crucial.
- Clear evidence and a full picture will help the agencies put the right measures in place.
- Schools should provide support as soon as a problem emerges to avoid escalation.
- Local organisations and agencies should have in place effective ways to identify emerging problems as well as potential unmet needs of individual children and families.
- All practitioners to understand their role in identifying emerging problems and to share information with other practitioners to support early identification and assessment.

#### **OFSTED**

- Inspectors should be able to see evidence of how a school is safeguarding children appropriately in the online environment.
- There should be well-developed strategies in place to keep children and learners safe and to support them to develop their own understanding of these risks and in learning how to keep themselves and others safe.
- Inspectors should consider the extent to which leaders and managers have put in place effective arrangements to identify children and learners who may need early help or who are at risk of neglect, abuse, grooming or exploitation.
- At all times schools or colleges should be actively considering the risks posed to all their pupils and students by putting adequate measures in place to protect them and keep them safe.

#### The Prevent Duty 2015

Schools and educational entities should be aware of the increased risk of online radicalisation, as terrorist organisations such as ISIL seek to radicalise young people through the use of social media and the Internet. Schools and childcare providers should have "clear procedures in place for protecting children at risk of radicalisation".

#### The Children's Act 1989 and 2004

"Local authorities in England have overarching responsibility for safeguarding and promoting the welfare of children in their area. As part of this, they have a number of statutory functions under the 1989 and 2004 Children Acts, including undertaking assessments of children who are in need or are suffering, or likely to suffer, significant harm in order to determine what services should be provided and what action should be taken."

#### The Education Act 2002

Section 157 for academies and independent schools requires governing bodies of maintained schools and further education colleges to ensure they safeguard and promote the welfare of children for all pupils and students under the age of 18.

#### The UK Safer Internet Centre

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This guidance highlights that schools should be led by their own risk assessments when deciding what level monitoring is right for them. Local Authorities and Multi-Academy Trusts must help their schools monitor for and protect against:

- **Bullying:** Any behaviour that includes threats, coercion to abuse, intimidation or aggression towards other students.
- Child sexual exploitation: Manipulative or coercive behaviour towards a child that encourages them to engage in a sexual relationship, including encouraging to meet.
- Discrimination: Any prejudiced or unfair behaviour that defies the Equality Act 2010.
- Drugs / substance abuse: Any evidence of drug misuse or promotion of illegal drug use.
- Extremism: Content that encourages terrorist or terrorist ideologies, including intolerance or signs of violence.
- Illegal: Any content that is illegal. For example, extremist content or child abuse images.
- Pornography: Content that includes explicit imagery or sexual acts.
- Self-harm: Content that encourages or exhibits deliberate self-harm.
- · Suicide: Anything that might suggest the user is considering suicide.
- Violence: Any threat or sign of physical force intended to hurt or kill.

## 3.0 Meeting the Guidelines and Legislation

#### The challenges faced

The guidelines focus not just on protecting children from seeing harmful content but on a school's ability to detect and identify risk and to do so before it escalates.

Relying on teachers to identify all risks as well as focus on teaching and pupil attainment is infeasible. Classes are often large and busy with frequently conflicting demands on the teacher's time and attention. This can make many risks undetectable without the aid of technology.

For example, a child might type a note to a friend to say he has a knife, and then quickly delete it. Or a registered sex offender studying in a college may search for inappropriate content online. Both of these examples are true stories that active monitoring detected within minutes, and so were dealt with appropriately. In the latter case, the individual was removed from the premises by Police within 45 minutes of typing the content.

In normal circumstances neither the DSL nor teacher could have seen these risks. In both cases active monitoring identified both instances and prevented potentially dangerous situations arising.

#### Serious incidents

## **14%** increase in **serious incident cases** reported to Ofsted in 2016/17

Source: Mental Health Foundation

#### Peer on peer

## **64**% of girls aged 13-21 have experienced some form of **sexual violence or harassment** at school

**Source:** Children and Families Minister at Safeguarding Conference - 2018

#### Abuse and grooming

## **700%** rise in **online sexual grooming**

Source: Home Secretary Sajid Javid, Home Office

#### Lack of resource

## **80%** of school leaders struggled to recruit teachers for posts

Source: NAHT 2017 Survey

#### **Bullying**

## 1 in 5 students have been **bullied** in the last year

Source: Annual Bullying Survey

#### Self harm

## **68%** rise in **self harm** in girls

Source: NHS UK



Within the last twelve months, cyberbullying has increased by 37%, with 66% of teachers citing it as the biggest online safety concern in schools.

The Digital Curriculum, Smoothwall. 2017



#### The challenges faced (continued)

Relying on the human eye to spot risk is no longer an appropriate means of safeguarding children.

Schools are often in the dark as to what is happening with and to their pupils.

The fact is the universe has shifted for today's young people. They do not perceive any difference between their on and offline worlds. Social media is an ever-present consciousness in their lives. A constant obsession to obtain the most streaks or likes can mean that young people are prepared to expose themselves to unknown contacts and therefore immense risk.

In the online world there is no undo button. Incidents outside of school may impact on the environment inside the school and vice versa. From hurtful messages to sharing images, schools can struggle to keep up and are commonly and understandably unaware of the risks in front of them.

Vulnerable, SEN and disabled students are at particular risk. KCSIE reminds schools to always have an "it could happen here" approach.

The move into secondary school has been identified as another risk. It's a time when students disregard their previous online safety advice and start to have the mentality 'it won't happen to me'.

With high risk comes the need to detect and react fast, and without an active monitoring solution, schools and their Local Authority or Multi-Academy Trust are unlikely to meet their legal obligations or duty of care.

## The long-term impact if risks are not identified

A report published in July 2018 by the UK Mental Health Policy Commission shows evidence that adverse childhood experiences can lead to mental health issues. By the age of 15, 50% of mental health issues will already have been seeded. Early intervention through active monitoring can reduce this significantly.

## 4.0 The Vital Role of Monitoring

As online dangers continue to increase so does the technology capable of addressing them.

#### What is Monitoring?

Active monitoring (also known as safeguard monitoring or digital monitoring) is a technology system in which digital devices within schools are constantly monitored to check for signs of risk in children.

#### Helping identify risks

Active monitoring helps to identify students at risk quickly. Serious risks such as a suicide, grooming or a gang meeting can all be picked up in real-time if a child has used their keyboard to view content, message someone, look for information, type out their feelings - even if they delete it immediately or never press 'send' or 'enter'.

It can help you detect problems and respond to issues you were previously unaware of and help individuals who haven't previously been shown to be at risk. For students already at risk you can check for escalation and feedback the evidence to relevant bodies. Active monitoring creates a safety-net for teachers who, in a busy classroom, may be unable to see what is happening online.

#### How it works

There are generally two types of active monitoring solution available:



Non third-party moderated



Third-party human moderated

#### Non-third party moderated

When a student or staff member types or views something alarming into a digital device, a screen capture is made by the active monitoring system. This capture could be of a browser, an email, a Microsoft document, a social media platform or a chatroom. Active monitoring is not like CCTV that films everything. It only captures the moments where a person has shown risk.

The system will create a risk-grade based on the capture. Schools and/or their Local Authority or Multi-Academy Trust can see risk alerts easily enabling them to act on severe alerts immediately.

Alerts are logged into a console, in real-time, enabling you to see the details as soon as you log in and decide which alerts need immediate attention and which can be dealt with later.

Lower level alerts are not discarded. In a robust solution, they will be analysed to uncover any concerning patterns and trends.

For example; a child searching online for 'cotton wool' and then later chatting on Facebook Messenger about 'diets' could indicate an eating disorder which, without the system's trend analysis, may go undetected.

Third-party moderated

The other type of monitoring is one that is human moderated. In this more advanced solution a capture is made in the same way as before. Artificial Intelligence (AI) then analyses the capture and creates a profile of the alert context. It also removes false positives at this point.

The capture is then sent to a human moderator for analysis. The analyst grades the capture and decides on the severity of the alert. They will also remove any further false positives.

Severe alerts are immediately communicated via phone call, and lesser alerts may be sent in conveniently timed reports. Most providers have a safeguarding portal for you to log in and see the full context of the alert and gather any extra evidence you may require.



Active monitoring helps to identify students at risk of suicide, grooming, cyberbullying or gang meetings in real-time.

#### **Key differences**

#### Non third-party moderated

- More affordable
- · Allows the Local Authority or Multi-Academy Trust to create their own individual setting
- Uses risk grading
- · Works offline
- · Has a console that makes it easy for safeguarding staff to access and analyse information

Ideal for: The Local Authority or Multi-Academy Trust who wants to run safeguarding as a service for schools. You may also want to implement this service to other settings such as children's homes.

#### Third-party human moderated

- Al profiling creates a clear picture of the context of an alert, removing many false positives therefore reducing DSL workload
- A human moderator a team of experts will check your school's captures and analyse their priority grade whilst removing any false positives that may have slipped through
- Works offline
- · A more time efficient monitoring solution as most false positives will be removed

Ideal for: The Local Authority or Multi-Academy Trust who wish to ensure their schools have effective safeguarding with human moderation already included, avoiding the need for alert management themselves.

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#### Do you have a question?

Contact our online safety experts. We'll be happy to help.

Tel: +44 (0)870 1999 500

Email: enquiries@smoothwall.com

### Illustrative case scenarios

The following cases show how monitoring can help you identify risks. Some of these scenarios are real and where that's the case, the names and details have been changed to protect confidentiality.

Monitoring type: None in place

#### Bobby year 9

#### Risk type:

#### Violence to others

- 1. Bobby brought a knife into school.
- 2. He messaged one of his peers that he was going 'to get' another pupil.
- 3. Later that afternoon, Bobby stabbed another pupil.
- 4. The log was found the next day by the school technician, after painstaking forensic analysis of the computer Bobby was using.
- 5. If active monitoring had been used, this risk would have been spotted and the stabbing avoided.

#### Freddie year 9

#### Risk type:

#### Drugs

- 1. Freddie was working on a shared document with a friend.
- 2. Freddie quickly typed in "fancy a spliff at break?". The friend agreed and then deleted the words.
- 3. At break-time, Freddie and his friend met up and smoked cannabis.
- 4. The use of drugs was discovered several weeks later by a member of the break-time staff.
- 5. If active monitoring had been used, this incident would have been spotted and the drug-use avoided.

#### Jessica year 11

#### Risk type:

#### Mental health

- 1. Jessica was working on a computer in the school library.
- 2. She typed "how to cope with depression and anxiety" into Google.
- 3. As her depression worsened she read a forum online about depression and began to cut herself.
- 4. She covered her arms and legs for weeks to hide her self-harm. It wasn't until her PE class started gymnastics that her teacher noticed the scars.
- 5. If active monitoring had been used, this risk could have been spotted and she could have received treatment.

#### Monitoring type: Non third-party moderated

#### Emma year 6

#### Risk type: Child exploitation - vulnerable student

- 1. Emma was sat at a school computer during her lunch break.
- 2. She was sent a threatening email saying that if she didn't meet someone called Richard after school, he would post the photos she sent to him so that everyone could see what she had done (using serious sexual language). She was told "not to tell anyone" about the meeting.
- 3. The serious sexual language triggered a severe alert.
- 4. The school DSL picked up the alert. She was able to intervene by asking Emma to come and talk to her.
- 5. The DSL invited Emma's foster parents into the school and used the support of her social worker and outside agencies to help Emma. Richard was reported to the police and the school were able to give clear evidence of the incident. The monitoring system de-escalated the problem and ensured Emma received the help she needed.

#### Matthew year 7

#### Risk type: Violence

1. Matthew was in a maths lesson where the teacher had set a 20-minute maths consolidation exercise on the computer.

- 2. While his teacher helped another student on the other side of the classroom, Matthew wrote a note on screen,"I think James brought in a knife".
- 3. An alert was triggered at this point and sent to the school's DSL. Matthew nudged his best friend to take a look. His best friend saw it but then Matthew's maths teacher called the class to attention. Matthew quickly deleted the note on screen.
- 4. The school DSL on duty had seen the alert and its severity. Having a full safeguarding picture of the school the DSL knew which James the note was referencing. They de-escalated the situation by implementing the school safeguarding strategy to remove weapons from a student.

#### Sara year 9

#### Risk type: Peer on peer bullying

- 1. A relationship rift had caused a group of girls to set-up a "we hate Sara Potts" website.
- 2. The girls posted malicious messages anonymously on the website with cruel comments.
- 3. Sara told a teacher but didn't know who was doing it.
- 4. The school added customisation around Sara Potts' name on the website. The DSL received alerts of 5 girls adding to the website within 24 hours and could follow up on the situation.

#### Monitoring type: Third-party moderated

#### Sabena year 10

### Risk type: Discrimination

- Sabena had created a video of her classmate Sophie and had placed Sophie's head on a dog's body.
   Sophie had Marcus Gunn Syndrome.
- 2. Sabena set-up a website called "Sophie, the dog".
- 3. Sabena's friend Thea accessed the website from her Chromebook and wrote "yeah Sophie looks good as a bitch".
- 4. An alert was triggered and sent to the human moderator.
- 5. The human moderator assessed the situation and notified the school.
- 6. The DSL logged into the monitoring console to see the full context.
- 7. The DSL was able to immediately implement the school safeguarding policy for this context.

#### Mohammed year 11

#### Risk type: Suicidal

- 1. Mohammed typed into Google "the most pain free way to kill yourself".
- 2. Although never pressing Enter, his keystrokes were recorded and an alert was sent to the human moderator.
- 3. The human moderator could see how Mohammed had previously looked up paracetamol and codeine. They contacted the school's DSL immediately.
- 4. The Safeguarding Lead logged into the console, located Mohammed's whereabouts and put together a swift plan to implement the school's safeguarding policy for a child at risk and intervene before it was too late.

#### Harry year 5

#### Risk type: Self harm

- 1. Harry typed into Google "can i cut my hair myself".
- 2. An alert was raised for self harm because of the word 'cut'.
- 3. Al and human moderation removed this as a false positive.

Active monitoring with a human moderator allows you to act on alerts fast, as well as save time by removing false positives like the one above. A good proactive provider will build individual profiles and learn from past experiences to have a clear understanding of your cohort.

Identifying students at risk is now the task at hand for schools across the UK. And the good news is that technological advances in safeguarding and active monitoring make this easier than ever before.



## 5.0 Providing Evidence for Ofsted

Ofsted will ask your schools or institutions to provide evidence of appropriate monitoring.

A technology based active monitoring solution will help you and your schools evidence appropriate monitoring in a number of key ways:

- Identify individuals at risk (both obvious and not so obvious), allowing you to intervene early and provide support as required.
- Highlight risks and concerns in real-time giving a comprehensive picture of the risk landscape affecting your schools.
- Demonstrate far reaching effective arrangements to identify children at risk.
- Provide a full evidence-based picture of the safeguarding provision and communicate effectively to outside agencies to ensure those at risk are identified and receive support at the right time.

A high-quality monitoring solution will expand your school's safeguarding provision whilst reducing the number of false positives, supporting and facilitating, not adding to, existing resource requirement. (A human moderated monitoring solution removes false positives almost entirely.)

The reality is you and your schools will not meet your obligations if you remain unaware of troubled students or students at an early stage of risk.

Identifying at risk students is now the task at hand for schools across the UK. And the good news is that technological advances in safeguarding and active monitoring make this easier than ever before.

# **6.0** How to Ensure Your Schools are Monitoring Appropriately

There are three steps every Local Authority and Multi-Academy Trust can take to ensure their schools are monitoring appropriately.

- 1. Ask your schools to review their current monitoring practices using the handy matrix below.
- 2. Assess areas of non or weak compliance to determine the level of monitoring support needed.
- 3. Define an approach to implementation.

## 1. Ask your schools to review their current monitoring practices

You should encourage your schools to review whether they are using the most effective solutions to identify students in need.

The matrix below shows government recommended guidelines together with a traffic light system to highlight where, if any, you and your schools' monitoring gaps may be.

Policy/set-up	Green	Amber	Red
Monitoring policy	We use an acceptable use policy which is embedded into the culture of our school. We also use it for the purpose of teaching online safety.	We use one acceptable use policy with all students.	We tell students what they should and shouldn't do when accessing the Internet.
Devices	Our system monitors all school devices.	Our system works on all managed devices in schools.	Our system only works on desktop computers / we only use physical monitoring.
Multi-Academy / College settings	Our system is fully customisable with a granular configuration that gives access to a full overview of all schools and a singular view for individual schools. And / or we use a human moderator with a singular portal for individual schools to access.	We monitor an overview system but it is not possible for individual schools to see a portal of monitored activity relevant to their individual school.	A granular view is not possible. We need a separate system for each individual school.

	Green	Amber	Red		
Processes					
Prioritisation alert management	Alerts work in real-time and let the DSL react to concerns when needed immediately. They are activated by various sources online and offline.	Alerts are risk-graded but do not show in real-time. Alerts may not occur out of browser. The system may be limited in the way it makes captures.	The DSL must look through a logbook for any issues. There is limited or no prioritisation. We have limited categorisation. A teacher makes a note if they see an incident.		
Flexibility  Procedures	We use intelligent analysis and profiling to gain a full picture of a student's activity. We used added human moderation to ensure only the right risks get through and with the right severity level.	Schools can customise their risk-grading and words to fit the cohort. They can customise by class groups to avoid curriculum captures.	Customisation is not possible and no profiling or Al exists. We only use physical monitoring.		
Reporting and evidence	We can view a full contextual background in a report. We can analyse peer trends and pupil profiles.	Context is given with screenshots as evidence.	Logbooks take much time in making sure nothing is missed. Limited evidence is given. We have no context. The tutor reports incidents to DSL to note down.		
Data storage	We hold data in a guarded off- site setting with robust levels of online protection.	We hold data is in a secure setting with good online protection.	We hold data physically on site and have no extra security.		
Impact					
and impact of your	Our alerts are risk assessed in real-time through AI and human moderation. False positives are removed and DSLs only have to react to real alerts.	Our alerts are listed in risk order. This relies on the DSL checking through alerts. Gives text evidence.	We don't act on alerts quickly enough. Evidence is very limited. Teachers may not see misuse or risks as children are good at concealing screens.		
Suitable for					
Size of institution / staff / student ratio	Our monitoring provision is suitable for clusters of schools looking to have effective granular controls over their monitoring arrangements.	Our monitoring provision is suitable for settings in which schools do not require their own access to evidence trends and are happy with reports created.	Our provision is not suitable for LAs and Multi-Academy Trusts.		
Restrictions					
Any limitations	Not controlled completely within individual schools.	Will take more time in removing false positives and may not give enough evidence for disciplinaries.	We have hundreds of students. We manually check log files or watch over the shoulder of students. We don't always understand the logs.		

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A good monitoring solution will not invade privacy. It will pick up risk concerns that should be identified, as outlined by KCSIE guidelines.



## 2. Assess areas of non or weak compliance to determine level of monitoring support needed

The result of the review will determine your next step. If your schools' predominantly report greens then your need for further action will be low.

If your assessment reveals varying levels of provision you may consider recommending a technology-based monitoring solution to individual schools who need it most.

If your assessment reports predominantly ambers or reds, you may wish to implement school-wide monitoring as a means of raising standards to a more appropriate level and quickly.

#### 3. Define approach to implementation

Each of Smoothwall's monitoring solutions can be deployed within a single school or set up to monitor multiple groups of schools from a central point.

#### **Active monitoring**

Active monitoring systems rely on a dedicated DSL within the school or governing body to monitor alerts raised by the system. If your preference is to monitor multiple schools then settings can be customised to give individual schools access to the customer portal to see their own captures, while an overall monitor within your governing body keeps an eye on all schools.

#### **Human-moderated active monitoring**

If within your schools or governing organisation you have none or limited staff to monitor alerts, you may wish to consider a human moderated option. In this option a third-party team monitors all of your schools and alerts their DSL of risk or incidents. This set-up would help with workload efficiency as it reduces the number of false positives. Some solutions like Smoothwall Monitor Managed Service will even include AI profiling which will build up to the minute profiles on every child.

## 7.0 How to Integrate Active Monitoring into a Busy Safeguarding Strategy

Whether you are looking to procure an active monitoring solution to centrally manage all of your schools or looking to assist each school individually, the following checks will help you find the right one and ensure a smooth implementation.

#### Integrating with your safeguarding processes

- · Will the monitoring solution fit into your schools' processes for identifying students at risk?
- · Will it be easily accessible to the DSL, so that they can determine levels of risk quickly and efficiently without missing major concerns?
- Check the solution's features will effectively risk grade and categorise the type of risk your processes have flagged.
- Does the solution allow your schools to react quickly to concerns? Ask how long it takes for an alert to take place and whether it functions in real-time.
- · Does the solution have the right set-up for supporting multiple schools at once?
- · Does it include online and offline captures for browsers, email, Microsoft documents and chatrooms? Alerts are just as likely to come in a Word document as they are

from the more obvious chat room or email. Not having this level of reach will impact on your schools' ability to spot risks.

Ensure your system monitors multiple languages if needed.

#### Integrating with your safeguarding policies

- · Will the monitoring solution help pick up signs of issues from various contexts whether it be a third-party contacting by email or webchat, or peer to peer digital communication?
- Will it give you a better understanding of risks that may not involve time in school or at home?
- A good monitoring solution will not invade privacy. It will pick up risk concerns that should be identified, as outlined by KCSIE guidelines.
- If you are looking to manage centrally can it provide easy customisation so that your schools can manage risks local to their needs?

- Check that you are aware of how long data will be stored and whether it is kept in a secure setting.
- Ask where support and development for the solution will take place. Check it is within the EU, or if not, with a country deemed to have adequate data protection.
- Check that you are aware of how long your data will be stored and whether it is kept in a secure setting.

#### Integrating with your safeguarding procedures

Once a pupil at risk has been identified check that your monitoring solution supports the procedures that follow.

- Does it provide evidence and detail to share with parents or outside safeguarding bodies?
- Does it give context around a capture to enable understanding of the full picture?
- Is it age appropriate? Check that it allows for different levels and content settings dependent on your year groups and curriculum sets. This will help in prioritising your alerts and avoiding false captures.

#### Integrating with existing safeguarding policies

- Will the monitoring solution help pick up signs of issues from various contexts whether it be a third-party contacting by email or webchat, or peer to peer digital communication?
- Will it give you a better understanding of risks that may not involve time in school or at home?
- A good monitoring solution will not invade privacy. It will pick up risk concerns that should be identified, as outlined by KCSIE guidelines.
- If you are looking to manage centrally can it provide easy customisation so that your schools can manage risks local to their needs?
- Check that you are aware of how long data will be stored and whether it is kept in a secure setting.

## 8.0 Frequently Asked Questions

#### How much should we expect to pay for monitoring?

Active monitoring solutions range in price depending on the number of schools, the quality and range of monitoring, whether it is real-time risk grading, moderated by humans or AI, and other factors. Most good providers, like Smoothwall, will offer a number of different solutions to match your requirements and budget.

#### How are other Local Authorities and Multi-Academy Trusts budgeting for this?

Sources of budget can vary by institution. Warwickshire County Council run a school subscription service for schools to pay for out of their budgets. Multi-Academy Trusts might want to use school budgets from their safeguarding, general, or computer software funds.

Smoothwall have written a document to help prepare a case for funding. You can download at https://smoothwall.

com/how-to-create-a-case-for-funding

#### How can we use active monitoring within the **Data Protection Act 2018 and GDPR?**

Monitoring is not affected by Data Protection Act and GDPR. KCSIE 2018 states:

"The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children."

#### How do we know that a monitoring system will store our college's data securely?

You will need to ensure the safety of your sensitive data. Vendors should be able to show evidence of where your data is stored. At Smoothwall, data privacy is a top priority and data is stored in a secure Microsoft Azure data centre. Smoothwall employees are all DBS checked, even those who don't visit schools.

#### How can we check the impact a monitoring solution might have on our schools' IT systems?

You should check with your vendor that their software is discreet and that you have the necessary capacity required to run it on your schools' networks. All Smoothwall's monitoring solutions have no discernible impact on performance and work silently in the background. A user will not be aware that monitoring is taking place or that a capture has been taken.

#### What's involved in implementing a monitoring solution?

Installation can be different depending on the vendor. Ask if there is a requirement for staff to have specific technical knowledge and if the system is cloud based. At Smoothwall, installation is simple and straight forward with no technical knowledge required. Smoothwall support can guide Local Authorities and Multi-Academy Trusts on the best way to set up a centralised place for their monitoring or create a different approach by signing schools up for human moderated monitoring.

## Our schools already have web filtering, why do they need monitoring as well?

Filtering blocks content to prevent it being seen and accessed by students. It is essential. But it cannot monitor what a child types into their device. Most filtering systems do not send alerts in real-time enabling you to act upon them quickly. Monitoring and filtering work hand in hand to provide you with a robust digital safeguarding capability that helps you keep children safe and meet Ofsted's requirements.

#### Our schools are overstretched as it is. Won't monitoring add more safety concerns to address?

All schools must keep their pupils safe online and should actively look for risks. You will find a choice of solutions that vary in need for resources from your individual schools. If you are managing the service for them, or if you suggest a human-moderated version, you will significantly reduce the need for staff time spent on it in individual schools.

## Will monitoring make unnecessary captures by topics used in the curriculum?

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In some solutions, customisation is available to manage your risk settings so that you can remove key topics for specific classes. However, in doing this you should be careful not to remove content that might need to be there. Every school has different needs which is why a good monitoring system will vary and have flexible settings tailored to the needs of each of your schools.

#### Is monitoring scalable for larger institutions?

Early solutions were beset by scalability issues, putting many people off active monitoring, however Smoothwall are one of a few exceptions. Both Smoothwall Monitor Self-Service and Managed Service can monitor multiple schools simultaneously. They are easily scalable due to their minimum impact on networks, cloud-based portal, their easy installation and their automatic updates.

#### Do you have a question?

Contact our online safety experts. We'll be happy to help.

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Email: enquiries@smoothwall.com

## **Appendices**

### Further reading

You may also wish to download:



#### **Safeguard Monitoring: How to Prepare Your Case for Funding**

A step by step guide for DSLs, Head Teachers, Principals and anyone responsible for ensuring a compliant digital monitoring provision within their School.

Available at: https://smoothwall.com/how-to-create-a-case-for-funding



#### **Benchmarking Your Digital Safeguarding: How to Create an Improvement Strategy for Ofsted**

A practical guide for school/college Headteachers, Principals, DSLs and anyone responsible for digital safeguarding in an education setting.

Available at: https://smoothwall.com/benchmarking-digital-safeguarding-ofsted



#### Web Filtering in Education: Cloud, On-premise or Hybrid?

A complete guide designed to give IT Leaders within multi-academy trusts thorough insight into the many deployment options available to best suit their network needs.

Available at: https://smoothwall.com/web-filtering-deployment-mats

#### About Smoothwall

Smoothwall is the leading digital safeguarding solutions provider in UK Education. 10,000 schools, colleges and academies depend on our filtering and monitoring technologies to keep their students safe and their education organisations compliant.

From our humble beginnings in 2000 we have been dedicated to empowering educational organisations to digitally safeguard the young people in their care. Our solutions are innovative and pioneering and developed from the ground up to meet and exceed the legislative requirements set out by the Department for Education, as outlined in the Prevent duty and Keeping Children Safe in Education.

Digital safeguarding solutions were historically seen as security products to be selected, deployed and managed by a school/college's ICT department. And while the ownership remains generally true, the meteoric rise in the use of the internet as a vital tool for learning has firmly placed digital safeguarding on the agenda of most educational stakeholders.

Web filters today are not tools for blocking content. They are a means of improving learning outcomes by enabling students to freely access rich internet content, protected by granular filtering, controls and alerts to ensure any risks and safeguarding issues are quickly and accurately identified. Schools/colleges favour Smoothwall because of our understanding of this core concept and our pioneering solutions that support it.

Where Smoothwall Filter dynamically analyses content and intelligently blocks harmful content, Smoothwall Monitor is installed onto the school/college's computers where it analyses on-screen content and any keystrokes made.

Words or phrases indicating the user may be at risk of harming or being harmed are captured in a screen shot and sent to the DSL for analysis (or the Smoothwall team if it's a managed service). Behavioural profiling by monitoring words over time provides an added level of vigilance to enable an early stage help intervention.

As digital learning becomes more commonplace in the classroom, so does safeguarding issues such as mental health, cyberbullying, radicalisation, child sexual exploitation and others. The demands placed on the physical eyes and ears of teachers far exceed their ability to identify all but the most obvious risks, and puts the organisation at odds with both student needs and statutory guidelines.

Smoothwall's robust filtering and monitoring provision work in tandem to keep your young people safe and your organisation compliant with the legislation, guidelines and recommendations placed upon it.

#### Our partners

Smoothwall are members of the Internet Watch Foundation (IWF) and implement the Child Abuse Image Content list of domains and URLs. Smoothwall also implements the police assessed list of unlawful terrorist content, produced on behalf of the Home Office.

Smoothwall exclusively partners with National Online Safety to offer customers their award-winning e-safety training for the whole school community. We also partner with EduGeek and regularly consult Headteachers, Teachers, DSLs, IT leaders and a range of supporting bodies across UK Education.

#### Contact us

#### Ask yourself

Are you confident that all of your schools are monitoring effectively, keeping their children safe in real-time, and fulfilling the requirements set out in KCSIE and Ofsted's inspection guidance?

If you don't know, it's time to check. If you're unsure or have a question, contact Smoothwall's Online Safety Experts who will be happy to help.

#### Arrange a free demonstration

To see a free, no-obligation demonstration of Smoothwall Monitor or to ask any questions please contact us.

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