# Risk Assessment Templates for the Use of Web Tools, Technology and Social Media for Education Settings

**Published August 2023**



**Guidance Notes**

These templates are provided to enable leaders working in education settings to explore and address a range of potential risks identified as a result of using online learning or communication tools. These suggestions are not exhaustive and will need to be adapted according to the tools and services being considered and the specific context of the setting. This document may be updated frequently and leaders and encouraged to use the most recent version.

## **Risk assessments**

* Risk assessments should, where possible, be carried out by both technical and educational staff.
* Risk assessments should be reviewed by the Designated Safeguarding Lead (DSL) and Data Protection Officer (DPO) and approved by a member of the setting’s senior leadership team.

## **Points to consider**

* + Settings should ensure that appropriate filters and monitoring systems are in place to protect learners when they are online using setting provided IT systems/devices.
  + If the aim is to engage learners, Settings should, where possible explore official channels and systems first (such as school/setting websites google/Microsoft education packages if already being used) prior to using public domain social media tools.
  + An evaluation of privacy and data security should include an evaluation of the policies for a service (e.g. minimum age) and test procedures for interacting with the service provider, e.g. account deletion.
  + It is important for settings to understand what personal data is collected by services and tools and ensure that it’s use in line with privacy and data protection (including GDPR) requirements. This may include considering how data is used and whether there is an audit trail that tracks back to a real identity.
    - When new software or processing systems are implemented, there needs to be a clear process in place to inform the DPO and ensure it is done compliantly. It may be necessary to carrying out a separate Data Protection Impact Assessment (DPIA) prior to use: Additional guidance and templates are available from the [ICO](https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/) and on [Kelsi](https://www.kelsi.org.uk/school-management/data-and-reporting/access-to-information/the-general-data-protection-regulation-gdpr).
  + Content suitability should be based on an assessment of the impact of introducing a high bandwidth service on to a network and age-related categorisation of advertising, images and textual content found on the site.
  + Settings will need to amend policies to ensure any new use is reflected and that decisions and expectations are clearly communicated to staff, parents/carers and learners as appropriate.

## **Appropriate filtering and monitoring**

Under their responsibilities as outlined in the Prevent Duty, schools and education settings are required [“*to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering*”](https://www.gov.uk/government/publications/prevent-duty-guidance). Furthermore, the Department for Education’s statutory guidance ‘[Keeping Children Safe in Education](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2)’ obliges schools and colleges to “*ensure appropriate filters and appropriate monitoring systems are in place and regularly review their effectiveness” and they “should be doing all that they reasonably can to limit children’s exposure to the above risks from the school’s or college’s IT system*” however, schools and colleges will need to “*be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding*.”

The appropriateness of filters and monitoring systems are a matter for individual settings; decisions about what is appropriate will be informed by the risk assessment required by the Prevent Duty, and will depend on the IT systems in place as well as your specific risk profile, which will depend on the age range/ability of children, the number of children, any children who are potentially at greater risk of harm and how often children and staff access your devices and IT systems. The [UK Safer Internet Centre](http://www.saferinternet.org.uk/appropriate-filtering-and-monitoring) has published guidance as to what “appropriate” filtering and monitoring might look like; DSLs and leadership staff should ensure they are familiar with this guidance and its implications.

To support schools and colleges to meet their requirement, the Department for Education has published [filtering and monitoring standards](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges) which set out that schools and colleges should:

* identify and assign roles and responsibilities to manage filtering and monitoring systems.
* review filtering and monitoring provision at least annually.
* block harmful and inappropriate content without unreasonably impacting teaching and learning.
* have effective monitoring strategies in place that meet their safeguarding needs.

In July 2023, the UK Safer Internet Centre on behalf of the Department for Education carried out a series of webinars regarding schools/colleges filtering and monitoring responsibilities. The recordings of the webinars, along with supporting information, guidance, services and tools (including a checklist) are available on the [SWGfL website](https://swgfl.org.uk/resources/filtering-and-monitoring/). The UK Safer Internet Centre have also published [‘Filtering and monitoring – Questions for governors, proprietors and trustees’](https://saferinternet.org.uk/blog/filtering-and-monitoring-questions-for-governors-proprietors-and-trustees).

Kent schools and settings can contact the Education Safeguarding Service for support and to discuss their risk assessments and/or approaches further.

**Disclaimer**

Kent County Council make every effort to ensure that the information in this document is accurate and up to date. If errors are brought to our attention, we will correct them as soon as practicable.

The copyright of these materials is held by Kent County Council. However, educational settings that work with children and young people are granted permission to use all or part of the materials for not-for-profit use, providing Kent County Council copyright is acknowledged and we are informed of its use.

# Considerations to Explore Prior to Implementing the Use of Technology and Social Media Tools

## **What are the objectives and outcomes for this project?**

* What are your aims and objectives?
  + How will you know they have been achieved?
* Will the project be learner, parent/carer or staff led?
* How will you evaluate success?

## **If using a communication tool:**

* Who is the intended audience?
* Have you surveyed your audience to find out if they will engage?

## **Why use this tool or platform over traditional methods of communication or learning?**

* What is the most suitable technology or tool/service to use for this purpose?
* Are there any other setting provided tools/platforms already available which offer alternative approaches or similar functions? **Note: use of setting owned or managed tools/platforms should be the default approach where possible.**
* How will you ensure fair access for your targeted audience e.g. for those who do not have IT access or do not wish to use social media tools for personal reasons?

## **Are you able to use the tool/platform in this way?**

* Do the terms and conditions or functions allow you to use the tool/service for your required purpose?
* Is there a version of the tool/platform available specifically for the education market? **Note: if an educational version is available and deemed appropriate, this would be the recommended option.**
* If using with learners, is the tool/platform age appropriate?
  + Is there a minimum age requirement?
* Do you have parental consent, as necessary?
* Do you have leadership approval/agreement?

## **Are you aware of privacy issues and restrictions?**

* Has the tool/platform been appropriated evaluated and/or risk assessed to explore and address potential safeguarding and data protection risks?
  + If the tool/platform processes data, has this been discussed with the Data Protection Officer (DPO), and if required, have you undertaken a Data Protection Impact Assessment (DPIA)?
  + Has this discussed with the Designated Safeguarding Lead (DSL)?
* Are there any known issues with the platform, for example security risks or privacy concerns? **Note: It is recommended that you check information from recognised and reputable sources.**
* Have you explored the tool/platform privacy and control settings?
  + Do you know the best option(s) for your needs and requirements?
* Can you restrict access to only your intended audience for all or part of the site? **Note: this is essential if the setting is sharing information it wouldn’t share publicly.**
* Does the tool/platform offer moderation?
  + If so, who will be responsible for moderation on a regular basis?
* Does the tool/platform offer user tracking (if appropriate) to ensure adherence to setting Acceptable Use Policies?
* Do you have appropriate permissions or consent for any images, documents etc. to be shared?
* Have your policies (e.g. acceptable use, social media, image use) been updated to reflect this new use?

## **Can you deliver this idea safely and responsibly?**

* Do you have the resources (people, time etc.) to support this activity safely and securely?
* If applicable, are appropriate filters and monitoring systems in place?
  + Is this documented by the setting?
  + How are users made aware of monitoring approaches?
* Does the setting have clear boundaries and expectations about safe and appropriate online behaviour and have these been communicated to all those involved?
* Have you updated your setting Acceptable Use Policy (AUP) or created a specific AUP to reflect this use?
  + Has this been communicated to all members of the community?
* If appropriate, does the setting have an up-to-date policy regarding the use of social media?
  + Has this been communicated to all members of the community?
* Have members of the community, as appropriate, received up-to-date information and/or training regarding safe and responsible online behaviour?
  + - How is this evidenced?

# Checklist for the Use of Tools, Systems and Technology

**Carried out by:** *(name and role)*

**Date:**

**Reviewed by:**

Member of Technical Staff: (*Name and date*)

Designated Safeguarding Lead: (*Name and date*)

Data Protection Officer: (*Name and date*)

Member of Leadership Staff: (*Name and date*)

**Date to be reviewed (***at least annually is recommended***):**

**Summary of Risk Assessment Decision (amend as appropriate)**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Risk** | **Staff** | **Early Years** | **KS1** | **KS2** | **KS3** | **KS4** | **16+** |
| General |  |  |  |  |  |  |  |
| Privacy and Data Security |  |  |  |  |  |  |  |
| Data Protection |  |  |  |  |  |  |  |
| Content Suitability |  |  |  |  |  |  |  |
| Communication |  |  |  |  |  |  |  |
| Filter site? | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N |

**Key**

|  |  |
| --- | --- |
|  | High risk identified: Unsuitable to use |
|  | Risk Identified: Action is required: Proceed with caution |
|  | Limited risk |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Yes** | **No** | **Further information/discussion** | **Action to be taken** |
| **General Considerations** | | | | |
| Endorsed by recognised authority for education use |  |  |  |  |
| Service has positive reputation for dealing with concerns and risks *(if appropriate)* |  |  |  |  |
| SLT Approval |  |  |  |  |
| Use of site is documented in setting policies and procedures *(if appropriate)* |  |  |  |  |
| Appropriate Acceptable Use Policy in place (generic and/or specific) |  |  |  |  |
| Up-to-date online safety training embedded and in place as appropriate to setting needs? |  |  |  |  |
| Parental consent required and provided *(if appropriate)* |  | If consent is required and not given |  |  |
| Users can be tracked/identified |  |  |  |  |
| Mobile device management software is installed/used *(if appropriate)* |  |  |  |  |
| Use is compliant with GDPR requirements |  |  |  |  |
| **Privacy and Security (for sites/devices that allow learners and/or staff to interact with each other or others)** | | | | |
| Registration of users required |  |  |  |  |
| Anonymous registration possible |  |  |  |  |
| User posts attributed to real, verified identities |  |  |  |  |
| Service can be administrated or managed by staff e.g. staff can verify users |  |  |  |  |
| Minimum age is suitable for the setting  NB check sites terms & conditions and terms of service. |  |  |  |  |
| Privacy tools are available |  |  |  |  |
| **Data Security (Liaise with Data Protection Officer regarding compliance with GDPR)** | | | | |
| Personal Data Collected – Logs Data |  |  |  |  |
| Personal Data Collected – Email Address |  |  |  |  |
| Personal Data Collected – Personal address/phone numbers |  |  |  |  |
| Personal Data Collected – IP Address |  |  |  |  |
| Personal Data Collected – Cookies (Sessional or persistent) |  |  |  |  |
| Personal Data Collected – Data sharing with other services |  |  |  |  |
| **Content Suitability** | | | | |
| High Bandwidth – Internet radio/TV |  |  |  |  |
| High Bandwidth – Internet telephony |  |  |  |  |
| High Bandwidth – File sharing |  |  |  |  |
| High Bandwidth – Personal Storage |  |  |  |  |
| High Bandwidth – Streaming Media |  |  |  |  |
| Adult Material or themes (images, text, videos) *Note: this does not apply to educational material relating to appropriate educational subjects such as sex & relationships education* |  |  |  |  |
| User generated content, for example, photos, videos etc. *Note: Be aware user generated content is unlikely to be moderated so content may therefore be unsuitable* |  |  |  |  |
| Advertising Material  Note: Be aware of COPPA requirements |  |  |  |  |
| Dating/Personal sites |  |  |  |  |
| Weapons |  |  |  |  |
| Promotion of drugs, alcohol, tobacco etc. (not educational sites) |  |  |  |  |
| Promotion of violence, hatred, racism etc. |  |  |  |  |
| Promotion of gambling |  |  |  |  |
| Promotion of extremist organisations |  |  |  |  |
| Promotion of illegal activity |  |  |  |  |
| Promotion of computer misuse |  |  |  |  |
| Other inappropriate content |  |  |  |  |
| **Communication (if appropriate)** | | | | |
| Moderated by DBS checked adult.  If so, how often? |  |  |  |  |
| Staff admin controls |  |  |  |  |
| Age banding/tools provided |  |  |  |  |
| Communication between learners is possible |  |  |  |  |
| Communication between others, outside of the setting is possible |  |  |  |  |
| Learner/Staff communication allowed |  |  |  |  |
| Unverified users present |  |  |  |  |
| **Other** | | | | |
|  |  |  |  |  |

# Consideration Form for the Use of Official Social Network Channels

**Social Network considered: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_**

**Member of Staff: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Role: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**What are the reasons for using Social Networking?**

|  |
| --- |
|  |

**What should you do?** (As appropriate to audience)

|  |  |
| --- | --- |
| Consider alternatives, for example, on private/secure networks (e.g. VLE, school website) | ❑ |
| Discuss intentions with leadership team/line manager | ❑ |
| Survey your intended audience(s) | ❑ |
| Inform parents/carers of the use of the site | ❑ |
| Brief staff to raise awareness about online safety (both personal and the community) | ❑ |
| Brief learners to raise awareness and understanding around information sharing on social media | ❑ |
| Update policies e.g. social media, image consent, etc. | ❑ |
| Agree and display acceptable use policies for use of site (including specific AUPS for admins and users) | ❑ |
| Posters/Instructions are shared to help inform users of the agreed rules | ❑ |

|  |  |  |
| --- | --- | --- |
| **Potential Hazard**  Please note this list is not exhaustive | **Action to be taken to reduce risks** | **Ensure that learners/parents/staff know….**  Please note this list is not exhaustive |
| **Online bullying or harassment of/by**   * Learners * Staff * Parents |  | ...what to do if they feel they are being bullied or see bullying online  …the settings anti-bullying policy and sanctions |
| **Contact by unknown people**   * Some social networks can search for people by age and gender so easy for people to be targeted * Members of the community can be clearly identified by unknown and unverified users |  | … how to refuse contact with unknown people  ...how to use privacy settings effectively e.g. using “friends” list and checking how posts/content can be viewed  ...how to report suspicious contacts |
| **Personal information being made public accidentally or deliberately**   * Many sites share information publicly by default unless you adjust privacy settings * Information made public all around the world instantly * Can add a location which could mean people could identify where you are from * Can enter address or phone details so can be contacted directly. * Admin not being aware of image use and confidentiality requirements |  | ...that once sent information could be seen by anyone  ...they need to adjust their privacy settings to keep aspects of the site private  …the potential risks of adding their location would mean that they could be found by people they do not know  ...the potential risks of listing their personal details  …the settings policies regarding confidentiality, data protection etc. |
| **Privacy and data protection**   * Site may share information with third party suppliers who perform functions, such as advertising * Site may disclose information if required to comply with law, regulation or legal request * In the event social network is taken over information may be sold or transferred but privacy policy to still apply. |  | …that the company may share the data with other companies  ...that even if they delete the information it is still there, and a trace will be left that can still be accessed |
| **Inappropriate photos and tagging**   * Users sharing photos without consent * Other users tagging people in photos |  | ...that any photo or video on the site could be seen by anyone  ...that tagging the photo could lead to identification and therefore contact by people they do not know |
| **Age limits**   * More social networking sites have an age limit of at least 13.   + It will not be appropriate to use these platforms with pupils under the age minimum requirement |  | …they should only use social network if they are old enough  ...how to inform the social network of the age of user if it contravenes rules |
| **Finances**   * Some sites have functionality that requires payment |  | ...the dangers of paid services |
| **Behaviour of community members**   * Site might not mediate content or intervene in disputes between users. * Users are allowed to post content, including potentially inflammatory content, provided that they do not violate the Terms of Service and Rules. * What to do if users have problems is not immediately obvious on the site? |  | ...that they act legally.  ...the AUP makes it clear what users should do if they have a problem and that guidance is available by clicking on help  ...Terms of Service and where to find these and any support they might require from the site.  … their responsibilities and the sanctions that can be imposed if behaviour breaches policies |
| **Other Issues** |  |  |
|  |  |  |

**Decision and Justification**

|  |
| --- |
|  |

**Approved by: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Member of Leadership Team: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (Role)**

**Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

| **Date completed** | **Assessed by (name/role)** | **Checked / Validated by (Name/role)** | **Platform being assessed** | **Target audience** | **Review date** |
| --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |
| **Purpose/Aims:** | Curriculum requirements, justification, aims and objectives | | | | |
| **Other details:** | e.g.   * Required for/by specific subjects or syllabus. * Who requires access e.g. staff only, learner access (all learners, or small groups)? * Time limits (e.g. one-off lesson, term/scheme of work).   If appropriate, classroom management approaches (e.g. supervision and education of users) | | | | |

# Risk Assessment for the Use of Tools, Systems and Technology - Template One

| **What are the hazards?** | **Who might be harmed and how?** | **What are you already doing to control the risks?** | **What further action do you need to take to control the risks?** | **Who needs to carry out the action?** | **When is the action needed by?** | **Date Completed** |
| --- | --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

| **Date:** | **Assessed by:** | **Checked / Validated\* by: (SLT)** | **Tool/System/Technology:** | **Audience:** | **Review date:** |
| --- | --- | --- | --- | --- | --- |
| **Purpose/Aims:** | | | | | |
| **Outcomes:** | | | | | |

# Risk Assessment for the Use of Tools, Systems and Technology – Template Two

| **Hazard** | **Considerations** | **Specific risks identified** | **Who might be harmed and how** | **Risk rating** | **Existing measures to control risk** | **Result and action to be taken** |
| --- | --- | --- | --- | --- | --- | --- |
| **Privacy and Terms** | | | | | | |
| Privacy Policy |  |  |  |  |  |  |
| Data Protection Requirements  *For example, management and storage of personal data* |  |  |  |  |  |  |
| Age Restrictions (if aimed at learners) |  |  |  |  |  |  |
| Parental consent (if appropriate) |  |  |  |  |  |  |
| Content ownership |  |  |  |  |  |  |
| Terms of Use, *for example, is it okay to use as a setting* |  |  |  |  |  |  |
| **Site Functionality** | | | | | | |
| Membership or access verification *For example are there unverified users* |  |  |  |  |  |  |
| Privacy settings *For example restricting access, securing accounts running the channel/platform* |  |  |  |  |  |  |
| Privacy settings of users |  |  |  |  |  |  |
| Messenger tools/functions |  |  |  |  |  |  |
| Collaborative tools |  |  |  |  |  |  |
| **Content Management and Suitability** | | | | | | |
| File uploads |  |  |  |  |  |  |
| Search options |  |  |  |  |  |  |
| Advertisements |  |  |  |  |  |  |
| Inappropriate content |  |  |  |  |  |  |
| Illegal content |  |  |  |  |  |  |
| Moderation of site/content |  |  |  |  |  |  |
| **Safety and support** | | | | | | |
| Functions for reporting abuse or content |  |  |  |  |  |  |
| Deleting and controlling of accounts |  |  |  |  |  |  |
| Confidentiality |  |  |  |  |  |  |
| Online bullying or harassment |  |  |  |  |  |  |
| Reputational risk/damage |  |  |  |  |  |  |
| Up-to-date setting policies  *For example, acceptable use of technology* |  |  |  |  |  |  |
| Up-to-date training for those involved |  |  |  |  |  |  |
| **Other** | | | | | | |
| *For example are there any known security or privacy risks* |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

**Action Plan**

|  |  |  |  |
| --- | --- | --- | --- |
| **Risk Identified** | **Action Taken** | **Action by** | **Date** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |