



## **E-Safety Policy – September 2023**

E-Safety encompasses Internet technologies and electronic communications such as mobile phones and wireless technology. It highlights the need to educate children and young people about the benefits and risks of using new technology and provides safeguards and awareness for users to enable them to control their online experiences.

The following E-Safety Policy has been written by NovaCity. It has been agreed and approved by the board of directors.

The E-Safety Policy will be reviewed at least once annually.

This policy is for devices owned by NovaCity and specific internet access through NovaCity routers for educational programmes and company management.

NOVACITY RESPECTS AND STANDS FIRMLY BEHIND THE RIGHT TO PRIVACY, AND A FREE INTERNET ON PERSONAL DEVICES.

### **Why is Internet Use Important?**

The purpose of Internet use within NovaCity is to raise educational standards, promote achievement, support the professional work of staff, and enhance the management of information and administration systems. Internet use is an essential element in 21st-century life for education, business, and social interaction. Access to the Internet is therefore an entitlement for participants who show a responsible and mature approach to its use.

- ENTITLEMENT, IN THIS CASE, DOES NOT MEAN SUPPLIED BY NOVACITY LTD. OUR SITES DO NOT OFFER FREE PUBLIC WIFI. ACCESS TO THE INTERNET THROUGH NOVACITY LTD IS RESTRICTED TO COMPANY-OWNED DEVICES AND STAFF MEMBERS
- Access to the internet via personal devices (3G/4G/5G/Personal hotspot) is not controlled, and will never be controlled by NovaCity Ltd. There are safeguards to protect young people. Please see the policy points below.

Use of the internet outside of NovaCity is a matter of everyday life for young people. NovaCity is not responsible for this. NovaCity Ltd will aim to contribute to a safe internet experience for young people by giving guidance where possible and having systems in place so that if an issue concerning the safety of young people is concerned, we can act accordingly in line with policy and procedure.

## THE STEPS WE HAVE TAKEN

### Authorised Internet Access

- Wi-Fi and internet access are strictly controlled within NovaCity Premises and not publicly available apart from designated, supervised machines.

### World Wide Web

- If any user discovers unsuitable sites, the URL (address), time, and content are reported to the Local Authority via the centre manager.
- NovaCity ensures that the use of Internet-derived materials by users complies with copyright law.
- Users are informed to be critically aware of the materials they are shown and how to validate information before accepting its accuracy.

### Staff Internet Usage

- Whilst using NovaCity's internet on privately owned computers, staff are expected to be responsible in its usage
- Staff are encouraged to be responsible whilst using social media, email, and the internet via their own devices.
- Staff appliances are not to be given to users of the centre under any circumstances.
- Using the internet as an aid to business is quite apparent. The use of social media tools as advertising methods is not to be overlooked as a valuable resource. Restricting access to video sites (YouTube), social media (Facebook/Instagram) and email is to restrict the functionality of the business. It is therefore reasonably acceptable under general circumstances for this activity to occur in private, locked offices and on personal appliances such as smartphones and laptops when off duty, or as part of the social media team's role.

### User Internet Usage

- Access to Wi-Fi as a method to connect to the internet is prohibited for the public.
- Access is to be given only to Nova Arts students to enable the completion and submission of work. (Barnsley site)
- Access is given to Alternative Provision Students through company-owned laptops only. (Rotherham Site)
- Appropriate filters are in place. These include:
- Parental locks on the devices to restrict access to harmful material (Rotherham Alternative Provision)
- Advanced DNS Wi-Fi programme installed to create a safe and restricted internet that can be controlled by NovaCity Ltd - <https://www.safedns.com/>
- Usage of the Internet is supervised by staff.
- Users are advised about internet safety and security.

### Mobile Phones

- Mobile phones are allowed in the building and are encouraged to be used unless it is at the detriment of the activities taking place.
- Young people should be encouraged but educated on safely sharing their experiences with family and friends whilst using the centre.
- When cameras are used by staff to take pictures of classes they are stored securely and or deleted when there is no use for them. (Removed from personal devices immediately after uploading to password-protected folders). This is made clear on the waiver form that all

users must sign before entry to the building. If photos or videos cannot be taken of a young person this needs to be brought to the attention of the training team.

#### Published Content Company Website

- The contact details on the Website will be the e-mail and telephone number.
- Staff or participant personal information will not be published under any circumstances.
- Images used for promotion are to be cleared with parents or guardians if featuring any young person under the age of 18.
- At the request of a Parent or Guardian, any image shall be removed from company social media and the company website.

#### Publishing User Images and Work

- Images that include users will be selected with direct permission from a parent or guardian.
- The act of sharing user content on company media accounts will be allowed after vetting the media for inappropriate content. Such media should be used to inspire others to share and interact positively with the content.

#### Information System Security

- NovaCity ICT systems capacity and security will be reviewed regularly.
- Virus protection will be installed and updated regularly.

#### Protecting Personal Data

- Personal data will be recorded, processed, transferred, and made available according to the Data Protection Act 1998.
- The use of the NovaCity App, which records user details is protected through GDPR regulations of *ABC Fitness Solutions, LLC. Trading as Glofox*. Members are fully in control of their data on the app and can request data at any time.
- The company website warns that cookies are collected to enhance the use of the website. Users can agree or disagree with the collection.
- Subscribers can request to be unsubscribed at any time. Only email addresses are kept for this purpose. The email address is then removed from our subscriber list.

#### Assessing Risks

- NovaCity will take all reasonable precautions to prevent access to harmful material. However, due to the international scale and linked Internet content, it is not possible to guarantee that unsuitable material will never appear at a NovaCity venue.
- The internet is accessible to everyone with a smartphone and an internet connection separate from NovaCity internet. We will, however, as far as reasonably possible, ensure that all entrants to the building use any personal device sensibly, safely and appropriately.
- NovaCity reserves the right to remove any person not following NovaCity established rules, including internet usage at our premises.
- NovaCity cannot accept liability for the material accessed, or any consequences of Internet access through a third party, using their own internet connection.
- NovaCity will audit ICT use to establish if the e-safety policy is adequate and that the implementation of the e-safety policy is appropriate.

#### Handling e-safety Complaints

- Complaints of Internet misuse are dealt with by a senior member of staff present, then referred to the Directors.
- Any complaint about staff misuse must be referred to the Manager on site, then referred to the Directors.

- Complaints of a child protection nature must be dealt with in accordance with NovaCity child protection and safeguarding procedures. Any staff made aware of a Child protection or safeguarding issue must refer to the Designated Safeguarding lead.
- Users will be informed of the complaint's procedure.
- The complaints form is present on the company website.

#### Communication of Policy

##### Users

- Rules for Internet access will be posted in all networked rooms.
- Users will be informed that Internet use will be monitored.

##### Staff

- All staff will be given the NovaCity e-Safety Policy and its importance explained.
- Staff will be made aware that Internet traffic can be monitored and traced to the individual user. Discretion and professional conduct are essential.

E-Safety Incident Log/Report form

|                            |  |
|----------------------------|--|
| DATE OF INCIDENT           |  |
| Member of staff reporting  |  |
| URL/web address            |  |
| Evidence collected         |  |
| Location (room)            |  |
| Device identity            |  |
| Details                    |  |
| <u>Referred to</u>         |  |
| <u>Other actions taken</u> |  |