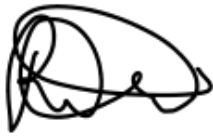




Multi Trades Training

Safe & Acceptable Use of IT Policy

Review date: July 2023

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| Approved by | Rob Jones | Position | Director |
|  | | Date | 12 th May 2022 |

Safe use of Information Technology (IT), Electronic-Safety (E-Safety), and social media

1. Statement of Intent

This policy outlines the general roles, responsibilities, and requirements Multi Trades Training Ltd (MTT) expects from members of staff, associates, contractors and learners in relation to their online activity and use of technologies during their day-to-day activities. This applies to all locations associated with MTT programme delivery within the workplace, in locations of online lessons and activity, or whilst representing the organisation.

This policy is in addition to our Safeguarding and Prevent Policy.

2. Scope

The policy applies to all members of MTT i.e., employed, and contracted staff, learners, or apprentices who have access to our information, communication technology (ICT) systems, both on site and off. MTT aims to educate all members about e-safety, i.e., using the internet safely, issues and appropriate behaviours so that they can remain safe and legal online.

We understand that the use of technology has become a prominent feature in many safeguarding issues. Child sexual exploitation, grooming, radicalisation, and many more, are often able to become established online, and subsequently inflict harm to others, through technology.

It is our obligation, in line with 'Keeping Children Safe in Education' and as a responsible education provider to educate our network in their use of technology and to establish ways to identify, intervene and escalate incidents where appropriate.

3. Terms

To provide protection for all learners or apprentices who meet MTT and make use of technology such as mobile phones, tablets and/or computers.

To provide staff, learners and anyone associated with the delivery of training through MTT with guidance on the procedures they must follow if they suspect a learner may be in breach of policy or the victim of a breach.

4. Introduction:

E-safety is defined as;

'Being safe from risks to personal safety and wellbeing when using all fixed and mobile devices that allow access to the internet, as well as those that are used to communicate electronically'.

This includes personal computers (PC's), laptops, tablets, mobile phones and gaming consoles such as Xbox, PlayStation, Wii and smart TV's.

Safeguarding against these risks is everyone's responsibility and needs to be considered as part of the overall arrangements in place that safeguard and promote the welfare of all members of MTT, learners, staff, and stakeholders, particularly those that are considered vulnerable.

Cyber-bullying by learners and apprentices will be treated as seriously as any other type of bullying and will be managed through our Anti-bullying and Harassment (Safeguarding) policies & procedures.

5. Understanding the risks of using the Internet and associated devices:

The internet is an essential element in 21st century life and ICT knowledge, now seen as an important life-skill, is vital to access life-long learning and employment. It is also important to recognise that the internet provides many benefits, not just to young people and vulnerable adults, but also to the professional work of staff.

It is important that there is a balance between controlling access to the internet and technology and allowing freedom to explore and use these tools to their full potential. While acknowledging the benefits, it is also important to recognise that the risk to safety and well-being of users is everchanging as technologies develop.

E-safety covers the Internet, but it also covers mobile phones and other electronic communications technologies that provide access to the internet. Unfortunately, there are people who will use these technologies to project harm to others, including young or vulnerable people. The harm might range from sending hurtful or abusive texts and emails, to enticing children and young people to engage in sexually orientated conversations or actions online, encouraging webcam filming, collecting explicit photography or trying to arrange face-to-face meetings with underage children.

There is a "duty of care" for anyone working with children under the age of 18 and young people. Educating all members of MTT's staff, learners, apprentices and stakeholders on the risks and responsibilities and E-safety falls under this duty.

This policy aims to be an aid in regulating inappropriate ICT activity in MTT and providing a clear understanding of appropriate ICT use that members of MTT can use as a reference for their conduct online outside of MTT hours. E-safety is a company-wide issue and responsibility.

E-Safety can be summarised into three key areas:

Content

Unwanted exposure to illegal, inappropriate or harmful material: This can include, but is not limited to,

- Online pornography images, videos and films.
- Websites that promote pro-violence and hate whether political or not providing images or videos, making a viewer question their values, promoting bias, racism or extremism.
- Misleading information or advice.
- Websites that promote substance abuse, websites that are pro anorexia, self-harm, or suicide
- Commercials like adverts that lead to, spam, sponsorship, placing trackers to collect personal information

Contact

Being subjected to harmful online interaction with others. This includes but is not limited to;

- Grooming, feeling confident to meet strangers unaware or aware of their sexual intentions.
- Cyber-bullying, unwelcome persuasions, being bullied, harassed or stalked aggressively which could lead to self-harm, anxiety and depression .
- Giving trust that can allow identity theft through harvesting personal information and sharing of passwords.

Conduct

Personal online behaviour that increases the likelihood of, or causes, harm. This covers the disclosure of personal information, health and wellbeing and sexting.

- Commercial - illegal downloading, hacking, gambling, financial scams,
- Aggressive - bullying or harassing another
- Sexual - creating and uploading inappropriate material, including sexting
- Values - providing misleading information or advice on terrorism

Much of the material on the internet is published for an adult audience and some is unsuitable for young people. In addition, there is information on weapons, crime, racism and extremism that would be considered inappropriate and restricted elsewhere. It is also known that adults who wish to abuse others may pose as a child, young person, or peer to engage with them and then attempt to meet up with them. This process is known as "grooming" and may take place over a period of months using chat rooms, social networking sites, tablets and mobile phones.

Cyberbullying:

Cyberbullying is bullying through the use of communication technology and can take many forms e.g. sending threatening or abusive text messages, e-mails or through messaging within social media websites. This bullying can be either personally or anonymously directed at individuals, making insulting comments about someone on a social networking site or blog or making/sharing derogatory or embarrassing videos of someone via mobile phone or email.

Sexting:

This involves users sending sexually explicit texts in the form of images or video to other young people or adults. These images are often then distributed further without permission, which poses a significant safeguarding risk and places them at risk of further harm.

6. General Principles

MTT recognises that staff and learners and apprentices have lives outside and can and will make decisions about their own use of social networking sites. To inform these decisions, and for the protection of both staff and learners and apprentices, this policy is designed to be clear and explicit about appropriate behaviour in the use of social media and electronic communication and MTT's responsibility to its staff and learners and apprentices to promote E-safety.

Staff and employer obligations:

- Staff should be aware of this policy, as well as the safeguarding policy
- Staff should not "friend" learners on social media platforms, nor should they communicate with those learners outside the realms of their working duty
- Staff should seek the advice of the designated safeguarding lead if they have any concerns about the use of the internet or technology
- Staff should follow the safeguarding reporting process if they have concerns that a learner is at risk of harm (immediate, imminent or future) and follow the Prevent reporting process if they suspect a learner is at risk of radicalisation or extremism (definitions of which can be found in the safeguarding policy document)

Learner and Apprentice obligations:

- Learners and apprentices should be aware of this policy and agree to its terms for acceptable use.
- Learners and apprentices should behave online in a manner that is consistent with the following guidelines:
 - Learners and apprentices are responsible for their behaviour when using or interacting with technology at MTT i.e., the internet, social media, mobile-phones, including the content they access and the way they conduct themselves.
 - Learners and apprentices will not create or access material that could be considered illegal or offensive. If this happens accidentally, they will report this to a member of MTT staff.
 - Learners and apprentices will not distribute material to other persons via technology that could be considered threatening, offensive, bullying, or illegal.
 - Learners and apprentices should not give out their own personal information online, or that of anyone else.
 - Learners and apprentices should avoid using their mobile phone during learning and working activities unless for the use of collecting evidence to upload to Quads Direct or to access the platform.

MTT take the view that information posted on website and social media domains should be considered as published, permanent and potentially public - even if it is "protected" in some way. For example, something personal by nature for an individual who doesn't want people to know about it does not make it private if it has been published to Facebook. Social networks can provide simple ways of sharing information and seemingly innocent information, photographs, videos, opinions or comments are vulnerable to misrepresentation and unauthorised distribution via the internet.

Do...

- Assume everything online is permanent and effectively public and can be seen by everyone.
- Consider who might see anything you post and if there is someone who you wouldn't want see it.
- Write appropriately for your expected audience.
- Make all staff and learner online interactions are meaningful and professional.
- Consider your safety and reputation before posting online.
- Take responsibility for what you post or distribute online.
- Use the internet positively for communication, collaboration, and learning.
- Use and maintain privacy settings to protect your personal information but do not rely on them.

Do not...

- Post anything which might damage your own reputation or that of MTT.
- Redistribute any material which may harm others in any way.
- Use the internet to form, or attempt to form, any relationship which would be otherwise inappropriate.
- Create an online environment which invites others to post harmful content.
- Post without thinking or if under the influence of drink or drugs.
- Post without considering the safeguarding risks to yourself and others.

Education

All learners and apprentices will receive education regarding the use and potential dangers of social media will be advised of how to use the internet and social media safely through review tutorials.

MTT staff are encouraged to use the resource to update their understanding and ensure they are using best practice. Staff development will be arranged to ensure staff use social media in a professional way.

7. Code of Practice

Staff Conduct

Staff are reminded that their professional responsibilities within MTT require them to act professionally in their social networking and internet activities, and to create a clear distinction between their social and their professional lives.

Contact with learners and apprentices must remain within the boundaries of their professional lives. The guiding principle here is “think before you post” Where staff make use of web-publishing and social networks for professional purposes they are expected to:

- Behave professionally and with integrity
- Adhere to MTT policy guidelines
- Respect their audience
- Promote productive conversations
- Protect and enhance the value of MTT's reputation
- Protect confidential and business sensitive information
- Be personable, add value and encourage responses
- Be proactive in correcting any errors made

Employed and contracted MTT staff must not post comments or any other information on any public forum, website, social networking site or blog:

- that are unsubstantiated and/or negative about MTT, their colleagues, our learners, parents, or employers
- that do not meet MTT's Equality and Diversity, Code of Conduct and Safeguarding Policies
- that recommend or appear to endorse law breaking of any kind
- that give an account of any inappropriate behaviour

The same principles apply to all messaging and emails sent in an official or professional capacity.

Communications between staff and current or prospective learners and apprentices should only take place for legitimate, professional reasons. In some cases, there may be a non-professional reason for a relationship to exist beyond MTT, e.g., common academic interest or common membership of a club, society or team, family members. In such circumstances social communication may occur. Staff should, however, be aware of the risks involved and use their professional judgment to ensure that this communication is limited appropriately.

A member of staff inviting a current or prospective learner to join a network without any professional purpose or inviting them to "follow" a purely personal profile will be regarded as inappropriate. Accepting any invitation to "friend", follow or become part of a current or prospective learner's personal network is also considered inappropriate. The risks in this situation are clear and

there can be no justification. Where such a situation arises MTT reserves the right to demand an explanation for this action and act accordingly and commence with the disciplinary process.

We recognise staff may wish to take part in online communities also used by learners and apprentices. In such cases staff should ensure that personal information is secured. Any staff member contributing under a personal profile is obliged to ensure that minimal personal information is visible under that profile.

Official usage

As a general principle, staff should use their MTT contact details or a "professional" profile for communication with current and prospective learners and apprentices and ensure that any communication is both professional and necessary.

- Email contact with learners and apprentices, parents and other stakeholders should be channelled through MTT's email system.
- Staff should pay particular attention when replying to emails forwarded to a personal account as these will appear to the recipient as having been sent from the personal account.
- MTT will continue to develop the use of social media for marketing, communications and curriculum purposes.
- Authorised MTT networks such as Facebook, Instagram, YouTube and LinkedIn which exist for a clear professional purpose should be discussed with the Operations Director who will offer advice and guidance on what is acceptable.
- Staff creating or participating in authorised networks should do so either anonymously, where this is possible, or under a professional profile.
- A professional profile is where a member of staff maintains an online presence explicitly for professional purposes. This profile should minimise any information which could be used to compromise the individual and should not be used to record social activity or personal opinion but may be used to record professional information or opinion.

It is important that a professional profile is not added to non-professional networks or linked to the profiles of others except where the connection is professional. This might legitimately include links to learner groups but would be unlikely to include groups of friends or family.

Monitoring

Under certain circumstances MTT may need to monitor staff and learner or apprentice email communication and use of the internet when using MTT equipment, undertaking MTT business or related activities.

Staff, learners and apprentices should be aware that any such use is governed by the MTT Data Protection Policy and this Safe & Acceptable Use of IT Policy.

It is recommended that staff monitor their own online presence, in particular, any material posted by others about them.

If staff become aware of, or are concerned about, any critical or unprofessional comments that are posted by colleagues they should draw these initially to the attention of the directors in order that an official response may be posted if appropriate.

Staff should be reminded that the use of social media during their working hours should be limited to their planned rest periods and all staff should employ common sense around acceptable use.

Leaners and apprentices should also be encouraged to follow the same 'best practice' and in general, personal use is discouraged particularly where an alert service or other desktop 'widget' may interrupt workflow. Professional use should be transparent and any request to view interactions respected.

It is acknowledged that existing and new staff members may already have a significant online presence with membership of complex social-networks. It is the responsibility of staff to consider their existing and ongoing online activity in line with this code of practice. We anticipate that restrictions within this policy may mean that existing members of staff need to change their current practice and recognise that this will take time. For existing staff, it is expected that these adjustments will be concluded within 6 months of the publication of this policy.

Fan Sites: Where staff or leaners and apprentices are the subject of groups, pages, sites or "posts" over which they have no control, MTT commits to taking whatever reasonable steps it can to safeguard individuals and to help protect individual reputations along with the reputation of MTT.

8. Conduct for leaners and apprentices

As members of the MTT community, leaners and apprentices must abide by the terms of the Learner Code of Conduct covered at enrolment, respecting the rights of fellow leaners and apprentices and staff, as well as the reputation of MTT. They should think carefully about how they express themselves, and bear in mind the need to safeguard themselves. Material posted on the internet can be hard to delete and should, therefore, be considered permanent.

Leaners and apprentices must not post comments on a social networking site or blog, or send text messages:

- that could be viewed as bullying or harassing another member of MTT community
- that are counter to MTT's Equality and Diversity policy or the Learner Code of Conduct
- that explicitly encourages other members of MTT community to break the law
- that are likely to bring MTT into disrepute
- leaners and apprentices should not post photos that they might not wish others to see.

Leaners and apprentices should not invite staff to join social networks or follow purely personal profiles.

Leaners and apprentices will be given guidance on appropriate use of the internet and e-safety through tutorial.

If a learner has cause for concern regarding use of the internet or social networking, they must report the incident immediately to a member of staff. There may be occasions where this will be treated as a safeguarding issue.

9. Associated policies:

This policy must be read in conjunction with the associated policies below:

- Safeguarding Policy
- Data Protection Policy (GDPR)
- MTT Code of Conduct
- Equality & Diversity Policy
- Staff Disciplinary Policy & Procedures
- Leaners and apprentices Code of Conduct

Any breach of any aspect of this social media policy by staff or learners and apprentices may result in action being considered under the appropriate disciplinary policy as considered necessary after appropriate investigation. Please see MTT disciplinary policy for more details.

10. Notes & Definitions

Open communication takes place in a public forum which can be viewed by unknown internet users i.e., the general public

Closed communication is where the participants are all known to each other. Most closed communication will be between two individuals (e.g. email exchange) but would also include "friends only" groups or sites with registered members etc.

Public information is that which can be accessed anonymously by internet users who are unknown to the originator.

Private information is that which is only available to a limited, known sub-set of internet users or solely by the owner of the information themselves.

The originator of online content is the individual who first uploads or creates the content using online tools.

Distribution – posting, uploading, adding, or forwarding digital content via electronic, web-based systems (including email) constitutes distribution of that content. A choice to publicly distribute private information is the responsibility of the distributor NOT the originator or the maintainer of the system used to distribute. It is the responsibility of content originators to understand the system they are using and, where control cannot be guaranteed, to amend use of the system accordingly.

Adding content to online systems, other than those designed solely for storage purposes, will be seen as distribution of that content.

Content which is "personal" in nature but made available to a public audience either deliberately or by carelessness will be considered the responsibility of the originator/ distributor of the content (e.g. the photographer NOT the subject of the photograph)

Whilst an initial interaction may be "private", the content of any e-communication with a learner or parent must be considered permanent and de-facto public because there can be no guarantee sought or given that the learner/parent will not redistribute content publicly.

If private information is re-distributed without the consent of the originator this is the responsibility of the distributor. However, where such information is inappropriate it may be necessary for the originator to defend the initial process of distribution which placed it in a vulnerable position.

11. Equality and Diversity

As with all MTT Policies and Procedures due care has been taken to ensure that this policy is appropriate to all employees regardless of gender, race, ethnicity, disability, sexual orientation, marital status, gender identity, religion or age.

The policy will be applied fairly and consistently whilst upholding MTT's commitment to providing equality to all.

If any staff member, whether employed or contracted, feels that this or any other policy does not meet this aim, please contact MTT Quality Assurance Manager by email or the Directors.

12. Contact

| Name | Position | Email | Mobile |
|---------------|-----------------------|--|---------------|
| Rob Jones | Director | rob.jones@mttraining.co.uk | 07733 171 338 |
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Policy responsibility and review

This policy and its procedures will be reviewed annually and revised if necessary, in response to changes in practice, customer and stakeholder feedback, changes in practice or legislation, to ensure it continues to meet our needs and those of our Qualification Regulators i.e., Awarding Organisations (NOCN Cskills Awards) , ESFA (Education & Skills Funding Agency) and external agencies and stakeholders.