

Dixons digital position November 2023

Dixons Marchbank Academy

- Out trust's filtering is operational and applies in academies (and at home or when tethered for devices with the Sophos AV agent installed).
- IT are installing the Sophos AV agent on all trust devices for home use.
- Dixons filtering and monitoring meets the IWF (internet watch foundation for children) expectations and we don't 'block all'; we use (through Sophos firewall / device Sophos AV agent) the IWF list for blocking (protecting for CSAM / CTIRU). If a school makes a request to allow / block, this is agreed at a senior level.
- Our filtering system identifies the device name or ID, IP address, and where possible, the individual on all trust windows based devices linked to on site wifi or wired connection and any device with the Sophos AV agent installed.
- The filtering system filters all internet feeds, including any backup connections.
- At DMB, our filtering system is blanket across all age ranges and abilities.
- On site, through our firewall, we enforce SafeSearch for all searches; the firewall remains effective even if keyboards are altered to another language.
- Our system is able to identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them.
- Our trust meets the Broadband Internet Standards.
- Through Smartlog (National Cyber Security Centre (NCSC) accredited training):
 - all staff who can access the IT Network have Basic Cybersecurity Awareness Training annually; and that at least one governor has accessed this training
 - all staff who use the school's IT Network have had annual Basic Cyber Security Training
 - at least one governor has attended a Basic Cyber Security training session
- Our procurement / risk / review / checks are all managed centrally by our trust IT team.
- The IT service provider (our internal trust IT department) has technical responsibility for maintaining filtering and monitoring systems, providing filtering and monitoring reports and completing actions following concerns or checks to systems.
- We are able to produce filtering and monitoring reports for DMA, the Impero alerts are shared directly to the DSL – at DMA, reports are instantly delivered to the DSL once an alert has been triggered.
- At DMA, the DSL has set up a link to outlook in order to receive immediate alerts. The DSL then follows safeguarding protocol.
- Named SLT member responsible for monitoring and filtering is the Principal.
- Named Governor responsible for monitoring and filtering is our Trustee Robert Keniwell.
- Work is underway to produce RACI documentation within our trust IT team that identifies and assigns the roles and responsibilities of staff and third parties, for example, external service providers. Exemplar RACIs can be shared.
- The DSL understands the new lead responsibility for safeguarding and online safety, overseeing: filtering and monitoring, safeguarding concerns and checks to filtering and monitoring systems (this is transitioning from the central trust IT team to now sit at TAAc where it will be regularly agenda'ed).
- Plans are in place for the Trust Board to review the filtering and monitoring provision annually to identify: current provision, gaps and the specific needs of pupils / staff. This will inform our scheme of delegation and our risk register as appropriate. It is agenda'ed across the year.
- Online safety reviews are planned to be conducted and documented by SLT, DSL, IT and the governor.
- We will record these online safety reviews and make them available to those entitled to inspect that information.
- These reviews will inform: related safeguarding or technology policies and procedures; roles and responsibilities; training of staff; curriculum and learning opportunities; procurement decisions; how often and what is checked; monitoring strategies.
- The changes to the digital standards are presenting a national challenge particularly around mobile and app content and we are consulting sector partners to navigate this. However, a significant strength is our policy at DMA that no children use or access mobiles. And mobile applications used in school are only permitted from a curated list.



Appendix: DfE Meeting digital and technology standards in schools and colleges

From: Department for Education

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<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges> Filtering and monitoring standards for schools and colleges

You should identify and assign roles and responsibilities to manage your filtering and monitoring systems.

The importance of meeting the standard

Schools and colleges should provide a safe environment to learn and work, including when online. Filtering and monitoring are both important parts of safeguarding pupils and staff from potentially harmful and inappropriate online material.

Clear roles, responsibilities and strategies are vital for delivering and maintaining effective filtering and monitoring systems. It's important that the right people are working together and using their professional expertise to make informed decisions.

How to meet the standard

Governing bodies and proprietors have overall strategic responsibility for filtering and monitoring and need assurance that the standards are being met.

To do this, they should identify and assign:

- a member of the senior leadership team and a governor, to be responsible for ensuring these standards are met
- the roles and responsibilities of staff and third parties, for example, external service providers

We are aware that there may not be full-time staff for each of these roles and responsibility may lie as part of a wider role within the school, college, or trust. However, it must be clear who is responsible and it must be possible to make prompt changes to your provision.

Technical requirements to meet the standard

The senior leadership team are responsible for:

- procuring filtering and monitoring systems
- documenting decisions on what is blocked or allowed and why
- reviewing the effectiveness of your provision
- overseeing reports

They are also responsible for making sure that all staff:

- understand their role
- are appropriately trained
- follow policies, processes and procedures
- act on reports and concerns

Senior leaders should work closely with governors or proprietors, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring. Your IT service provider may be a staff technician or an external service provider.

Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The DSL should work closely together with IT service providers to meet the needs of your setting. You may need to ask filtering or monitoring providers for system specific training and support.

The DSL should take lead responsibility for safeguarding and online safety, which could include overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems

The IT service provider should have technical responsibility for:

- maintaining filtering and monitoring systems
- providing filtering and monitoring reports

- completing actions following concerns or checks to systems

The IT service provider should work with the senior leadership team and DSL to:

- procure systems
- identify risk
- carry out reviews
- carry out checks

When to meet the standard

You should already be meeting this standard.

You should review your filtering and monitoring provision at least annually

The importance of meeting the standard

For filtering and monitoring to be effective it should meet the needs of your pupils and staff, and reflect your specific use of technology while minimising potential harms.

To understand and evaluate the changing needs and potential risks of your school or college, you should review your filtering and monitoring provision, at least annually.

Additional checks to filtering and monitoring need to be informed by the review process so that governing bodies and proprietors have assurance that systems are working effectively and meeting safeguarding obligations.

How to meet the standard

Governing bodies and proprietors have overall strategic responsibility for meeting this standard. They should make sure that filtering and monitoring provision is reviewed, which can be part of a wider online safety review, at least annually.

The review should be conducted by members of the senior leadership team, the designated safeguarding lead (DSL), and the IT service provider and involve the responsible governor. The results of the online safety review should be recorded for reference and made available to those entitled to inspect that information.

Your IT service provider may be a staff technician or an external service provider.

Technical requirements to meet the standard

A review of filtering and monitoring should be carried out to identify your current provision, any gaps, and the specific needs of your pupils and staff.

You need to understand:

- the risk profile of your pupils, including their age range, pupils with special educational needs and disability (SEND), pupils with English as an additional language (EAL)
- what your filtering system currently blocks or allows and why
- any outside safeguarding influences, such as county lines
- any relevant safeguarding reports
- the digital resilience of your pupils
- teaching requirements, for example, your RHSE and PSHE curriculum
- the specific use of your chosen technologies, including Bring Your Own Device (BYOD)
- what related safeguarding or technology policies you have in place
- what checks are currently taking place and how resulting actions are handled

To make your filtering and monitoring provision effective, your review should inform:

- related safeguarding or technology policies and procedures
- roles and responsibilities
- training of staff
- curriculum and learning opportunities
- procurement decisions
- how often and what is checked
- monitoring strategies

The review should be done as a minimum annually, or when:

- a safeguarding risk is identified
- there is a change in working practice, like remote access or BYOD

- new technology is introduced

There are templates and advice in the reviewing online safety section of [Keeping children safe in education](#).

Checks to your filtering provision need to be completed and recorded as part of your filtering and monitoring review process.

How often the checks take place should be based on your context, the risks highlighted in your filtering and monitoring review, and any other risk assessments. Checks should be undertaken from both a safeguarding and IT perspective.

When checking filtering and monitoring systems you should make sure that the system setup has not changed or been deactivated. The checks should include a range of:

- school owned devices and services, including those used off site
- geographical areas across the site
- user groups, for example, teachers, pupils and guests

You should keep a log of your checks so they can be reviewed. You should record:

- when the checks took place
- who did the check
- what they tested or checked
- resulting actions

You should make sure that:

- all staff know how to report and record concerns
- filtering and monitoring systems work on new devices and services before releasing them to staff and pupils
- blocklists are reviewed and they can be modified in line with changes to safeguarding risks

You can use South West Grid for Learning's (SWGfL) [testing tool](#) to check that your filtering system is blocking access to:

- illegal child sexual abuse material
- unlawful terrorist content
- adult content

When to meet the standard

You should already be meeting this standard.

Your filtering system should block harmful and inappropriate content, without unreasonably impacting teaching and learning

The importance of meeting the standard

An active and well managed filtering system is an important part of providing a safe environment for pupils to learn.

No filtering system can be 100% effective. You need to understand the coverage of your filtering system, any limitations it has, and mitigate accordingly to minimise harm and meet your statutory requirements in [Keeping children safe in education](#) (KCSIE) and the [Prevent duty](#).

An effective filtering system needs to block internet access to harmful sites and inappropriate content. It should not:

- unreasonably impact teaching and learning or school administration
- restrict students from learning how to assess and manage risk themselves

How to meet the standard

Governing bodies and proprietors need to support the senior leadership team to procure and set up systems which meet this standard and the risk profile of the school or college.

Management of filtering systems requires the specialist knowledge of both safeguarding and IT staff to be effective. You may need to ask your filtering provider for system specific training and support.

Technical requirements to meet the standard

Make sure your filtering provider is:

- a member of [Internet Watch Foundation](#) (IWF)
- signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
- blocking access to illegal content including child sexual abuse material (CSAM)

If the filtering provision is procured with a broadband service, make sure it meets the needs of your school or college.

Your filtering system should be operational, up to date and applied to all:

- users, including guest accounts
- school owned devices
- devices using the school broadband connection

Your filtering system should:

- filter all internet feeds, including any backup connections
- be age and ability appropriate for the users, and be suitable for educational settings
- handle multilingual web content, images, common misspellings and abbreviations
- identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them
- provide alerts when any web content has been blocked

Mobile and app content is often presented in a different way to web browser content. If your users access content in this way, you should get confirmation from your provider as to whether they can provide filtering on mobile or app technologies. A technical monitoring system should be applied to devices using mobile or app content to reduce the risk of harm.

It is important to be able to identify individuals who might be trying to access unsuitable or illegal material so they can be supported by appropriate staff, such as the senior leadership team or the designated safeguarding lead.

Your filtering systems should allow you to identify:

- device name or ID, IP address, and where possible, the individual
- the time and date of attempted access
- the search term or content being blocked

Schools and colleges will need to conduct their own data protection impact assessment (DPIA) and review the privacy notices of third party providers. [A DPIA template](#) is available from the ICO.

[The DfE data protection toolkit](#) includes guidance on privacy notices and DPIAs.

The UK Safer Internet Centre has guidance on establishing [appropriate filtering](#).

Your senior leadership team may decide to enforce Safe Search, or a child friendly search engine or tools, to provide an additional level of protection for your users on top of the filtering service.

All staff need to be aware of reporting mechanisms for safeguarding and technical concerns. They should report if:

- they witness or suspect unsuitable material has been accessed
- they can access unsuitable material
- they are teaching topics which could create unusual activity on the filtering logs
- there is failure in the software or abuse of the system
- there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks
- they notice abbreviations or misspellings that allow access to restricted material

Dependencies to the standard

Check that you meet:

- [Broadband internet standards](#)
- [Cyber security standards](#)

When to meet the standard

You should already be meeting this standard.

You should have effective monitoring strategies that meet the safeguarding needs of your school or college

The importance of meeting the standard

Monitoring user activity on school and college devices is an important part of providing a safe environment for children and staff. Unlike filtering, it does not stop users from accessing material through internet searches or software.



Monitoring allows you to review user activity on school and college devices. For monitoring to be effective it must pick up incidents urgently, usually through alerts or observations, allowing you to take prompt action and record the outcome.

Your monitoring strategy should be informed by the filtering and monitoring review. A variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users
- live supervision by staff on a console with device management software
- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services

How to meet the standard

Governing bodies and proprietors should support the senior leadership team to make sure effective device monitoring is in place which meets this standard and the risk profile of the school or college.

The designated safeguarding lead (DSL) should take lead responsibility for any safeguarding and child protection matters that are picked up through monitoring.

The management of technical monitoring systems require the specialist knowledge of both safeguarding and IT staff to be effective. Training should be provided to make sure their knowledge is current. You may need to ask your monitoring system provider for system specific training and support.

Technical requirements to meet the standard

Governing bodies and proprietors should support the senior leadership team to review the effectiveness of your monitoring strategies and reporting process. Make sure that incidents are urgently picked up, acted on and outcomes are recorded.

Incidents could be of a malicious, technical, or safeguarding nature. It should be clear to all staff how to deal with these incidents and who should lead on any actions.

The UK Safer Internet Centre has guidance for schools and colleges on establishing [appropriate monitoring](#).

Device monitoring can be managed by IT staff or third party providers, who need to:

- make sure monitoring systems are working as expected
- provide reporting on pupil device activity
- receive safeguarding training including online safety
- record and report safeguarding concerns to the DSL

Make sure that:

- monitoring data is received in a format that your staff can understand
- users are identifiable to the school or college, so concerns can be traced back to an individual, including guest accounts

If mobile or app technologies are used then you should apply a technical monitoring system to the devices, as your filtering system might not pick up mobile or app content.

In the online safety section of [Keeping children safe in education](#) there is guidance on the 4 areas of risk that users may experience when online. Your monitoring provision should identify and alert you to behaviours associated with them.

Technical monitoring systems do not stop unsafe activities on a device or online. Staff should:

- provide effective supervision
- take steps to maintain awareness of how devices are being used by pupils
- report any safeguarding concerns to the DSL

School and college monitoring procedures need to be reflected in your Acceptable Use Policy and integrated into relevant online safety, safeguarding and organisational policies, such as privacy notices.

Schools and colleges that have a technical monitoring system will need to conduct their own data protection impact assessment (DPIA) and review the privacy notices of third party providers. [A DPIA template](#) is available from the ICO.

[The DfE data protection toolkit](#) includes guidance on privacy notices and DPIAs.

Dependencies to the standard



Check that you meet:

- [Cyber security standards](#)

When to meet the standard

You should already be meeting this standard.

Recent inspection questions

- Is the policy up to date?
- Have governors signed it?
- Can we demonstrate that we have done Prevent?
- Do we retain signatures for completion?
- Do we have anti bullying policy?
- Do you have a filtering policy?
- Visitors to site – Site is secure – visitors sign in on arrival, are they given a leaflet?
- Posters and noticeboard on site, new board going up – makes sure what is in it – signposting people to key personnel

- Digital and technology standards in school – Senso from Impero? – check on filtering systems – is provider signed up to counter terrorism, child protection does it meet the standards, can you get around it using other languages, check if filtering is applied to mobile and app content, does it filter? Does it monitor? Does it identify the device name, filter address, is there safe search or a child friendly search engine? Enhanced training is required for staff – to make it more overt – need to talk about it.
- Has the school identified and assigned a member of SLT and a governor to oversee technical and digital standards – no – both are required
- Speak to central services re: IT function and what it covers – develop an awareness amongst staff of what monitoring and filtering is about. Someone needs to be aware of the processes and policy and how it is managed to safeguard children. We have to check on reports that come in for monitoring and filtering.
- SLT team – responsible for overseeing reports, what is monitored and filtered– what is trust policy?
- Has the SLT ensured that all staff understand and monitor reporting and filtering?
- Are arrangements in place for governors, SLT and IT service providers, DSL to work together on this?
- Does the DSL monitor online safety
- Has /does the governing body got a plan to review the monitoring and filtering process
- Results need to be recorded as evidence for self-review – relating safeguarding or technology policies and procedures, roles and responsibilities, staff training, training for children – what will and won't be allowed, how often checking and monitoring strategies
- Check if academy meets the broadband/ internet standards
- Has a governor completed cyber security training?
- Is it clear who is going to report it and who to?

