Childnet's response to the Ofsted Draft Framework and Handbooks

April 2019

Childnet is very concerned to notice that 13 previous references to online safety across the Ofsted Inspection Framework and Handbooks documents has now been reduced to only two. These remaining references in the proposed documents now only require inspectors to do an internet check for safeguarding incidents for EY and non-association independent schools. We do not support such a move, particularly at a time when online safety education has never been more pertinent, and also that there is a very real risk that unless 'online' is explicitly mentioned and referenced it could be overlooked.

Ofsted has proven to be one of the main drivers of school improvement around online safety over the last five years, by including online safety in the overall judgement of a school's safeguarding effectiveness (UK Schools Online Safety Policy & Practice: SWGfL; Plymouth University). By removing the majority of references from all documents, we feel this sends a very strong message to schools that online safety is no longer regarded by Ofsted as important or necessary when safeguarding children and young people.

Whilst we understand the need to reduce the workload on schools and streamline the inspection framework, we feel there is still a strong need to make explicit reference to online safety. For most young people, the internet plays an essential role in their friendships and relationships, providing positive opportunities for communication, connection and self-expression.

Year on year we have seen the impact that positive online safety education can have in schools through our Safer Internet Day Campaign. In 2019 it reached 46% of young people and provided schools with an opportunity to increase young people's knowledge of online risks and how to report them. As a result of Safer Internet Day, 42% of schools surveyed reported that the day had led to disclosures about potential safeguarding issues online. Positive actions such as this form part of effective safeguarding in schools.

It's also important to be conscious of the fact that this new framework is coming at a time when schools are gearing up to deliver the upcoming Relationships Education in all primary settings, RSE in all secondary settings and Health Education in all state funded schools. This statutory guidance makes no fewer than 66 references to online safety and supporting young people's understanding of the online world. Removing almost all references to online safety from the Ofsted Inspection Framework would almost certainly cause confusion and uncertainty for schools.

Childnet's recommendations

1. Online safety should be explicitly referred to in the Framework, and in Handbooks where relevant

We would urge Ofsted to reinstate references to online safety as part of education providers' safeguarding responsibilities, through the Framework and flowing from this, in the Handbooks themselves. This would ensure that schools and inspectors are explicitly clear that online safety forms part of safeguarding as a whole, and that inspectors are fully trained to carry out this important function effectively.

Specifically, within the draft Education Inspection Framework, Childnet recommends the following alterations to ensure that providers have the necessary guidance to address their responsibilities for online safety education:

A. Paragraph 26, we recommend the wording be amended to:
*"relationships among learners and staff reflect a positive and respectful culture. Learners feel safe and do not experience bullying or discrimination, **including when using the internet and social media.**"*

B. Paragraph 28, we recommend the wording be amended to:
*"the provider has a culture of safeguarding that facilitates effective arrangements to: identify learners who may need early help or who are at risk of neglect, abuse, grooming or exploitation; **ensure learners are equipped with the skills and knowledge they need to assess and manage risks they face both online and offline**; help learners reduce their risk of harm by securing the support they need, or referring in a timely way to those who have the expertise to help; and manage safe recruitment and allegations about adults who may be a risk to learners and vulnerable adults."*

2. The inspection Framework should require inspectors to assess providers' compliance with two key safeguarding documents as part of their assessment of providers' safeguarding provision

In both section 175 of the Education Act 2002 and DfE statutory guidance "*Keeping Children Safe in Education*" there are clear references to the duty of care schools have to their community in terms of online safety and security, effective staff development and the creation of safe online spaces. In addition to this, schools are expected to fulfil their statutory duties under the Prevent Duty and "*Working Together to Safeguard children*" which makes it clear that in order for a practitioner to be effective they '*need to continue to develop their knowledge and skills in this area and be aware of the new and emerging threats, including online abuse, grooming, sexual exploitation and radicalisation*.'

Childnet recommends that the wording is strengthened in the Education Inspection Framework, so that this key document becomes a tool used to inform judgements rather than a reference tool:

Paragraph 14. ***"Inspectors will assess the extent to which the provider complies with relevant statutory duties as set out in 'Keeping Children Safe in Education' and 'Working together to Safeguard Children'."***

3. <u>The Inspection Framework should refer to youth participation and youth voice in safeguarding</u>

Pupil engagement in online safety provision has been identified as an area of weakness for nearly a decade. We would encourage Ofsted to make clear references to the effective use of youth participation and pupil voice in its Inspection Framework, and flowing from this, to refer to it where relevant in Inspection Handbooks.

In 2010, it was concluded by Ofsted that "In the outstanding schools, senior leaders, governors, staff and families worked together to develop a clear strategy for e-safety" but "few of the schools visited made good use of the views of pupils and their parents to develop their e-safety provision" (Safe Use of new Technologies - webarchive.nationalarchives.gov.uk/20120405120429tf /http://www.ofsted.gov.uk/resources/safe-use-of-new-technologies). Then again in 2015 as part of a joint project between Ofsted and the UK Safer Internet Centre, it was concluded that "in terms of students influencing online safety policy, a significant majority of schools do not involve student contribution" (www.saferinternet.org.uk/blog/ofsted-reveals-new-'online-safety-schools'-survey).

In paragraph 27, we recommend the wording be amended to:
*"the provider prepares learners for life in modern Britain by: equipping them to be responsible, respectful, active citizens who contribute positively to **their school community and to** society, **both online and offline**; developing their understanding of fundamental British values; developing their understanding and appreciation of diversity; celebrating what we have in common and promoting respect for the different protected characteristics as defined in law."*