UK Schools Online Safety Policy & Practice Assessment 2020

Annual Analysis of 360 degree safe Self-Review Data

Prepared By
Prof Andy Phippen & Prof Emma Bond, February 2020

360°safe
the online safety self-review tool

SWGfL
Safe, Secure, Online

Contents

Executive Summary

This analysis of data from the 360 Degree Safe draws from the self-review data of over 11,000 schools across the country to consider the "state of the nation" related to online safety policy and practice in English schools, as well as allowing us to reflect on 10 years of 360 Degree Safe, and analysis of the data it collects. This 9th review of the database presents a familiar picture to the one we have explored over the last ten years of online safety self-review. We continue to see that some areas, such as filtering and monitoring, and a number of policy aspects are growing in strength, which is encouraging as policy is needed as part of the foundation for effective and consistent online safety practice in schools.

While the shape of the data has remained the same over the last ten years we can see constant improvement across the country overall. In the last ten years we have seen changes to the education landscape which have, arguably, placed greater importance on online safety. When we began this evaluation journey, there were no statutory requirements on schools to consider online safety, now there are many. We have seen improvement in all aspects of online safety over the last 10 years, with some, such as **Whole School** (which considers how embedded online safety policy is and how it is consistent with other safeguarding responsibilities), **Mobile Technology** (how mobile devices are used in schools) and **Professional Standards** (relating to staff use of technology, both professionally and socially) have all improved by almost a whole level over this time.

At the current time we have areas of great strength in school online safety policy and practice:

Over 90% of schools have some form of Acceptable Use Policy, which is needed to clearly detail the expectation of all in the school regarding use of establishment technology and devices.

- 69% of all establishments have at least coherent and embedded Filtering and Monitoring, providing a high level of protection from Illegal, inappropriate or upsetting content, and enabling monitoring that is both useful and proportionate.
- 73% of establishments have at least coherent and embedded Policy Scope, which is encouraging as policy contributes toward clear and consistent practice in the setting.
- 79% of schools have some form of practice around Parental Engagement.

However, there are also areas of weakness

- 49% have **Governor Education** disclosed as level 4 or 5 (meaning no practice or only planned practice) around online safety issues. Therefore we would question whether these schools are in any position for the board to present sufficient challenge to senior leaders at schools to ensure effective online safety is in place.
- 41% of establishments disclose level 4 or level 5 for **Staff Training**, which is a statutory safeguarding requirement for schools. This complements the lack of governor education such that schools without a knowledgeable board are not in a position to ensure a school is carrying out its statutory duties regarding online safety training.
- There are only 19% of schools who have anything above "basic" **Data Protection** practices, and over 50% are at level 3. 28% of schools have no data protection policy in place, which means they are not fulfilling statutory duties around data protection and storage.
- One aspect we would consider to be aspirational around online safety practice is **Impact of Online Safety Policy and Practices**, or whether a school would evaluate their current policy and practice in a school improvement strategy. Very few schools in our database (13%) have strong practice with this aspect, and almost 50% have little evidence as to whether the safeguarding protocols and interventions they have in place are effective.

Given this report is not just the annual update, but also a "ten years on" reflection, we have additionally engaged with 45 online safety professionals to get them to reflect upon the changes they have seen in this time, and what were their hopes for the future. There is a belief that on the whole online safety practice has improved in schools during this time, however this is offset with a constantly changing online safety landscape and the nature of risk. We can see this reflected in the 360 Degree Safe data, which shows **Whole School** approaches being far stronger than they were ten years ago, and the vast majority of schools now having strong policies that underpin online safety practice in the schools.

However, we can also show that, even with statutory and inspection pressures, many schools are not fulfilling their legal duties related to effective online safety training and school boards are not sufficiently knowledgeable to make this happen or to be in a position to make judgements on the efficacy of the online safety delivered to students at a school. Looking to the future, we can see the value, and impact of pragmatic statutory guidance and inspection, and would hope this helps schools continue to improve their online safety policy and practice. We have come a long way in the last ten years, but there is still more to do.

Introduction

360 degree safe (https://360safe.org.uk/) was launched by SWGfL in November 2009 to allow schools to evaluate their own online safety provision; benchmark that provision against others; identify and priorities areas for improvement and find advice and support to move forward. Over 14,000 schools across the UK now use one of the three free resources[1] which integrates online safety into school policy and the curriculum in a way that actively challenges teachers and managers in the school to think about their online safety provision, and its continual evolution. This report looks at the use of the resource in English schools, analysing data from over 11,000 establishments.

The flexibility of 360 degree safe is such that it can be introduced at any speed (as appropriate to the school's situation) and can be used in any size or type of school. As each question is raised so it provides suggestions for improvements and also makes suggestions for possible sources of evidence which can be used to support judgements and be offered to inspectors when required.

In one particularly interesting development, where evidence is needed, the program provides links to specific areas of relevant documents, rather than simply signposting documents on the web. This saves time for everyone concerned about online safety, and allows the school to show immediately the coverage and relevance of its online safety provision.

360 degree safe will also provide summary reports of progression, (again this is useful when challenged), and is an excellent way of helping all staff (not just those charged with the job of implementing an online safety policy) to understand the scope of online safety and what the school is doing about the issue.

Above all 360 degree safe provides a prioritised action plan, suggesting not just what needs to be done, but also in what order it needs to be done. This is a vital bonus for teachers and managers who approach the issue of online safety for the first time, in a school which has no (or only a very rudimentary) policy.

This self-review process is more meaningful if it includes the perceptions and views of all stakeholders. As broad a group of people as possible should be involved to ensure the ownership of online safety is widespread.

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[1] There are three versions of the tool available - http://www.360safe.org.uk/, used in England, https://360safecymru.org.uk/, using in Wales and https://360safescotland.org.uk/, used in Scotland

Once they have registered to take part in 360 degree safe process the school will be able to download the 'Commitment to Online Safety for signing by the Headteacher and Chair of Governors' as a sign of the commitment to use the online tool. Once the school has completed some of the elements of 360 degree safe tool then the Online Safety Certificate of Progress can be awarded. When the school meets the benchmark levels it can be formally assessed via inspection before being awarded the "Online Safety Mark", an award validated and approved by Plymouth University. There are now over 400 schools in the country with this award (https://360safe.org.uk/Accreditation/Accredited-Schools).

In September 2010, the first analysis of the 360 degree safe database was published by the South West Grid for Learning based upon data returned from 547 establishments across England and Wales. The tool has grown considerably from this point and this analysis collects data from over 11000 educational establishments across England.

Methodology

The tool defines 28 aspects related to online safety, from policy issues (Acceptable Usage Policy, policy on mobiles, etc.) through factors such as staff training to technical measures like filtering[2]. A full list of aspect descriptions is included in Appendix A and we will refer to definitions through the discussions in this report. For each aspect the tool provides a numeric rating between 1 (the strongest rating) and 5 (the weakest) with a detailed definition for each to allow schools to determine, for each aspect, how their school performs. Generally, these levels are defined as:

Level 5	There is little or nothing in place
Level 4	Policy and practice is being developed
Level 3	Basic online safety policy and practice is in place
Level 2	Policy and practice is coherent and embedded
Level 1	Policy and practice is aspirational and innovative

Table 0-1 - Overall level definitions for the 360 degree safe tool

Schools conduct a review of their establishment against these criteria, for each one deciding at what level they currently perform (which each level descriptor very clearly defined within the tool). Every submission to the tool is recorded into a database to initially baseline the schools practice. However, the tool retains previous submissions and will allow the school to define a development plan to move their online safety policy and practice on

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[2] An overview of the 360 structure, detailing aspects covered, can be found at https://360safe.org.uk/Overview/Structure-Map.

and it is intended to be used as (and frequently is used as) a school improvement plan. The storage of all data in a comprehensive database, however, provide a large dataset for analysis of online safety policy and practice across the educational landscape as a whole, on which this report is based.

The annual analysis of the data focuses on establishments self-review of their online safety policy and practice, exploring their ratings against the 28 aspects of 360 degree safe. Aspect exploration allows the measurement of degrees of progression and improvement in the self-review and those where, in general, policy and practice among UK educational establishment requires support to deliver further progress. The tool allows both overall analysis of aspect performance across the whole dataset, as well as being able to focus on specific aspects, regions, times, etc. The dataset is unique in the world of online safety – which provide use with an incomparable opportunity to explore data submitted by schools themselves across the country to get a national perspective.

This year marks a ten-year anniversary for the analysis of the data on the tool, having first been released in 2009, with the first evaluation being conducted the year after, in 2010. Therefore, this report will firstly, as is usual, present a "state of the nation" analysis of the current state of the 360 degree safe database. Furthermore, we will use this 10-year anniversary to reflect up the progress of schools in the UK during this 10-year period, and we have also conducted further research with school staff, online safety advisors and policy makers who have been involved in online safety over this time. Overall we conducted online interviews with 45 professionals, considering how the field has changed in this time and what their aspirations are for the next 10 years. The findings from these interviews are presented in section 6 and we will also draw quotes from some of the respondents at the start of each section of the rest of this report in which was address the question "Has 360 degree safe changed the way you look at online safety?". With almost unanimously positive responses from the professionals stating that it has changed the way they approach online safety, these quotations show the different ways it is used and how it has challenged the online safety landscape.

Details of the Establishments Analysed

It has made us more thorough. It has made us engage more with our community and involve more stakeholders in policy and procedure. It has steered us towards better use of our student digital leaders as a resource to upskill our community. It has left us more confident that we are doing the correct things and that our policies are fit for purpose. (eLearning Coordinator)

The previous year's analysis was published in January 2019 based upon data collected in December 2018[3]. Data for this year's analysis was collected in December 2019, so presented here is an analysis based upon 12 months of progression from the previous one. Table 3-1 shows the basic statistics for establishment registrations drawn from the analysed dataset:

Establishments signed up to the tool on November 2019	11,494
Establishments who have embarked on the self-review process	6,504
Establishments with full profiles completed	4,065

Table 0-1 - Database baseline figures in November 2018

In the past 12 months there have been an additional 726 schools who have signed up to the tool. Yet, we should note here that there has been a drop in the overall number of schools (1271) who have embarked on self-review, which might seem curious. However, over the last year all Welsh schools have been migrated from the 360 Degree Safe (England) database to the dedicated 360 Degree Safe Cymru self-review tool[4].

The tool allows schools to perform the self-review at their own pace, it is not necessary for them to complete 28 aspects before using the tool for improvement. As each aspect in the database is analysed independently we collect all responses from each regardless of whether an institution has completed a full review. Nevertheless, this means we have a difference between the number of schools who have registered, the number who have embarked upon the review, and the number who have completed it. As shown in table 3-1, 4,065 schools have now completed a full review, 222 more than the 2018 review.

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[3] UK Schools Online Safety Policy and Practice Assessment 2018 Annual Analysis of 360 degree safe self review data , Phippen A, https://swgfl.org.uk/research/uk-schools-online-safety-policy-and-practice-assessment-2018/

[4] The 360Cyrmu tool now has 1641 schools enrolled, 1351 embarked on self-review and 988 with full reviews.

Figure 3-1 shows the distribution of different types of schools in the database. Unsurprisingly, given their number across the country, the majority of the schools are from the primary setting. The second largest group are secondary schools. Along with a few nursery and "all through" schools, there are a number of establishments who are defined as "not applicable", that don't easily fit into a definition of phase (for example, local authorities, pupil referral units, community special schools, independents, etc.). For the purposes of the analysis presented below, we will focus on primary and secondary schools, as they comprise the vast majority of establishments in the database and allow a comparison of two consistent types of establishment (i.e. the variation of institutions in the "not applicable" proportion means that comparing practice in these settings would not provide a consistent picture).
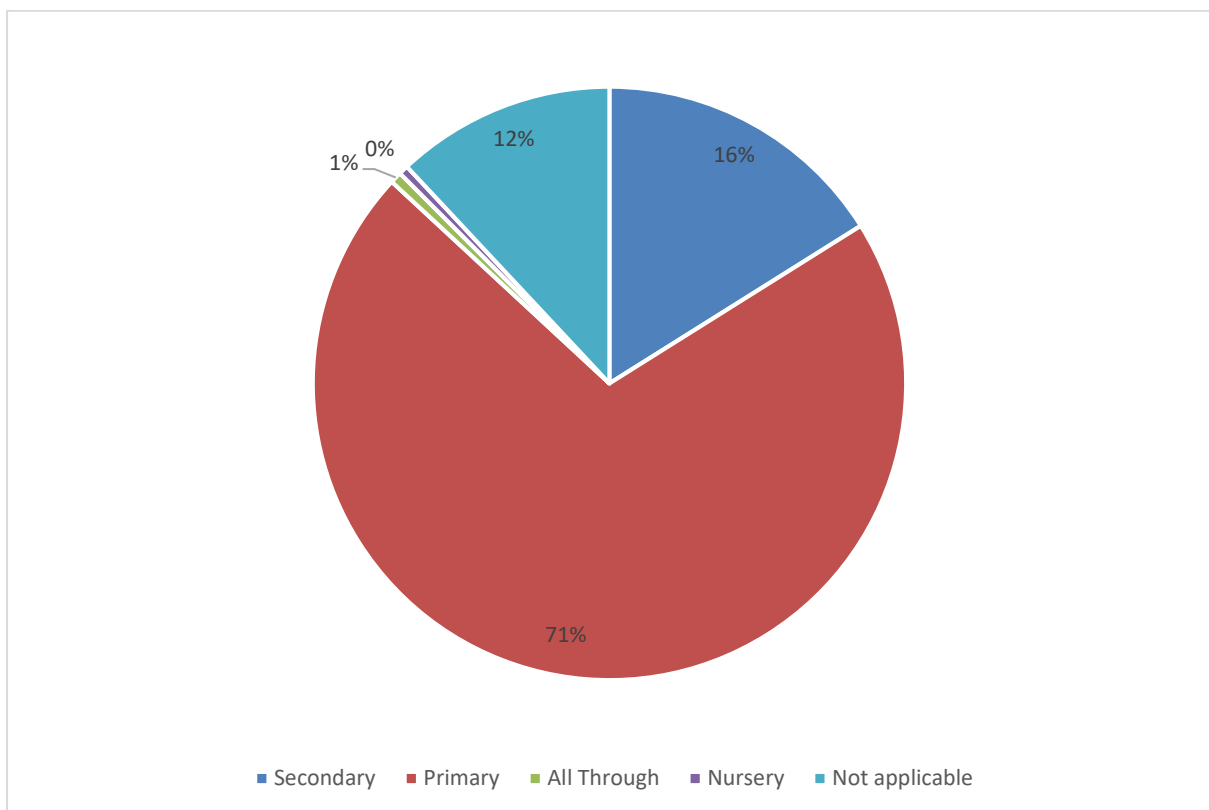

Figure 0-1 - Establishment phase

In terms of regional distribution, while the roots of the tool lie in the South West, and this region has one of the largest proportions of school in the database, we can see clearly from figure 3-2 that the tool is used across the whole country. The tool is truly national in its reach (and versions of the tool are also available and in use in Scotland and Wales) and while some areas have more schools than others there is no region of England where to tool is not used.
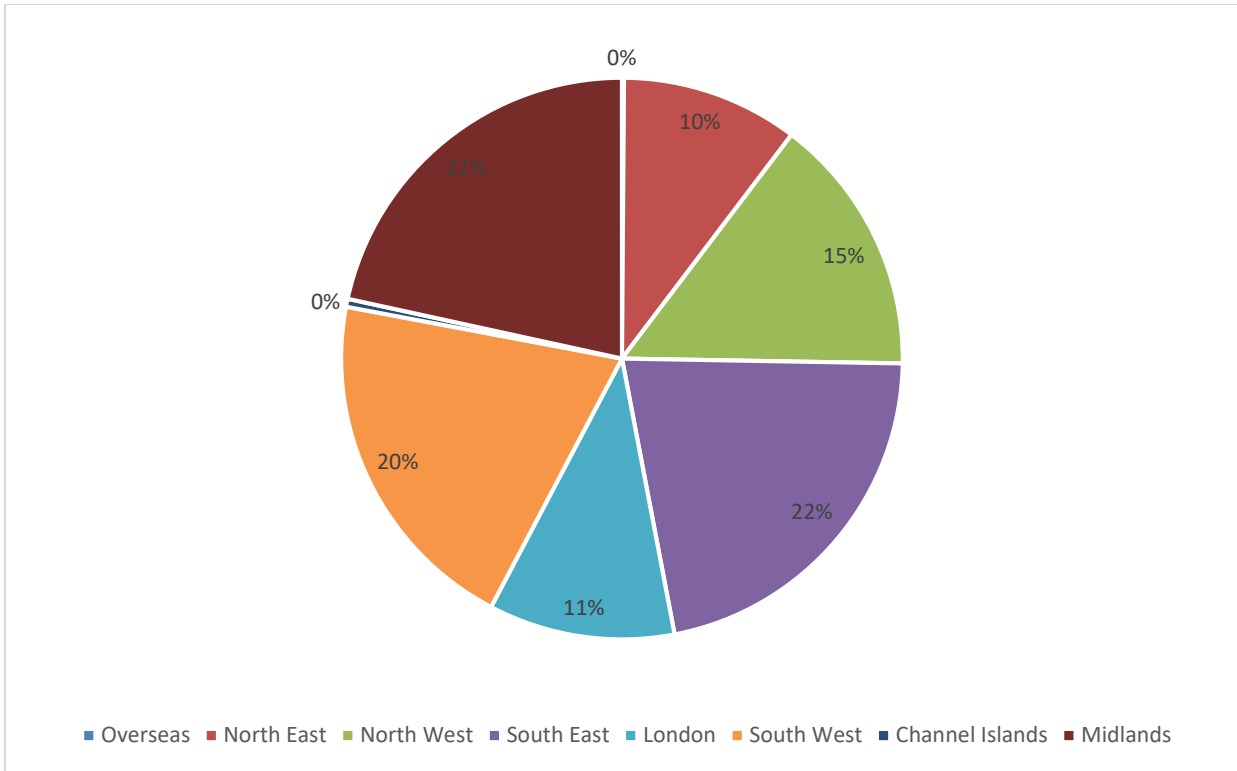
Figure 0-2 - Location of establishments across England

Activity on 360 degree safe

It has helped us to think about balancing the positives and negatives of online use. Getting children more involved and developing children's digital resilience. We have developed a community that supports online safety including all stakeholders. (Early years' teacher)

This top-level review of the 360 database explores what we refer to as the "State of the Nation". This applies basic descriptive statistics to the database to get an overall picture of the data per aspect. It therefore allows us to understand what are the areas of strength and what are the areas of weakness across the nation. As we have been conducting this review now for ten years we will also, later in this report, compare with the "state of the nation" in 2009 to now, as well as considering year on year developments.

As discussed in section 2, each aspect can be rated by the self-reviewing establishments on a progressive maturity scale from 5 (lowest rating) and 1 (highest). In all cases analysis of the aspect ratings shows an across establishment maximum rating of 1 and minimum of 5. Therefore, the larger the column in the chart below, the weaker the practice for this aspect.

Given each value for assessment is equally weighted, taking a mean score of every establishment gives us a picture of strength and weakness in online safety policy and practice across all schools in the database to show us performance across the country as a whole. While we also conduct regional analyses and comparisons, these are outside of the scope of this report and generally not released publicly.

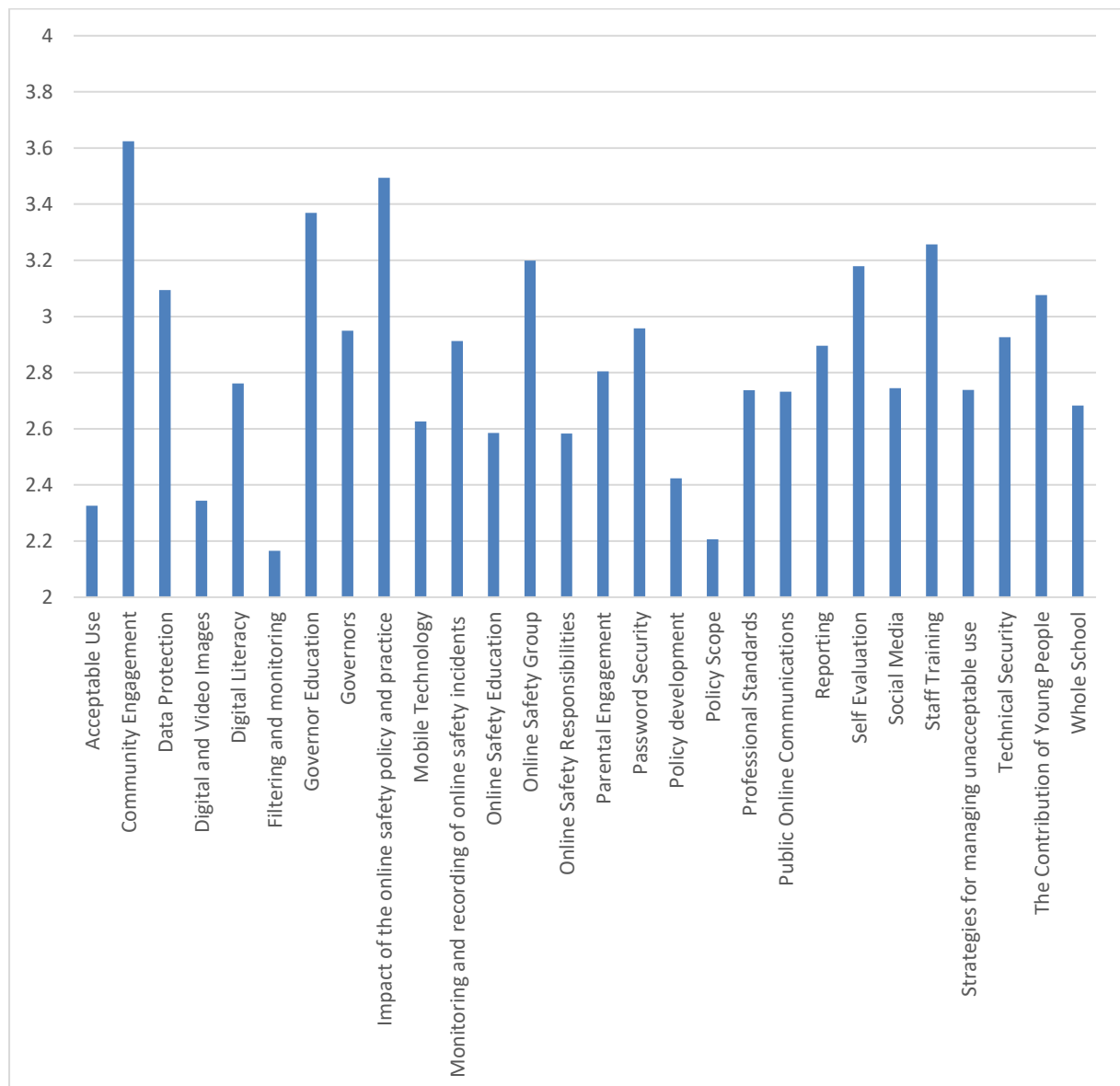Figure 4-1 illustrates overall averages across aspects:

Figure 0-1 - Average rating per aspect

We have, in the past, referred to the "shape" of the data analysed from the 360safe database. The shape generally shows strength in policy and technical aspects, and weakness in those aspects that require longer term investment or are more labour intensive. This makes sense for school practice – policies can be developed and established

(and reviewed), and technical aspects are often implemented by third parties. This shape has remained consistent over the last 10 years, even with new establishments being added every year, giving us confidence about the consistency of the self-review process, and the robustness of the data. This year we are not surprised to see that the shape remains consistent with previous years, even with the reduction of embarkations with the tool (due to moving many schools in Wales to 360Cymru) and an increase in those having conducted a full review.

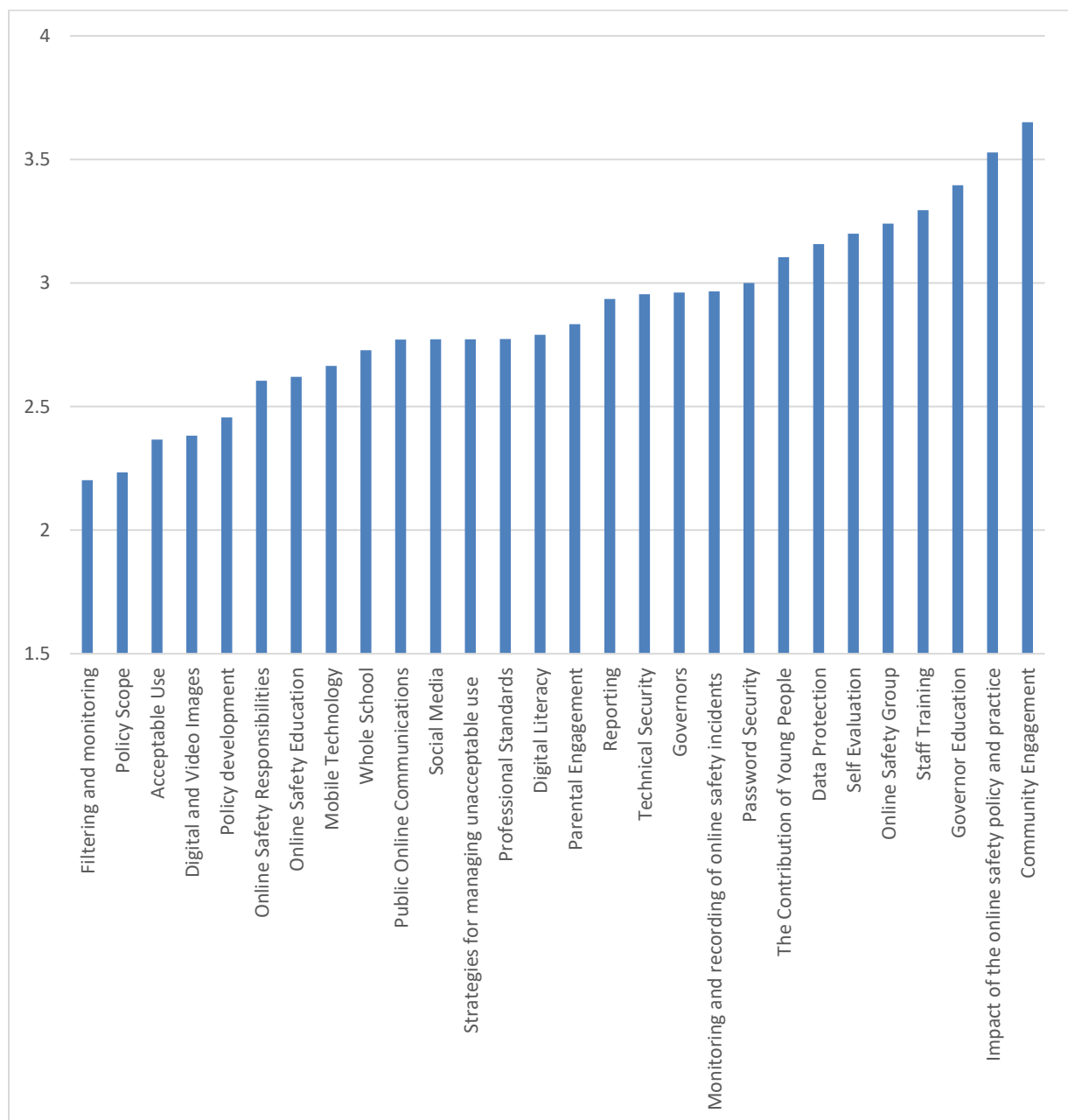Figure 4-2 orders the aspects from strongest to weakest and more clearly illustrates this point:

Figure 0-2 - Average rating per aspect, ranked

In this 2019 analysis, the strongest aspects are shown in table 4-1, and we have included their aspect definitions to describe the nature of the aspect:

Aspect	Aspect Mean
Filtering and Monitoring This aspect describes how the online safety policy is consistent with school expectations in other relevant policies / safeguarding practices and vice versa e.g. behaviour, anti-bullying, Prevent Action Plan; PHSE, Child Protection / Safeguarding and computing policies. There is evidence that the policy is embedded across the school.	2.165
Policy Scope This aspect considers policy content; its breadth in terms of technology and expectations around behaviour and its relevance to current social trends and educational developments.	2.206
Acceptable Use This aspect considers how a school communicates its expectations for acceptable use of technology and the steps toward successfully implementing them in a school. This is supported by evidence of users' awareness of their responsibilities.	2.326
Digital and Video Images This aspect describes how the school manages the use and publication of digital and video images in relation to the requirements of the Data Protection Act.	2.344
Policy Development This aspect describes the process of establishing an effective online safety policy: the stakeholders involved and their responsibilities; consultation, communication, review and impact.	2.423

Table 0-1 - Strongest aspects and means

While average values have all increased slightly, all five of the strongest aspects are the same as last year. All but one of these aspects are policy based, and the other is technical. The values associated with these aspects are extremely high, reflecting "coherent and embedded" practice, as defined at level 2 with the tool. Given the high averages, we are very confident that, in general, schools in the database, and therefore across the nation, have strong policy related online safety aspects and have effective policy development processes. It is encouraging to see one of the key requirements of schools as defined in

the statutory Keeping Children Safe in Education guidance[5] is carried out with a high level of practice:

87. As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. As such, governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place.

The weakest in the database are:

Aspect	Aspect Mean
Community Engagement This aspect describes how the school communicates and shares best practice with the wider community including local people, agencies and organisations.	3.624
Impact of the online safety policy and practice This aspect covers the effectiveness of a school's online safety strategy; the evidence used to evaluate impact and how that shapes developments in policy and practice.	3.494
Governor Education This aspect describes the school's provision for the online safety education of Governors to support them in the execution of their role.	3.369
Staff Training This aspect describes the effectiveness of the school's online safety staff development programme and how it prepares and empowers staff to educate and intervene in issues when they arise.	3.257
Online Safety Group This aspect describes how the school manages their online safety strategy, involving a group with wide ranging representation.	3.199

Table 0-2 - Weakest aspects and means

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[5]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835733/Keeping_children_safe_in_education_2019.pdf

Again, the order of weak aspects is the same as the previous analysis, with slight improvements in average. All of these are activities which require long-term investment of time and resources. **Community Engagement** continues to be the weakest aspect by some distance and shows also that schools struggle to engage their wider community with online safety practice and messages. All of these values, on average, show that practice with these aspects is either "basic" or "planned", so in many cases, given expected distribution of responses (discussed in more detail below), we will know that schools have no strategy for either staff training or governor education, two aspects we would argue would underpin effective online safety practice in schools. Returning once more to the Keep Children Safe in Education guidance, we can see that there is a statutory expectation that governors ensure all staff are appropriately trained in safeguarding, including online safety:

84. Governing bodies and proprietors should ensure that all staff undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. Induction and training should be in line with advice from the local three safeguarding partners.

85. In addition, all staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

86. Governing bodies and proprietors should recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.

The results from the analysis of the database would suggest this is not always being carried out effectively. Moreover, the lack of effective governor education would raise concerns whether school boards were sufficiently knowledgeable to be able to make this challenge to school leadership.

Another basic statistical measure – standard deviation – allows us to explore the overall database through a different lens. We can look at the range of responses per aspect and

determine the variability of responses per aspect. A large standard deviation shows that the values vary greatly, a small one shows most of the responses fall around the mean value.
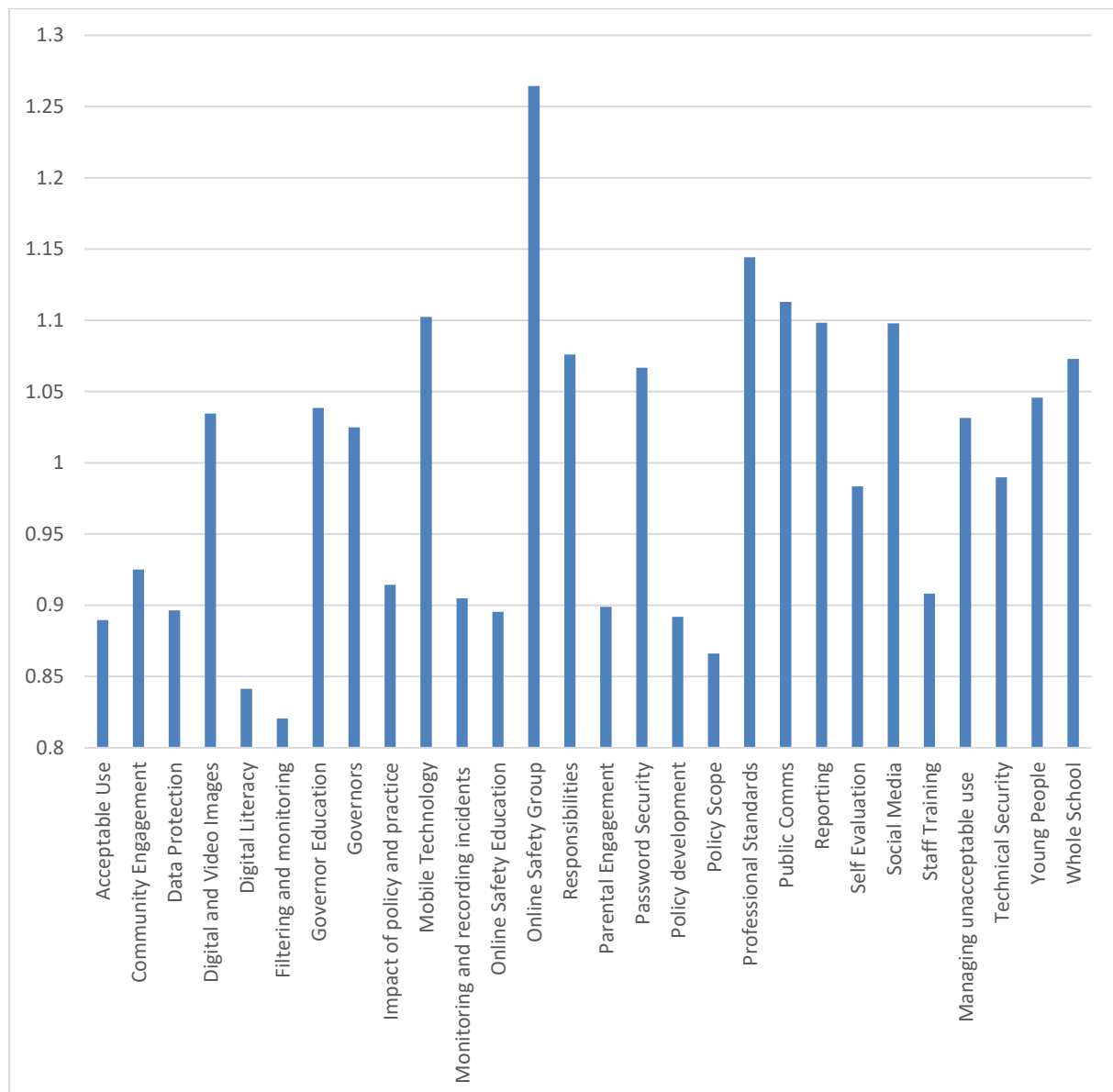

Figure 0-3 - Standard deviations per aspect

The picture with standard deviations is consistent with previous analyses. There are some very encouraging things to draw from the comparison of the standard deviation against means. For example, **Filtering and Monitoring** is strong with a narrow standard deviation, meaning it is consistently effective across schools. Similar could be said for **Policy Scope** and **Acceptable Use**. However, there are also weak aspects that have narrow standard deviations – so we can say that not only is staff training one of the weakest aspects from the average position, it is also one of the most consistently weak aspects. Governor training is more interesting, with a broader deviation, showing that some schools are engaging with this more than others.

Looking at standard deviations on their own does not show us whether a narrow distribution is a good or bad thing. However, when comparing deviations to the strongest and weakest aspect according to mean, we have a more interesting analysis.

Aspect	Standard Deviation	Aspect Mean
Filtering and Monitoring	0.821	2.165
Policy Scope	0.866	2.206
Acceptable Use	0.89	2.326
Digital and Video Images	1.035	2.344
Policy development	0.892	2.423

Table 0-3 - Strongest aspects with standard deviations

For the strongest aspects we generally see fairly narrow deviations, meaning that these aspects are performing similarly across different establishments. The only one that is significantly larger than the others in **Digital and Video Images**, which can vary depending on school culture and phase.

Aspect	Standard Deviation	Aspect Mean
Community Engagement	0.925	3.65
Impact of the online safety policy and practice	0.914	3.53
Governor Education	1.038	3.4
Staff Training	0.908	3.3
Online Safety Group	1.265	3.24

Table 0-4 - Weakest aspects with standard deviations

We have a similar picture with the weaker aspects, for example, **Staff Training** is one of the smallest standard deviation across the whole data set. And with an average value below 3 (the "basic practice" measure) we can confidently say that staff training is consistently weak, across our establishments. Similarly, **Community Engagement** is fairly consistent with its weak performances. If we plot averages against standard deviations, we have a clearer picture on where there is good and bad practice against these two measures:
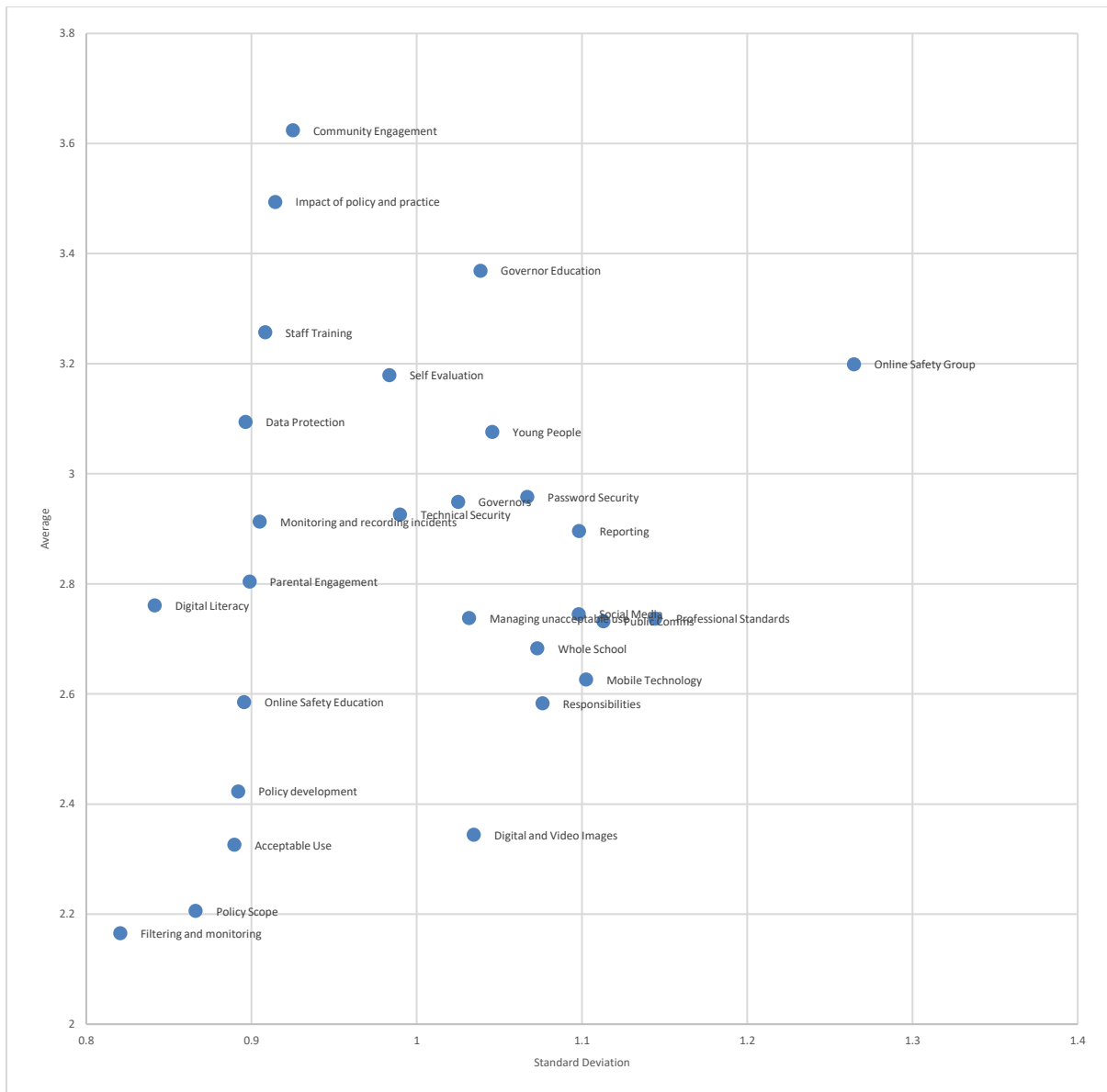
Figure 0-4 - Plotting averages and standard deviations per aspect

In this plot, those closer to the bottom left of the graph are those we might consider to be consistently good. Those in the upper left quarter are consistently weak aspects, and those toward the right are more diverse in practice. So we can see that **Online Safety Group** is an aspect with great variability and not generally strong practice across schools. As aspect such as **Mobile Technology** is interesting because while practice is, on average, strong, the deviation would suggest this is not consistent, and would, as we show later with primary and secondary comparison, show different approaches at different phases.

We have already stated that performance this year, on average, is very similar to previous years and we see no fundamental changes in the share of the data. However, every aspect shows some level of improvement, albeit generally small. If we compare with last year's averages, we can see in figure 4-5 that there are improvements across all aspects.
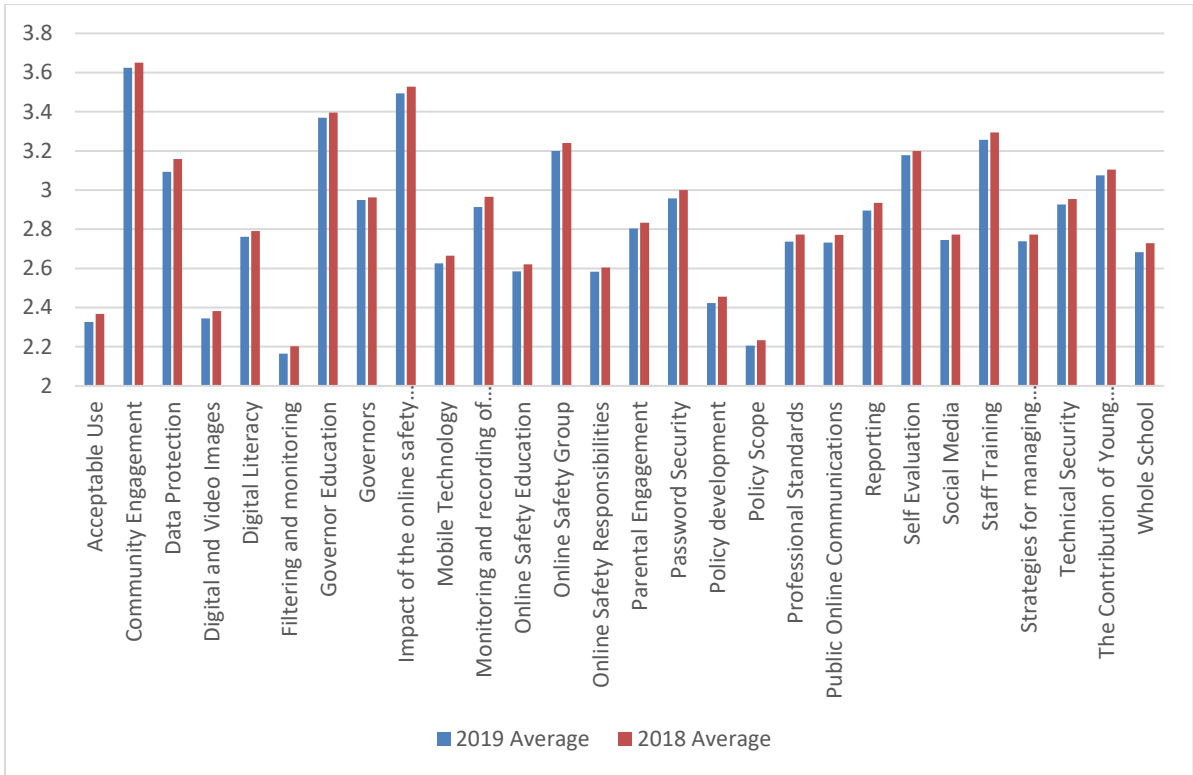
Figure 0-5 – Comparison of 2018 and 2019 means

If we order these changes based upon the difference between the 2018 and 2019 means (figure 4-6), we can see how small these improvements are:
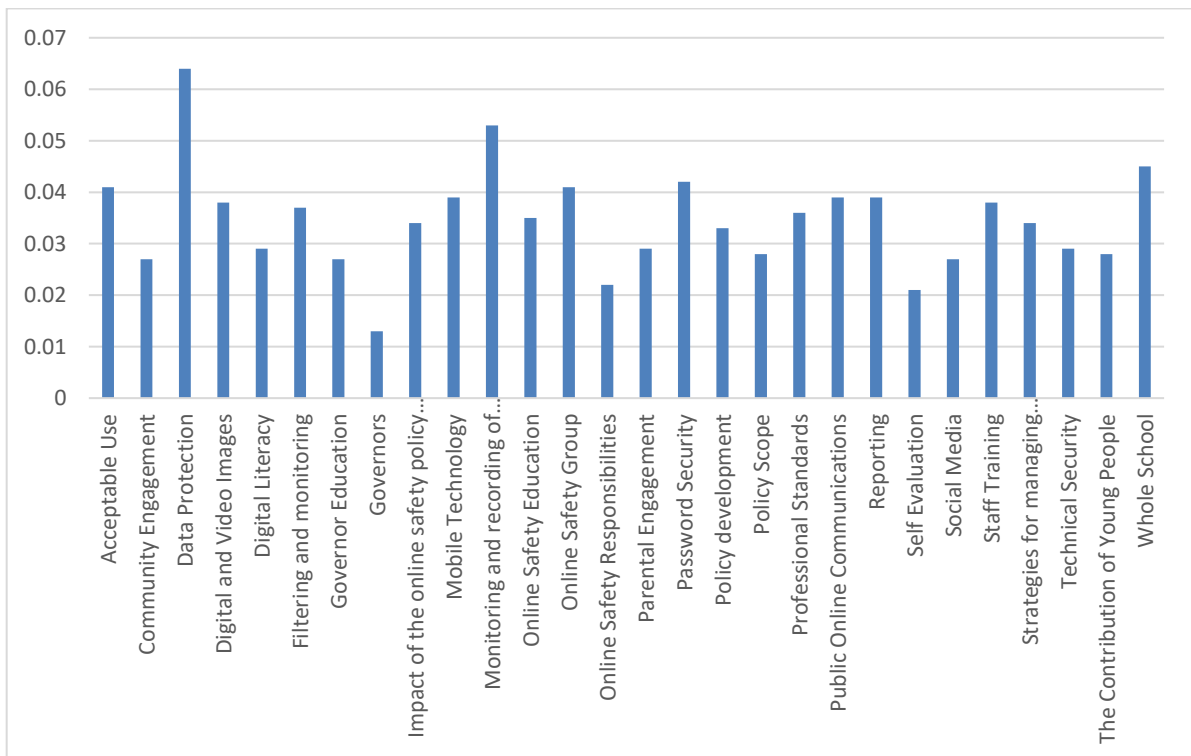

Figure 0-6 - Difference between 2018 and 2019 means

While no improvements are significant, perhaps the introduction of stronger data protection legislation in England and Wales would explain the increasing in activity around this aspect.

A further measure of distribution can be carried out by breaking down the proportion of each aspect where establishments have evaluated themselves per level – that is, the percentage of establishments who rate themselves at 1, 2, 3, 4 or 5 for a given aspect. While descriptive statistics such as mean and standard deviation allow us to look generally at an aspect, this aspect distribution allows us to visually see the proportion of each establishment at a level per aspect. This compliments other measures, and also allows more detail on whether average, or strong, practice is impacting on the aspect means. This is clearly illustrated in figures 4-7 and 4-8. Figure 4-7 shows the stronger aspects.
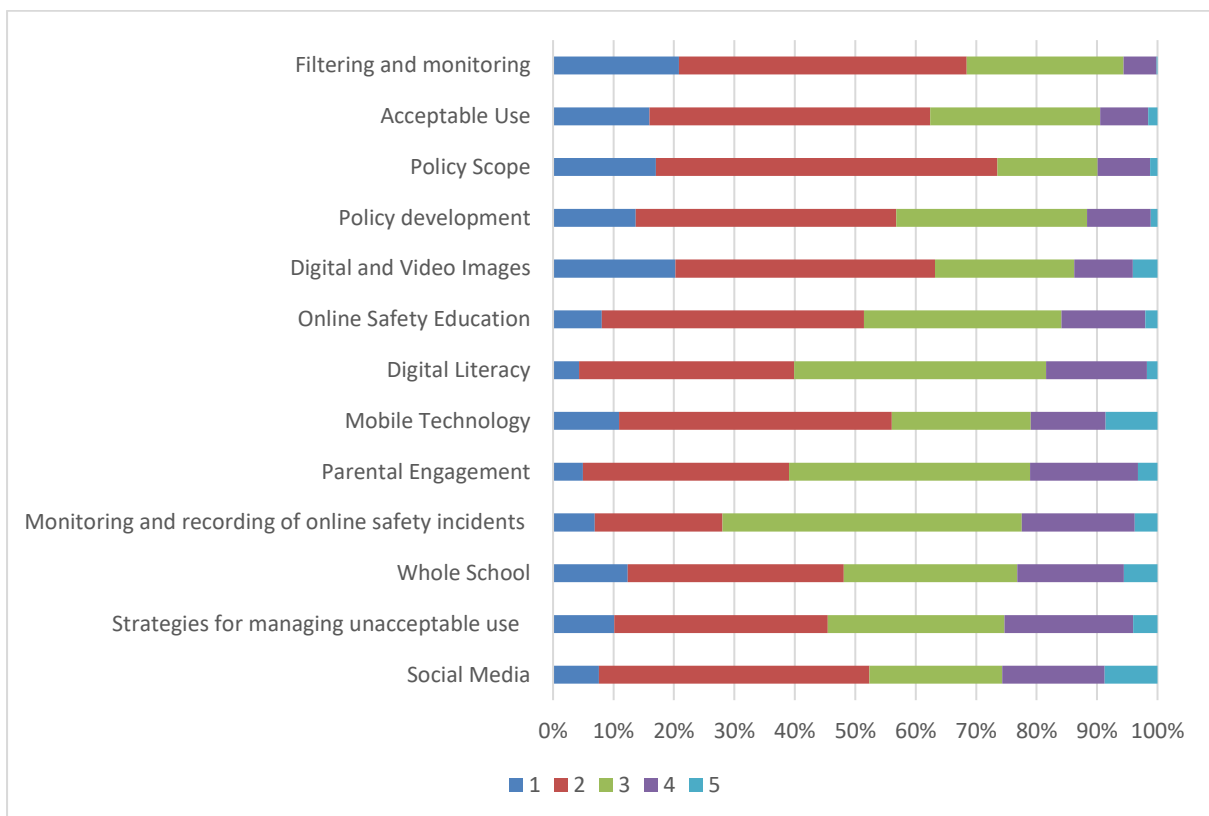

Figure 0-7 - Distribution of ratings per aspect – stronger aspects

By way of reminder, the levels can be essentially expressed as:

Level 5	Nothing in place
Level 4	Under development
Level 3	Basic
Level 2	Coherent and embedded
Level 1	Aspirational and innovative

This distribution analysis provides a different perspective which confirms some of the findings from the descriptive statistics. For example, it does confirm that the stronger aspects generally centre on policy and technical issues. Certainly this finer grained detail allows us to draw some positive conclusions.

Over 90% of schools have some form of **Acceptable Use Policy**, which is needed to clearly detail the expectation of all in the school regarding use of establishment technology and devices.

69% of all establishments have at least coherent and embedded **Filtering and Monitoring**, providing a high level of protection from inappropriate or upsetting content, and enabling monitoring that is both useful and proportionate.

73% of establishments have at least coherent and embedded **Policy Scope**, which is encouraging as policy contributes toward clear and consistent practice in the setting. Level 2 **Policy Scope** is defined as:

The online safety policy covers the use of the computing systems, equipment and software in school. It also covers the use of school-owned technology outside school and the use of personal technology in school.

It is comprehensive in that it includes sections on roles and issues such as social networking, online-bullying, data protection, passwords, filtering, digital and video images and use of mobile devices.

It establishes school expectations regarding ethics and behaviour of all users. The policy clearly states the school's commitment to act on online safety incidents outside the school that affect the well-being of staff and pupils / students

Only 21% of schools have no practice around **Parental Engagement**. This is important when we consider the response from online safety practitioners below.

However, 40% of schools only have **Parental Engagement** at a "basic" level, defined by the tool as:

The school provides some opportunities for parents to receive information or education about online safety. The school has run events / meetings for parents and carers and has referenced online safety issues in communications (e.g. newsletter, website, social media).
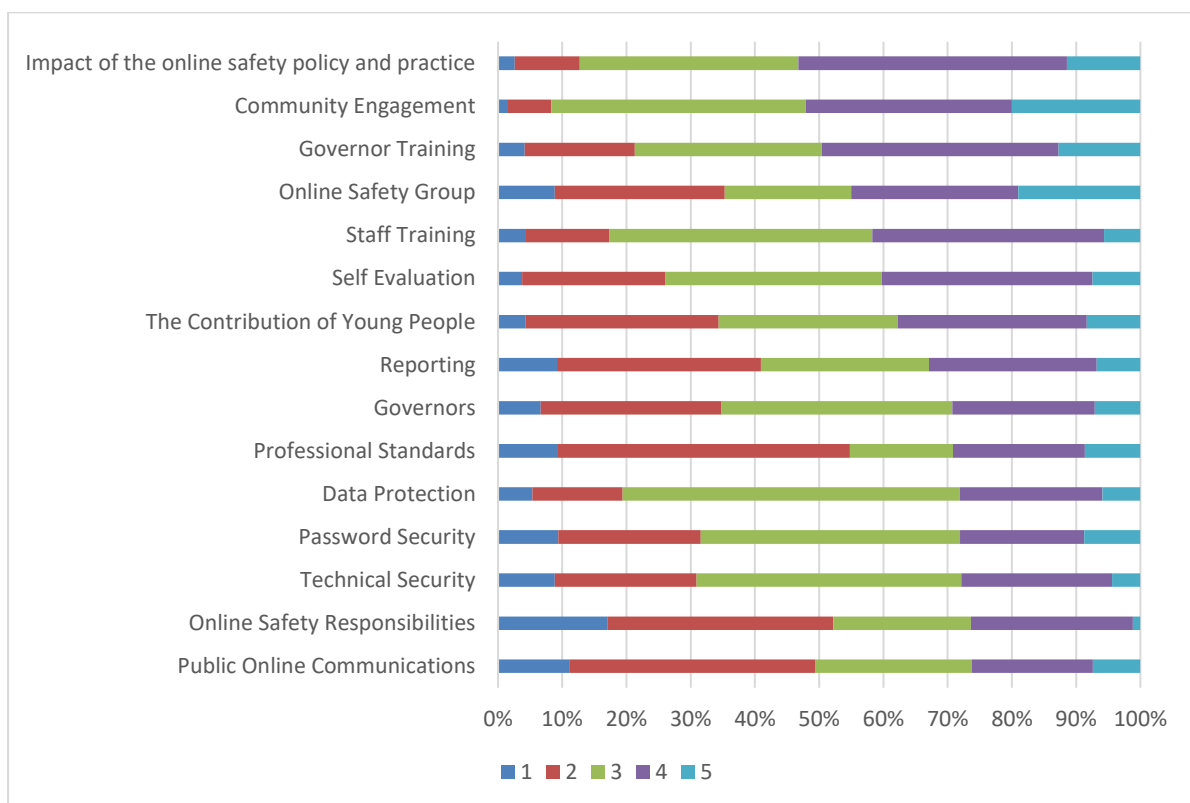

Figure 0-8 – Distribution of ratings per aspect - weaker aspects

However, distributions from figure 4-8 confirm the weaknesses of the earlier analysis:

49% have governor education disclosed as level 4 or 5 around online safety issues. Level 4 and level 5 **Governor Education** is defined as:

Level 5 - There is no opportunity for Governors to receive online safety education.

Level 4 - Opportunities for Governor online safety education are being explored.

Therefore, we would question whether these schools are in any position for the board to present sufficient challenge to senior leaders at schools to ensure effective online safety is in place.

41% of establishments disclose level 4 or level 5 for **Staff Training**, which we have already shown is a statutory requirement on schools to provide. While the number of schools who report **Staff Training** at level 4 or level 5 is reducing slightly (43% in 2018 and 47% in 2017) this is clearly a cause for concern, and would complement the lack of governor education such that schools without a knowledgeable board are not in a position to ensure a school is carrying out its statutory duties regarding online safety training.

There are only 19% of school who have clear and effective **Data Protection** practices, and over 50% are at level 3. While level 3 for data protection:

The school has a comprehensive set of Data Protection Policies. Data subjects are informed about their rights and about the use of personal data (e.g. through a Privacy Notice). The school has appointed a Data Protection Officer (DPO) who actively monitors compliance with the law and provides independent appropriate advice to senior leaders. The DPO has led a data audit / mapping exercise to understand where data currently resides, including third parties and cloud storage. The Governors/Directors responsibilities for the development and approval of Data Protection policy and procedure are clearly defined. The school has identified the personal data which it has a legal basis to process and has obtained consent for any additional data processing activity. The school has processes in place to manage Freedom of Information requests. There are procedures for the recording of subject access request and data breaches have been developed. Through training, staff are aware of their data protection responsibilities.

means that a school is fulfilling its statutory duties, there are still risks in data processing that a higher level of practice would mitigate. Perhaps more concerning is that 28% of schools have no data protection policy in place, which means they are not fulfilling statutory duties around data protection and storage.

One aspect we would consider to be aspirational around online safety practice is "Impact of online safety policy and practices", defined as:

This aspect covers the effectiveness of a school's online safety strategy; the evidence used to evaluate impact and how that shapes developments in policy and practice.

In other words, whether the evaluate their current policy and practice in a school improvement strategy. Very few schools in our database (13%) have strong practice with this aspect, and almost 50% do not consider this at all.

Comparing Primary and Secondary Establishments

It has allowed me to support schools to identify smaller, more manageable aspects of online safety and delegate responsibility more easily due to its clear aspect and themed approach. It has become a fundamental tool for educators to understand, reflect and action online safety activity. Despite changing online safety challenges over the last decade, the tool has been continuously relevant and applicable to all settings. It has encouraged and supported a strategic approach to online safety at an organisational and individual level, by breaking down complex topics into clear and concise sections. I cannot imagine supporting online safety without it! (Online Safety Advisor)

A further comparison of the data can be seen by comparing the performance of primary and secondary establishments. Over previous analyses we have seen a gulf between primary and secondary schools, with secondary's, having greater resources and support, far exceeding the performance of their primary school counterparts. However, over the years we can see a creeping up of performance in primary schools while secondary's do not progress so fast. Since 2016, primary schools had begun to outperform secondary schools in some areas, and this is clear to see with analysis of the data this year.

Looking at the 2019 data set, we can certainly see some difference between the two phases of school and the continued improvements in primary schools:
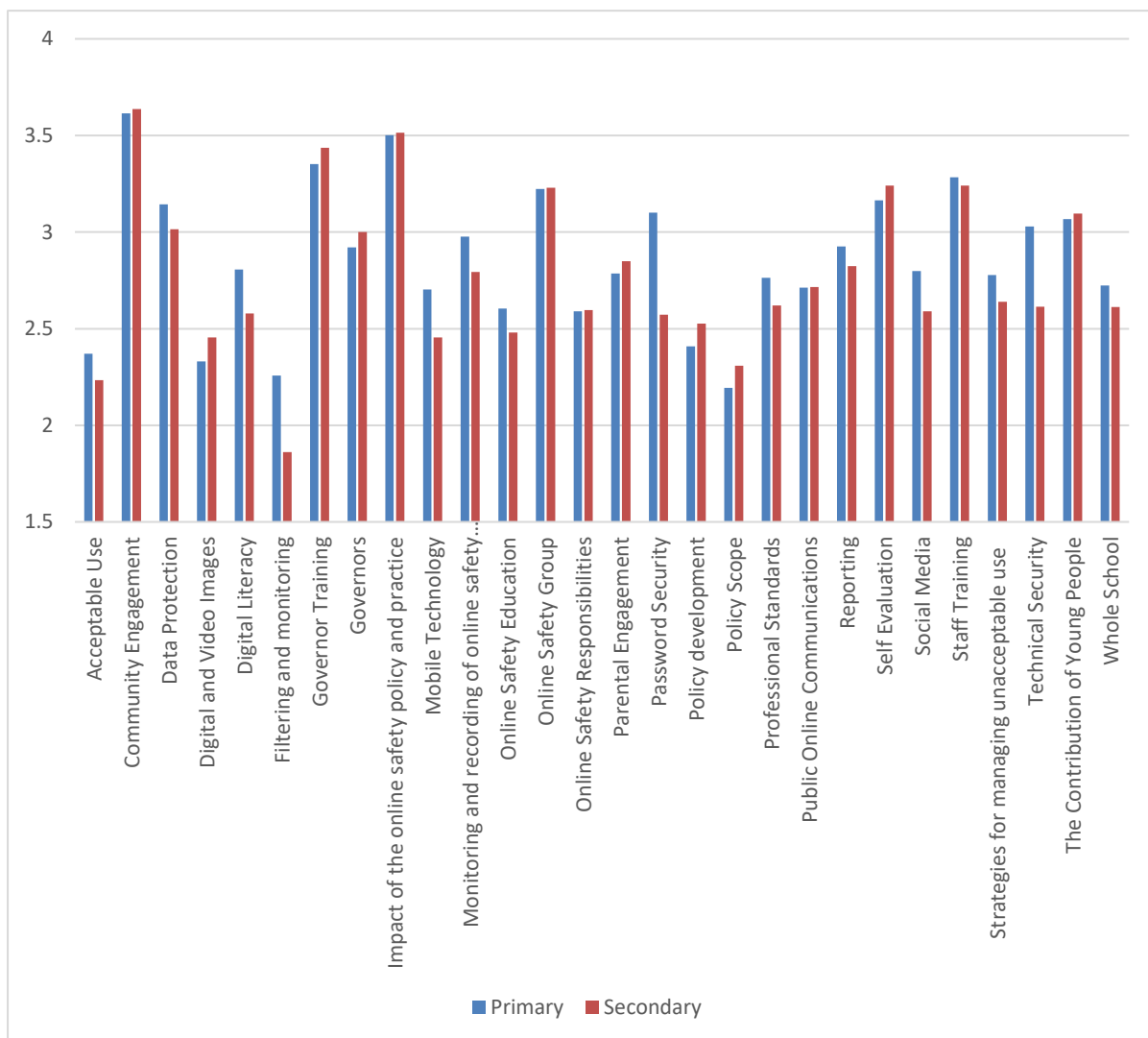
Figure 0-1 - Primary/secondary comparison 2019

While we used to see a clear gap between primary and secondary schools this is certainly not the case anymore. We can see that the differences are generally less pronounced, and in an increasing number of cases primary schools are performing more effectively than their secondary counterparts.

A clearer illustration of this is in figure 5-2, which shows the difference in value between primary and secondary schools. A positive values means the secondary school has better performance, a negative one means primaries are more effective.
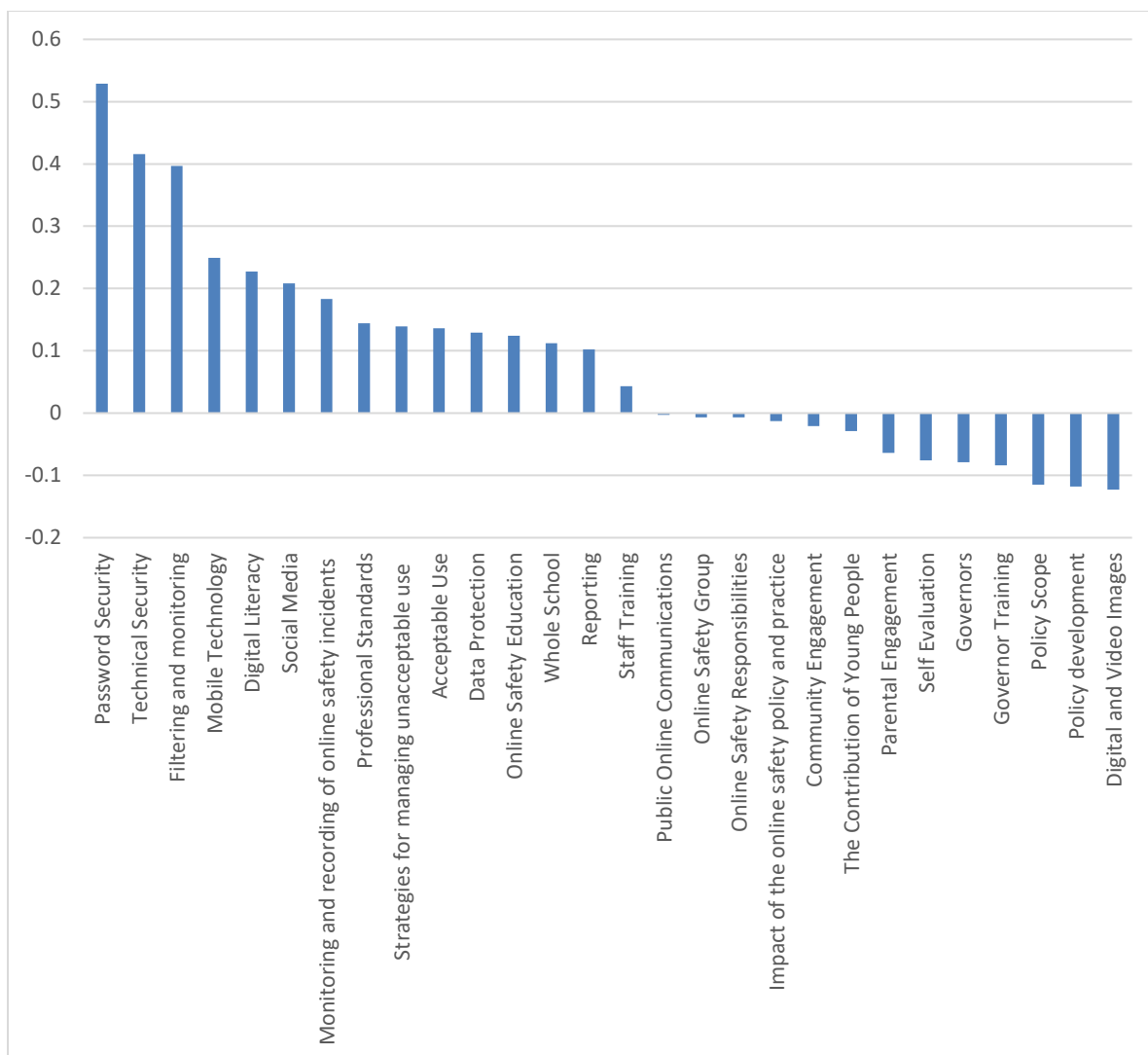
Figure 0-2 – Primary/Secondary differences

We can see from figure 5-2 that primary schools now outperform secondary's on a number of aspects and more than ever. In previous analyses primary schools outperformed secondary schools in 9 (2017), then 11 (2018), and now 13 aspects (albeit very small) difference for 6 aspects. **Policy Development, Digital and Video Images, Policy Scope, Governors, Governor Education, Self-Evaluation** and **Parental Engagement** are markedly better for primary settings that their secondary counterparts. The majority of these aspects are the more resource-intensive activities and show the increased effort primary schools are investing in their online safety policy and practice and playing to their strengths of closer community involvement and the need to address issues such as digital image capture more seriously. As with last year the only three aspects now where secondary schools massively outperform primaries all related to technical measures where they have generally either outsourced practice or have more dedicated resource to deal with this. While when we saw in the early years of analysis secondary schools clearly outpacing primaries when it comes to online safety, this is clearly no longer the case.

The State of Online Safety 2010-2020

The comprehensive self-review and support given has given me a framework upon to structure, plan and implement a strong digital safety that works on all levels in our school and its wider community. (ICT/Digital Safety Coordinator, Primary setting)

Finally, in this annual review, given it is now 10 years since 360 degree safe was first published, we can now consider how far schools have come over the last decade. While we have flagged concerns regarding schools failing to meet their statutory requirements and challenges in moving from online safety being a requirement imposed by inspection and regulation to a more widely recognized part of the wider safeguarding landscape for schools, schools have come a long way from the first analysis of tool data in 2010. If we compare to the "state of the nation" then and now, we can clearly see that we have made great progress in online safety policy and practice:
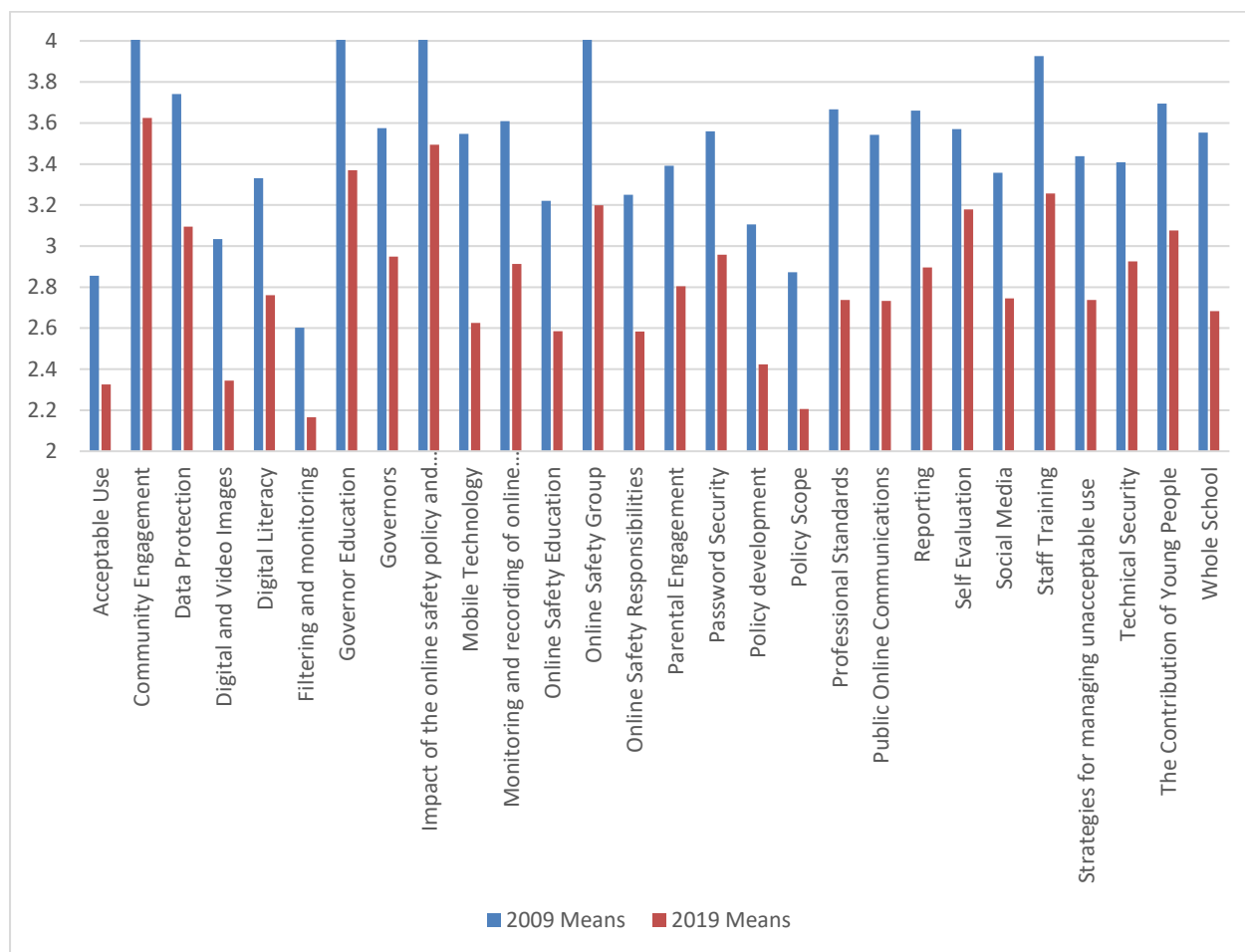

Figure 0-1 - Comparing 2009 means to 2019

All aspects have improved considerably since the start of the tool's use. If we order these improvements from "least improved" to "most improved":
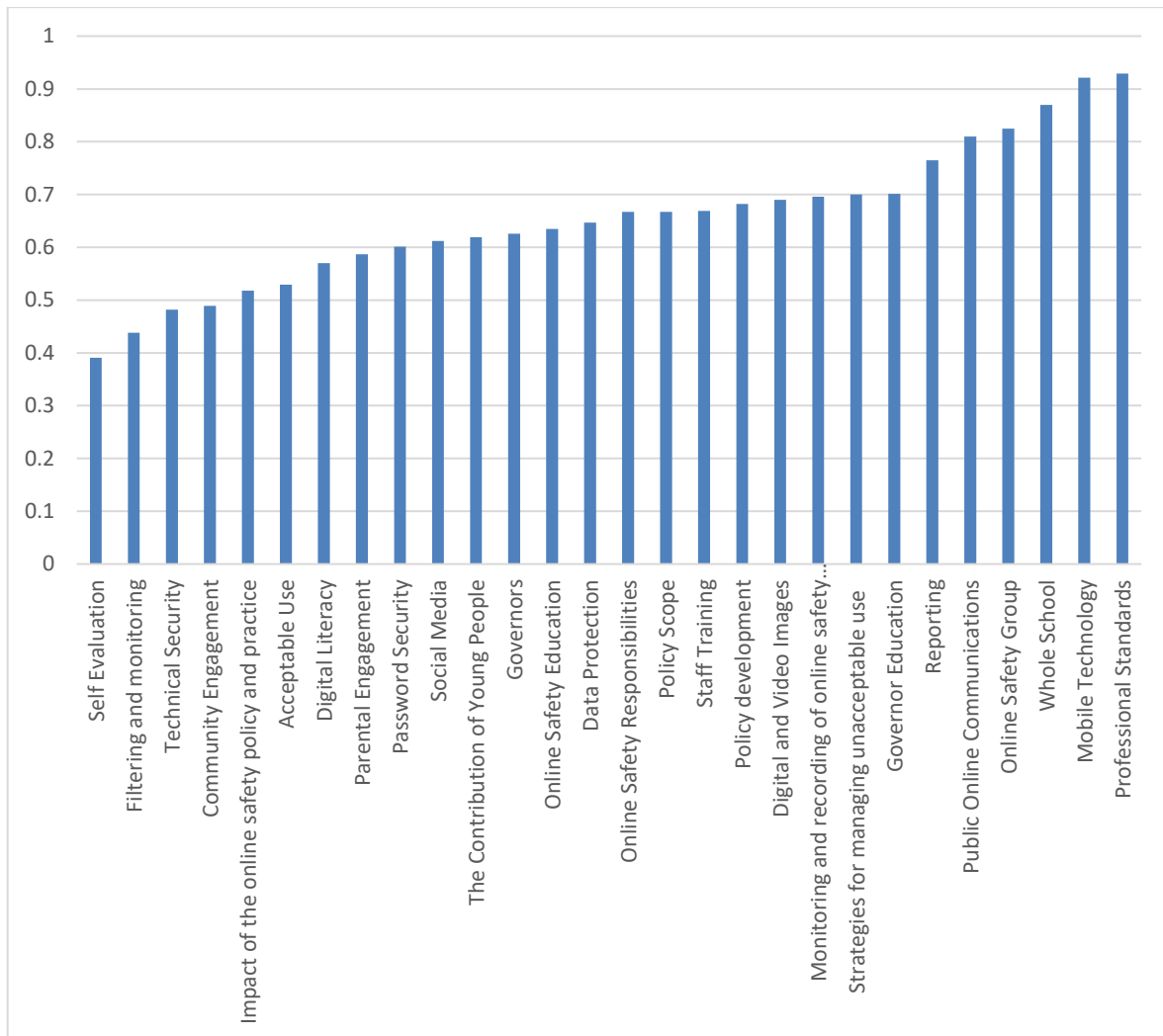

Figure 0-2 - Least to most improved aspects since 2009

We can see that all aspects have improved to some degree, with the majority improving, an average, by more than half a level. For some, such as Mobile Technology and Professional Standards, there is almost a whole level change. It is interesting to note the improvement in Mobile Devices, which reflects the importance of this policy aspect no compared to in 2009, where there were far less students bringing devices to school. We can see that some of the consistently stronger aspects suchas Filtering and Monitoring and Technical Security have not made such clear gains, they already started from a position of strength. And while still weak, it is encouraging to see aspects such as Governor Education and Staff Training have improved more than half a level in this time, arguably as a result of stronger regulatory pressure. If we consider the development year on year in this time, as show in figure 6-3, we can see a consistent shape of data all moving, in general, in the right direction, very consistently improving as the database grew, particularly over the last five years.
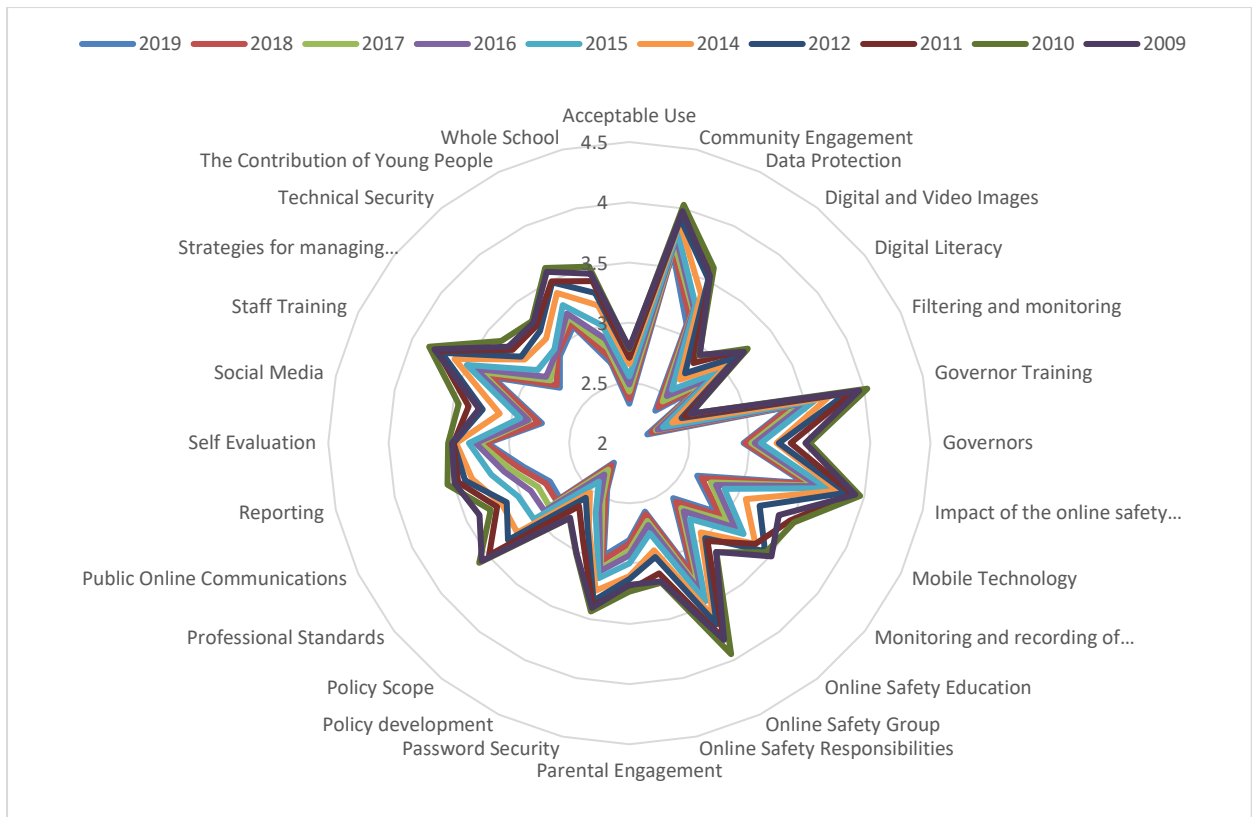
Figure 0-3 - Year on year improvement across all aspects

This was reflected in the interviews we conducted with online safety professionals during the production of this report. In total 45 professionals were spoken to, in different roles:

Teaching staff	22
Senior leaders	9
Advisors	10
Technical staff	3
Technical supplier	1

Table 0-1 – Roles of professionals interviewed

All were asked the same questions, which were:

- Has 360 degree safe changed the way you look at online safety?
- What do you think the major changes have been in online safety in the last 10 years?
- Are children safer online than they were 10 years ago?
- What changes would you like to see in online safety in the next ten years?
- What changes do you expect to see in online safety in the next ten years?

We have already used illustrative quotes throughout this report to show professional's responses for the first question, where they almost universally stated that 360 Degree Safe had changed the way online safety was tackled in their work (the only dissenting voice being a technology provider whose practice would, unsurprisingly, be unchanged as they didn't work in schools).

When considering what the major changes have been in online safety over the last ten years, a number of key themes emerged. In general, professionals felt that online safety was now more effectively embedded in the school – it was no longer viewed as an add on that should be dealt with by the IT department, and was more strongly embedded in the whole school context. This is certainly something that is reflected in the 360 database analysis, where policy is now far stronger than when the tool was first introduced, and the **Whole School** aspect being near a whole level higher in 2019 than it was in 2009.

There was also a view that social media was far more prevalent for students of all ages (which again reflects the improvements in social media policy over the last 10 years) and that diversity of risk had increased. One online safety advisor saw a positive change as:

Understanding the need to address behaviours rather than a (historical) focus on the technology itself.(Online safety advisor)

Which again would reflect a greater awareness in a whole school context and a move away from our early experiences that online issues were something the IT department could control or block.

One further comment again illustrated the role of the school as a hub for online safety knowledge:

How much of a role school has to play in helping students, parents and the community to understand risks (eLearning coordinator)

However, it was also acknowledged that there was still a struggle to keep up, and the complexity of the message needs to adapt:

The biggest shift for me, aside from the rapid growth of mobile devices, is the issue of speaking to people that you don't know online. It used to be an easy message of 'only speak to people you know'. However, the difficulty these days is that it is common place to talk to, game with and meet people

in person from the online world. Many children's parents met in this way.
(Senior Leader)

Central to a lot of comments was that parental engagement was still a challenge, and there was only so much schools can do without that support. This challenge is again reflected in the 360 database in that Community Engagement is still weak and while Parental Engagement is stronger, most schools do not have aspirational practice in this area.

When asked whether they thought children were safer online now than there were in 2009, there was, unsurprisingly, some nuanced answers:

If tech had not advanced so quickly over the last 10 years then my answer would be a resounding yes. However, children are having to learn/ be taught solutions to new problems on an almost constant basis. (eLearning coordinator)

Overall 21 professionals felt children were safer online, and 24 felt they were not. There were positives:

- Better teaching of online safety
- As a result, children are more aware of risks
- Greater proactivity in schools

But there were also negatives:

- A greater number of devices and services for young people to engage with
- Greater diversity of risk, less about upsetting content and more about risk in interaction
- Keeping up with new technologies and threats all of the time

These findings highlight the importance in moving online safety practice away from technology, and consider more strongly behaviours and risk mitigation. One senior leader also, once again, reiterated that schools can only do so much without the engagement of other stakeholders in the safeguarding of young people:

There are more ways that online platforms can be used to threaten the safety and well-being of children DESPITE all the efforts of schools and

teaching. The wider community HAS to accept it is a community responsibility, not just the school. (Deputy Headteacher)

In terms of what professionals expect to see in the next 10 years, many felt it was difficult to predict but their expectations were generally around greater regulation and stronger control of platform providers.

More government involvement, greater regulation on companies, expectation of greater transparency from companies, with more hopefully disclosures around a more embedded and less "box ticking" approach to online safety.

While there were professionals who could see the value of this to the school setting, as stated above, in that greater transparency and more effective reporting would lead to a higher level of disclosure which could, in turn, make online safety more evidence-based and embedded, others felt this focus was a focus that was unhelpful:

Lack of effective intervention by the government - a continued blaming of industry rather than attempting to address the real issues with proper resources. (Online Safety Advisor)

This was also reflected in responses to being asked what they would *want* to see change in the next ten years. The key word that came from the vast majority of responses to this question was "Responsibility":

Greater responsibility taken by parents for their children's use of online platforms and their behaviour on them. Greater emphasis in all schools on individual responsibility for own behaviour. Online platforms taking greater responsibility for monitoring and removing inappropriate content. (Deputy Headteacher)

There was a very clear view that parents needed to be more effectively engaged, and policy makers could add more value to the online safety space by taking a coordinating role in terms of practice and curriculum. An interest comment from an early years practitioner highlighted the need for improvements in delivery of online safety:

Children moving on from reciting the safety tips to actually following them.
(early years' teacher)

And there was also a strong view that online safety needs even greater embedding, not being considered exclusive to other wellbeing related issues:

It's hard to say as it really needs to adapt with the times, technology and pace of change. It's hard to predict what the greatest risks will be. I would possibly like to see more focus respect, looking for truth and bias and caution around sharing posts too quickly or forming opinions too quickly based on things shared online. (eLearning coordinator)

One comment made by an online safety advisor very clearly detailed the different roles played by stakeholders in this area, and how all have a part to play, as well as making a progressive statement on what effective online safety education looks like in a school setting:

All schools delivering effective online safety - young people who are confident in dealing with challenges that they face online. Parents who have a better understanding of technology and how best to support their children. New technologies and platforms building safety by design. More public awareness campaigns on TV (as they have in other countries). (Online Safety Advisor)

In order to achieve this progressive view, we know that schools need to embrace online safety across the whole school, and have the involvement of young people at the heart of this. The 360 data analysis shows that we are making some great strides in some of these areas, however, ten years on, we know there is still work to do to have schools nationally having governing boards sufficiently knowledgeable to ensure training is in place for all staff to be able to support young people to ensure they are confident and resilient when they go online.

Conclusions

We now have ten years' worth of self-review data to be able to reflect upon online safety policy and practice in schools across the country. We can see the shape of the data remaining fairly consistent over this time – technical and policy aspects are strong, and labour intensive aspects such as staff training, the monitoring of impact of policy and community engagement are weaker. While the shape of the data has remained the same over the last ten years we can see constant improvement across the country. In the last ten years we have seen changes to the education landscape, such as the statutory duties[6], an inspection framework which bases safeguarding judgements on this regulation[7] and data protection legislation[8], which have, arguably, placed greater importance on online safety. When we began this evaluation journey, there were no statutory requirements on schools to consider online safety, now there are many.

We have seen, through discourse with professionals, that there is a belief that whole online safety practice has improved in schools during this time, this is offset with a constantly changing online safety landscape and the nature of risk. We have, at the same time, had professionals talking a great deal about the need to focus online safety on responsibilities across the whole stakeholder space, rather than expecting technology to solve problems or schools being wholly responsible for keeping children safe online. Again, we can see this reflected in the 360 Degree Safe data, which shows Whole School approaches being far stronger than they were ten years ago, and the vast majority of schools now having strong policies that underpin online safety practice in the schools.

However, we can also show that, even with statutory and inspection pressures, many schools are not fulfilling their legal duties related to effective online safety training and school boards are not sufficiently knowledgeable to make this happen or to be in a position to make judgements on the efficacy of the online safety delivered to students at a school. Looking to the future, we can see the value, and impact, of pragmatic statutory guidance and inspection, and would hope this helps schools continue to improve their online safety policy and practice. We have come a long way in the last ten years, but there is still more to do.

6

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835733/Keeping_children_safe_in_education_2019.pdf

7

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/801429/Education_inspection_framework.pdf

8

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/747620/Data_Protection_Toolkit_for_Schools_OpenBeta.pdf

Appendix A – Aspect Descriptions

Acceptable Use	This aspect considers how a school communicates its expectations for acceptable use of technology and the steps toward successfully implementing them in a school. This is supported by evidence of users' awareness of their responsibilities.
Community Engagement	This aspect describes how the school communicates and shares best practice with the wider community including local people, agencies and organisations.
Contribution of Young People	This aspect describes how the school maximises the potential of young people's knowledge and skills in shaping online safety strategy for the school community and how the benefits contribute to young people personal development.
Data Protection	This aspect describes the ability of the school to be compliant with the current Data Protection Act and Freedom of Information legislation (which includes the General Data Protection Regulation compliance). It describes the ability of the school to effectively control practice through the implementation of policy, procedure and education of all users. To reflect the changes that schools are required to make under the new legislation, the benchmark level for this aspect will be increased to level 2 in early 2019.
Digital and Video Images	This aspect describes how the school manages the use and publication of digital and video images in relation to the requirements of the Data Protection Act.
Digital Literacy	This aspect describes how the school develops the ability of young people to find, evaluate, use, share, and create digital content in a way that minimises risk and promotes positive outcomes.
Filtering and Monitoring	This aspect describes how the online safety policy is consistent with school expectations in other relevant policies / safeguarding practices and vice versa e.g. behaviour, anti-bullying, Prevent Action Plan; PHSE, Child Protection / Safeguarding and computing policies. There is evidence that the policy is embedded across the school.
Governor Education	This aspect describes the school's provision for the online safety education of Governors to support them in the execution of their role.
Governors	This aspect describes Governors' (or those in a similar position e.g. a

	Board of Directors) online safety accountabilities and how the school ensures this influences policy and practice.
Impact of the online safety policy and practice	This aspect covers the effectiveness of a school's online safety strategy; the evidence used to evaluate impact and how that shapes developments in policy and practice.
Mobile Technologies	This aspect considers the benefits and challenges of mobile technologies; their use in a school environment and beyond; the effective management of devices, apps and services and the implementation of an effective safeguarding strategy. This includes not only school provided technology, but also personal technology e.g. "BYOD".
Monitoring and Reporting on Online Safety Incidents	This aspect covers a school's effectiveness in monitoring and recording online safety incidents; its response to those incidents and how they inform online safety strategy.
Online Safety Education	This aspect describes how the school builds resilience in its pupils / students through an effective online safety education programme.
Online Safety Group	This aspect describes how the school manages their online safety strategy, involving a group with wide ranging representation.
Online Safety Responsibilities	This aspect describes the roles of those responsible for the school's online safety strategy
Parental Engagement	This aspect describes how the school educates and informs parents and carers on issues relating to online safety, including support for establishing effective online safety strategies for the family.
Password Security	This aspect covers the ability of the school to ensure the security of its systems and data through good password policy and practice. It addresses the need for age appropriate password practices and for the school to implement password records, recovery and change routines.
Policy Development	This aspect describes the process of establishing an effective online safety policy: the stakeholders involved and their responsibilities; consultation, communication, review and impact.
Policy Scope	This aspect considers policy content; its breadth in terms of technology and expectations around behaviour and its relevance to

current social trends and educational developments.

Professional Standards	This aspect describes how staff use of technology complies with both school policy and professional standards.
Public Online Communications	This aspect describes how the school manages its public facing online communications, both in managing risk and disseminating online safety advice, information and practice.
Reporting	This aspect describes the routes and mechanisms the school provides for its community to report abuse and misuse.
Self-Evaluation	This aspect describes how the online safety self-evaluation process builds on and aligns with other self-evaluation mechanisms the school might use.
Social Media	This aspect covers the use of social media in, by and, where appropriate, beyond the school. It considers how the school can educate all users about responsible use of social media.
Staff Training	This aspect describes the effectiveness of the school's online safety staff development programme and how it prepares and empowers staff to educate and intervene in issues when they arise.
Strategies for Managing Unacceptable Use	This aspect considers the actions a school may take and the strategies it employs in response to misuse. There is evidence that responsible use is acknowledged through celebration and reward.
Technical Security	This aspect describes the ability of the school to understand and ensure reasonable duty of care regarding the technical and physical security of administrative and curriculum networks (including Wi-Fi) and devices and the safety of its users.
Whole School	This aspect describes how the online safety policy is consistent with school expectations in other relevant policies / safeguarding practices and vice versa e.g. behaviour, anti-bullying, Prevent Action Plan; PHSE, Child Protection / Safeguarding and computing policies. There is evidence that the policy is embedded across the school.