



Guidance for schools/ colleges in England on how to respond to the online sexual harassment of school/college staff

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ABOUT THIS GUIDANCE

This guidance refers to information published by the Department for Education and is therefore intended for school/colleges leaders, governors, federations, and trust leaders in England.

Online Sexual Harassment

Sexual harassment is a form of unlawful discrimination under the Equality Act 2010.

A person (A) harasses another (B) if:

- a. A engages in unwanted conduct related to a relevant protected characteristic; and
- b. The conduct has the purpose or effect of (i) violating B's dignity or (ii) creating an intimidating, hostile, degrading, humiliating or offensive environment for B.

Online sexual harassment is unwanted sexual contact on a digital device which negatively impacts another person. This may also include indirect contact, such as fake accounts made in the likeness of an individual without directly contacting them. It can include an offline component; sometimes it starts offline and moves online, or the harassment escalates, and the person targeted begins to experience attacks offline as well.

Online sexual harassment can be perpetrated by an individual, for example someone in a position of authority such as a headteacher, school/college leader, supervisor, or by a pupil, parent, partner or colleague. It may involve groups of people such as parents, local community members, or the public. It may be obvious, implied or underhand. There may be no clear motive. Whatever form it takes, if schools/colleges or colleges fail to take sufficient action to protect their staff from online sexual harassment or fail to provide appropriate support to them when an incident happens, they could be failing in their duty of care to their employees.

Examples of online sexual harassment can include;

- ▶ Sending or requesting unwanted sexualised messages.
- ▶ Sharing unsolicited intimate imagery and/or requesting intimate imagery.
- ▶ Leaving sexualised or sexually suggestive comments on someone's online content.
- ▶ Sharing photos/videos/livestreaming without a person's permission with a sexual connotation/observation.
- ▶ Doctoring/editing imagery to make people appear to be in intimate or in sexually suggestive situations.
- ▶ Sexualised insults, name-calling or spreading rumours online.
- ▶ The taking, sharing or storing of intimate imagery without consent (down blousing/upskirting), or doctoring/editing imagery to appear sexualised.
- ▶ Online stalking, including persistently following or messaging someone, adding them to a group or creating fake profiles to hide identity in order to add/follow.
- ▶ Sharing of any sexually explicit imagery over the internet or in person, without necessary reason (necessary reasons may include helping remove content in sexting incidents between pupils, or to show an injury).
- ▶ Threatening to do any of the above.

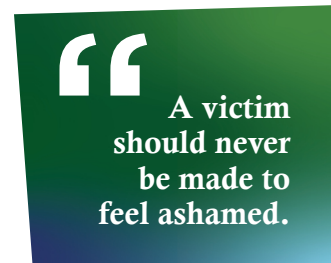
We understand that sexual harassment or abuse of this type rarely happens in isolation. As such, this guidance suggests actions to address the online element as well as the possible wider issue.

PART ONE: Responding to incidents

Reports of online abuse may be complex, requiring difficult professional decisions to be made. This guidance does not attempt to provide (nor would it be possible to provide) detailed advice on what to do in any or every particular case. The advice provides effective safeguarding practice and principles for schools/colleges to consider in their decision-making process.

The school/college should act as soon as an incident has been reported or identified. This will include:

- ▶ Providing appropriate support for the person who has been subject to online abuse (the victim);
- ▶ Reporting criminal behaviour to the police and or engaging children's services, where appropriate.
- ▶ Investigating what has happened.
- ▶ Assisting in removing harmful or inappropriate material from circulation.
- ▶ Applying disciplinary measures and working with the perpetrator (if known), to ensure that it does not happen again.
- ▶ Learning as an organisation how to better prevent future incidents or improve the quality of response



SAFEGUARDING AND SUPPORTING THE VICTIM

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be made to feel ashamed or given the impression that they are creating a problem by reporting online sexual abuse/harassment.

In some cases, the victim may not make a direct report. For example, a friend or colleague may make a report, or a member of school or college staff may overhear a conversation that suggests a member of staff is being subjected to online abuse. As with all safeguarding concerns, it is important that in such instances staff take appropriate action in accordance with school/college policies. If in any doubt, they should speak to the online safety/designated safeguarding lead (or a deputy). In such cases, the basic safeguarding principles remain the same, but it is important for the school or college to understand why the victim has chosen not to make a report themselves. This discussion should be handled sensitively.

In the case that the victim is unaware of the abuse directed at or about them, senior leaders should ensure that they are made aware of this in an appropriate setting (i.e. in a private space away from others), so they can regain control and be active in reporting.

When there has been a report of online sexual harassment, the online safety/designated safeguarding lead (or a deputy) may consider it necessary to make a risk and needs assessment. The risk and needs assessment should consider:

- ▶ the victim, especially their protection and support
- ▶ the alleged perpetrator
- ▶ other members of the school/college community as appropriate, especially any actions that are appropriate to protect them.

Engage with the victim to understand their needs and wishes, to ensure they feel some agency and that their voice is heard. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Consult with the victim about what changes would make school/college feel a safe space for them. This may mean, for example, that the victim would prefer to change their routine or location of work, rather than risk being blamed for making the perpetrator move.

Added considerations around gender, sexuality and cultural sensitivities

Some staff may have added vulnerabilities to be aware of in the context of online sexual harassment.

- ▶ Homophobic and biphobic bullying is behaviour or language that makes a person feel unwelcome, uncomfortable or upset because of their sexuality or perceived sexuality. Transphobic bullying is behaviour or language that makes a person feel unwelcome, uncomfortable or upset because of their gender identity.
- ▶ Cultural sensitivities are especially important to consider where the abuse is image based, for example, a woman that follows Islam may be targeted by abusers by sharing images of her without her hair covered in traditional head covering. Images such as this will not be an obvious breach of community guidelines on online platforms as there is no nudity or obviously violation, but for the woman can be just as damaging.
- ▶ If the comments are threatening, abusive, sexist, of a sexual nature or constitute a hate crime, the staff member affected or a representative from the school/college should contact the police to report them.

Consider the proportionality of the response. Support should be tailored on a case-by-case basis considering the nature of the behaviour and the impact on the victim.

ENGAGING THE POLICE AND/OR CHILDREN'S SERVICES

Where a report of online abuse constitutes a criminal offence, it should be reported to the police. Online harassment is a crime. Where the abuse is low level but persistent, reporting to the police may also be helpful as part of longer-term evidence gathering or in cases where the behaviour escalates in severity.

Where a report has been made to the police, the school or college should consult the police and agree what information can be disclosed to staff and others, including the alleged perpetrator.

They should also discuss the best way to protect the victim and any further actions the school/college should or should not take whilst the Police investigation is underway. For example, the school/college may hand over the investigation entirely to the Police. However, the school/college has a continuing responsibility to safeguard students and staff and should not postpone a safeguarding response because the police investigation hasn't yet concluded.

“ the school/college has a continuing responsibility to safeguard students and staff.

In some cases, it may become clear very quickly, that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school or college continue to provide support for the victim as required.

Where the perpetrator is known to be a child, consider whether to involve the Local Authority Designated Officer (LADO) to ensure that children's social care are able to provide early help as outlined in Working Together to Safeguard Children;

For further guidance on contacting the police and understanding the criminal process, please refer to the 'Sexual violence and sexual harassment between children in school' guidance from page 36 onwards; https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_colleges_and_colleges.pdf

INVESTIGATING AND GATHERING EVIDENCE

It is important that schools/colleges consider every report of online sexual harassment on a case-by-case basis. Always follow the appropriate procedures to investigate and safeguard victims (and student perpetrators where necessary).

If the perpetrator is unknown, steps can be taken to identify the person responsible. These can include looking at the school/college system and computer logs; identifying and interviewing possible witnesses; and, with police involvement, obtaining user information from the internet service provider. The Professionals Online Safety Helpline provide some information on conducting your own investigations in school: <https://swgfl.org.uk/magazine/schools/colleges-fake-accounts-and-ripas-what-you-can-do/>

The person subject to the online abuse may have evidence of the activity and should be encouraged to keep this to assist any investigation (this evidence may also be gathered by a colleague or friend). Evidence can include things such as screen shots of messages/online posts/comments, there might also be content online that is live, in which case additionally gather the web addresses to these as evidence.

Schools/colleges should be mindful that evidence can be taken down or disappear from viewer online platforms at any time, whether removed by individuals or at the request of corporate administrators of social media platforms. Schools/colleges should log and record incidents as part of their wider safeguarding monitoring practice and impact evidence. In some cases, further evidence may come to light at a later point, and it may become necessary to review the entire history of the case again.

If images have been shared of the victim you should ensure that only those that need to see these as part of an investigation have access to them. It can be retraumatising for the victim to imagine that a wide group of people have seen the images.

The Education and Inspections Act 2006 provides school/college staff with the right to confiscate an electronic device (including a mobile phone) in class if it contravenes the school's acceptable use of ICT or behavioural or anti-bullying policies. Ensuring pupils and their parents sign up to acceptable use policies in advance of any incident allows a school/college to search the content of that child's device when an incident arises. Further information about searching and confiscating electronic devices is provided in the ['Searching, Screening and Confiscation Advice for Schools/colleges'](#).

REMOVING HARMFUL OR INAPPROPRIATE CONTENT FROM CIRCULATION

Where harmful or inappropriate content has been circulated online, the perpetrator may be unwilling or unable to remove it. The school/college can report the matter to the app or website it has been shared on, which should remove content which is illegal or breaches their terms of use. However, the school/college can also seek guidance from the local authority, legal advisers or support from other agencies for example, the ReportHarmfulContent.com service or the Professionals Online Safety Helpline.

DISCIPLINARY ACTION

Decisions around appropriate sanctions and disciplinary action should be taken within the context of relevant policies, procedures and the law, with everyone involved made aware of the procedures being followed.

Where the perpetrator is a staff member

Where the perpetrator is known to be a member of staff, use the staff code of conduct to investigate the matter thoroughly and proceed through the disciplinary process. Note that it is possible the staff member is airing a grievance online rather than following the appropriate process at school/college.

Schools/colleges should refer to the staff behaviour policy, which should be explicit in the fact that sexual harassment and abuse is unacceptable, and relevant sanctions set out in the policy should be applied.

Where the perpetrator is a student

It is important that sanctions are applied in line with the school's acceptable behaviour policy. Consider the context and circumstances to determine the appropriate sanction.

Steps should be taken to support the perpetrator to change their behaviour, as well as ensuring they are able to access any help that they may need.

In some cases of online sexual harassment, the school/college may take the view that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour and anti-bullying policies and by providing pastoral support. Whatever the school's or college's response, it should be underpinned by the principle that online sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).



The school/college can also seek guidance from the local authority, legal advisers or support from other agencies.

Advice on behaviour and discipline in schools/colleges is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably expected of them. Exclusions statutory guidance for maintained schools/colleges, academies and PRUs is available at <https://www.gov.uk/government/consultations/revised-behaviour-in-schools/colleges-guidance-and-suspension-and-permanent-exclusions-guidance>

Disciplinary action can be taken whilst other investigations by the police and/or children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent a school/college from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly.

This is a matter for the school/college and should be carefully considered on a case-by-case basis. The online safety/designated safeguarding lead (or a deputy) should take a leading role. The school/college should consider if, by taking any action, they would prejudice an investigation and/or any subsequent prosecution.

Careful liaison with the police and/or children's social care should help the school/college make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for the school/college to reach their own view about what happened while an independent investigation is considering the same facts.

Working with parents and carers

Where the perpetrator is a student, the school or college will, in most instances, engage with their parents/carers. Schools/colleges should use their behaviour and child protection policies to provide the framework for this engagement. If parents are reluctant to engage, or it is suspected that the parents/carers are complicit in the sexual harassment, this should be reported appropriately either to the police (if there is an open investigation) and/or to social services.

Where the perpetrator is a parent/ carer or member of the wider school/ college community

Schools/colleges can bar someone from the premises if they feel that their aggressive, abusive or insulting behaviour or language is a risk to staff or pupils. It's enough for a member of staff to feel threatened.

The school or college should tell an individual that they've been barred, or they intend to bar them, in writing. Letters should usually be signed by the headteacher, though in some cases the local authority, academy trust or proprietor may wish to write instead. The individual must be allowed to present their side before the school/college makes their decision. A school/college can either:

- ▶ bar the person temporarily, until they have had the opportunity to formally present their side; or
- ▶ inform them they intend to bar them and invite them to present their side by a set deadline

After the individual's side has been heard, the school or college should decide whether to continue with barring them. The decision should be reviewed within a reasonable time, decided by the school/college.

Safeguarding and discipline

Taking disciplinary action does not negate the need to provide support to both perpetrator and victim, especially where they may be concerned the perpetrator themselves may have been a victim of abuse. The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator:

- ▶ The school or college will have a difficult balancing act to consider. On one hand they need to safeguard the victim, and on the other hand provide the alleged perpetrator with safeguarding support as appropriate and implement any disciplinary sanctions.
- ▶ Consider the nature of the allegations. The alleged perpetrator will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- ▶ Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. Advice should be taken, as appropriate, from specialist services and the police.
- ▶ Consider the dynamic between victim and perpetrator and if there is a power imbalance, for example if the staff member accused is in a senior position to the victim.

ORGANISATIONAL LEARNING

Effective safeguarding practice is for schools/colleges to create and maintain safe environments which reduce the risk of online sexual harassment. They should have clear, well-understood and regularly reviewed local policies and processes to both prevent and respond to incidents. Stakeholders should be aware of the support they can access if online abuse has occurred.

Identify what the organisation can learn from this incident:

1. Consider the context and factors influencing this incident. For example, did staff follow relevant policies and procedures? Were students aware of your acceptable use policy? Identify key strengths and risks of your organisation's approach.
2. Do you need to gather any further information to ensure you are confident that your school/college represents a safe environment for all staff, students, visitors and the wider school/college community? Identify required actions to gather further information. Consider undertaking a [360safe](#) or [360 groups](#) self-assessment.
3. What could you do to mitigate identified risks as well as maintain and build on identified strengths? Review your organisation's policies and procedures, guidance, education, training and technology provision.
4. Identify further preventative and supportive measures you can put in place, and how you will implement and monitor their success.

SOURCES OF IMMEDIATE SUPPORT

- ▶ Resources and information for victims can be found at <https://www.victimsupport.org.uk/>. See also <https://www.educationsupport.org.uk>. School/college leaders should recognise that online sexual harassment can have a lasting detrimental effect on staff wellbeing. Support should be offered as appropriate to help staff feel confident in their role again. Staff can access free emotional support from 'Education support'; <https://www.educationsupport.org.uk/get-help/help-for-you/helpline/>
- ▶ Schools/colleges should not feel that they are alone in dealing with online abuse. The police will be important partners where a crime might have been committed. Many schools/colleges have close relationships with their local police force or can access non-emergency support by calling 101. The designated safeguarding lead (or deputy) should (when necessary) be liaising closely with the local police presence, where there is one.
- ▶ **The NSPCC** provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk. The helpline provides expert advice and support for school/college staff and will be especially useful for the designated safeguarding lead (and their deputies).
- ▶ **The UK Safer Internet Centre** provides the Professionals Online Safety Helpline at 0344 381 4772 and helpline@saferinternet.org.uk. The helpline provides expert advice and support for school/college and college staff with regard to online safety issues and will be especially useful for the designated safeguarding lead (and their deputies) when a report of sexual violence or sexual harassment includes an online element.

PART TWO: Preventing online sexual abuse and harassment

School/college leaders have legal duties to keep their staff safe. There are a number of actions schools/colleges can take to protect their staff from online sexual harassment:

- ▶ A whole school/college approach to online safety
- ▶ Ensuring staff have been trained so they know how to keep themselves safe online
- ▶ Ensuring clear and well-understood policies are in place that leaves no doubt for staff, pupils/students and parents/carers as to what online sexual harassment is and what the implications of carrying out this kind of abuse are.

These rights and responsibilities should be embedded within acceptable use policies, pupil behaviour policies, and staff behaviour policies (sometimes called a code of conduct). Guidance and templates to create/refresh policies can be found here; <https://swgfl.org.uk/resources/online-safety-policy-templates/>

1. Schools/colleges should encourage all members of their community to use the internet and social media responsibly. (<https://www.saferinternet.org.uk/blog/back-school-social-media-advice-teachers-professionals-online-safety-helpline>)
2. Employers have a duty to support all members of staff. Nobody should feel victimised in their workplace.
3. Many instances of online sexual harassment are illegal and should be referred to the police by the individual affected or their school/college.

School/college leaders should take reports of online sexual harassment seriously and follow their staff code of conduct, anti-bullying policies, and specific laws carefully and consistently.

A WHOLE SCHOOL/COLLEGE APPROACH TO ONLINE SAFETY

Schools/colleges which demonstrate best practice in online safety take a whole school/college approach, including protecting their staff from online sexual harassment. Everyone in the school/college should be engaged as required, be that in making policies or actively reading and signing in agreement. This will include the governing body or proprietor, all the staff, children, adult students, parents and carers.



Employers have a duty to support all members of staff. Nobody should feel victimised in their workplace.

1. Online safety should be a recurrent theme running through policies and procedures. The school's approach to online safety should reflect and be part of the broader approach to safeguarding.
2. The schools/colleges safeguarding procedures, with regard to online safety, should be transparent, clear and easy to understand for staff, pupils, students, parents and carers.
3. Online safety should be bedded into the curriculum rather than taught in isolation.
4. Relationship and sex education should be included in the curriculum and include learning around sexual harassment/abuse as appropriate to the key stage; <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

Please see below link for guidance and resource on how to help create a whole-school/college approach to online safety; <https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/curriculum-planning>. Consider undertaking a [360safe](#) or [360 groups](#) self-assessment.

ONLINE SAFETY TRAINING

- ▶ Decisions relating to teachers' professional development rightly rest with schools/colleges, leaders and educators, as they are in the best position to assess their individual requirements, local priorities and issues. Further information can be found in the 'The Standard for Teachers' Professional Development guidance.
- ▶ Schools/colleges should consider the importance of their staff being aware of the different types of online sexual harassment, alongside the laws protecting them, thus empowering staff to report this abuse without fear of consequences.



Specialist organisations can offer a different perspective and expert knowledge.

- ▶ The Department for Education has guidance on 'Sexual violence and sexual harassment between children in schools'. It could be the case that this information is included in appropriate safeguarding and child protection training and expanded to include whole school/college communities.

The following free resource may also help: <https://swgfl.org.uk/resources/preparing-for-preventing-and-managing-incidents-involving-online-and-offline-violence/>

- ▶ To support their training, schools/colleges should consider carefully if external input would help train their staff in staying safe from sexual harassment online. Specialist organisations can offer a different perspective and expert knowledge. It is good practice for schools/colleges to assure themselves of the quality of any specialist provider whose services they may choose to use (guidance here from UKCIS can help: <https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings>)
- ▶ Links to some specialist organisations that could help include:
 - <https://vinciworks.com/courses/diversity-harassment/mystory-harassment-and-bullying-at-work>
 - https://www.essentialskillz.com/business-protection-online-training/sexual-harassment?gclid=Cj0KCQjwsZKJBhC0ARIsAJ96n3UAEopXW2-oyo3RSKlii-PqSVXratHiLETx_HiuKwoXU0AkQ4_m8aAo5nEALw_wcB

POLICIES AND PROCEDURES

It is important for schools/colleges to reflect online sexual harassment in existing policies (as per the whole school/college approach). There are 3 main areas to consider:

1. Staff
2. Pupils/Students
3. Parents and Carers

It will be important that everyone understands the school/college's approach to online sexual harassment, are clear as to what this abuse looks like online, and what implications and sanctions will be in place if this abuse takes place.

Staff behaviour

Keeping Children Safe in Education (KCSIE) statutory guidance sets out that schools/colleges should have a staff behaviour policy (sometimes called a code of conduct) which should, amongst other things, include acceptable use of technologies, staff/pupil relationships and communications including the use of social media.

The staff behaviour policy is an ideal place to frame acceptable online behaviours for school/college staff, especially in how they are expected to engage with each other online, and be explicit in the school/college approach to online sexual harassment i.e. it is never acceptable and will be investigated/dealt with, including by reporting to the police where relevant.

Other areas that may strengthen acceptable use of technology policy include:

- ▶ Rules on the use of digital equipment and technologies when used on or off the school/college premises within school/college hours: for example, internet access, tablets, laptops and mobile phones.
- ▶ Acceptable behaviour for staff (and pupils), including behaviour outside school: for example, the use of social networking services and other sites, so as not to harm others or bring the school/college into disrepute. This includes image abuse, be that intimate image abuse or the use of images taken in school/college and doctored to sexually harass staff.
- ▶ Guidelines on digital communications between staff, pupils/students and their parents and the consequences and sanctions for users not following them.
- ▶ Guidance on whistle blowing policies and how to deal with an online allegation of abuse and/or sexual misconduct; <https://www.gov.uk/guidance/whistleblowing-procedure-for-maintained-schools/colleges>



The staff behaviour policy is an ideal place to frame acceptable online behaviours for school/college staff.

Student behaviour

Behaviour policies should include sections such as peer to peer conduct, staff conduct towards students and other colleagues, and student conduct towards staff. Behaviour policies should explicitly include sexual harassment abuse. This policy will outline the kinds of abusive sexualised behaviour that are unacceptable and include sanctions if this policy is breached, this will also advise on when/if the incident(s) will be reported to the police and/or other relevant authority, such as local authority social services.

Acceptable use of technology

An Acceptable Use Policy relates to the use of technology in school/college. With this guidance in mind, the policy should include rules around how and where mobile devices can be used, for example only at break time or after school/college and not in the classroom, with the aim to prevent imagery being taken without consent.

Mobile technology

Keeping Children Safe In Education sets out that schools/colleges should have a clear policy on the use of mobile technology. This will be another opportunity for schools/colleges to embed their approach to online sexual abuse and harassment, and this document in particular, provides an opportunity to be clear that the use of mobile technology – be it by staff or pupils/students – is never acceptable to abuse or harass a member of school/college staff with.

Senior leaders should ensure that the policies and procedures are understood and followed by all staff and the school. Schools/colleges can achieve this by making the policies readable and accessible, consider lowering the reading age of the policy so all students can understand. Also consider asking staff/students to sign to say they have read and understood the policy.

Parents/Carers

Creating a good school/college – parent/carer relationship can help create an atmosphere of trust that encourages concerns to be raised in an appropriate manner. Part of this is making sure that parents/carers are aware and understand how they should communicate with their school.

- ▶ Parents and carers should be informed of the correct complaints procedure at school, so that if they have a grievance, this can be raised appropriately.
- ▶ Parents and carers have a right to raise concerns about the education of their child but should always do so in an appropriate manner. Schools/colleges should make clear that it is not acceptable for parents or carers to abuse or harass school/college staff online, be it via social media, messaging apps or emails. It should be clear that online abuse will be dealt with as seriously as face-to-face abuse. The best way to do this is to be as clear as possible in the policies and processes that are shared with parents and carers, so there can be no doubt as to the appropriate standards of online communication.
- ▶ The Department for Education's guidance 'Controlling access to school/college premises' provides useful advice to help schools/colleges understand procedures in relation to Section 547 of the Education Act 1996, which makes it a criminal offence for a person who is on school/college premises without lawful authority to cause or permit a nuisance or disturbance.
- ▶ Schools/colleges must make it clear to the whole school/college community that if a crime has been committed against a member of staff, it will be reported to the police.

- ▶ "Schools/colleges should remind parents, whenever appropriate, that defamatory statements against staff have legal consequences and that it may be a criminal offence under the Education Act 2011 to publish any material that may lead to the identification of a teacher who has been accused of abuse by or on behalf of a pupil from the same school. Publication includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public". This means a parent or carer who publishes details of an allegation on social media would breach the reporting restrictions if what was published could lead to the teacher's identification by members of the public. Breach of reporting restrictions is a crime, punishable by a fine of up to £5000.



Parents and carers should be informed of the correct complaints procedure at school.

PART THREE: Guidance for staff

What to do if you are abused or sexually harassed online

If a staff member is targeted online with content or messages that are sexually suggestive, abusive or constitutes sexual harassment, there are several things staff can do:

- ▶ This should be reported to their line manager or senior member of staff, so the school/college can be aware and help, especially in the case that the perpetrator is a student or member of the school/college community.
- ▶ Staff should also, where possible, report this directly to the platform. Information about how to report content on several different social networks can be found here; <https://reporthearmfulcontent.com/advice/>
- ▶ "The NEU produced this guidance for school/college staff on how to respond to cyberbullying; <https://neu.org.uk/advice/cyberbullying-school-staff>"

Reporting sexual harassment

- ▶ School/college and college staff should understand the protocols for reporting online abuse and their responsibilities in doing so. Many schools/colleges appoint a designated person or nominated member of the senior management team to deal with bullying, including online abuse.
- ▶ If the designated person is not able to help, there is a conflict of interest, or the staff member feels their concerns have not been handled appropriately, staff should be aware of escalation routes including reporting to governors/school/college board or local authority.
- ▶ The wishes of the victim in terms of how they want to proceed with investigating the incident should be taken into account. Victims should be given as much control as possible over decisions regarding how any investigation will be progressed, and any support that is put in place for them.

Getting sexually abusive/harassing content removed from online platforms

- ▶ If online content is abusive in a sexually suggestive way and the person(s) responsible are known, supporting staff should, where possible, try to engage with them and make sure that they understand why the material is unacceptable, (in breach of behaviour and or acceptable use policies) offensive or illegal and request they remove it.
- ▶ Most social networks have reporting mechanisms in place to report content which breaches their terms. If the person responsible has not been identified or does not respond to requests to take down the material, staff should use the tools on the social networking site directly to make a report, and/or contact the Professionals Online Safety Helpline to support them to do this.
- ▶ Some service providers will not accept complaints from a third party. In cases of mobile phone abuse, where the person being harassed is receiving malicious calls and messages, the account holder will need to contact the service provider directly.

- ▶ Before contacting a service provider, it is important to be clear about where the content is; for example, by taking screen shots of the material that includes the web address. If requesting that they take down material that is not illegal, be clear to point out how it breaks the site's terms and conditions. Where the material is suspected of being illegal, staff should contact the police directly.

These incidents if proven, are likely to lead to sanctions against pupils or parents and disciplinary action against school/college employees. If persisting or extreme, it may also be reported to law enforcement. If you need guidance on whether an incident should be reported to the police, please call the 'Professionals Online Safety Helpline' who can advise.

- ▶ If there are concerns surrounding staff conduct which has led to or is framed within the abuse, this should be investigated (under whistle blowing policies noted on page 7) and reported appropriately if found to be true.
- ▶ This type of online harassment and abuse can be very unsettling and lead to negative feelings. Should staff be struggling, they can access free emotional support from 'Education Support', who offer a helpline for all teaching staff; <https://www.educationsupport.org.uk/get-help/help-for-you/helpline/>

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Schools/colleges should provide their staff with opportunities to develop their digital skills and the positive use of technologies

MANAGING YOUR ONLINE LIFE AS A PROFESSIONAL

All school/college staff have a responsibility to make themselves aware of the systems within their school/college that support their safeguarding and wellbeing, including identifying the person to whom they should report incidents of online sexual harassment on or offline. This support should be explained to staff as part of their induction, in staff training and wellbeing sessions.

Schools/colleges should provide their staff with opportunities to develop their digital skills and the positive use of technologies, as well as regular child protection online safety training, so that they can keep themselves up to date with various technologies.

- ▶ All school/college staff are in a position of trust and are expected to act in a professional manner at all times. The Teachers' Standards set out the legal minimum requirements for teacher practice and conduct.
- ▶ There may be times where an individual's actions in their personal life come under scrutiny from the community, the media or public authorities, including with regard to their own children, or adults in the community.

Staff should be aware that their behaviour online, and how they react to this pressure whether in or out of the workplace, could compromise their position within their school/college or college, or bring their employer into disrepute. Such behaviour may result in their dismissal, their prohibition from teaching by the Teaching Regulation Agency (TRA) or action by another relevant regulatory body.

If a teacher is a victim of abuse, such as intimate image abuse, this will be considered as a priority by the school/college and the school/college will work to support the staff member to resolve the issue. Sanctions will only apply to the teacher where there are concerns around their conduct relating towards pupils, staff and/or other children

- ▶ School/college and college staff should guard themselves against identity theft and have a good understanding of laws and policies protecting their personal data including images. For example, a staff member may have their image/name used by another to open a social network page, then posts false opinions or perceived indecent images – to inflame opinion against them or cause trouble and damage their reputation.



Staff can contact the Professionals Online Safety Helpline for guidance.

- The NASUWT produced this guidance for teachers on protecting your privacy online; <https://www.nasuwt.org.uk/advice/health-safety/social-media-the-abuse-of-technology/protecting-your-privacy-online.html>
- You can also access 'Privacy checklists' for main social media networks from the UK Safer Internet Centre here; <https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/teaching-resources/social-media-checklists>

Staff should be aware of their rights to privacy and be able to report incidents where this has been violated directly to the platform, as well as to their line manager. If staff need guidance on specific platforms and the reporting methods available to them, they can contact the Professionals Online Safety Helpline for help on 0344 381 4772.

- ▶ Staff should know and understand their school/college policies on the use of social media. Childnet's '[Using Technology](#)' guide has more information on what to be aware of.

The ICO provide comprehensive guidance for staff on how to stay safe online, from protecting identity to avoiding scams <https://ico.org.uk/your-data-matters/online/social-networking/>

Social networking

- ▶ Staff have the right to use social networking sites, internet dating sites, message boards or forums as any other internet user. This does require them submitting some personal information online so it is important that staff are careful with how much they choose to share online, and what information is publicly available.
- ▶ When creating profiles, staff may wish to assess how easily they want to be found online. It may be that using a pseudonym and/or a picture that does not obviously show their identity will afford them some more privacy and minimize the risk of students/wider school/college community finding them online. It is up to staff how visible they wish to be and some may choose to be findable but manage their profiles effectively to prevent any unwanted contact.
- ▶ It is important for staff to understand that with most social networking and other sites, profile pictures are always publicly available. Pictures can be harvested by abusers, to be doctored and or shared further without consent and out of context.
- ▶ Staff should review the privacy settings on their social media accounts regularly to ensure it is still at the level they want. Staff can contact the Professionals Online Safety Helpline for guidance on this.



ANNEX A - PREVENTING ONLINE SEXUAL HARASSMENT

CHECKLIST FOR SENIOR LEADERS

The senior leadership team are confident and up to date in their knowledge of understanding, preventing and responding to online sexual harassment.

The organisation ensures the whole school/college community is involved in preventing online harm and sexual harassment, including the creation of related policies.

Staff understand how the children and young people in the school/college community use technology and how they can use it to perpetrate online sexual harassment.

It is clear to staff that acceptable use of technology forms part of their contract.

Staff, leaders, governors, parents and carers understand how and when to report incidents of online sexual harassment.

The school/college supports anonymous and confidential reporting of online sexual harassment.

The school/college is able to identify and respond effectively to online comments made by others that reference the school and its community.

Filtering logs alert the school/college to breaches of the filtering policy. Pro-active monitoring supports a prioritised safeguarding response to serious issues.

The school/college has a process to support staff who are being sexually harassed online during holiday/out of hours.

The school/college is confident that it sufficiently educates staff and students in digital skills and the appropriate use of technology.

The school/college monitors the impact of its online harms prevent work and takes appropriate steps to improve.

ANNEX B - FURTHER INFORMATION AND SUPPORT

SPECIALIST ORGANISATIONS

Organisation/Website/Guidance and what they do

<https://www.saferinternet.org.uk/>

Provides advice and support to children, young people, parents, carers and schools/colleges about staying safe online.

They also provide the Professionals Online Safety Helpline and Report Harmful Content, to support the removal of legal but harmful content online. reportharmfulcontent.com

<http://www.swgfl.org.uk/>

Includes a template for setting out online safety policies

Also provide the Revenge Porn Helpline for people over 18 who have had their intimate image(s) shared online without consent; <https://revengepornhelpline.org.uk/>

Harmful Sexual Behaviour Support Resources <https://swgfl.org.uk/helplines/harmful-sexual-behaviour-support-service/>

<https://neu.org.uk/advice/cyberbullying-school-staff>

The NEU produced this guidance for school/college and college staff on how to respond to cyberbullying;

<http://www.childnet.com/cyberbullying-guidance>

Guidance for schools on cyberbullying

<https://www.gov.uk/government/organisations/uk-council-for-internet-safety>

The UK Council for Internet Safety's website provides:

- ▶ Sexting advice
- ▶ Online safety: Questions for Governing Bodies
- ▶ Education for a connected world framework

SPECIALIST ORGANISATIONS (Continued)

Organisation/Website/Guidance and what they do

<http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/e-safety-schools/> NSPCC advice for schools/colleges

<http://www.lgfl.net/online-safety/> Advice and resources from the London Grid for Learning

<http://www.gov.uk/government/publications/searching-screening-and-confiscation> Guidance to schools/colleges on searching children in schools/colleges and confiscating items such as mobile phones

www.educationsupport.org.uk Emotional support for teaching unions

TOOLKITS

www.360safe.org.uk Online safety self-review tool for schools/colleges

www.360earlyyears.org.uk Online safety self-review tool for early years settings

www.360groups.org.uk/ Online safety self-review tool for groups

INFORMATION SHARING

<https://ico.org.uk/for-organisations/education/> Information to help schools/colleges comply with General Data Protection Regulation (GDPR).

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice> Guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers.