Controlled Schools' Support Council
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18 April 2019

Dear sir/madam

Safeguarding Board for Northern Ireland - Keeping Children and young people safe online: an e-Safety Strategy and Three Year Action Plan for Northern Ireland 2019 – 2022.

Thank you for the opportunity to respond to the above consultation.
The Controlled Schools' Support Council (CSSC) was set up in September 2016 to represent and support the interests of the controlled sector in Northern Ireland. To date 94% of controlled schools have opted-in to register with CSSC.

The controlled sector is:
- Large – it accounts for 49% of all schools and caters for over 143,600 children, making it the largest education sector in Northern Ireland.
- Diverse – providing education across all school types, *i.e.* nursery, primary, secondary, grammar and special schools. Within this, controlled integrated and controlled Irish Medium schools are included.
- Inclusive – providing education for children of all faiths and none (63% of pupils define as Protestant, 10% Catholic and 27% 'other') and over a third of newcomer pupils in Northern Ireland.

The CSSC welcomes the opportunity to comment on the Safeguarding Board for Northern Ireland's draft e-Safety Strategy for Children and Young People in Northern Ireland.

Vision and definition of e-safety

SBNI Vision for the draft e-safety strategy: -
Our vision is that all children and young people can make best use of the educational, social and economic benefits of the online world, while staying safe from potential harm online.

The Safeguarding Board for Northern Ireland's (SBNI) vision articulates well the desired gains from the E-Safety Strategy and Action Plan.

CSSC notes that the objectives linked to the vision include the aim of improving e-safety by facilitating the responsible use of digital and internet technology.

CSSC believes that every child and young person should be equipped with the information and knowledge that allows them to use digital and internet technology appropriately, in a manner which is respectful of others and ensures that they are safe from harm. This informed and responsible participation in the online world could potentially have been referenced in the articulated vision, however, it is noted that the definition for e-safety agreed by the strategy references the need to use electronic devices in a safe, responsible and respectful way and CSSC is therefore satisfied that this this key message is a part of the strategy.

E-safety is about using electronic devices in a safe, responsible and respectful way. It means safeguarding children and young people in the digital world and educating them to keep themselves safe online.

CSSC is in agreement with the definition that the strategy has assumed for the purposes of common understanding, however, the need to use electronic devices in a safe, responsible and respectful way should also be reflected in the related objectives as the impact of using electronic devices inappropriately can have a potentially detrimental impact on the mental health and well-being of young children and in the more extreme cases, inappropriate use of the internet can lead to criminalising young people and have a lasting impact on the young person's reputation and prospects.

Who should be involved in e-safety?

CSSC agrees with the approach that a range of people should be involved in keeping children safe online. The opportunities, but also the risks associated with the use of new technology, impact on the whole of society and need to be understood by all who have responsibility for children and young people whether as a parent/carer, youth worker, teacher, policy maker or a member of the general public.

CSSC notes that a co-design process involving a Project Board, a Young People's Advisory Group and a Parent Teacher Advisory Group informed the development of this e-Safety Strategy. CSSC believes that this is a crucial recognition of how the strategy must reflect the needs of those it will impact and engagement with teachers, parents, children and young people, policy makers and practitioners is essential to the process of designing an e-safety strategy which is informed by those it will affect. Continued engagement with all of these stakeholders should be a feature of all ongoing work in the area of e-safety.

CSSC welcomes the consultation document's acknowledgment that "responsibility for educating children and young people doesn't fall solely to teachers" and that education can take place at home, at school, in residential or custodial care, at youth clubs and organisations, while socialising with friends or wider family, via the online world and in a wide range of other settings.

While the strategy acknowledges the role that parents, the wider family and the wider population can play in modelling acceptable behaviour it is crucial that the strategy clarifies through any public awareness campaign that e-safety is a matter for all to engage with and

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it is not only children who need to be educated and empowered but also their parents and the wider community so that their capacity to understand the opportunities but also the risks afforded by the use of new digital technologies is enhanced. E-safety and the risks posed by engagement with the online world is an environmental concern which requires the participation of all members of society. The British government's commitment to legislate for more rigorous regulation of online content highlights the importance of not making e-safety solely the responsibility of those who work with children and young people and that industry representatives and internet providers also have a role to play in reducing online risks

Key Pillars for Action and Areas of Activity

(a) Creating a sustainable e-safety infrastructure for Northern Ireland.

CSSC welcomes the intention to strengthen links between Northern Ireland and wider UK e-safety structures such as the UK Council for Internet Safety (UKCIS) and believes that this will facilitate the SNIB's intention of taking "an evidence based approach ensuring that e-safety training and support services are based on both evidence of need and what works to keep children and young people safe online." CSSC notes that the UKCIS's, *'Education for a Connected World: A framework to equip children and young people for digital life,'* notes the topics that children should be equipped to deal with at different developmental stages and these include self-image and identity, online relationships, online reputation, online bullying, managing online information, health, wellbeing and lifestyle, privacy and security, copyright and ownership. While the strategy does not explicitly outline if this will be the approach taken in Northern Ireland CSSC would welcome this as a model for the content that should be delivered to children and young people and notes the proposed design and development of a website in year 1 of the three year plan. It is hoped that this will provide educators with the relevant and necessary resources to support their approach to e-safety and that this website will become a repository of information that allows schools to ensure that they are aware of any changes to legislation, emerging trends in online activity and the potential impact on their school population.

CSSC endorses the development of a comprehensive cross-government action plan as the most appropriate way to ensure that the strategy reflects existing evidence of good practice in e-safety approaches and believes that collaboration with existing e-safety mechanisms in the UK will potentially allow the SBNI to promote and add value to existing provision.

In its consideration of the Northern Ireland context CSSC notes the National Children's Bureau's (NCB) finding in relation to e-safety in 2014 that, "there is a lack of consistency across Northern Ireland in terms of training delivered and messages given and NCB highlights "the need for a comprehensive cross-departmental strategy to support the consistent roll-out of e-safety training and support." The Children's Services Co-operation Act (NI) 2015, outlines that each children's authority must, so far as is consistent with the proper exercise of its children functions co-operate with other children's authorities and with other children's service providers' engaged in activities which contribute to the well-being of children or young persons. Collaboration between these authorities is essential to allow for the sharing of resources and the pooling of funds so that parents/carers, all those working with children and young people and the general public are supported in empowering children and young people to be safe and secure online.

CSSC commends the rights based approach taken to design the strategy and notes the European context of much of the engagement around e-safety through the Safer Internet Forum, the Internet Governance Forum and the Safer Internet Centres. CSSC would agree with the assertion that 'given the decision to leave the European Union, it is critical that mechanisms are put in place to ensure the continuation of conversations and sharing of good practice on e-safety.'

CSSC approves of the recommendation of a baseline level of filtering for Wi-Fi in public areas as a further means of ensuring the e-safety of all children and young people and welcomes the intention to encourage a consistent approach to e-safety through stronger Departmental direction on technical provision. CSSC is aware of the potential for Wi-Fi outside the C2k Wireless system to allow pupils' unrestricted access in school grounds and therefore welcomes the intention in the strategy for continued reminders and enhanced education for schools to further safeguard children in this area. CSSC is one of the key educational stakeholders informing the work of the Education Authority's Education Technology Services Project to ensure that the educational and technology infrastructure and services provided to schools adequately support the business critical functions and meet the current and future needs of users in schools and therefore welcomes the SBNI's work in the area of addressing how to keep children and young people safe online.

(b) Educating our children and young people, their parents/carers and those who work with them.

CSSC notes the acknowledgment within the strategy of the need to develop a consistent approach to e-safety messages for children, young people, parents, carers and practitioners. The draft consultation notes that e-safety training and support is delivered across Northern Ireland by a number of training and development organisations and that this accounts for the disparate nature of key messages and approaches to training delivery. CSSC therefore welcomes the strategy's aim of providing "clarity and coordination of messaging, ensure quality of resources, training and dissemination methods and advocate for the measurement of impact on the children, young people and families that services are delivered to." While CSSC agrees with the intention of embedding a culture of e-safety within schools, colleges, children and youth organisations, there is a real concern as to how the skilling up of practitioners will be resourced. While the strategy proposes a number of

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key actions to support the skilling up of practitioners, including a wider focus across primary training and in continued professional development, it is not clear how this will be resourced. The reference in the three year action plan to the key activity of exploring specialist funding support to buy-in training from the approved list of charter mark delivery organisations does not provide certainty, yet the expectation is clear in the strategy that schools will have to assume additional responsibilities in this area that may not reflect current practice. Over the last few years the reduction in funds available to education has placed many schools in difficult financial circumstances and a survey of CSSC's member schools in late 2017 revealed that funding cuts are resulting in:

- A reduced curriculum offer
- Significantly larger classes
- Reduced planning and preparation time for teachers
- A reduction in teaching and non-teaching staff across schools
- A reduction in extra and co-curricular activities.

While the consultation document states that the majority of schools and children and youth organisations have appointed a dedicated person with responsibility for e-safety within the safeguarding team, 'it also argues that their role must be strengthened with appropriate resourcing allocated to allow them to build their capacity and that of their colleagues'. The ability of schools to resource a role of this type will be difficult for most schools in the current economic context. The consultation document calls for departmental guidance to ensure that e-safety is embedded within the organisational culture. If this is to be achieved schools will need to be resourced to avail of the relevant approved training and to reward staff who assume the responsibility for co-ordinating the e-safety approach of the school and ensuring that e-safety becomes a fully integrated aspect of safeguarding within the school and is incorporated in the wider school curriculum at all ages and stages.

(c) Developing evidence informed quality standards for e-safety

CSSC understands that trends and risks in online activity change often, change quickly and can render current legislation outdated. CSSC therefore welcomes the intention to review the current legislative framework so that policy makers, parents, carers and practitioners are kept informed of the current risks and the most appropriate e-safety responses. The website proposed for development in year 1 of the three year e-safety action plan 2019-2022 together with the proposed social media presence will be essential in informing schools of any changes that they need to be aware of.

The lack of consistent messaging in e-safety and the large number of different organisations who deliver training for young people or practitioners is acknowledged in the strategy and is a recurring key issue raised by stakeholders in the focus groups carried out by the SBNI.

While the intention to develop a charter mark scheme for e-safety training may ensure that the programmes delivered by the wide variety of organisations commit to specific consistent criteria around messaging, delivery methods and practitioner training, it does not address the fact that schools will still have to resource these programmes and services. It is noted that in year 3 of the action plan one of the specific activities for the Child Protection Senior Officials Group will be to explore specialist funding support for schools, colleges, children and youth organisations to buy-in training from the approved list of charter mark delivery organisations. CSSC would contend that this is crucial in respect of the current economic context of schools in Northern Ireland.

In developing evidence based quality standards for e-safety provision, CSSC welcomes the intention within the strategy to take an evidence based approach to work on supporting e-safety and to undertake to understand the scale of the problem through the collection of more robust data to inform future direction. The strategy notes that this includes the recording and reporting of incidents across the children and youth sector and references school's responsibility under the Addressing Bullying in Schools (NI) Act 2016, to record information pertinent to incidents of bullying in schools. If a similar approach is to be taken to e-safety incidents, some of which may invariably feature in bullying incidents, it is essential that schools are supported in the development of appropriate policy and procedures and that any requirement to record such incidents does not become onerous and is resourced in a manner that allows schools to easily adopt as part of every-day practice. The strategy references the need to strengthen the self-assessment processes as a means of developing and maintaining a consistent approach to e-safety and the intention to promote self-assessment tools such as the '360 degree safe' tool. The website will be crucial therefore in acting as a central repository for the most relevant and helpful e-safety information, guidance and resources. Engagement with schools will be essential in establishing the type of support that should be in place to assist their efforts and CSSC notes the commitment in year 2 of the action plan to the development and dissemination of sample e-safety policies and procedures to support embedding of e-safety within organisations.

Response to Equality and Human Rights Screening

CSSC is of the opinion that the actions SBNI is taking to address the equality issues have been thoroughly considered and will take an evidence based approach based on both evidence of need and 'what works' to keep children and young people safe online. CSSC is reassured by the commitment to develop gender appropriate messaging in acknowledgment of the differing impact of specific online risks to girls and boys and those identified as more vulnerable to potential risks such as lesbian, gay, bisexual and transgender people. CSSC also notes the commitment to ensuring that any e-Safety messages are age-appropriate and that Department of Education guidance will ensure regional consistency which will ensure that all children and young people receive the same support. CSSC is furthermore assured by the commitment in year 1 to the development of an agreed reporting pathway to enable children and young people to access support if needed.

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Response to the Regulatory Impact and Rural Proofing Screening Assessments

CSSC is satisfied that no rural issues have been identified to date that differ from the regional impacts that have been identified. CSSC is assured that the SBNI Strategic Plan 2018-2022 will be evaluated on an ongoing basis by the SBNI Board.

Proposed governance and accountability structures

CSSC is in agreement with the proposed governance and accountability structures, in particular the acknowledgement of the need for a cross-departmental body in the form of the Child Protection Senior Officials Group. CSSC would welcome inclusion in the e-safety forum which is comprised of representatives from statutory, community and voluntary sector children and youth organisations.

To conclude CSSC is of the opinion that the vision articulated for this strategy is a positive one. However, CSSC is concerned about the resource implications of some of the strategy's recommendations, namely the expectation for schools to buy-in training and the recommendation that every school will have a designated member of staff who will have responsibility for embedding a culture of e-safety within the school. CSSC is of the opinion that e-safety is not something that should be shouldered by schools only and is reassured by the strategy's clear acknowledgment of this and the assertion that education takes place "at home, at school, in residential or custodial care, at youth clubs and organisations, while socialising with friends or wider family, via the online world and in a wide range of other settings." The development of appropriate resources will be crucial in supporting schools to address e-safety and the development of the proposed website should be an important depository of the most up to date information and resources.

The cross-departmental approach to developing this strategy, the wide variety of stakeholder input on the Project Board, consultation with young people, parents teachers and children and youth organisations is very reassuring as is the intention to progress the work through the Child Protection Senior Officials Group, Cyber-Security Leadership Board, UKCIS and member bodies and the E-Safety Forum with SBNI as the co-ordinating body. CSSC welcomes the evidence based and outcomes based approaches articulated in this strategy and the commitment to ensure the continued meaningful participation of all stakeholders. CSSC would be willing to discuss its response with the Strategic Board for Northern Ireland.

Yours faithfully

Barry Mulholland
Chief Executive