

Visigo eSafety Monitoring Services

What is Visigo?

We have a legal duty to protect children online and how well we do this is assessed by Ofsted. Visigo is a service that monitors student activity on our computers for areas of concern, such as self-harm, bullying, grooming and other risk categories. It will send alerts to our safeguarding team if it detects that a student is at risk.

How does Visigo work?

The Visigo software is downloaded onto our computers, where it collects text which is typed using the keyboard. Operating system passwords are not captured, other passwords across the web are excluded on a best endeavours basis. The software also takes screen shots (what is visible on the screen) when concerning behaviour is detected. This means that information will still be collected even if the websites or apps being used encrypt data.

What information does Visigo collect?

Visigo collects all the information which is typed and screen shots when required. The information may include personal details, family details, details of hobbies and interests, lifestyle and social circumstances, financial information, educational and employment details, health details, racial or ethnic origin, political opinions and religious or other beliefs.

What happens to the information which Visigo collects?

All the information collected by the Visigo software is sent to Smoothwall Limited, which is the company who provides the Visigo service. The information is then analysed for anything that could put a student at risk.

Who is Smoothwall Limited?

Smoothwall Limited is a UK company which has its head offices at Avalon House, 1 Savannah Way, Leeds Valley Park, Leeds, LS10 1AB.

It is registered at Companies House under company number 4298247. It is also registered as a data controller with the Information Commissioner's Office under registration number Z6048580.

If you would like more information about Smoothwall Limited, please contact the Data Protection Officer, Simon Scott-Beer.

Why does Smoothwall Limited collect the information?

Smoothwall Limited collects and processes the information so that it can provide, test, develop and improve the Visigo services, so that the school can meet its safeguarding obligations in respect of students' online safety, which is in the public interest as well as the students' interests.

The information is collected and processed on the basis that it is in the substantial public interest as well as the legitimate interests of Smoothwall Limited and the school for the school to meet its statutory obligations to safeguard its students and ensure their online safety through the use of the Visigo software and services.

The explicit consent of the students or their parents and guardians to the collection and processing is also obtained. This consent can be withdrawn at any time by writing to the school and/or Smoothwall Limited.

Who is the information shared with?

It is only shared with Smoothwall Limited's sub-contractors who help to provide the Visigo services by analysing the information to build a user profile and with our safeguarding team. It may also be shared with law enforcement or health professionals in emergency situations.

How is a user profile built?

The information is stored against a user's log-on details (but not their password). It is then analysed using a number of methods including pattern matching, algorithmic analysis, profiling and machine learning. If the analysis indicates that a student is at significant risk, a screenshot is captured and the information will be reviewed by a team of human moderators who can see a complete picture of what was happening on the computer at the time in question. If the review confirms that a student appears to be at risk, an alert will be sent to the school's safeguarding team, which in the most serious and urgent of cases would be by telephone call. The profiling and human moderation helps to avoid false alerts, which might otherwise be caused by things like the occasional swear word or a student inadvertently accessing or attempting to access some undesirable material on the web.

How long is the information kept for?

The information is only kept for as long as it is needed to provide the Visigo services. Text input, screen shots and a student's user profile are kept for as long as they are a student and will be deleted within fifteen months of them leaving the school.

Where is the information stored?

The information which is collected is stored within the European Economic Area.

Is the stored information encrypted?

Yes, the information is encrypted in both transmission and storage.

Can I access my information?

Yes, you have a right to access the personal information which Smoothwall Limited holds about you by contacting the Data Protection Officer at Smoothwall Limited. You may also ask Smoothwall Limited to make any necessary changes to that information to make sure that it is accurate and up to date.

What if I have a complaint?

If you have a complaint, please contact the School's Data Protection Officer [*insert their name and contact details*], who will do their very best to sort out the problem.

You may also contact the Data Protection Officer at Smoothwall Limited or the Information Commissioner's Office (www.ico.org.uk) at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.