



Elton Primary School & Nursery

E-Safety Policy

In our school, the wellbeing and education of all our children comes first

Governors	Summer 2022
Review	Summer 2024

Scope of the Policy

This policy applies to all members of the *school* community (including staff, pupils, volunteers, parents / carers, visitors, community users) who have access to and are users of school ICT systems, both inside and outside of school.

The Education and Inspections Act 2006 empowers Headteachers to such extent as is reasonable, to regulate the behaviour of pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of cyber-bullying, or other e-safety incidents covered by this policy, which may take place outside of the school, but is linked to membership of the school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data. In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

The school will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents / carers of incidents of inappropriate e-safety behaviour that take place out of school.

Roles and Responsibilities

The following section outlines the e-safety roles and responsibilities of individuals and groups within the school.

Headteacher and Senior Leaders:

- The Headteacher - has a duty of care for ensuring the safety (including e-safety) of members of the school community, though the day to day responsibility for e-safety will be delegated to the E-Safety Co-ordinator.
- The Headteacher –and deputy head teacher are aware of the procedures to be followed in the event of a serious e-safety allegation being made against a member of staff. (see flow chart on dealing with e-safety incidents – included in a later section – “Responding to incidents of misuse” and relevant Local Authority HR / other relevant body disciplinary procedures).
- The Headteacher - is responsible for ensuring that staff receive suitable training to enable them to carry out their e-safety roles and to train other colleagues, as relevant.
- The Headteacher - will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal e-safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles. The school technician can monitor use as part of his visits.

Computing Lead

- takes day to day responsibility for e-safety issues and has a leading role in establishing and reviewing the school e-safety policies / documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an e-safety incident taking place.
- provides training and advice for staff
- liaises with the Local Authority / relevant body
- liaises with school technical staff
- receives reports of e-safety incidents
- meets regularly with the safeguarding Governor to discuss current issues, review incident logs and filtering / change control logs
- attends relevant meetings
- reports regularly to Senior Leadership Team

Network Manager / Technical staff:

The school technician is responsible for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- that the school meets required e-safety technical requirements and any Cheshire West and Chester e-safety guidance that may apply.
- the filtering is applied via CWAC policy and updated on a regular basis – we also have the facility to block websites on a school basis.
- that the use of the network, internet and email is monitored in order that any misuse / attempted misuse can be reported to the Headteacher / Senior Leaders; E-Safety Coordinator for investigation.
- that monitoring software / systems are implemented and updated as agreed in school policies

Teaching and Support Staff

are responsible for ensuring that:

- they have an up to date awareness of e-safety matters and of the current school e-safety policy and practices
- they have read, understood and signed the Staff Acceptable Use Policy / Agreement (AUP)
- they report any suspected misuse or problem to the Headteacher for investigation
- all digital communications with pupils / parents / carers should be on a professional level and only carried out using official school systems
- e-safety issues are embedded in all aspects of the curriculum and other activities
- pupils understand and follow the e-safety and acceptable use policies
- pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor the use of digital technologies, mobile devices, cameras etc in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- in lessons where internet use is pre-planned students / pupils are guided to suitable sites and that processes are in place for dealing with any unsuitable material that is found in internet searches.

Safeguarding Designated Person

The Headteacher is trained in e-safety issues and aware of the potential for serious child protection / safeguarding issues to arise from:

- sharing of personal data
- access to illegal / inappropriate materials
- inappropriate on-line contact with adults / strangers
- potential or actual incidents of grooming
- cyber-bullying

It is important to note that these are child protection issues, not technical issues, simply that the technology provides additional means for child protection issues to develop.

Pupils:

- are responsible for using the school digital technology systems in accordance with the Pupil Acceptable Use Policy
- have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so

- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking / use of images and on cyber-bullying.
- should understand the importance of adopting good e-safety practice when using digital technologies out of school and realise that the school's E-Safety Policy covers their actions out of school, if related to their membership of the school.

Parents / Carers

Parents / Carers play a crucial role in ensuring that their children understand the need to use the internet / mobile devices in an appropriate way. The school will take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website and information about national / local e-safety campaigns / literature. Parents and carers will be encouraged to support the school in promoting good e-safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to parents' sections of the website and on-line student / pupil records
- their children's personal devices in the school

Community Users

Community Users who access school systems / website as part of the wider school provision will be expected to sign a user acceptable use statement before being provided with access to school systems.

Policy Statements

Education – pupils

Whilst regulation and technical solutions are very important, their use must be balanced by educating pupils to take a responsible approach. The education of pupils in e-safety is therefore an essential part of the school's e-safety provision. Children and young people need the help and support of the school to recognise and avoid e-safety risks and build their resilience.

E-safety should be a focus in all areas of the curriculum and staff should reinforce e-safety messages across the curriculum. The e-safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:

- A planned e-safety curriculum is part of our Computing lessons and is regularly revisited
- Key e-safety messages are reinforced as part of a planned programme of assemblies and pastoral activities
- Pupils should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information.
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils should be helped to understand the need for the pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school
- Staff should act as good role models in their use of digital technologies the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (eg racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the technician can temporarily remove those sites from the

filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

Education – parents / carers

Many parents and carers have only a limited understanding of e-safety risks and issues, yet they play an essential role in the education of their children and in the monitoring / regulation of the children's on-line behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

The school will therefore seek to provide information and awareness to parents and carers through:

- Letters, newsletters, web site
- Parents / Carers evenings / sessions
- High profile events / campaigns eg Safer Internet Day
- Reference to the relevant web sites / publications

Education – The Wider Community

The school will provide opportunities for local community groups / members of the community to gain from the school's e-safety knowledge and experience. This may be offered through the following:

- Providing family learning courses in use of new digital technologies, digital literacy and e-safety
- E-Safety messages targeted towards grandparents and other relatives as well as parents.
- The school website will provide e-safety information for the wider community
- Supporting community groups eg Early Years Settings, Childminders, youth / sports / voluntary groups to enhance their e-safety provision

Education & Training – Staff / Volunteers

It is essential that all staff receive e-safety training and understand their responsibilities, as outlined in this policy.

Training will be offered as follows:

- A planned programme of formal e-safety training will be made available to staff. This will be regularly updated and reinforced.
- All new staff should receive e-safety training as part of their induction programme, ensuring that they fully understand the school e-safety policy and Acceptable Use Agreements.
- The E-Safety Coordinator will receive regular updates through attendance at external training events from LA and other relevant organisations and by reviewing guidance documents released by relevant organisations.
- This E-Safety policy and its updates will be presented to and discussed by staff in staff meetings
- The E-Safety Coordinator will provide advice / guidance / training to individuals as required.

Training – Prevent

- All staff have completed online training on the Prevent agenda to ensure they are aware of the warning signs of radicalisation and how to deal with any issues that arise. Certificates are kept in the school office.

Technical – infrastructure / equipment, filtering and monitoring

The school will be responsible for ensuring that the school infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their e-safety responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems

- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school technical systems and devices.
- Some users (at KS2 and above) will be provided with a username and secure password by the technician who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password and will be required to change their password frequently.
- The technician is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored. There is a clear process in place to deal with requests for filtering changes
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.

Bring Your Own Device (BYOD)

The school has plenty of iPads and laptops for the staff and children to use in school so there is little need for people to bring their own devices in. We currently ask children not to bring in their own devices in any circumstances. However in some cases when associate teachers are on training or when other professionals are delivering sessions then devices are needed to be connected. In such circumstances:

- The school has a set of clear expectations and responsibilities for all users
- The school adheres to the Data Protection Act principles
- All users are provided with and accept the Acceptable Use Agreement
- Where possible these devices will be covered by the school's / academy's normal filtering systems, while being used on the premises
- All users will use their username and password and keep this safe

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents / carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for cyberbullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet eg on social networking sites.
- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other *students / pupils* in the digital / video images.
- Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those

images should only be taken on school equipment, the personal equipment of staff should not be used for such purposes.

- Care should be taken when taking digital / video images that pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Written permission from parents or carers will be obtained before photographs of pupils are published on the school website
- Student's / Pupil's work can only be published with the permission of the student / pupil and parents or carers.

General Data Protection Regulation

Personal data will be recorded, processed, transferred and made available according to the GDPR, which will replace the Data Protection Act 1998 in May 2018 and states that personal data must be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Kept no longer than is necessary
- Processed in accordance with the data subject's rights
- Secure
- Only transferred to others with adequate protection.

Please refer to the school's data protection policy for more in-depth details but the key e-safety points are summarised below:

Data and Computer Security

Elton Primary School and Nursery undertakes to ensure security of personal data by the following general methods (precise details cannot, of course, be revealed):

Physical Security

Appropriate building security measures are in place, such as alarms, window bars, deadlocks and computer hardware cable locks. Only authorised persons are allowed in the computer room. Visitors to the school are required to sign in and out, to wear identification badges whilst in the school and are, where appropriate, accompanied.

Logical Security

Security software is installed on all computers containing personal data. Only authorised users are allowed access to the computer files and password changes are regularly undertaken. Computer files are backed up regularly.

Procedural Security

Staff are trained in their Data Protection obligations and their knowledge updated as necessary.

Overall security policy for data is determined by the Governing Body and is monitored and reviewed regularly, especially if a security loophole or breach becomes apparent.

Communications

A wide range of rapidly developing communications technologies has the potential to enhance learning. The following table shows how the school currently considers the benefit of using these technologies for education outweighs their risks / disadvantages:

Communication Technologies	Staff & other adults			Pupils				
	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Mobile phones may be brought to school	✓						✓	
Use of mobile phones in lessons		✓	✓					
Use of mobile phones in social time	✓							
Taking photos on mobile phones / cameras				✓				
Use of other mobile devices eg tablets, gaming devices		✓					✓	
Use of personal email addresses in school, or on school network		✓	✓	✓				
Use of school email for personal emails				✓				
Use of messaging apps		✓	✓	✓				
Use of social media		✓	✓	✓				
Use of blogs		✓					✓	

When using communication technologies the school considers the following as good practice:

- The official school email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. *Staff and students / pupils should therefore use only the school / academy email service to communicate with others when in school, or on school / academy systems.*
- Users must immediately report, to Kevin Manning – in accordance with the school policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and pupils or parents / carers (email, chat, etc) must be professional in tone and content. These communications may only take place on official (monitored) school / academy systems. Personal email addresses, text messaging or social media must not be used for these communications.
- All children can email safely through their own school email accounts be monitored.
- Pupils are taught about e-safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.

- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.
- Staff should only use their mobile phones in staff only areas such as the staffroom. Without the consent of the headteacher, they should not have phones out in areas where children are present.

Social Media - Protecting Professional Identity

All schools and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Schools and local authorities could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, cyberbully, discriminate on the grounds of sex, race or disability or who defame a third party may render the school or local authority liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to pupils, staff and the school through limiting access to personal information:

- Training to include: acceptable use; social media risks; checking of settings; data protection; reporting issues.
- Clear reporting guidance, including responsibilities, procedures and sanctions
- Risk assessment, including legal risk

School staff should ensure that:

- No reference should be made in social media to pupils, parents / carers or school staff
- They do not engage in online discussion on personal matters relating to members of the school community
- Personal opinions should not be attributed to the school or local authority
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.

The school's use of social media for professional purposes will be checked regularly to ensure compliance with the Social Media, Data Protection, Communications, Digital Image and Video Policies.

Unsuitable / inappropriate activities

The school believes that the activities referred to in the following section would be inappropriate in a school context and that users, as defined below, should not engage in these activities in school or outside school when using school equipment or systems. The school policy restricts usage as follows:

User Actions

		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	pornography				X	
	promotion of any kind of discrimination				X	

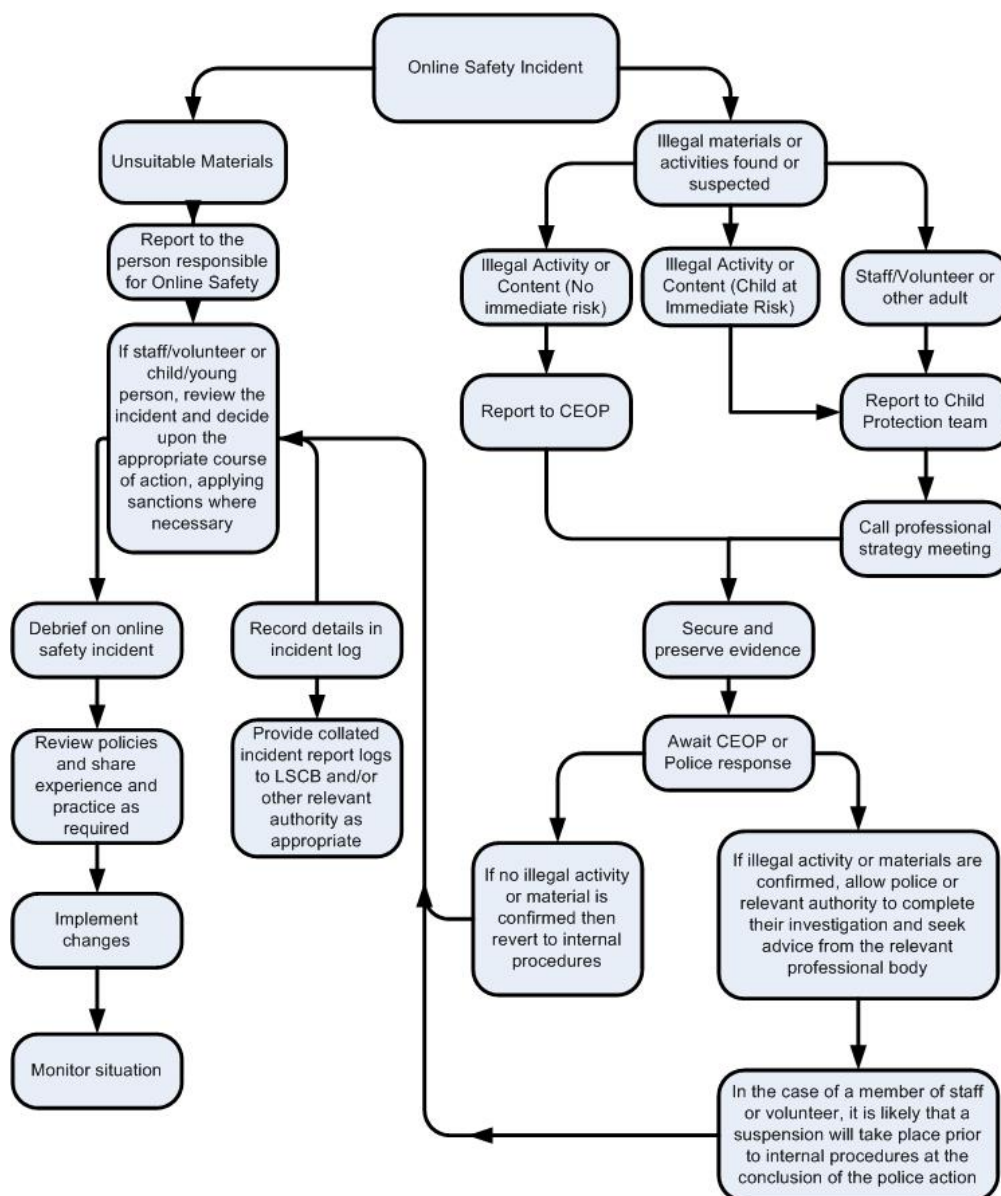
relate to:	threatening behaviour, including promotion of physical violence or mental harm				X	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Using school systems to run a private business					X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school / academy					X	
Infringing copyright					X	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)					X	
Creating or propagating computer viruses or other harmful files					X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)					X	
On-line gaming (educational)			X			
On-line gaming (non educational)			X			
On-line gambling					X	
On-line shopping / commerce				X		
File sharing				X		
Use of social media			X			
Use of messaging apps			X			
Use of video broadcasting eg Youtube			X			

Responding to incidents of misuse

This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities.

Illegal Incidents

If there is any suspicion that the web site(s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right hand side of the Flowchart (below and appendix) for responding to online safety incidents and report immediately to the police.



Other Incidents

It is hoped that all members of the school community will be responsible users of digital technologies, who understand and follow school policy. However, there may be times when infringements of the policy could take place, through careless or irresponsible or, very rarely, through deliberate misuse.

In the event of suspicion, all steps in this procedure should be followed:

- Have more than one senior member of staff / volunteer involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the url of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below)
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does then appropriate action will be required and could include the following:

- Internal response or discipline procedures
- Involvement by Local Authority or national / local organisation (as relevant).
- Police involvement and/or action
- If content being reviewed includes images of Child abuse then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:
 - incidents of 'grooming' behaviour
 - the sending of obscene materials to a child
 - adult material which potentially breaches the Obscene Publications Act
 - criminally racist material
 - other criminal conduct, activity or materials
- Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.

It is important that all of the above steps are taken as they will provide an evidence trail for the school and possibly the police and demonstrate that visits to these sites were carried out for child protection purposes. The completed form should be retained by the group for evidence and reference purposes.

School Actions & Sanctions

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour / disciplinary procedures as follows:

Students / Pupils

Actions / Sanctions

Incidents:	Refer to class teacher / tutor	Refer to Head of Department / Head of Year / other	Refer to Headteacher / Principal	Refer to Police	Refer to technical support staff for action re filtering / security etc	Inform parents / carers	Removal of network / internet access rights	Warning	Further sanction eg detention / exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).			X	X					
Unauthorised use of non-educational sites during lessons	X						X	X	
Unauthorised use of mobile phone / digital camera / other mobile device	X	X	X			X	X	X	
Unauthorised use of social media / messaging apps / personal email	X	X	X			X	X	X	
Unauthorised downloading or uploading of files	X	X	X			X	X	X	
Allowing others to access school / academy network by sharing username and passwords		X	X		X	X	X	X	
Attempting to access or accessing the school / academy network, using another student's / pupil's account		X	X		X	X	X	X	
Attempting to access or accessing the school / academy network, using the account of a member of staff		X	X		X	X	X	X	
Corrupting or destroying the data of other users	X	X	X		X	X	X	X	
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X	X	X		X	X	X	X	
Continued infringements of the above, following previous warnings or sanctions		X	X	X	X	X	X	X	
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school	X	X	x		x	x	x	x	X
Using proxy sites or other means to subvert the school's / academy's filtering system		x	x	x	x	x	x	x	X
Accidentally accessing offensive or pornographic material and failing to report the incident	X	X	x		x	x	x	x	X
Deliberately accessing or trying to access offensive or pornographic material	X	x	x	x	x	x	x	x	X
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act		x	x		x	x	x	x	X

Staff

Actions / Sanctions

Incidents:	Refer to line manager	Refer to Headteacher / Principal	Refer to Local Authority / HR	Refer to Police	Refer to Technical Support Staff for action re filtering etc	Warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		X	X	X			X	X
Inappropriate personal use of the internet / social media / personal email	X	X			X	X		X
Unauthorised downloading or uploading of files	X	X			X	X		
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account	X	X			X	X		
Careless use of personal data eg holding or transferring data in an insecure manner	X	X			X	X		
Deliberate actions to breach data protection or network security rules	X	X			X	X		
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	X	X			X	X		X
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X	X	X	X	X	X	X	X
Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with students / pupils	X	X			X	X		
Actions which could compromise the staff member's professional standing	X	X			X	X		X
Actions which could bring the school / academy into disrepute or breach the integrity of the ethos of the school / academy	X	X			X	X		X
Using proxy sites or other means to subvert the school's / academy's filtering system	X	X	X		X	X		
Accidentally accessing offensive or pornographic material and failing to report the incident	X	X	X		X	X		
Deliberately accessing or trying to access offensive or pornographic material	X	X	X	X	X	X	X	X
Breaching copyright or licensing regulations	X	X			X	X		
Continued infringements of the above, following previous warnings or sanctions	X	X	X		X	X		X