PLUMPTON SCHOOL

ONLINE SAFETY POLICY & PROCEDURES

Designated Safeguarding Lead (DSL)	**Sarah Penny**
Online Safety Lead (OSL if different from DSL)	**Ali Davies**
Remote Education Lead (if different from DSL)	
Online Safety / Safeguarding Link Governor	
PSHE / RSHE lead	**Jayne Blackburn**
Network Manager / other technical support	**Teleappliant**

Approved by[1]	
Name:	Gemma Gardner
Position:	Governor
Signed:	GG
Date:	8/2/24
Review date[2]:	

[1] The Governing Body are free to delegate approval of this document to a Committee of the Governing Body, an individual Governor, or the Head Teacher.

[2] Governors free to determine review period. Recommended annually.

Online Safety – links to various useful websites

360° safe - Online safety self-review tool for schools
Sample UKSIC EYFS, Primary and Special School Online Safety Posters (ages 3-6) (ages 7-11)
Sample UKSIC Secondary School Online Safety Poster (11 years and over)
KAHSC Online Safety - Managing Filtering and Monitoring
KAHSC Model EYFS, Primary & Special School pupil/parent Acceptable Use Agreement
KAHSC Model Secondary School pupil/parent Acceptable Use Agreement
KAHSC Model Staff/Volunteer Acceptable Use Agreement
KAHSC Model Governor Acceptable Use Agreement
KAHSC Response to an online safety incident or concern flowchart

Wherever the term 'parent' is used this includes any person with parental authority over the child concerned e.g. carers, legal guardians etc.

Wherever the term 'Head teacher' is used this also refers to any Manager with the equivalent responsibility for children.

Wherever the term 'school' is used this also refers to academies and Pupil Referral Units (PRU) and references to Governing Bodies include Proprietors in Independent Schools and Academies and the Management Committees of PRUs and will usually include wrap around care provided by a setting such as After School Clubs and Breakfast Clubs.

3. Associated School Policies and procedures

This Policy should be read in conjunction with the following school Policies/procedures and, where they exist, addendums to those Policies and procedures:

- Overarching Safeguarding Statement
- Child Protection Policy and procedures
- Data Protection Policy including procedures for CCTV
- Health and Safety Policy and procedures
- Behaviour Policy and procedures
- Procedures for Using Pupils Images
- Whistleblowing procedures
- Code of Conduct for staff and other adults
- Voluntary Home-School Agreement

4. Communication/Monitoring/Review of this Policy and procedures

This Policy and procedures will be communicated to staff, pupils, and the wider community by:

- posting it on the school website/Learning Platform/shared staff drive
- making a paper copy available on request from the school office
- discussing school policy and procedures during induction with new staff and other relevant adults including (where relevant) the staff Acceptable Use Agreement
- discussing Acceptable Use Agreements with pupils at the start of each year
- issuing Acceptable Use Agreements to external users of school systems (e.g. Governors) usually on entry to the school
- holding Acceptable Use Agreements in pupil and personnel files

The Online Safety Policy is also referenced in other school Policies and procedures as outlined above.

The review period for this Policy and procedures is determined by the Governing Body/Proprietors and indicated on the front cover.

5. Scope of the Policy

This Policy and procedures applies to all members of the School/Academy community (including staff, pupils, volunteers, parents, visitors, community users) who have access to and are users of our ICT systems, both in and out of school.

The Education and Inspections Act 2006 empowers Head teachers, 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 includes incidents of cyberbullying (including prejudiced-based and discriminatory bullying), or other online safety related incidents covered by this Policy and procedures, which may take place out of school, but is linked to membership of the school. The 2011 Education Act increased these powers in relation to the searching for, and of, electronic devices and the deletion of data. In the case of both acts, action can only be taken in relation to issues covered by the published Behaviour Policy and procedures.

PROCEDURES

1. Roles and Responsibilities

The following section outlines the roles and responsibilities for online safety of individuals and groups within the school:

1.1 Governors

The role of the Governors/online safety Governor is to:

- ensure a member of the Governing Body is elected to the role of Online Safety Governor who should then lead on relevant governance requirements below;
- ensure an appropriate senior member of staff from the School Leadership Team (SLT) is appointed to the role of DSL with lead responsibility for safeguarding and child protection (including online safety and an understanding of the filtering and monitoring systems and processes in place) with the appropriate status, authority, time, funding, training, resources, and support;
- ensure other roles and responsibilities are appropriately allocated to staff and third parties, e.g. external service providers in order to meet the DfE Digital and technology standards;
- ensure that systems are in place to meet the requirements of the DfE Cyber security standards. Schools must have a Cyber security and resilience strategy in place which is supported by an appropriate Cyber Response Plan;
- ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures;
- approve the Online Safety Policy and procedures, reviewing its effectiveness e.g. through Governors or a Governor Sub-committee receiving regular information about online safety incidents and monitoring reports and making use of the UK Council for Internet Safety (UKCIS) guide Online safety in schools and colleges: Questions from the Governing Board;
- ensure that appropriate filters and appropriate monitoring systems are in place, but also consider how 'over-blocking' may lead to unreasonable restrictions on what pupils can be taught in relation to online teaching and safeguarding;
- ensure that the SLT and **all** staff have an awareness and understanding of the procedures and processes in place to manage filtering and monitoring and how to escalate concerns when identified;
- ensure all governors and trustees receive appropriate training on online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring in relation to school owned IT devices;
- ensure that the school follows all current online safety advice (including that for online filtering and monitoring) to keep both pupils and staff safe;
- support the school in encouraging parents and the wider community to become engaged in online safety activities;
- have regular reviews with the Online Safety Coordinator/Designated Safeguarding Lead (DSL) and incorporate online safety into standing discussions of safeguarding at Governors meetings (including incident logs, adverse monitoring reports, change control logs etc.)
- ensure that where the online safety coordinator is not the named DSL or deputy DSL, there is regular review and open communication between these roles and that the DSL's clear overarching responsibility for online safety as a whole is not compromised;
- work with the Data Protection Officer (DPO), DSL and Head teacher to ensure a UK GDPR compliant framework for storing data, helping to ensure that child protection is always at the forefront and data protection processes support careful and legal sharing of information;
- check that school is making good use of information and support (Annex B – Further information which forms part of Keeping Children Safe in Education);
- ensure that all staff undertake regular updated safeguarding training, including online safety training, in line with advice from the Local Safeguarding Children's Partnerships (LSCP), and that it is integrated, aligned, and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning;

1.3 Designated Safeguarding Lead (DSL)/Online Safety Lead (OSL)

The DSL may delegate certain online safety duties e.g. to the OSL, but not the day-to-day responsibility; this assertion and all quotes below are taken from Keeping Children Safe in Education. Where the online-safety co-ordinator is not the named DSL or deputy DSL, there must be a regular review and open communication between these roles to ensure that the DSL's clear overarching responsibility for online safety is not compromised.

The Designated Safeguarding Lead/Online Safety Lead will:

- take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place);
- be the first point of contact for any concerns the wider staff and other adults working in the school may have in relation to child protection and online safety harmful behaviour e.g. sharing nude and/or semi-nude images and/or videos/online challenges or hoaxes and refer to the UKCIS guidance Sharing nudes and semi-nudes: how to respond to an incident and the DfE Guidance Harmful online challenges and online hoaxes;
- ensure an effective approach to online safety is in place that empowers the school to protect and educate the whole school community in their use of technology and establish mechanisms to identify, intervene in and escalate any incident where appropriate;
- source innovative ways to promote an awareness and commitment to online safety throughout the school community with strong focus on parents, who are often appreciative of school support in this area, but also including 'hard-to-reach' parents;
- liaise with other agencies in line with Working together to Safeguard Children statutory guidance;
- have an understanding of the unique risks associated with online safety (including an understanding of the filtering and monitoring systems and processes in place in the school) and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school and to support other adults in doing so;
- ensure that online safety education is embedded in line with DfE guidance Teaching Online Safety in schools across the curriculum (e.g. by use of the UKCIS framework 'Education for a Connected World' and the ProjectEVOLVE - Education for a Connected World Resources) and beyond, in the wider school community;
- work with the Head teacher, Data Protection Officer, Governors, and the school ICT technical staff to ensure a DPA compliant framework for storing data, helping to ensure that child protection is always at the fore and data protection processes support careful and legal sharing of information;
- keep up to date with the latest local and national trends in online safety;
- review and update this Policy and procedures, other online safety documents (e.g. Acceptable Use Agreements) and the strategy on which they are based (in line with Policies and procedures for behaviour and child protection) and submit for review on a regular basis to the Governors/Trustees;
- liaise with school technical, pastoral, and support staff as appropriate;
- communicate regularly with SLT and the designated online safety Governor/committee to discuss current issues (anonymised), review incident logs and filtering/change control logs;
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident and that these are logged in the same way as any other child protection incident;
- oversee and discuss 'appropriate filtering and monitoring' with Governors in order to meet the DfE Filtering and monitoring standards (both physical and technical) and ensure staff are aware of its necessity;
- ensure the DfE guidance on sexual violence and sexual harassment (Part five - Keeping Children Safe in Education) is followed throughout the school and that staff adopt a zero-tolerance approach to this as well as to bullying (in all its forms) generally;
- facilitate training and advice for staff and others working in the school to ensure that:
  - all staff who work directly with children must read and understand KCSiE Part one (which includes Annex B). The DSL, Head teacher and other members of the SLT must read and understand the whole of Keeping Children Safe in Education
  - knowledge of risks and opportunities is cascaded throughout the organisation;
- be aware of emerging online safety issues and legislation, and of the potential for serious child

- ensure that any digital communications with pupils are on a professional level and only through school-based systems, never through personal mechanisms, e.g. email, text, mobile phones or social media messaging or posts.

1.5 PSHE/RSHE Lead(s)

Responsibilities of PSHE/RSHE Leads include:

- all as listed in the 'all staff' section above;
- ensuring that consent, mental wellbeing, healthy relationships and staying safe online is embedded into the PSHE/Relationships education, relationships, and sex education (RSE) and health education curriculum. This will include being taught what positive, healthy and respectful online relationships look like, the effects of the pupils' online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age-appropriate way that is relevant to their pupils' lives (KCSiE);
- complementing the computing curriculum which covers the principles of online safety at all key stages, with progression in the content to reflect the different and escalating risks that pupils face. This includes how to use technology safely, responsibly, respectfully, and securely, and where to go for help and support when the pupil has concerns about content or contact on the Internet or other online technologies;
- working closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches, and messages within PSHE/RSHE.

1.6 Computing/Subject Lead(s)

Responsibilities of the Computing Lead include:

- all as listed in the 'all staff' section above;
- the overseeing delivery of the online safety element of the Computing curriculum in accordance with the national curriculum;
- working closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches, and messages within Computing;
- collaboration with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with Acceptable Use Agreements.

1.7 Network Manager/Technical staff

Responsibilities of the Network Manager/ICT Technician include:

- all as listed in the 'all staff' section above;
- supporting Governors and SLT in achieving the DfE digital and technology standards;
- supporting SLT in the formulation of a Cyber Security resilience strategy and appropriate Cyber response plan as outlined in the DfE Cyber security standards;
- reporting any online safety related issues that arise through external monitoring reports, to the DSL/OSL in the first instance;
- keeping up to date with the school's Online safety Policy and technical information to effectively carryout their online safety role and to inform and update others as relevant;
- working closely with the DSL/OSL/DPO to ensure that school systems and networks reflect school Policy;
- ensuring that the above stakeholders understand the terms of existing services and how any changes to these systems (especially in terms of access to personal and sensitive records/data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms etc.) might affect the system functions and safety online;
- supporting and providing advice on the implementation of 'appropriate filtering and monitoring' in order to meet the school's obligations outlined in the DfE Filtering and Monitoring standards;
- ensuring that users may only access the school's networks through an authorised and properly enforced password protection procedures, in which passwords are regularly changed;

- understand the importance of adopting safe and responsible behaviours and good online safety practice when using digital technologies outside of school and realise that the school's acceptable use agreements cover their actions out of school, including on social media;
- know and understand school procedures on the use of mobile phones, digital cameras, and other digital devices;
- know and understand school procedures on the taking/use of images and on cyberbullying/sharing nude and/or semi-nude images and/or videos;
- understand that the school is able to, and will, impose filtering rules and will monitor the use of school owned digital devices for inappropriate access to, or downloads from, websites. Beaches may lead to sanctions as described in the School Behaviour Policy and procedures and, in some cases, may involve the Police;
- understand the benefits/opportunities and risks/dangers of the online world and know who to talk to at school if there are problems.

1.11 Parents

Parents play a crucial role in ensuring that their children understand the need to use the Internet/mobile devices in an appropriate way. Research shows that many parents do not fully understand the issues and are less experienced in the use of ICT than their children. The school will therefore take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website/VLE and information about national/local online safety campaigns/literature.

The key responsibilities for parents are to:

- support the school in promoting online safety which includes the pupils' use of the Internet and the school's use of photographic and video images;
- work with and support the school when issues or concerns are identified which are as a result of the school's filtering and monitoring procedures and processes;
- read, sign, and promote the Pupil Acceptable Use Agreement and encourage their child to follow it;
- consult with the school if they have any concerns about their child's and others' use of technology;
- promote positive online safety and model safe, responsible, and positive behaviours in their own use of technology (including on social media) by ensuring that they themselves do not use the Internet/social network sites/other forms of technical communication in an inappropriate or defamatory way;
- support the school's approach to online safety by not uploading or posting to the Internet any images or details of others without permission and refraining from posting pictures, video or text that could upset, offend, or threaten the safety of any member of the school community or bring the school into disrepute.

2. Teaching and Learning

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk known as the 4Cs:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial, or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Strong links between teaching online safety and the curriculum (see also Roles above) are the clearest in:

- Personal, Social and Health Education (PSHE)
- Relationships education, relationships, and sex education (RSE) and health
- Computing

- will remind pupils about their responsibilities through an end-user Acceptable Use Agreement which will be displayed throughout the school or when they log on to the school's network;
- ensures staff model safe and responsible behaviour in their own use of technology during lessons;
- ensures that when copying materials from the web, staff and pupils understand issues around plagiarism; how to check copyright and know that they must respect and acknowledge copyright/intellectual property rights;
- ensures that staff and pupils understand the issues around aspects of the commercial use of the Internet, as age appropriate. This may include risks in pop-ups; buying online; online gaming/gambling etc.

2.2 Pupils with additional needs

We use a wide range of strategies to support children with additional needs who might need extra support to keep themselves safe, especially online.

- Sensitively check pupil's understanding and knowledge of general personal safety issues using reminders and explicit prompts to link their existing knowledge of "how to keep safe" to the rules that will apply specifically to, for instance, internet use.
- Apply rules consistently to embed understanding.
- Communicate rules clearly to parents and seek their support in implementing school rules at home. Working with parents and sharing information with them is relevant to all children, but this group especially.
- Careful explanations about why rules might change in different situations i.e. why it is ok to give your name and address to an adult if you are lost in town, but not when using the Internet.
- Consistent use of cause and effect linking the rules to consequences teaching realistic and practical examples of what might happen if... without frightening pupils.

2.3 Remote Education

The DfE expects schools to maintain their capabilities to deliver high quality remote education in cases where it is not possible or contrary to government guidance for some or all pupils to attend face-to-face education.

Our priority will always be to deliver high-quality face-to-face education to all pupils. Remote education will only ever be considered as a short-term measure and as a last resort where in person attendance is not possible.

This might include:

- occasions when our Head teacher decides that it is not possible for us to open safely, or that opening would contradict guidance from local or central government
- occasions when individual pupils, for a limited duration, are unable to physically attend school but are able to continue learning, for example pupils with an infectious illness.

In these circumstances pupils will have access to remote education as soon as we reasonably can in proportion to the length of absence and disruption to their learning.

We will try to provide remote education equivalent in length to the core teaching pupils would receive in school This can include recorded or live direct teaching time, as well as time for pupils to complete tasks and assignments independently, and we understand good practice is considered to be:

- 3 hours a day on average across the cohort for key stage 1, with less for younger children
- 4 hours a day for key stage 2

In developing our remote education provision, we have:

- selected Seesaw and Tapestry platforms to use consistently across the school to allow interaction, assessment, and feedback with procedures in place to ensure staff are trained and confident in its use. This enables us to provide online video lessons recorded by teaching staff and high-quality lessons developed by external providers as well as monitored methods of communication.

We recognise that there are additional safeguarding risks to pupils associated with them spending more time online than before the global pandemic, both in their leisure time and to be able to access remote education. There may also be risks from or to the people they live with during live video link work and staff are expected to plan accordingly and seek advice from the OSL/DSL as necessary. The pupil Acceptable Use Agreement includes expected conduct during remote education activities.

We recognise that there are additional safeguarding risks to staff as well, especially those facilitating remote learning via live video links that may also impact other people in their household or community. The Staff Code of Conduct sets out expected good remote education practice.

Staff are expected to:

- follow DfE guidance Safeguarding and remote education and safeguarding procedures when planning remote education strategies and teaching remotely
- provide information about their temporary home working environment insofar as it might impact on their physical health, or the safeguarding of learners or their own household.
- act appropriately on feedback and use any necessary online or cyber tools provided.
- provide information about the technology they use at home to get online i.e. to ensure compatibility with school systems, especially cyber security measures involved in accessing sensitive data like medical, behaviour or performance information on school servers remotely.
- implement relevant guidance on safe teaching and pastoral care from their home e.g. what is in the background of recorded or live streams, what is visible on shared screens, what can be heard by others in a household etc.
- Pay special attention to how they protect personal data at home.
- Report to their line manager any issues or concerns they may have either about their personal safety or that of a pupil.
- Keep talking about staying safe online, which we can do by:
    - Ensuring staff have the tools to promote a healthy balance between the positive and negative aspects of life online.
    - Signposting parents and carers to tools to explain and reduce risks and help them talk to their child.
    - Reiterating behaviour expectations and ways to handle and report problems, especially encouraging children to speak to a trusted adult if they come across content online that makes them uncomfortable.
    - Supporting critical thinking and promoting resources like It's not easy being a parent in the digital age | Parent Zone and Trust Me | Childnet which provide ways parents and carers can help their child develop these skills.

3. Handling online safety concerns and incidents

Our staff recognise that online safety is only one element of the wider safeguarding agenda as well as being a curriculum strand of Computing, PSHE/RSHE and Citizenship.

General concerns will be handled in the same way as any other child protection concern. Early reporting to the DSL/OSL is vital to ensure that the information contributes to the overall picture or highlights what might not yet be a problem.

Support staff will often have a unique insight and opportunity to find out about issues first in the playground, corridors, toilets, and other communal areas outside the classroom (particularly relating to bullying and sexual harassment and violence).

Procedures for dealing with online safety, concerns and incidents are detailed in the following Policies:

- Child Protection Policy and procedures
- Child on child abuse Policy and procedures
- Behaviour Policy and procedures (includes anti-bullying procedures)
- Acceptable Use Agreements
- Prevent Risk Assessment

All staff and other relevant adults have been issued with a copy of the UKCIS overview document (Sharing nudes and semi-nudes: how to respond to an incident) in recognition of the fact that it is generally someone other than the DSL or OSL who will first become aware of an incident. Staff, other than the DSL, must not intentionally view, copy, print, share, store or save or delete the image or ask anyone else to do so but must report the incident to the DSL as soon as possible.

It is the responsibility of the DSL to follow the guidance issued by UKCIS, decide on the next steps and whether to involve other agencies as appropriate.

It is important to understand that whilst the sharing of nude and/or semi-nude images and/or videos is illegal, pupils should be encouraged to discuss with staff situations if they have made a mistake or had a problem with this issue.

The UKCIS advice outlines how to respond to an incident of nudes and semi-nudes being shared including:

- risk assessing situations;
- safeguarding and supporting children and young people;
- handling devices and images;
- recording incidents, including the role of other agencies.
- informing parents and carers

The types of incidents which this advice covers are:

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18;
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18;
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

3.2 Upskirting

All staff are aware that 'upskirting' (taking a photo of someone under their clothing) is now a criminal offence, but that pupils should be encouraged to discuss with staff situations if they have made a mistake or had a problem with this issue. If staff or other adults become aware of an incident of 'upskirting', the issue must be reported to the DSL as soon as possible.

3.3 Cyberbullying

Cyberbullying (also known as online bullying) can be defined as the use of information and communications technology particularly mobile devices and the internet, deliberately to upset someone else and reported incidents will be treated in the same way as any other form of bullying. The Behaviour Policy and procedures will be followed in relation to sanctions taken against the perpetrator. It is important not to treat online bullying separately to offline bullying and to recognise that some bullying will have both online and offline elements. Support will be provided to both the victim and the perpetrator. In some cases, it may be necessary to inform or involve the Police.

Many young people and adults find that using the Internet and mobile phones is a positive and creative part of their everyday life. Unfortunately, technologies can also be used negatively. When children are the target of bullying via mobile phones, gaming, or the Internet, they can often feel very alone, particularly if the adults around them do not understand cyberbullying and its effects. A once previously safe and enjoyable environment or activity can become threatening, harmful and a source of anxiety. It is essential that young people, school staff and parents understand how cyberbullying is different from other forms of bullying, how it can affect people and how to respond and combat misuse. Promoting a culture of confident users will support innovation and safety.

There are several statutory obligations on schools in relation to behaviour which establish clear responsibilities to respond to bullying. In particular, section 89 of the Education and Inspections Act 2006:

Where staff become aware of a potentially harmful online hoax or challenge, they will immediately inform the DSL who will take the appropriate action either with the pupil concerned or with the wider group where the incident involves more than one pupil.

Where the DSL considers it necessary to directly address an issue, this can be achieved without exposing children and young people to scary or distressing content. In the response, we will consider the following questions:

- is it factual?
- is it proportional to the actual (or perceived) risk?
- is it helpful?
- is it age and stage of development appropriate?
- is it supportive?

A hoax is a deliberate lie designed to seem truthful. The internet and social media provide a perfect platform for hoaxes, especially hoaxes about challenges or trends that are said to be harmful to children and young people to be spread quickly.

We will carefully consider if a challenge or scare story is a hoax. Generally speaking, naming an online hoax, and providing direct warnings is not helpful. Concerns are often fuelled by unhelpful publicity, usually generated on social media, and may not be based on confirmed or factual occurrences or any real risk to children and young people. There have been examples of hoaxes where much of the content was created by those responding to the story being reported, needlessly increasing children and young people's exposure to distressing content.

Evidence from Childline shows that, following viral online hoaxes, children and young people often seek support after witnessing harmful and distressing content that has been highlighted, or directly shown to them (often with the best of intentions), by parents, carers, schools, and other bodies. In this respect, staff will be mindful of the advice provided by the UK Safer Internet Centre which provides guidance on dealing with online hoaxes or challenges.

In any response, reference will be made to the DfE guidance 'Harmful online challenges and online hoaxes'.

3.5 Sexual violence and harassment

DfE guidance on sexual violence and harassment is referenced in Part five of 'Keeping Children Safe in Education'. All staff are aware of this guidance.

We have a zero tolerance approach to all forms of sexual violence and harassment and will act appropriately on information which suggests inappropriate behaviour regardless of the considered seriousness. Any incident of sexual harassment or violence (online or offline) must be reported to the DSL at the earliest opportunity. The DSL will follow the guidance as outlined in the Child Protection Policy and procedures. Sanctions will be applied in line with our Behaviour Policy and procedures.

3.6 Misuse of school technology (devices, systems, networks, or platforms)

Clear and well communicated rules and procedures are essential to govern pupil and adult use of school networks, connections, internet connectivity and devices, cloud platforms and social media (both when on school site and outside of school).

These rules are defined in the relevant Acceptable Use Agreements as provided to pupils, staff, and Governors.

Where pupils contravene these rules, the Behaviour Policy and procedures will be applied; where staff contravene these rules, action will be taken as outlined in the staff code of conduct and, where necessary, the school disciplinary procedures.

The school reserves the right to withdraw, temporarily or permanently, any or all access to such technology or the right to bring mobile technology devices onto school property.

- Virus protection will be updated regularly.
- Personal data sent over the Internet or taken off site will be encrypted.
- Portable media may not be used without specific permission followed by an anti-virus/malware scan.
- Unapproved software will not be allowed in work areas or attached to email.
- Files held on the school's network will be regularly checked.
- The ICT coordinator/network manager will review system capacity regularly.
- Use of user logins and passwords to access the school network will be enforced – see Section 6.2 below.

The Head teacher, Data Protection Officer and Governors work together to ensure a DPA compliant framework for storing data, but which ensures that child protection is always put first, and data protection processes support careful and legal sharing of information.

4.2 Password Security

We will ensure that the school network is as safe and secure as is reasonably possible and that users can only access data to which they have right of access; no user is able to access another's files without permission (or as allowed for monitoring purposes within the school's procedures); access to personal data is securely controlled in line with the school's personal data procedures; logs are maintained of access by users and of their actions while users of the system.

All users (adults and young people) will have responsibility for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.

Passwords for new users, and replacement passwords for existing users can be allocated by Mrs Davies, Online Safety Lead. Any changes carried out must be notified to the member of staff responsible for issuing and coordinating password security (above).

Users will change their passwords every 6 months.

Training/Awareness:

It is essential that users are made aware of the need to keep passwords secure, and the risks attached to unauthorised access/data loss. This will apply to even the youngest of users, even if class log-ons are being used.

Members of staff will be made aware of the school's password security procedures:

- at induction;
- through the school's Online Safety Policy and procedures;
- through the Acceptable Use Agreement.

Pupils will be made aware of the school's password security procedures:

- in Computing/ICT and/or Online Safety lessons;
- through the Acceptable Use Agreement.

The following rules apply to the use of passwords:

- passwords must be changed every 150 days/months;
- the last four passwords cannot be re-used;
- the password will be a minimum of 8 characters long and must include three of – uppercase character, lowercase character, number, special character;
- the account should be "locked out" following six successive incorrect log-on attempts;
- temporary passwords e.g. used with new user accounts or when users have forgotten their passwords, shall be enforced to change immediately upon the next account log-on;
- passwords shall not be displayed on screen, and shall be securely hashed (use of one-way encryption);
- requests for password changes should be authenticated to ensure that the new password can only be passed to the genuine user.

- Pupils will be taught about email safety issues, such as the risks attached to the use of personal details. They will also be taught strategies to deal with inappropriate emails and be reminded of the need to write emails clearly and correctly and not include any unsuitable or abusive material.
- Personal information must not be posted on the school website and only official email addresses will be used to identify members of staff.
- Spam, phishing, and virus attachments can make email dangerous. The school ICT provider ensures mail is virus checked (ingoing and outgoing), includes spam filtering and backs emails up daily.

5.2 Emailing personal, sensitive, confidential, or classified information

Staff or pupil personal data should never be sent/shared/stored in emails and any data must be encrypted prior to being sent.

- Assess whether the information can be transmitted by other secure means before using email - emailing confidential data is not recommended and should be avoided where possible;
- The use of Hotmail, BTInternet, G-mail or any other Internet based webmail service for sending email containing sensitive information is not permitted;
- Where your conclusion is that email must be used to transmit such data:
  - Obtain express consent from your manager to provide the information by email;
  - Exercise caution when sending the email and always follow these checks before releasing the email:
    - Verify the details, including accurate email address, of any intended recipient of the information;
    - Verify (by phoning) the details of a requestor before responding to email requests for information;
    - Do not copy or forward the email to any more recipients than is necessary.
  - Do not send the information to any person whose details you have been unable to separately verify (usually by phone);
  - Send the information as an encrypted document **attached** to an email;
  - Provide the encryption key or password by a **separate** contact with the recipient(s) e.g. by telephone or in writing;
  - Do not identify such information in the subject line of any email;
  - Request confirmation of safe receipt.

5.3 Zombie accounts

Zombie accounts refer to accounts belonging to users who have left the school and therefore no longer have authorised access to the school's systems. Such Zombie accounts when left active can cause a security threat by allowing unauthorised access.

- Ensure that all user accounts are disabled once the member of the school has left;
- Prompt action on disabling accounts will prevent unauthorised access;
- Regularly change generic passwords to avoid unauthorised access (Microsoft© advise every 42 days).

Staff will refer to further advice available at IT Governance as necessary.

6. School Website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. Mrs Gill has day to day editorial responsibility for online content published by the school on the school website and will ensure that content published is accurate and appropriate. The school website is managed by/hosted by Kierweb.

The DfE has determined information which must be available on a school website. What maintained schools must publish online (maintained schools) OR What academies, free schools and colleges should publish online (academies and free schools).

Where other staff submit information for the website, they are asked to consider the following principles:

that reveals the identity of others and their location, such as house number, street name or school. We teach them about the need to keep their data secure and what to do if they or a friend are subject to bullying or abuse.

- Staff and parents are regularly reminded about the importance of not sharing without consent, due to child protection concerns (e.g. children looked-after often have restrictions for their own protection) data protection, religious or cultural reasons or simply for reasons of personal privacy.
- If specific pupil photos (not group photos) are used on the school web site, in the prospectus or in other high-profile publications the school will obtain individual parental or pupil consent for its long-term use (for more information see KAHSC Safety Series: General G21 – The Use of Images when Working with Children and the KAHSC Model Consent Form - trips images and pain relief).
- A pupil's work can only be published with the consent of the pupil and parents. We will seek the consent of the pupil first and then, if necessary, the parents.

8. Cloud Platforms

This school adheres to the principles of the DfE document Cloud computing services: guidance for school leaders, school staff and governing bodies and our Data Protection Policy and procedures includes the use of Cloud services.

For online safety, basic rules of good password management, expert administration and training is used to keep staff and pupils safe and to avoid incidents. The DPO and network manager will analyse and document systems and procedures before they are implemented and regularly review them.

The following principles apply:

- Privacy statements inform parents and children when and what type of data is stored in the cloud.
- The DPO approves new cloud systems, what may or may not be stored in them and by whom on the basis of a data protection impact assessment (DPIA).
- Regular training ensures all staff understand sharing functionality and this is audited to ensure that pupil data is not shared by mistake. Open access or widely shared folders are clearly marked as such.
- Pupils and staff are only given access and/or sharing rights when they can demonstrate an understanding of what data may be stored and how it can be seen.
- Two-factor authentication is used for access to staff or pupil data.
- Pupil images/videos are only made public with parental consent.
- Only school-approved platforms are used by students or staff to store pupil work.
- All stakeholders understand the difference between consumer and education products (e.g. a private Gmail account or Google Drive and those belonging to a managed educational domain).

9. Social Media

9.1 Managing social networking, social media, and personal publishing sites

This school operates on the principle that if we don't manage our social media reputation, someone else will. Online reputation management is about understanding and managing our digital footprint (everything that can be seen or read about the school online). Negative coverage almost always causes some level of disruption and can result in distress to individuals.

We therefore manage our social media footprint carefully to know what is being said about the school and in order to respond to criticism and praise in a fair, responsible manner.

The school has an official Facebook/X (formerly known as Twitter)/Instagram account which is managed by the school and will respond to general enquiries about the school, but we ask parents not to use these channels to communicate about their children or other personal matters.

Email (via governor, staff, and pupil school email addresses only) and Seesaw or Tapestry are the official online communication channels between parents and the school, and between staff and pupils. While we welcome communication about and with us from within and outside our school community online using our social media accounts they **must never** be used to communicate with us about personal or private matters, including over any private messaging service operated by such social media providers.

- Staff official blogs or wikis will be password protected and run from the school website with approval from the SLT. Members of staff are advised not to run social network spaces for pupil use on a personal basis.
- Personal publishing will be taught via age-appropriate sites that are suitable for educational purposes. They will be moderated by the school where possible.
- Pupils will be advised on security and privacy online and will be encouraged to set passwords, deny access to unknown individuals and to block unwanted communications.
- Pupils will be encouraged to approve and invite known friends only on social networking sites and to deny access to others by making profiles private.
- All members of the school community are advised not to publish specific and detailed private thoughts, especially those that may be considered threatening, hurtful, or defamatory.
- Steps will be taken in line with guidance on How schools and parents can spot and tackle online abuse of teachers - The Education Hub (blog.gov.uk).
- Newsgroups will be blocked unless a specific use is approved.
- Concerns regarding a pupil's use of social networking, social media, and personal publishing sites (in or out of school) will be raised with their parents, particularly when concerning the underage use of sites.
- Staff personal use of social networking, social media and personal publishing sites will be discussed as part of staff induction and outlined in the school Staff Acceptable Use Agreement – see link on contents page.

9.2 Personal devices and bring your own device (BYOD) procedures:

We recognise the widespread use of personal devices makes it essential that schools take steps to ensure mobile phones and devices, including wearable or "smart" technologies like health or fitness trackers, are used responsibly at school and it is essential that pupil use of their devices does not impede teaching, learning and good order in classrooms. Staff will be given clear boundaries on professional use.

Mobile devices can present a number of problems when not used appropriately:

- They are valuable items which may be stolen or damaged;
- Their use can render pupils or staff subject to sexual harassment, cyberbullying, and other forms of control;
- Apps or mobile devices which broadcast location data can make staff or pupils vulnerable to behaviours like stalking and can provide perpetrators with information to take cyberbullying into the real world.
- Internet access on phones and personal devices can allow pupils to bypass school security settings and filtering;
- They can undermine classroom discipline as they can be used on "silent" mode;
- Mobile phones with integrated cameras could lead to child protection, cyberbullying, and data protection issues in relation to inappropriate capture, use or distribution of inappropriate images of pupils or staff;

Permitted use of mobile phones and personal devices is a school decision and the following will apply:

- The use of mobile phones and other personal devices by pupils and staff in school will be decided by the school and covered in the relevant school Acceptable Use Agreement.
- The sending of abusive or inappropriate messages or content via mobile phones or personal devices is forbidden by any member of the school community and any breaches will be dealt with as part of the school Behaviour Policy and procedures.
- The school reserves the right to search the content of any mobile or handheld devices on the school premises where there is a reasonable suspicion that it may contain undesirable materials, including those which promote pornography, violence, or bullying. Staff mobiles or hand-held devices may be searched at any time as part of routine monitoring.
- School staff may confiscate a phone or device if they believe it is being used to contravene the school's Behaviour Policy and procedures.
- If there is suspicion that the material on the mobile may provide evidence relating to a criminal offence the phone will be handed over to the Police for further investigation.

- If members of staff have an educational reason to allow children to use mobile phones or personal devices as part of an educational activity, then it will only take place when approved by the SLT.
- Staff should not use personal devices such as mobile phones or cameras to take photos or videos of pupils and will only use work-provided equipment for this purpose.
- Where members of staff are required to use a mobile phone for school duties, for instance in case of emergency during off-site activities, or for contacting pupils or parents, then a school mobile phone will be provided and used. In an emergency where a staff member does not have access to a school-owned device, they should use their own device and hide their own mobile number for confidentiality purposes.
- If a member of staff breaches the school Policy and procedures, then disciplinary action may be taken.

Parents are asked to keep phones out of sights whilst on the school premises. They must ask permission before taking any photos e.g. of displays in corridors or classrooms and avoid capturing other children. Parents are asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office.

Network/internet access on school devices

Pupils are not allowed networked file access via personal devices. However, they are permitted to access the school wireless internet network for school-related internet use/limited personal use within the framework of the Acceptable Use Agreement. All such use is monitored.

Searching, Screening and Confiscation

In line with the DfE guidance 'Screening, searching and confiscation: advice for schools', the Head teacher and staff authorised by them have a statutory power to search pupils/property on school premises (with consent for items banned by the school and without consent for items which are prohibited or illegal). Staff may examine any data or files on an electronic device they have confiscated as a result of a search, if there is good reason to do so. If the member of staff conducting the search suspects they may find an indecent image of a child (sometimes known as nude or semi-nude images), the member of staff must never intentionally view the image, and must never copy, print, share, store, save or delete such images.

When an incident might involve an indecent image of a child and/or video, the member of staff will confiscate the device, avoid looking at the device and refer the incident to the DSL (or deputy) as the most appropriate person to advise on the school's response. This includes the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material, including but not exclusive to sexual images, pornography, upskirting, violence or bullying. Further details are available in the Behaviour Policy and procedures.

10. Managing filtering and monitoring

Whilst considering our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn we (the Governors, SLT and staff) will do all we reasonably can to limit children's exposure to online safety risks from the school's IT system. As part of this process, we will ensure that the school has appropriate filtering and monitoring system in place and will regularly review their effectiveness.

By making use of an appropriate risk assessment, the school will work towards meeting the obligations set out in the DfE filtering and monitoring standards which set out that schools should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs

The Governors will review the standards and discuss with IT staff and service providers what more needs to be done to support the school in meeting the standards.

The following issues will be addressed and regularly reviewed in relation to the management of filtering:

- The school's broadband access will include filtering appropriate to the age and maturity of pupils.

The safety and effectiveness of virtual communities depends on users being trusted and identifiable. This may not be easy, as authentication beyond the school may be difficult as demonstrated by social networking sites and other online tools such as Instagram, YouTube, X (formerly known as Twitter) and Tik Tok. The registering of individuals to establish and maintain validated electronic identities is essential for safe communication but is often not possible. Video conferencing introduces new dimensions; webcams are increasingly inexpensive and, with faster internet access, enable video to be exchanged across the Internet. The availability of live video can sometimes increase safety - you can see who you are talking to - but if inappropriately used, a video link could reveal security details.

New applications are continually being developed based on the Internet, the mobile phone network, wireless, Bluetooth or infrared connections. Users can be mobile using a phone, games console or personal digital assistant with wireless internet access. This can offer immense opportunities for learning as well as dangers such as a pupil using a phone to video a teacher's reaction in a difficult situation.

We will take steps to keep updated on new technologies, including those relating to mobile phones and handheld devices, and be ready to develop appropriate strategies. For example, whether communicating with a pupil or families via SMS or an instant messaging app about a pupil's absence or to send reminders. There are dangers for staff if personal devices or accounts are used to contact pupils so, we will endeavour to make a school owned device or account available if this kind of contact is necessary.

The inclusion of inappropriate language or images is difficult for staff to detect. Pupils may need reminding that such use is inappropriate and conflicts with school Policy and procedures. Abusive messages should be dealt with in line with the school's Behaviour Policy and procedures.

- Emerging technologies will be examined for educational benefit and a risk assessment will be carried out before use in school is allowed.
- Pupils will be instructed about safe and appropriate use of personal devices both on and off site in accordance with the school Acceptable Use Agreement/Mobile Phone procedures.

13. Cyber security and resilience

It is vital that the school understand our vulnerabilities in relation to potential cyber-attacks and breaches, regularly review our existing defences and take the necessary steps to protect our networks. As well as having a current and cohesive Cyber Response Plan in place, there are several measures that we can implement to help to improve our IT security and mitigate the risk of a cyber-attack. These measures fall under the 'Identify, Protect and Detect' pillars of effective cyber resilience and are outlined in our cyber security and resilience strategy. A copy of our strategy is available on request from the school office.

14. Policy Decisions

14.1 Authorising internet access

The school will allocate internet access to staff and pupils based on educational need. It will be clear who has internet access and who has not. Normally most pupils will be granted internet access. We will not prevent pupils from accessing the Internet unless the parents have specifically denied permission, or the child is subject to a sanction as part of our Behaviour policy and procedures.

- The school will maintain a current record of all staff and pupils who are granted access to the school's electronic communications.
- All staff will read and sign the Staff Acceptable Use Agreement before using any school ICT resources.
- Parents will be asked to read and sign the School Acceptable Use Agreement for pupil access and discuss it with their child, where appropriate.
- Parents will be informed that pupils will be provided with supervised internet access appropriate to their age and ability.
- When considering access for vulnerable members of the school community (such as with children with special education needs) the school will make decisions based on the specific needs and understanding of the pupil(s).

15.2 Discussing the Policy and procedures with Staff

It is important that all staff feel confident meeting the demands of using ICT appropriately in teaching, administration, and all other aspects of their school and personal life and the School Online Safety Policy and procedures will only be effective if all staff subscribe to its values and methods.

Staff will be given opportunities to discuss the issues and develop appropriate teaching or other work strategies. It would be unreasonable, for instance, if cover or supply staff were asked to take charge of an internet activity without preparation.

Any member of staff who has concerns about any aspect of their own or anyone else's ICT or internet use either on or off site, they should discuss this with their line manager. Where concerns are related to children's safeguarding, they should also be reported to the DSL who should follow the Child Protection Policy and procedure for recording and reporting allegations that meet the harm threshold and recording (and in some case reporting i.e. to a contractor's employer) low level concerns that do not.

Consideration is given when members of staff are provided with devices by the school which may be accessed outside of the school network. Staff are made aware of their responsibility to maintain the security and confidentiality of school information.

All staff have a universal duty to understand harms and protect children from them, including online. ICT use is widespread and all staff including administration, midday supervisors, facilities staff, Governors, and volunteers who use it or work with children who use it are included in awareness raising and training.

Induction of all new staff will include:

- A copy of the Online Safety Policy and procedures and a scheduled opportunity to discuss them.
- That internet traffic can be monitored and traced to the individual user, and the importance of having high professional standards and always following current policies and procedures.
- Up-to-date and appropriate staff training in safe and responsible internet use, both professionally and personally.
- Requirement to read, understand and sign relevant Acceptable Use Agreements.
- For staff who manage filtering systems or monitor ICT use: that they will be supervised by the SLT and what the procedures for reporting issues are.
- How the school will promote online tools which staff should use for work purposes, especially with children, and the procedure staff should go through if there is a new tool they want to use.
- That their online conduct out of school could have an impact on their role and reputation in school. Civil, legal, or disciplinary action could be taken if they are found to bring the profession or institution into disrepute, or if something is felt to have undermined confidence in their professional abilities.

Volunteers will receive an online safety induction based on what staff receive but suitable for the role they have been asked to fulfil.

When we employ an Early Career Teacher (ECT replacing newly qualified teacher or NQT) or work with trainee teachers the OSL will ensure use of the UKCIS Online Safety Audit Tool or similar self-assessment with them to help them better understand their role in keeping children safe online and our policy and practice.

15.3 Enlisting Parents' Support

Internet use in pupils' homes is increasingly widespread. Unless parents are aware of the dangers, pupils may have unrestricted and unsupervised access to the Internet in the home. The school may be able to help parents plan appropriate, supervised use of the Internet at home and educate them about the risks.

To engage with parents and carers we will:

- draw attention to our Online Safety Policy and procedures in newsletters, and on the school website;
- encourage a partnership approach to online safety at home and at school which may include demonstration evenings, regular suggestions for safe home internet use, promoting educational online safety activities for families, or highlighting online safety issues at other attended events e.g. parent evenings and sports days;

ONLINE SAFETY LINKS

This list provides links to relevant government guidance and a range of national organisations who can offer support to schools.

Related guidance is available on:

- relationships and sex education (RSE) and health education
- national curriculum in England computing programmes of study
- national curriculum in England citizenship programmes of study

Support and resources are also available from:

- National Centre for Computing Education (NCCE)
- UK Council for Internet Safety
- UK Safer Internet Centre (UKSIC)
- Education for a Connected World
- CEOP (Child Exploitation and Online Protection Centre)
- CEOP Education Programme (Thinkuknow.co.uk)
- Cumbria Safeguarding Children Partnership (Cumbria SCP)
- Information Commissioner's Office (ICO)
- Teaching online safety in schools
- The PREVENT Duty – DfE non-statutory Departmental advice for Schools and Childcare Providers
- How social media is used to encourage travel to Syria and Iraq: briefing note for schools – Home Office advice
- Internet Watch Foundation (IWF)
- Smoothwall

Schools can also get advice from national organisations such as:

- Anti-Bullying Alliance
- Association for Citizenship Teaching
- The Diana Award
- DotCom Charity
- Hopes and Streams
- Internet Matters
- NSPCC learning
- Parent Zone's school resources
- PSHE Association
- SWGfL
- Better Internet for Kids
- Virtual Global Taskforce — Report Abuse
- Cyberbullying.org

You can refer parents to the following national organisations for support:

- Internet Matters
- NSPCC
- Parent Zone
- Facebook Advice to Parents
- Family Online Safety Institute (FOSI)
- Get safe online - Test your online safety skills

You can refer pupils to the following national organisations for support:

- BBC Own It
- Childline
- Childnet