Online Safety Policy

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Contents

1. Aims

The Trust aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and Academy Governance Committee members.
- Deliver an effective approach to online safety, which empowers the Trust to protect and educate the whole school community in its use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate.

1.1 The 4 Key Categories of Risk

The Trust's approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as 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, such as 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

2. Legislation and Guidance

This policy is based on the Department for Education's (DfE's) statutory safeguarding guidance, Keeping Children Safe in Education, and its advice for schools on:

- Teaching online safety in schools
- Preventing and tackling bullying and cyber-bullying: advice for headteachers and school staff
- Relationships and sex education
- Searching, screening and confiscation

It also refers to the DfE's guidance on protecting children from radicalisation.

It reflects existing legislation, including but not limited to the Education Act 1996 (as amended), the Education and Inspections Act 2006 and the Equality Act 2010. In addition, it reflects the Education Act 2011, which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on pupils' electronic devices where they believe there is a 'good reason' to do so.

The policy also takes into account the National Curriculum computing programmes of study.

This policy complies with our funding agreement and articles of association.

3. Roles and Responsibilities

3.1 The Academy Governance Committee

The Academy Governance Committee (AGC) has overall responsibility for monitoring this policy and supporting the headteacher with its implementation.

The AGC Safeguarding lead will co-ordinate regular meetings with appropriate staff to discuss online safety, and monitor online safety logs as provided by the designated safeguarding lead (DSL).

All AGC members will:

- Ensure that they have read and understand this policy.
- Agree and adhere to the Trust's Acceptable Use policy for school's ICT systems and the internet.
- Ensure that online safety is a running and interrelated theme while devising and implementing their whole school approach to safeguarding and related policies and/or procedures.
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable.

3.2 The Headteacher

The Headteacher is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school. The Headteacher is also responsible for:

- Educating pupils about online safety (see section 4).
- Ensure that any online safety incidents are logged (see appendix 1) and dealt with appropriately in line with this policy.
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy.

3.3 The Designated Safeguarding Lead

Details of the school's designated safeguarding lead(s) (DSLs) are set out in our child protection and safeguarding policy as well as relevant job descriptions.

The Online Safety Lead or DSL takes lead responsibility for online safety in school, in particular:

- Supporting the headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school.
- Working with the Headteacher or relevant senior leader, Trust ICT Manager and other staff as necessary, to address any online safety issues or incidents.
- Managing all online safety issues and incidents in line with the school child protection policy.
- Ensuring that any online safety incidents are logged (see appendix 1) and dealt with appropriately in line with this policy.

- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy.
- Updating and delivering staff training on online safety.
- Liaising with other agencies and/or external services if necessary.
- Providing regular reports on online safety in school to the headteacher and/or Academy Governance Committee.

This list is not intended to be exhaustive.

3.4 The Trust ICT Manager

The Trust ICT manager is responsible for:

- Ensuring an appropriate level of security protection is put in place, such as filtering and monitoring systems, which are reviewed and updated on a regular basis to assess effectiveness and ensure pupils are kept safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material.
- Ensuring that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly.
- Conducting full security checks and monitoring the school's ICT systems.
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files.

This list is not intended to be exhaustive.

3.5 All Staff and Volunteers

All staff, including contractors and agency staff, and volunteers are responsible for:

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Agreeing and adhering to the Acceptable Use Policy for the school's ICT systems and the internet, and ensuring that pupils follow the Acceptable Use Policy
- Working with the DSL to ensure that any online safety incidents are logged (see appendix 1) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy
- Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline and maintaining an attitude of 'it could happen here'
- Report any concerns or queries raised about this policy to the Headteacher

This list is not intended to be exhaustive.

3.6 Parents

Parents are expected to:

- Notify a member of staff or the Headteacher of any concerns or queries regarding this policy
- Ensure their child has read, understood and agreed to the Acceptable Use Policy for the school's ICT systems and internet

Parents can seek further guidance on keeping children safe online from the following organisations and websites:

- What are the issues? – UK Safer Internet Centre
- Hot topics – Childnet International
- Parent resource sheet – Childnet International

3.7 Visitors and Members of the Community

Visitors and members of the community who use the school's ICT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the Acceptable Use Policy.

4. Educating Pupils About Online Safety

Pupils will be taught about online safety as part of the curriculum:

The text below is taken from the National Curriculum computing programmes of study.

It is also taken from the guidance on relationships education, relationships and sex education (RSE) and health education.

All schools have to teach:

- Relationships education and health education in primary schools
- Relationships and sex education and health education in secondary schools

In **Key Stage 1**, pupils will be taught to:

- Use technology safely and respectfully, keeping personal information private
- Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies

Pupils in **Key Stage 2** will be taught to:

- Use technology safely, respectfully and responsibly
- Recognise acceptable and unacceptable behaviour
- Identify a range of ways to report concerns about content and contact

By the **end of primary school**, pupils will know:

- That people sometimes behave differently online, including by pretending to be someone they are not

- That the same principles apply to online relationships as to face-to-face relationships, including the importance of respect for others online including when we are anonymous
- The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them
- How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met
- How information and data is shared and used online
- What sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know

In **Key Stage 3**, pupils will be taught to:

- Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
- Recognise inappropriate content, contact and conduct, and know how to report concerns

Pupils in **Key Stage 4** will be taught:

- To understand how changes in technology affect safety, including new ways to protect their online privacy and identity
- How to report a range of concerns

By the **end of secondary school**, pupils will know:

- Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- How information and data is generated, collected, shared and used online
- How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours

- How people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)

All schools:

The safe use of social media and the internet will also be covered in other subjects where relevant.

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.

5. Educating Parents About Online Safety

The school will raise parents' awareness of internet safety in letters or other communications home, and in information via our website. This policy will also be shared with parents.

The school will let parents know:

- What systems the school uses to filter and monitor online use
- What their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child will be interacting with online

If parents have any queries or concerns in relation to online safety, these should be raised in the first instance with the headteacher and/or the DSL.

Concerns or queries about this policy can be raised with any member of staff or the headteacher.

6. Cyber-Bullying

6.1 Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of 1 person or group by another person or group, where the relationship involves an imbalance of power. (See also the school behaviour policy.)

6.2 Preventing and Addressing Cyber-Bullying

To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The school will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Class teachers and form teachers will discuss cyber-bullying with their tutor groups.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.

All staff, Academy Governance Committee members and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training.

The school also sends information/leaflets on cyber-bullying to parents so that they are aware of the signs, how to report it and how they can support children who may be affected.

In relation to a specific incident of cyber-bullying, the school will follow the processes set out in the school behaviour policy. Where illegal, inappropriate or harmful material has been spread among pupils, the school will use all reasonable endeavours to ensure the incident is contained.

The DSL will report the incident and provide the relevant material to the police as soon as is reasonably practicable, if they have reasonable grounds to suspect that possessing that material is illegal. They will also work with external services if it is deemed necessary to do so.

6.3 Examining Electronic Devices

The headteacher, and any member of staff authorised to do so by the headteacher (as set out in the schools behaviour policy), can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or pupils, and/or
- Is identified in the school rules as a banned item for which a search can be carried out, and/or
- Is evidence in relation to an offence

Before a search, if the authorised staff member is satisfied that they have reasonable grounds for suspecting any of the above, they will also:

- Make an assessment of how urgent the search is, and consider the risk to other pupils and staff. If the search is not urgent, they will seek advice from the Headteacher or DSL.
- Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it
- Seek the pupil's cooperation

Only staff authorised by the Head teacher may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so.

When deciding whether there is a 'good reason' to examine data or files on an electronic device, the staff member should reasonably suspect that the device has, or could be used to:

- Cause harm, and/or
- Undermine the safe environment of the school or disrupt teaching, and/or
- Commit an offence

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL / headteacher / other member of the senior leadership team to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response.

When deciding if there is a good reason to erase data or files from a device, staff members will consider if the material may constitute evidence relating to a suspected offence. In these instances, they will not delete the material, and the device will be handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if:

- They reasonably suspect that its continued existence is likely to cause harm to any person, and/or

- The pupil and/or the parent refuses to delete the material themselves

If a staff member **suspects** a device **may** contain an indecent image of a child (also known as a nude or semi-nude image), they will:

- **Not** view the image
- Confiscate the device and report the incident to the DSL (or equivalent) immediately, who will decide what to do next. The DSL will make the decision in line with the DfE's latest guidance on screening, searching and confiscation and the UK Council for Internet Safety (UKCIS) guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people

Any searching of pupils will be carried out only once authorised by the Headteacher in line with:

- The DfE's latest guidance on searching, screening and confiscation
- UKCIS guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people
- The school behaviour policy

Any complaints about searching for or deleting inappropriate images or files on pupils' electronic devices will be dealt with through the school complaints procedure.

7. Acceptable Use of the Internet in School

All pupils, parents, staff, volunteers and Academy Governance Committee members are expected to adhere to the Acceptable Use Policy regarding the acceptable use of the school's ICT systems and the internet. Visitors will be expected to read and adhere to the school's Acceptable Use Policy if relevant.

Use of the school's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role.

We will monitor the websites visited by pupils, staff, volunteers, Academy Governance Committee members and visitors (where relevant) to ensure they comply with the above.

8. Pupils Using Mobile Devices in School

Refer to the Trust Use of Personal Mobile Phone and Devices Policy and the Trust Bring Your Own Device (BYOD) Policy.

9. Staff Using Work Devices Outside School

All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- Keeping the device password-protected – strong passwords are at least 8 characters, with a combination of upper and lower-case letters, numbers and special characters (e.g. asterisk or currency symbol)

- Making sure the device locks if left inactive for a period of time
- Not sharing the device among family or friends
- Installing anti-virus and anti-spyware software
- Keeping operating systems up to date by always installing the latest updates

Staff members must not use the device in any way which would violate the Trust's Acceptable Use Policy.

Work devices must be used solely for work activities.

If staff have any concerns over the security of their device, they must seek advice from the Trust ICT Manager.

10. How the School Will Respond to Issues of Misuse

Where a pupil misuses the school's ICT systems or internet, we will follow the procedures set out in the school behaviour policy. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the school's ICT systems or the internet, or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with the Trust Disciplinary Procedure. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The school will consider whether incidents which involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

11. Training

All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation.

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

By way of this training, all staff will be made aware that:

- Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse
- Physical abuse, sexual violence and initiation/hazing type violence can all contain an online element
- Children can abuse their peers online through:
  - Abusive, harassing, and misogynistic messages
  - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
  - Sharing of abusive images and pornography, to those who don't want to receive such content

Training will also help staff:

- Develop better awareness to assist in spotting the signs and symptoms of online abuse
- Develop the ability to ensure pupils can recognise dangers and risks in online activity and can weigh up the risks
- Develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term

The DSL(s) will undertake child protection and safeguarding training, which will include online safety, at least every 2 years. They will also update their knowledge and skills on the subject of online safety at regular intervals, and at least annually.

Academy Governance Committee members will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

More information about safeguarding training is set out in our child protection and safeguarding policy.

12. Monitoring Arrangements

The DSL logs behaviour and safeguarding issues related to online safety. An incident report log can be found in appendix 1.

13. Links with Other Policies

This online safety policy is linked to our:

- Academy Child protection and safeguarding policy
- Academy Behaviour policy
- Trust Disciplinary Procedures
- Trust Data protection policy and privacy notices
- Trust Complaints Policy
- Acceptable Use Policy
- Use of Personal Mobile Phone and Devices Policy

Appendix 1: Example Confidential Online Safety Incident Report Log

Date	Alleged perpetrator(s)	Staff / pupil?	Alleged victim(s)	Staff / pupil?	Where the incident took place	Description of the incident	Substantiated or unsubstantiated	Action taken	Next steps	Name of staff member recording the incident