DOROTHY BARLEY INFANT SCHOOL

Online Safety Policy

Approval by Governing Body: Spring Term 2024

Chair of Governors: Mrs Sue Matthews

Executive Headteacher: Mrs Lauren Pearce

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Dorothy Barley Infant School is committed to safeguarding and promoting the welfare of children and expects all staff, governors and volunteers to share this commitment.

Introduction

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between all staff, governors and volunteers. It is designed to sit alongside our school's Safeguarding Policy. Accordingly, this policy is written in line with 'Keeping Children Safe in Education' 2023 (KCSIE), 'Teaching Online Safety in Schools' 2023, statutory RSHE guidance 2021. Any issues and concerns with online safety must follow the school's safeguarding and child protection procedures.

Policy review date:	December 2023
Policy reviewed by:	L M Seaton
Policy approved by Governors on:	TBC
Next policy review date:	December 2024

Key People

Executive Head Teacher	Lauren Pearce
Designated Safeguarding Lead (DSL) / team:	Lead: Anita Ratford Deputy: Jayne Osborne Other Safeguarding Leads: Norma McNicol Katie Palfreman Donna Scammell
Online safety coordinator	Louise Seaton
Online safety / safeguarding link governor	Lynne Noble
RSHE coordinator	Mel Smith
PSHE coordinator	Norma McNicol
Computing subject coordinator	Louise Seaton
Network manager / technical support	Greg Mead
Data protection officer	Yvonne Rogers

How will this policy be communicated?

This policy can only impact upon practice if it is a regularly updated, it is accessible to and understood by all stakeholders. It is communicated in the following ways:

- Posted on the school website/ staff shared drive
- Available on request from the main school office
- A copy is held in the policy folder in the main staffroom
- Part of school induction pack for all new staff (including temporary, supply and non-classroom-based staff and those starting mid-year)
- Integral to safeguarding updates and training for all staff (especially in September refreshers)
- Clearly reflected in the Acceptable Use Policies (AUPs) for staff, volunteers, contractors, governors, pupils and parents/carers. It is issued to whole school community, on entry to the school, annually and whenever changed.

Contents

Overview

Aims

This policy aims to promote a whole school approach to online safety by:

- Setting out expectations for all Dorothy Barley Infants School community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline)
- Helping safeguarding and senior leadership teams to have a better understanding and awareness of filtering and monitoring through effective collaboration and communication with technical colleagues
- Helping all stakeholders to recognise that online/digital behaviour standards (including social media activity) must be upheld beyond the confines of the school gates and school day, regardless of device or platform, and that the same standards of behaviour apply online and offline.
- Facilitating the safe, responsible, respectful and positive use of technology to support teaching & learning, increase attainment and prepare children and young people for the risks and opportunities of todays and tomorrow's digital world, to survive and thrive online
- Helping school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
    - for the protection and benefit of the children and young people in their care, and
    - for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice
    - for the benefit of the school, supporting the school ethos, aims and objectives, and protecting the reputation of the school and profession
- Establishing clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as Behaviour Policy or Anti-Bullying Policy)

Scope

This policy applies to all members of the Dorothy Barley Infants School community (including teaching and support staff, supply teachers, governors, volunteers, contractors, pupils, parents/carers, visitors and community users) who have access to our digital technology, networks and systems, whether on-site or remotely, and at any time, or who use technology in their school role.

Roles and responsibilities

This school is a community, and all members have a duty to behave respectfully online and offline, to use technology for teaching and learning and to prepare for life after school, and to immediately report any concerns or inappropriate behaviour, to protect staff, pupils, families and the reputation of the school. We learn together, make honest mistakes together and support each other in a world that is online and offline at the same time.

Depending on their role, all members of the school community should **read the relevant section in Annex A of this document** that describes individual roles and responsibilities. It should be noted that there is one for All Staff which must be read even by those who have a named role in another section. There are also pupil, governor, etc role descriptions in the annex.

Education and curriculum

It is important that schools establish a carefully sequenced curriculum for online safety that builds on what pupils have already learned and identifies subject content that is appropriate for their stage of development.

As well as teaching about the underpinning knowledge and behaviours that can help pupils navigate the online world safely and confidently regardless of the device, platform or app, embedding teaching about online safety and harms through a whole school approach and provides an understanding of these risks to help tailor teaching and support to the specific needs of pupils, including vulnerable pupils.

DfE: Keeping Children safe in Education (2023) para 136, notes that:

"The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
- 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;
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/)."

The following subjects have the clearest online safety links

- Relationships education, relationships and sex education (RSE) and health (also known as RSHE or PSHE)
- Computing

However, it is the role of all staff to identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum/stage/subject coordinators, and making the most of unexpected learning opportunities as they arise.

Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc) in school or setting as homework tasks, all staff should encourage sensible use, monitor what pupils/students are doing and consider potential dangers and the age appropriateness of websites.

Equally, all staff should carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular, extended school activities if relevant and remote teaching), supporting them with search skills, critical thinking (e.g. disinformation, misinformation and fake news), age appropriate materials and signposting, and legal issues such as copyright and data law.

At Dorothy Barley Infant School, we recognise that online safety and broader digital resilience must be thread throughout the curriculum and that is why we use elements of the cross-curricular framework 'Education for a Connected World – 2020 edition' from UKCIS (the UK Council for Internet Safety) and the scheme of work, 'Teach Computing'.

Annual reviews of curriculum plans / schemes of work are used as an opportunity to follow this framework more closely in its key areas of Self-image and Identity, Online relationships, Online reputation, Online bullying, Managing online information, Health, Wellbeing and lifestyle, Privacy and security, and Copyright and ownership.

Handling online-safety concerns and incidents

It is vital that all staff recognise that online safety is a part of safeguarding (as well as being a curriculum strand of Computing and PSHE/RSHE).

General concerns must be handled in the same way as any other safeguarding concern; safeguarding is often referred to as a jigsaw puzzle, so all stakeholders should err on the side of talking to the designated safeguarding lead to contribute to the overall picture or highlight 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.

School procedures for dealing with online-safety will be mostly detailed in the following policies:

- Safeguarding and Child Protection Policy
- Sexual Harassment
- Anti-Bullying Policy
- Behaviour Policy
- Acceptable Use Policies
- Prevent Policy
- Whistle- blowing Policy

This school commits to take all reasonable precautions to ensure online safety but recognises that incidents will occur both inside school and outside school (and that those from outside school will continue to impact pupils when they come into school or during extended periods away from school). All members of the school are encouraged to report issues swiftly to allow us to deal with them quickly and sensitively through the school's escalation processes.

Any suspected online risk or infringement should be reported to the designated safeguarding lead on the same day – where clearly urgent, it will be made by the end of the lesson or earlier.

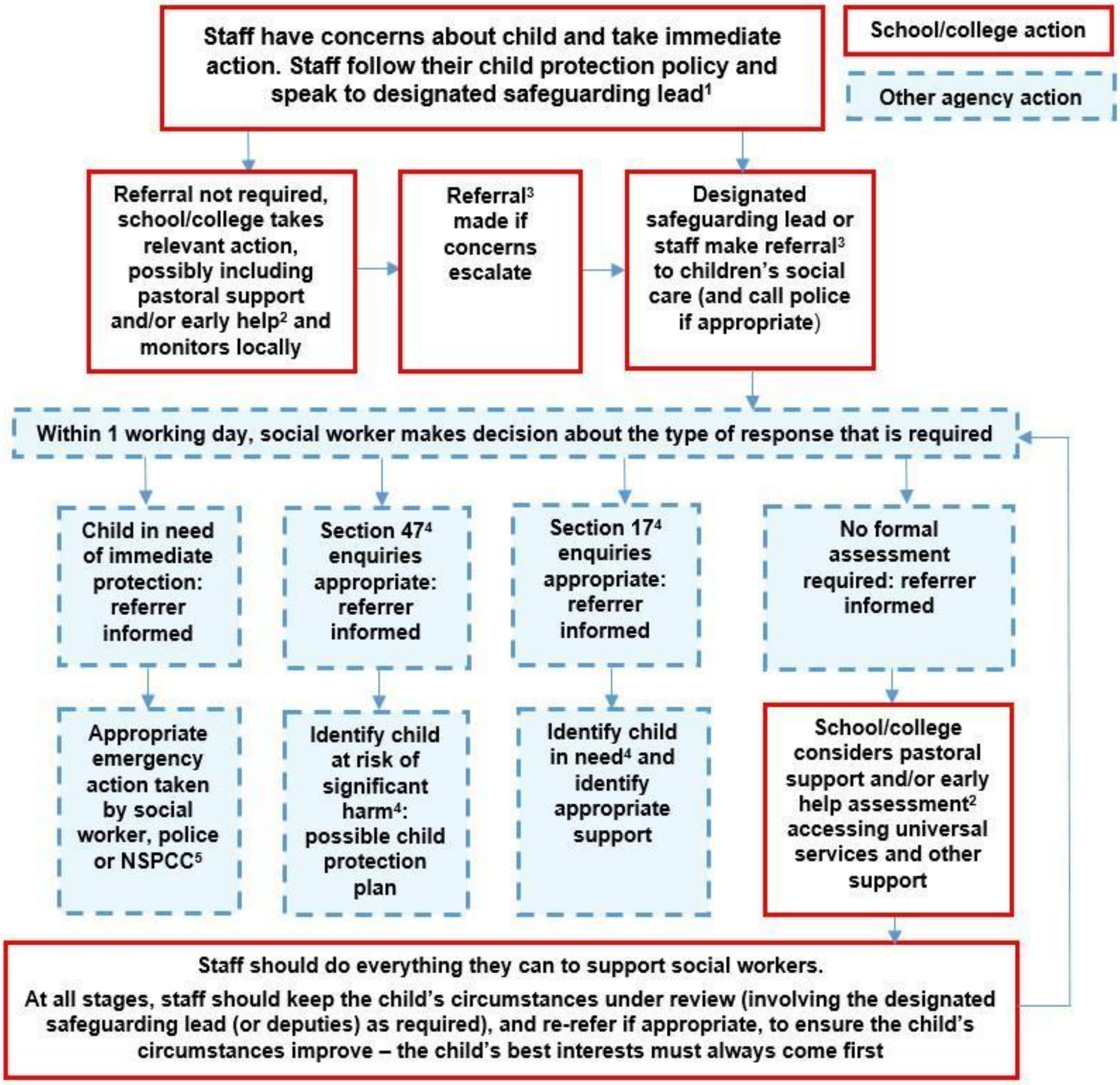
Any concern/allegation about staff misuse is always referred directly to the Headteacher, unless the concern is about the Headteacher in which case the complaint is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer).

The school will actively seek support from other agencies as needed (i.e. The local authority, LGfL, UK Safer Internet Centre's Professionals' Online Safety Helpline (POSH), NCA CEOP, Prevent Officer, Police)

We will inform parents/carers of online-safety incidents involving their children, and the Police where staff or pupils engage in or are subject to behaviour which we consider is particularly disturbing or breaks the law.

Actions where there are concerns about a child

The following flow chart is taken from page 22 of Keeping Children Safe in Education 2023 as the key education safeguarding document. As outlined previously, online safety concerns are no different to any other safeguarding concern and as such the school's Child Protection and Safeguarding Policy will be followed.



Staff have concerns about child and take immediate action. Staff follow their child protection policy and speak to designated safeguarding lead[1]
School/college action
Other agency action
Referral not required, school/college takes relevant action, possibly including pastoral support and/or early help[2] and monitors locally
Referral[3] made if concerns escalate
Designated safeguarding lead or staff make referral[3] to children's social care (and call police if appropriate)
Within 1 working day, social worker makes decision about the type of response that is required
Child in need of immediate protection: referrer informed
Section 47[4] enquiries appropriate: referrer informed
Section 17[4] enquiries appropriate: referrer informed
No formal assessment required: referrer informed
Appropriate emergency action taken by social worker, police or NSPCC[5]
Identify child at risk of significant harm[4]: possible child protection plan
Identify child in need[4] and identify appropriate support
School/college considers pastoral support and/or early help assessment[2] accessing universal services and other support
Staff should do everything they can to support social workers.
At all stages, staff should keep the child's circumstances under review (involving the designated safeguarding lead (or deputies) as required), and re-refer if appropriate, to ensure the child's circumstances improve – the child's best interests must always come first

Forms of Abuse that might be encountered online.

The following list is not definitive but highlights the most prevalent forms of abuse seen or taking place online. Further information and procedures to follow can be found in our Child Protection and Safeguarding Policy- Section 7 Recognising abuse and taking action.

- **Sexting- sharing nudes and semi-nudes.** Further advice can also be found at the updated UK Council for Internet Safety (UKCIS) guidance on sexting - now referred to as Sharing nudes and semi-nudes: advice for education settings to avoid unnecessary criminalisation of children**. NB - where one of the parties is over 18, this is no longer sexting but child sexual abuse.** Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL. The school DSL will in turn use the full guidance document, Sharing nudes and semi-nudes – advice for educational settings to decide next steps and whether other agencies need to be involved. It is important that everyone understands that whilst sexting is illegal, pupils/students can come and talk to members of staff if they have made a mistake or had a problem in this area.

- **Upskirting.** It is important that everyone understands that upskirting (taking a photo of someone under their clothing, not necessarily a skirt) is now a criminal offence and constitutes a form of sexual harassment as highlighted in Keeping Children Safe in Education. As with other forms of child on child abuse pupils/students can come and talk to members of staff if they have made a mistake or had a problem in this area.

- **Bullying**. Online bullying, including incidents that take place outside school or from home should be treated like any other form of bullying and the school bullying policy should be followed for online bullying, which may also be referred to as cyberbullying, including issues arising from banter.

- **Sexual violence and harassment.** DfE guidance on sexual violence and harassment has now been incorporated into Keeping Children Safe in Education and is no longer a document in its own right. Any incident of sexual harassment or violence (online or offline) should be reported to the DSL who will follow the full guidance. Staff should work to foster a zero-tolerance culture and maintain an attitude of 'it could happen here'. Schools must take all forms of sexual violence and harassment seriously, explaining how it exists on a continuum and that behaviours incorrectly viewed as 'low level' are treated seriously and not allowed to perpetuate. The document makes specific reference to behaviours such as bra-strap flicking and the careless use of language.

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 are defined in the relevant Acceptable Use Policy as well as in this document, for example in the sections relating to the professional and personal use of school platforms/networks/clouds, devices and other technology.

Where pupils contravene these rules, the school behaviour policy will be applied; where staff contravene these rules, action will be taken as outlined in the staff code of conduct/handbook.

It will be necessary to reinforce these as usual at the beginning of any school year but also to remind pupils that the same applies for any home learning that may take place in future periods of absence/ closure/quarantine etc.

Further to these steps, the school reserves the right to withdraw – temporarily or permanently – any or all access to such technology, or the right to bring devices onto school property.

Social media incidents

See the social media section later in this document for rules and expectations of behaviour for children and adults in the Dorothy Barley Infants School community. These are also governed by school Acceptable Use Policies.

Breaches will be dealt with in line with the school behaviour policy (for pupils) or code of conduct/handbook (for staff).

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community, the school will request that the post be deleted and will expect this to be actioned promptly.

Where an offending post has been made by a third party, the school may report it to the platform it is hosted on, and may contact the Professionals' Online Safety Helpline, POSH, (run by the UK Safer Internet Centre) for support or help to accelerate this process.

Data protection and data security

Personal data will be recorded, processed, transferred and made available according to the current data protection legislation and our school data protection policies.

The school

- Has a Data Protection Policy
- Implements the data protection principles and is able to demonstrate that it does so through use of policies, notices and records
- Has paid the appropriate fee to the Information Commissioner's Office (ICO) and included details of the Data Protection Officer (DPO)
- Has appointed a Data Protection Officer who has a high level of understanding of data protection law and is free from any conflict of interest
- Has an 'information asset register' in place and knows exactly what personal data it holds, where this data is held, why and which member of staff has responsibility for managing it
- Information asset register records the lawful basis for processing personal data (including, where relevant, how consent was obtained and refreshed). Where special category data is processed, an additional lawful basis will have also been recorded
- Will hold the minimum personal data necessary to enable it to perform its function and it will not hold it longer than necessary for the purposes it was collected for
- Data held must be accurate and up to date. Inaccuracies are corrected without unnecessary delay
- Lawful basis for processing personal data (including, where relevant, consent) has been identified and documented and details provided in a Privacy Notice
- Where special category data is processed, a lawful basis and a separate condition for processing have been identified
- Data Protection Impact Assessments are carried out where necessary; for example, to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier
- Has clear and understood arrangements for access to and the security, storage and transfer of personal data, including, where necessary, adequate contractual clauses or safeguards where personal data is passed to third parties, e.g. cloud service providers
- Procedures are in place to deal with the individual rights of the data subject, i.e. Subject access Requests to see all or part of their personal data held by the data controller
- Have clear and understood data retention policies and routines for the deletion and disposal of data
- Has a policy for reporting, logging, managing and recovering from an information risk incident which recognises the requirement to report relevant data breaches to the ICO within 72 hours of the breach, where feasible
- Consider the protection of personal data when accessed using any remote access solutions
- Has a Freedom of Information Policy which sets out how it will deal with FOI requests
- All staff receive data handling awareness / data protection training and are made aware of their responsibilities. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff

Staff must ensure that they:

- At all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse
- Can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- Where personal data is stored or transferred on mobile of other devices (including USBs) these must be encrypted and password protected
- Will not transfer any school data to personal devices except as in line with school policy
- Access personal data sources and records only on secure password protected computers and other devise, ensuring that they are properly 'logged off' at the end of any session
- When personal data is stored on any portable computer system, memory stick or any other removable media:
    - The data must be encrypted, and password protected.
    - The device must be encrypted, and password protected.
    - The device must be protected by up-to-date virus and malware checking software.
    - The data must be securely deleted from the device, in line with school policy once it has been transferred or its use is complete.

For further information please refer to the school Data Protection Policy and Information Security policy.

Appropriate filtering and monitoring

Keeping Children Safe in Education obliges schools to "ensure appropriate filters and appropriate monitoring systems are in place [and] not be able to access harmful or inappropriate material [but at the same time] be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding."

At this school, the internet connection is provided by EXA Networks. This means we have a dedicated and secure, schoolsafe connection that is protected with firewalls and multiple layers of security, including a web filtering system called SurfProtect Quantum, which is made specifically to protect children in schools.

Electronic communications

Please read this section alongside references to pupil-staff communications in the overall school Safeguarding Policy, and in conjunction with the Data Protection Policy. This section only covers electronic communications, but the same principles of transparency, appropriate conduct and audit trail apply.

Email

Staff at this school use the Microsoft Office 365 system for all school emails.
This system is fully auditable, trackable and managed by Computer Talk on behalf of the school. This is for the mutual protection and privacy of all staff, pupils and parents, as well as to support data protection.

General principles for email use are as follows:

- Email is the only means of electronic communication to be used between staff and parents (in both directions). Use of a different platform must be approved in advance by the data-protection officer / headteacher in advance (depending upon the context) Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and the DSL (if by a child) or to the Headteacher (if by a staff member) will be notified.
- Email may only be sent using the email systems above. There should be no circumstances where a private email is used; if this happens by mistake, the DSL/Headteacher/DPO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately.
- Staff or pupil personal data should never be sent/shared/stored on email.
    - If data needs to be shared with external agencies, encrypted emails must be sent on the school Office 365 email system.
    - Internally, staff should use the school network, including when working from home using Office 365 school one drive accounts, Google G Suite accounts or remote access.
- Appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff
- Staff are allowed to use the email system for reasonable (not excessive, not during lessons) personal use but should be aware that all use is monitored, their emails may be read and the same rules of appropriate behaviour apply at all times. Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination.

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. The Executive Headteacher and Governors have delegated the day-to-day responsibility of updating the content of the website to the office manager and members of the SLT. The site is hosted by Creative Schools.

Where staff submit information for the website, they are asked to remember:

- Schools have the same duty as any person or organisation to respect and uphold copyright law. Sources must always be credited and material only used with permission.
- Where pupil work, images or videos are published on the website, their identities are protected and full names are not published.

Cloud platforms

It is important to consider data protection before adopting a cloud platform or service – please refer to our DP policy.

For online safety, basic rules of good password hygiene ("Treat your password like your toothbrush –never share it with anyone!"), expert administration and training can help to keep staff and pupils safe, and to avoid incidents. The data protection officer and network manager analyse and document systems and procedures before they are implemented, and regularly review them.

The following principles apply:

- Privacy statements inform parents and children (13+) when and what sort 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. This is noted in a DPIA (data-protection impact statement) and parental permission is sought
- 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 permission
- 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)

Digital images and video

When a pupil joins the school, parents/carers are asked if they give consent for their child's image to be captured in photographs or videos, for what purpose and for how long. Parents answer as follows:

- For displays around the school
- For the newsletter

- For use in paper-based school marketing
- For online prospectus or websites
- For a specific high-profile image for display or publication

Whenever a photo or video is taken/made, the member of staff taking it will check the latest database before using it for any purpose.

Any pupils shown in public facing materials are never identified with more than first name.

All staff are governed by their contract of employment and the school's Acceptable Use Policy, which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. At Dorothy Barley Infants School, no member of staff will ever use their personal phone to capture photos or videos of pupils

Photos are stored on the school network in line with the retention schedule of the school Data Protection Policy.

Staff are reminded annually about the importance of not sharing without permission, due to reasons of child protection, data protection, religious or cultural reasons, or simply for reasons of personal privacy.

We encourage young people to think about their online reputation and digital footprint, so we should be good adult role models by not oversharing (or providing embarrassment in later life – and it is not for us to judge what is embarrassing or not).

Pupils are taught about how images can be manipulated in their online safety education programme and also taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children

Pupils are advised to be very careful about placing any personal photos on social media. They are taught to understand the need to maintain privacy settings so as not to make public, personal information.

Pupils are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images that reveals the identity of others and their location. 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, pupils' and parents' SM presence

Social media is a fact of modern life, and as a school, we accept that many parents, staff and pupils will use it. However, as stated in the acceptable use policies which all members of the school community sign, we expect everybody to behave in a positive manner, engaging respectfully with the school and each other on social media, in the same way as they would face to face.

This positive behaviour can be summarised as not making any posts which are or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which might bring the school or teaching profession into disrepute. This applies both to public pages and to private posts, e.g. parent chats, pages or groups.

If parents have a concern about the school, we urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, the school complaints procedure should be followed. Sharing complaints on social media is unlikely to help resolve the matter, but can cause upset to staff, pupils and parents, also undermining staff morale and the reputation of the school (which is important for the pupils we serve).

Many social media platforms have a minimum age of 13 (note that WhatsApp is 16+), but we ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use.

However, the school has to strike a difficult balance of not encouraging underage use at the same time as needing to acknowledge reality in order to best help our pupils/students to avoid or cope with issues if they arise. Online safety lessons will look at social media and other online behaviour, how to be a good friend online and how to report bullying, misuse, intimidation or abuse. However, children will often learn most from the models of behaviour they see and experience, which will often be from adults.

Email is the official electronic communication channel between parents and the school.

Staff are reminded that they are obliged not to bring the school or profession into disrepute and the easiest way to avoid this is to have the strictest privacy settings and avoid inappropriate sharing and oversharing online. They should never discuss the school or its stakeholders on social media and be careful that their personal opinions might not be attributed to the school, trust or local authority, bringing the school into disrepute.

All members of the school community are reminded that particularly in the context of social media, it is important to comply with the school policy on Digital Images and Video and permission is sought before uploading photographs, videos or any other information about other people.

The statements of the Acceptable Use Policies (AUPs) which all members of the school community have signed are also relevant to social media activity, as is the school’s Data Protection Policy.

Device usage

Personal devices including wearable technology

- **Pupils** are not allowed to bring mobile phones into school.

- **All staff** should leave their mobile phones on silent and only use them in private staff areas during school hours. Child/staff data should never be downloaded onto a private phone. If a staff member is expecting an important personal call when teaching or otherwise on duty, they must seek permission from the Deputy Head Teacher.
- **Volunteers, contractors, governors** should leave their phones in their pockets and turned off. Under no circumstances should they be used in the presence of children or to take photographs or videos. If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the Deputy Head teacher should be sought (the Deputy Head teacher may choose to delegate this) and this should be done in the presence of a member staff.
- **Parents** when they are in the school are asked to leave their phones in their pockets and turned off when they are on site. They should not take photos.

Network / internet access on school devices

- **Pupils** are not allowed networked file access via personal devices. However, they are allowed to access the school wireless internet network for school-related internet use in lessons.
- **All staff** should leave their mobile phones on silent and only use them in private staff areas during school hours.
- **Volunteers, contractors, governors** have no access to the school network on personal devices but can access the guest wireless network. They have no access to networked files/drives, subject to the acceptable use policy. All internet traffic is monitored.
- **Parents** have no access to the school network or wireless internet on personal devices Trips / events away from school

For school trips/events away from school, teachers will be issued a school duty phone and this number used for any authorised or emergency communications with parents. Any deviation from this policy (e.g. by mistake or because the school phone will not work) will be notified immediately to the deputy head teacher. Teachers using their personal phone in an emergency will ensure that the number is hidden to avoid a parent or student accessing a teacher's private phone number.

Searching and confiscation

In line with the DfE guidance '[Searching, screening and confiscation: advice for schools]', the Executive Headteacher and staff authorised by them have a statutory power to search pupils/property on school premises. 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, violence or bullying.

Appendix 1 – Roles

Please read the relevant roles & responsibilities section from the following pages.

School staff – **note that you may need to read two sections** – if your role is reflected here, you should still read the "All Staff" section.

Roles:

- All Staff
- Executive Head teacher/Deputy Head teacher
- Designated Safeguarding Lead / Online Safety Coordinator
- Governing Body, led by Online Safety / Safeguarding Link Governor
- PSHE / RSHE Lead
- Computing coordinator
- Subject coordinator
- Network Manager/technician
- Data Protection Officer (DPO)
- Volunteers and contractors
- Pupils
- Parents/carers

All staff

Key responsibilities:

- Read and follow this policy in conjunction with the school's main safeguarding policy and the relevant parts of Keeping Children Safe in Education
- Understand that online safety is a core part of safeguarding and part of everyone's job – never think that someone else will pick it up. Safeguarding is often referred to as a jigsaw puzzle – you may have the missing piece, so do not keep anything to yourself. Record online-safety incidents in the same way as any safeguarding incident; report in accordance with school procedures
- Know who the Designated Safeguarding Lead (DSL) is Anita Ratford. and notify her not just of concerns but also of trends and general issues you may identify. Also speak to her if policy does not reflect practice and follow escalation procedures if concerns are not promptly acted upon
- Sign and follow the staff acceptable use policy and code of conduct/handbook
- Identify opportunities to thread online safety through all school activities as part of a whole school approach in line with the RSHE curriculum, both outside the classroom and within the curriculum, supporting curriculum/stage/subject coordinators, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils)
- Whenever overseeing the use of technology in school or for homework or remote teaching, encourage and talk about appropriate behaviour and how to get help and consider potential risks and the age-appropriateness of websites
- Follow best-practice pedagogy for online-safety education, avoiding scaring, victim-blaming language and other unhelpful prevention methods
- When supporting pupils remotely, be mindful of additional safeguarding
- Carefully supervise and guide pupils when engaged in learning activities involving online technology, supporting them with search skills, critical thinking, age-appropriate materials and signposting, and legal issues such as copyright and GDPR.
- Be aware of security best-practice at all times, including password hygiene and phishing strategies.
- Prepare and check all online sources and classroom resources before using for accuracy and appropriateness.
- Encourage pupils to follow their acceptable use policy at home as well as at school, remind them about it and enforce school sanctions.
- Take a zero-tolerance approach to all forms of child-on-child abuse, not dismissing it as banter - this includes bullying, sexual violence and harassment
- Be aware that you are often most likely to see or overhear online-safety issues (particularly relating to bullying and sexual harassment and violence) in the playground, corridors, toilets and other communal areas outside the classroom – let the DSL know
- Receive regular updates from the DSL/OS coordinator and have a healthy curiosity for online safeguarding issues

- Model safe, responsible and professional behaviours in your own use of technology. This includes outside school hours and site, and on social media, in all aspects upholding the reputation of the school and of the professional reputation of all staff

Executive Head teacher

Key responsibilities:

- Foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding
- Oversee and support the activities of the designated safeguarding lead team and ensure they work with technical colleagues to complete an online safety audit in line with KCSIE (including technology in use in the school
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and Local Safeguarding Children Partnership support and guidance
- Ensure ALL staff undergo safeguarding training (including online safety) at induction and with regular updates and that they agree and adhere to policies and procedures
- Ensure ALL governors and trustees undergo safeguarding and child protection training and updates (including online safety) to provide strategic challenge and oversight into policy and practice and that governors are regularly updated on the nature and effectiveness of the school's arrangements
- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including remote systems are implemented according to child-safety first principles
- Liaise with technical colleagues on a regular basis to have an understanding and awareness of filtering and monitoring provisions and manage them effectively – in particular understand what is blocked or allowed for whom, when, and how. Note that KCSIE 2023 strengthens the wording for this.
- Liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information
- Support safeguarding leads and technical staff as they review protections for pupils in the home and remote-learning procedures, rules and safeguards
- Assign responsibility to a nominated member of staff to carry out online searches with consistent guidelines as part of due diligence for the recruitment shortlist process.
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident

- Ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
- Ensure the school website meets statutory requirements

Designated Safeguarding Lead

Key responsibilities (the DSL can delegate certain online safety duties to the online-safety coordinator, but not the overall responsibility; this assertion and all quotes below are from Keeping Children Safe in Education):

- "The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection [including online safety] … this **lead** responsibility should not be delegated"
- Work with the Executive HT and technical staff to review protections for **remote-learning** procedures, rules and safeguards
- Where the online-safety coordinator is not the named DSL or deputy DSL, ensure there is regular review and open communication between these roles and that the DSL's clear overarching responsibility for online safety is not compromised
- Ensure "An effective whole school approach to online safety [that] empowers a school to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate."
- Ensure ALL staff undergo safeguarding and child protection training (including online safety) at induction and that this is regularly updated
- Liaise with the Executive Head teacher and Chair of Governors to ensure that ALL governors and trustees undergo safeguarding and child protection training (including online safety) at induction to enable them to provide strategic challenge and oversight into policy and practice and that this is regularly updated
- Take day-to-day responsibility for online safety issues and be aware of the potential for serious child protection concerns
- Be mindful of using appropriate language and terminology around children when managing concerns, including avoiding victim-blaming language
- Remind staff of safeguarding considerations as part of a review of remote learning procedures and technology, including that the same principles of online safety and behaviour apply
- Work closely with SLT, staff and technical colleagues to complete an online safety audit (including technology in use in the school

- Work with the Executive Headteacher, DPO and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Stay up to date with the latest trends in online safeguarding and "undertake Prevent awareness training."

- Receive regular updates in online safety issues and legislation, be aware of local and school trends
- Ensure that online safety education is embedded across the curriculum in line with the statutory RSHE guidance
- Promote an awareness of and commitment to online safety throughout the school community, with a strong focus on parents, but also including hard-to-reach parents
- Communicate regularly with SLT and the designated safeguarding and online safety go to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring work and have been functioning/helping.
- Ensure 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 safeguarding incident.
- Oversee and discuss 'appropriate filtering and monitoring' with governors and ensure staff are also aware. Liaise with technical teams and ensure they are implementing not taking the strategic decisions on what is allowed and blocked and why. Also, as per KCSIE "be careful that 'over blocking' does not lead to unreasonable restrictions
- Ensure KCSIE 'Part 5: Sexual Violence & Sexual Harassment' is understood and followed throughout the school and that staff adopt a zero-tolerance, whole school approach to all forms of child-on-child abuse, and don't dismiss it as banter (including bullying).
- Facilitate training and advice for all staff, including supply teachers:
  - all staff must read KCSIE Part 1 and all those working with children also Annex B – translations are available in 13 community languages at kcsietranslate.lgfl.net
  - Annex A is now a condensed version of Part one and can be provided (instead of Part one) to those staff who do not directly work with children, if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare and safeguard children.
  - cascade knowledge of risks and opportunities throughout the organisation

Governing Body, led by Online Safety Link Governor

Key responsibilities (quotes are taken from Keeping Children Safe in Education)

- Approve this policy and strategy and subsequently review its effectiveness
- Undergo (and signpost all other governors and Trustees to attend) safeguarding and child protection training (including online safety) at induction to provide strategic challenge and into policy and practice, ensuring this is regularly updated
- Ensure that all staff also receive appropriate safeguarding and child protection (including online) training at induction and that this is updated
- "Ensure appropriate filters and appropriate monitoring systems are in place [but…] be careful that 'overblocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding".

- Ask about how the school has reviewed protections for pupils in the home and remote-learning procedures, rules and safeguards.
- "Ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of DSL [with] lead responsibility for safeguarding and child protection (including online safety) [with] the appropriate status and authority [and] time, funding, training, resources and support…"
- Support the school in encouraging parents and the wider community to become engaged in online safety activities
- Have regular strategic reviews with the online-safety coordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings
- Where the online-safety coordinator is not the named DSL or deputy DSL, ensure that there is regular review and open communication between these roles and that the DSL's clear overarching responsibility for online safety is not compromised
- Work with the DPO, DSL and headteacher to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Check all school staff have read Part 1 of KCSIE; SLT and all working directly with children have read Annex B
- "Ensure that all staff undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated […] in line with advice from the local three safeguarding partners […] integrated, aligned and considered as part of the overarching safeguarding approach." There is further support for this at cpd.lgfl.net
- "Ensure that children are taught about safeguarding, including online safety […] as part of providing a broad and balanced curriculum […] Consider a whole school or college approach to online safety [with] a clear policy on the use of mobile technology

PSHE / RSHE Coordinator

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online 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 their 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."
- Focus on the underpinning knowledge and behaviours outlined in Teaching Online Safety in Schools in an age appropriate way to help pupils to navigate the online world safely and confidently regardless of their device, platform or app.

- Assess teaching to "identify where pupils need extra support or intervention [through] tests, written assignments or self-evaluations, to capture progress" depending upon the age and developmental ability.
- This complements 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 they have concerns about content or contact on the internet or other online technologies.
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSHE.
- Ensure the RSHE policy is included on the school website.
- Work closely with the Computing subject coordinator to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach

Computing Coordinator

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum and KCSIE (2022).
- Work closely with the RSHE lead to avoid overlap but ensure a complementary whole-school approach
- Work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements

Subject Coordinators

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Look for opportunities to embed online safety in your subject or aspect, especially as part of the new RSHE curriculum, and model positive attitudes and approaches to staff and pupils alike
- Consider how the UKCIS framework Education for a Connected World and Teaching Online Safety in Schools can be applied in your context
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Ensure subject specific action plans also have an online-safety element

Network Manager/technician

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Collaborate regularly with the DSL and leadership team to help them make key strategic decisions around the safeguarding elements of technology. The KCSIE changes expect a great understanding of technology and its role in safeguarding, so help DSLs and SLT to understand systems, settings and implications.
- Support DSLs and SLT to carry out an annual online safety audit as now recommended in KCSIE This should also include a review of technology, including filtering and monitoring systems (what is allowed, blocked and why and how 'over blocking' is avoided as per KCSIE), protections for pupils in the home and remote-learning.
- Keep up to date with the school's online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- Work closely with the designated safeguarding lead / online safety coordinator / data protection officer to ensure that school systems and networks reflect school policy and there are no conflicts between educational messages and practice.
- Ensure the above stakeholders understand the consequences of existing services and of 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
- Maintain up-to-date documentation of the school's online security and technical procedures
- To report online-safety related issues that come to their attention in line with school policy
- Manage the school's systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption and backup for data, including disaster recovery plans, and auditable access controls.
- Monitor the use of school technology, online platforms and that any misuse/attempted misuse is identified and reported in line with school policy
- Work with the Headteacher to ensure the school website meets statutory DfE requirements

Data Protection Officer (DPO)

Key responsibilities:

(See Data Protection policy)

- To oversee the data protection strategy in school, and ensure compliance with GDPR legislation
- To ensure best practice in information management, i.e. Have appropriate access controls in

place, that data is used, transferred and deleted in-line with data protection requirements.
• To ensure that all access to safeguarding data is limited as appropriate.
• To be aware of references to the relationship between data protection and safeguarding in key DfE documents; Keeping Children Safe in Education and Data protection: a toolkit for schools

- Further information regarding the Data Protection Officer (DPO) and the UK General Data Protection
- Regulation (GDPR) can be found in the School's Data Protection policy

Volunteers and contractors

Key responsibilities:

- Read, understand, sign and adhere to an acceptable use policy (AUP)
- Report any concerns, no matter how small, to the designated safeguarding lead / online safety coordinator as named in the AUP
- Maintain an awareness of current online safety issues and guidance
- Model safe, responsible and professional behaviours in their own use of technology at school and as part of remote teaching or any online communications
- Note that as per AUP agreement a contractor will never attempt to arrange any meeting, including tutoring session, without the full prior knowledge and approval of the school, and will never do so directly with a pupil. The same applies to any private/direct communication with a pupil.

Pupils

Key responsibilities:

- Read, understand, sign and adhere to the student/pupil acceptable use policy and review this annually
- Treat home learning during any isolation/quarantine or bubble/school lockdown in the same way as regular learning in school and behave as if a teacher or parent were watching the screen
- Avoid any private communication or use of personal logins/systems to communicate with or arrange meetings with school staff or tutors
- Understand the importance of reporting abuse, misuse or access to inappropriate materials, including any concerns about a member of school staff or supply teacher or online tutor
- Know what action to take if they or someone they know feels worried or vulnerable when using online technology, at school, home or anywhere else.
- To 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 policies cover actions out of school, including on social media

- Remember the rules on the misuse of school technology – devices and logins used at home should be used just like if they were in full view of a teacher.
- Understand the benefits/opportunities and risks/dangers of the online world and know who to talk to at school or outside school if there are problems

Parents/carers

Key responsibilities:

- Read, sign and promote the school's parental acceptable use policy (AUP) and read the pupil AUP and encourage their children to follow it
- Talk to the school if they have any concerns about their children's and others' use of technology
- Promote positive online safety and model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers.
- Encourage children to engage fully in home-learning, whether for homework or during any school closures or isolation and flag any concerns
- Support the child during any home learning to avoid video calls in a bedroom if possible and if not, to ensure the child is fully dressed and not in bed, with the camera pointing away from beds/bedding/personal information etc. and the background blurred or changed where possible.
- If organising private online tuition, remain in the room if possible, ensure the child knows tutors should not arrange new sessions directly with the child or attempt to communicate privately. Further advice available in the Online Tutors – Guidance for Parents and Carers poster at parentsafe.lgfl.net, which is a dedicated parent portal offering updated advice and resources to help parents keep children safe online

External groups

Key responsibilities:

- Any external individual/organisation will sign an acceptable use policy prior to using technology or the internet within school
- Support the school in promoting online safety and data protection
- Model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about

others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers