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Introduction

Scope of the Online Safety Policy

This Online Safety Policy outlines the commitment of Somerdale Educate Together to safeguard members of our school community online in accordance with statutory guidance and best practice.

This Online Safety Policy applies to all members of the school community (including staff, learners, governors, volunteers, parents and carers, visitors, community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

Somerdale Educate Together will deal with such incidents within this policy and associated Respectful Relationships and Behaviour Policy and will, where known, inform parents/carers of incidents of inappropriate online safety behaviour that take place out of school.

Process for monitoring the impact of the Online Safety Policy

The school will monitor the impact of the policy using:

- logs of reported incidents
- Filtering and monitoring logs from the Securly platform
- internal monitoring data for network activity
- surveys/questionnaires of:
 - learners
 - parents and carers
 - staff.

Policy and leadership

Responsibilities

To ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviours, learning from each other and from good practice elsewhere, reporting inappropriate online behaviours, concerns, and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals and groups within the school.

Headteacher and senior leaders

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding, though the day-to-day responsibility for online safety is held by the Designated Safeguarding Lead, as defined in Keeping Children Safe in Education.
- The headteacher and deputy headteacher should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff.
- The headteacher is responsible for ensuring that the Designated Safeguarding Lead and Deputies/, Online Safety Lead, IT provider/technical staff, and other relevant staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.
- The headteacher will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role.
- The headteacher will receive regular monitoring reports from the Digital Lead.
- The headteacher/senior leaders will work with the responsible Governor, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring.

Governors

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy.

The governing board will receive regular information about online safety incidents and monitoring reports through the termly headteacher report. A member of the governing body will take on the role of Online Safety Governor to include:

- regular meetings with the Designated Safeguarding Lead / Online Safety Lead
- regularly receiving (collated and anonymised) reports of online safety incidents
- checking that provision outlined in the Online Safety Policy (e.g. online safety education provision and staff training is taking place as intended)
- Ensuring that the filtering and monitoring provision is reviewed and recorded, at least annually. (The review will be conducted by members of the SLT, the DSL, and the IT service provider and involve the responsible governor) - in-line with the DfE Filtering and Monitoring Standards
- reporting to relevant governors group/meeting
- Receiving (at least) basic cyber-security training to enable the governors to check that the school meets the DfE Cyber-Security Standards
- membership of the school Online Safety Group

Designated Safety Lead (DSL)

The DSL will:

- hold the lead responsibility for online safety, within their safeguarding role.
- Receive relevant and regularly updated training in online safety to enable them to understand the risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online
- meet regularly with the online safety governor to discuss current issues, review (anonymised) incidents and filtering and monitoring logs and ensuring that annual (at least) filtering and monitoring checks are carried out
- attend relevant governing body meetings/groups
- report regularly to senior leadership team

- be responsible for receiving reports of online safety incidents and handling them, and deciding whether to make a referral by liaising with relevant agencies, ensuring that all incidents are recorded.
- liaise with staff and IT providers on matters of safety and safeguarding and welfare (including online and digital safety)

Digital Lead (incorporating Online Safety)

The Digital Lead will:

- lead the Online Safety Group
- work closely on a day-to-day basis with the Designated Safeguarding Lead (DSL),
- receive reports of online safety issues, being aware of the potential for serious child protection concerns and ensure that these are logged to inform future online safety developments
- have a leading role in establishing and reviewing the school online safety policies/documents
- promote an awareness of and commitment to online safety education / awareness raising across the school and beyond
- liaise with the computing subject champion to ensure that the online safety curriculum is planned, mapped, embedded and evaluated
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents
- identify sources of training and advice for staff/governors/parents/carers/learners
- liaise with technical staff, pastoral staff and support staff (as relevant)
- receive regularly updated training to allow them to understand how digital technologies are used and are developing (particularly by learners) with regard to the areas defined In Keeping Children Safe in Education:
 - content
 - contact
 - conduct
 - commerce

Computing Subject Champion

The Computing subject champion will work with the DSL and Digital Lead to develop a planned and co-ordinated online safety education programme using ProjectEVOLVE.

This will be provided through:

- PHSE and SRE programmes and the computing curriculum
- assemblies
- relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week.

Teaching and support staff

School staff are responsible for ensuring that:

- they have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices
- they understand that online safety is a core part of safeguarding
- they have read, understood, and signed the staff acceptable use agreement (AUA)
- they follow all relevant guidance and legislation including, for example, Keeping Children Safe in Education and UK GDPR regulations
- all digital communications with learners, parents and carers and others should be on a professional level and only carried out using official school systems and devices (where staff

- use AI, they should only use school-approved AI services for work purposes which have been evaluated to comply with organisational security and oversight requirements)
- they immediately report any suspected misuse or problem to the Designated Safeguarding Lead or DDSL and record on CPOMS for investigation/action, in line with the school safeguarding procedures
 - online safety issues are embedded in all aspects of the curriculum and other activities
 - ensure learners understand and follow the Online Safety Policy and acceptable use agreements, have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
 - they supervise and monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other school activities (where allowed) and implement current policies regarding these devices
 - in lessons where internet use is pre-planned learners are guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
 - where lessons take place using live-streaming or video-conferencing, there is regard to national safeguarding guidance and local safeguarding policies
 - there is a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc
 - they model safe, responsible, and professional online behaviours in their own use of technology, including out of school and in their use of social media.
 - they adhere to the school's data protection policy, with regard to the use of devices, systems and passwords and have an understanding of basic cybersecurity
 - they have a general understanding of how the learners in their care use digital technologies out of school, in order to be aware of online safety issues that may develop from the use of those technologies
 - they are aware of the benefits and risks of the use of Artificial Intelligence (AI) services in school, being transparent in how they use these services, prioritising human oversight. AI should assist, not replace, human decision-making. Staff must ensure that final judgments, particularly those affecting people, are made by humans, fact-checked and critically evaluated.

IT Provider

The IT Provider is responsible for ensuring that:

- they are aware of and follow the school Online Safety Policy and Technical Security Policy to carry out their work effectively in line with school policy
- the school technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets (as a minimum) the required online safety technical requirements as identified by the [DfE Meeting Digital and Technology Standards in Schools & Colleges](#)
- there is clear, safe, and managed control of user access to networks and devices
- they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- the use of technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported to the Headteacher and Deputy Headteacher for investigation and action
- the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person
- monitoring systems are implemented and regularly updated as agreed in school policies

Learners

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement and Online Safety Policy
- should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology.
- should avoid plagiarism and uphold copyright regulations, taking care when using Artificial Intelligence (AI) services to protect the intellectual property of themselves and others and checking the accuracy of content accessed through AI services.
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school, if related to their membership of the school.

Parents and carers

Parents and carers play a crucial role in ensuring that their children understand the need to use the online services and devices in an appropriate way.

The school will take every opportunity to help parents and carers understand these issues through:

- publishing the school Online Safety Policy on the school website
- providing them with a copy of the learners' acceptable use agreement
- publish information about appropriate use of social media relating to posts concerning the school.
- seeking their permissions concerning digital images, cloud services etc
- parent/carers evenings, newsletters, website, social media and information about national/local online safety campaigns and literature.

Parents and carers will be encouraged to support the school in:

- reinforcing the online safety messages provided to learners in school.

Community users

Community users who access school systems/website/learning platform as part of the wider school provision will be expected to sign a community user AUA before being provided with access to school systems.

Online Safety Group

The Online Safety Group has the following members

- Designated Safeguarding Lead
- Digital Lead (incorporating Online Safety Lead)
- Trust Data and Systems Officer
- Technical staff from Soltech
- Computing Subject Champion
- Rights Respecting Ambassadors from Y1 – Y6.

Members of the Online Safety Group will assist the DSL and digital lead with:

- the production/review/monitoring of the school Online Safety Policy/documents
- the production/review/monitoring of the school filtering policy and requests for filtering changes
- mapping and reviewing the online safety education provision – ensuring relevance, breadth and progression and coverage
- reviewing network/filtering/monitoring/incident logs, where possible

- encouraging the contribution of learners to staff awareness, emerging trends and the school online safety provision
- consulting stakeholders – including staff/parents/carers about the online safety provision
- monitoring improvement actions identified through use of the 360-degree safe self-review tool.

Policy

The school Online Safety Policy:

- sets expectations for the safe and responsible use of digital technologies for learning, administration, and communication
- allocates responsibilities for the delivery of the policy
- is regularly reviewed in a collaborative manner, taking account of online safety incidents and changes/trends in technology and related behaviours
- establishes guidance for staff in how they should use digital technologies responsibly, protecting themselves and the school and how they should use this understanding to help safeguard learners in the digital world
- describes how the school will help prepare learners to be safe and responsible users of online technologies
- establishes clear procedures to identify, report, respond to and record the misuse of digital technologies and online safety incidents, including external support mechanisms
- is supplemented by a series of related acceptable use agreements
- is made available to staff at induction and through the National College Compliance Management website
- is published on the school website.

Acceptable use

The Online Safety Policy and acceptable use agreements define acceptable use at the school. The acceptable use agreements will be communicated/re-enforced through:

- staff induction and National College website
- splash screens (Chromebook background image)
- posters/notices around where technology is used
- communication with parents/carers
- built into education sessions
- school website

The Staff Acceptable Use Agreement can be found on National College Compliance. See Appendix for learner acceptable use agreements.

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not access online content (including	Any illegal activity for example: <ul style="list-style-type: none"> • Child sexual abuse imagery* • Child sexual abuse/exploitation/grooming 					X

User actions	Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
<p>apps, games, sites) to make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:</p>	<ul style="list-style-type: none"> • Terrorism • Encouraging or assisting suicide • Offences relating to sexual images i.e., revenge and extreme pornography • Incitement to and threats of violence • Hate crime • Public order offences - harassment and stalking • Drug-related offences • Weapons / firearms offences • Fraud and financial crime including money laundering <p>N.B. Schools should refer to guidance about dealing with self-generated images/sexting – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges</p>				
<p>Users shall not undertake activities that might be classed as cyber-crime under the Computer Misuse Act (1990)</p>	<ul style="list-style-type: none"> • Using another individual's username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised) • Gaining unauthorised access to school networks, data and files, through the use of computers/devices • Creating or propagating computer viruses or other harmful files • Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords) • Disable/Impair/Disrupt network functionality through the use of computers/devices • Using penetration testing equipment (without relevant permission) <p>N.B. Schools will need to decide whether these should be dealt with internally or by the police. Serious or repeat offences should be reported to the police. The National Crime Agency has a remit to prevent learners becoming involved in cyber-crime and harness their activity in positive ways– further information here</p>				X
<p>Users shall not undertake activities that are not illegal but are classed as unacceptable in school policies:</p>	<p>Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs)</p> <p>Promotion of any kind of discrimination</p> <p>Using school systems to run a private business</p> <p>Using systems, applications, websites or other mechanisms that bypass the filtering/monitoring or other safeguards employed by the school</p> <p>Infringing copyright and intellectual property (including through the use of AI services)</p>			X	

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
	Unfair usage (downloading/uploading large files that hinders others in their use of the internet)			X		
	Any other information which may be offensive to others or breaches the integrity of the ethos of the school or brings the school into disrepute				X	

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

- when communicating in a professional capacity, staff should ensure that the technologies they use are officially sanctioned by the school. (Arbor and via info@somerdaleet.org.uk)
- any digital communication between staff and learners or parents/carers (e-mail, social media, learning platform, etc.) must be professional in tone and content. Personal e-mail addresses, text messaging or social media must not be used for these communications.
- staff should be expected to follow good practice when using personal social media regarding their own professional reputation and that of the school and its community
- users should immediately report to the headteacher – in accordance with the school policy – the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- relevant policies and permissions should be followed when posting information online e.g., school website and social media. Only school e-mail addresses should be used to identify members of staff and learners.

Mobile Phone Use

Somerdale Educate Together Primary School is a Smartphone Free School. Children are not permitted to bring smartphones to school.

Please refer to the Staff Code of Conduct for the Trust policy on mobile phone use.

Children are not allowed to use personal mobile phones in school. Under agreement with the class teacher and parent, children in Year Five and Year Six who walk unsupervised to or from school are permitted to bring a mobile phone, or for another valid reason.

Parents must complete an [online request form](#) should they wish their child to bring their mobile phone to school. The class teacher, nor Somerdale Educate Together, or the Educate Together Academy Trust, can be held accountable for any damage to or loss of this equipment.

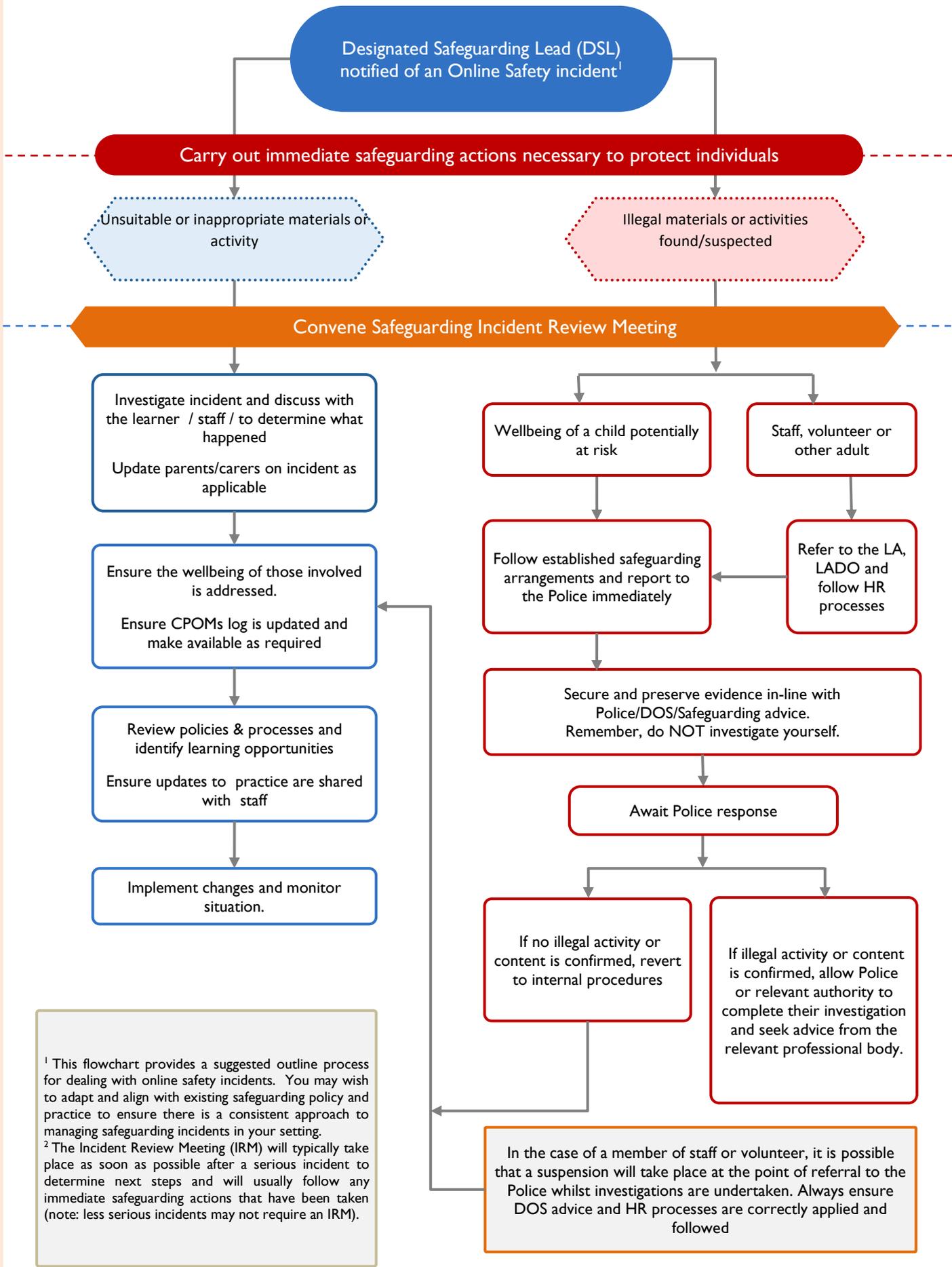
Pupil phones must be switched off before entering the school grounds, and must not be turned back until they have left the school premises. Mobile phones will be stored in a locked safe within the classroom.

Reporting and responding

The school will take all reasonable precautions to ensure online safety for all school users but recognises that incidents may occur inside and outside of the school (with impact on the school) which will need intervention. The school will ensure:

- there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the school safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies.
- all members of the school community will be made aware of the need to report online safety issues/incidents
- reports will be dealt with as soon as is practically possible once they are received
- the Designated Safeguarding Lead, Digital Lead and other responsible staff have appropriate skills and training to deal with online safety risks.
- if there is any suspicion that the incident involves any illegal activity or the potential for serious harm ([see flowchart and user actions chart in the appendix](#)), the incident must be escalated through the agreed school safeguarding procedures, this may include
 - Non-consensual images
 - Self-generated images
 - Terrorism/extremism
 - Hate crime/ Abuse
 - Fraud and extortion
 - Harassment/stalking
 - Child Sexual Abuse Material (CSAM)
 - Child Sexual Exploitation Grooming
 - Extreme Pornography
 - Sale of illegal materials/substances
 - Cyber or hacking [offences under the Computer Misuse Act](#)
 - Copyright theft or piracy
- any concern about staff misuse will be reported to the Headteacher, unless the concern involves the Headteacher, in which case the complaint is referred to the Chair of Governors and Educate Together Academy Trust.
- where AI is used to support monitoring and incident reporting, human oversight is maintained to interpret nuances and context that AI might miss
- where there is no suspected illegal activity, devices may be checked using the following procedures:
 - one or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
 - conduct the procedure using a designated device that will not be used by learners and, if necessary, can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). Use the same device for the duration of the procedure.
 - ensure that the relevant staff have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
 - record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed, and attached to the form
 - once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:
 - internal response or discipline procedures
 - involvement by the Educate Together Academy Trust
 - police involvement and/or action
- it is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively

- there are support strategies in place e.g., peer support for those reporting or affected by an online safety incident
- incidents should be logged on CPOMs.
- relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority; police; Professionals Online Safety Helpline; Reporting Harmful Content; CEOP.
- those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions (as relevant). These will also be recorded as actions on CPOMs incidents.
- learning from the incident (or pattern of incidents) will be provided (as relevant and anonymously) to:
 - the Online Safety Group for consideration of updates to policies or education programmes and to review how effectively the report was dealt with
 - staff, through regular briefings
 - learners, through assemblies/lessons
 - parents/carers, through newsletters, school social media, website
 - governors, through regular safeguarding updates
 - local authority/external agencies, as relevant
 - The school will make the flowchart below available to staff to support the decision-making process for dealing with online safety incidents.



¹ This flowchart provides a suggested outline process for dealing with online safety incidents. You may wish to adapt and align with existing safeguarding policy and practice to ensure there is a consistent approach to managing safeguarding incidents in your setting.

² The Incident Review Meeting (IRM) will typically take place as soon as possible after a serious incident to determine next steps and will usually follow any immediate safeguarding actions that have been taken (note: less serious incidents may not require an IRM).

In the case of a member of staff or volunteer, it is possible that a suspension will take place at the point of referral to the Police whilst investigations are undertaken. Always ensure DOS advice and HR processes are correctly applied and followed

School actions

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

Responding to Learner Actions

Incidents	Refer to class teacher/tutor	Refer to Deputy Head or member of Senior Leadership Team	Refer to Headteacher	Refer to Police/Social Work	Refer to technical support for advice/action	Inform parents/carers	Remove device/network/internet access rights	Issue a warning	Further sanction, in line with behaviour policy
Deliberately accessing or trying to access material that could be considered illegal		X	X	X		X			
Attempting to access or accessing the school network, using another user's account (staff or learner) or allowing others to access school network by sharing username and passwords		X				X			
Corrupting or destroying the data of other users.		X				X			X
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature			X			X			X
Unauthorised downloading or uploading of files or use of file sharing.	X					X			X
Using proxy sites or other means to subvert the school's filtering system.			X		X	X			X
Accidentally accessing offensive or pornographic material and failing to report the incident.			X		X	X			
Deliberately accessing or trying to access offensive or pornographic material.			X			X			X
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act.	X					X			
Unauthorised use of digital devices (including taking images)	X								X
Unauthorised use of online services	X								X
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.			X			X			X

Continued infringements of the above, following previous warnings or sanctions.			X			X			X
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Responding to Staff Actions

Incidents	Refer to line manager	Refer to Headteacher/ Principal*	Refer to MAT/HR*	Refer to Police	Refer to Technical Support Staff for action re filtering, etc.
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities)		X	X	X	
Actions which breach data protection or network / cyber-security rules.		X	X		
Deliberately accessing or trying to access offensive or pornographic material		x	X		
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software		X			
Using proxy sites or other means to subvert the school's filtering system.		x	x		X
Unauthorised downloading or uploading of files or file sharing		X			
Breaching copyright/ intellectual property or licensing regulations (including through the use of AI systems)		x	X		
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account.		x	x		X
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature		x	X		
Using personal e-mail/social networking/messaging to carry out digital communications with learners and parents/carers		X			
Inappropriate personal use of the digital technologies e.g. social media / personal e-mail		x	x		
Careless use of personal data, e.g. displaying, holding or transferring data in an insecure manner		x	x		
Actions which could compromise the staff member's professional standing		x	X		
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.		x	X		
Failing to report incidents whether caused by deliberate or accidental actions		X			
Continued infringements of the above, following previous warnings or sanctions.		x	X		

*Please refer to the Capability Policy and Procedures and the Disciplinary Policy and Procedures for further information

The use of Artificial Intelligence (AI) systems in School

Educate Together Academy Trust has a central 'Artificial Intelligence Policy' which can be found on their website. For internal staff, this can also be accessed via Compliancy Manager/National College.

Online Safety Education Programme

Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum will be provided in the following ways:

- A [planned online safety curriculum](#) for all year groups matched against a nationally agreed framework [Education for a Connected Work Framework by UKCIS/DCMS and the SWGfL Project Evolve](#) and regularly taught in a variety of contexts.
- Lessons are matched to need; are age-related and build on prior learning
- Lessons are context-relevant with agreed objectives leading to clear and evidenced outcomes
- Learner need and progress are addressed through [effective planning and assessment](#)
- Digital competency is planned and effectively threaded through the appropriate digital pillars in other curriculum areas e.g. PHSE; SRE; English etc
- it incorporates/makes use of relevant national initiatives and opportunities e.g. [Safer Internet Day](#) and [Anti-bullying week](#)
- the programme will be accessible to learners at different ages and abilities such as those with additional learning needs or those with English as an additional language.
- learners should be taught in all lessons to be critically aware of the materials/content they access online and be guided to validate the accuracy of information (including where the information is gained from Artificial Intelligence services)
- learners should be taught to acknowledge the source of information used and to respect copyright / intellectual property when using material accessed on the internet and particularly through the use of Artificial Intelligence services
- vulnerability is actively addressed as part of a personalised online safety curriculum e.g., for victims of abuse and SEND.
- learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school.
- staff should act as good role models in their use of digital technologies the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches. Staff utilise Google classroom for this.
- where learners are allowed to freely search the internet, staff should be vigilant in supervising the learners and monitoring the content of the websites / tools (including AI systems) the learners visit
- it is accepted that from time to time, for good educational reasons, learners may need to research topics, (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff should be able to request the temporary removal of those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need
- the online safety education programme should be relevant and up to date to ensure the quality of learning and outcomes.

Staff/volunteers

All staff will receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- a planned programme of formal online safety and data protection training will be made available to all staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly.

- the training will be an integral part of the school's annual safeguarding, data protection and cyber-security training for all staff
- all new staff will receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements. It includes explicit reference to classroom management, professional conduct, online reputation and the need to model positive online behaviours.
- the Digital Lead and Designated Safeguarding Lead will receive regular updates through attendance at external training events, and by reviewing guidance documents released by relevant organisations
- this Online Safety Policy and its updates will be presented to and discussed by staff in staff/team meetings/INSET days
- the Designated Safeguarding Lead/Digital Lead will provide advice/guidance/training to individuals as required.

Governors

Governors should take part in online safety training/awareness sessions, with particular importance for those who are members of any sub-committee/group involved in technology/online safety/health and safety/safeguarding. This may be offered in several ways such as:

- attendance at training provided by the local authority/MAT or other relevant organisation (e.g., SWGfL)
- participation in school training / information sessions for staff or parents (this may include attendance at assemblies/lessons).
- Online training via the National College or Governor Hub.

A higher level of training will be made available to (at least) the Online Safety Governor. This will include:

- Cyber-security training (at least at a basic level)
- Training to allow the governor to understand the school's filtering and monitoring provision, in order that they can participate in the required checks and reviews.

Families

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

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

- regular communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes
- opportunities for engagement with parents/carers on online safety issues through awareness workshops / parent/carer evenings etc
- the learners – who are encouraged to pass on to parents the online safety messages they have learned in lessons and by learners leading sessions at parent/carer evenings.
- letters, newsletters, website
- high profile events / campaigns e.g. [Safer Internet Day](#)
- reference to the relevant web sites/publications, e.g. [SWGfL](#); www.saferinternet.org.uk/; www.childnet.com/parents-and-carers (see Appendix for further links/resources).

Technology

The school is responsible for ensuring that the school infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. The school should ensure that all staff are made aware of policies and procedures in place on a regular basis and explain that everyone is responsible for online safety and data protection.

Filtering & Monitoring

The school filtering and monitoring provision is agreed by senior leaders, governors and the IT Service Provider and is regularly reviewed (at least annually) and updated in response to changes in technology and patterns of online safety incidents/behaviours. The DSL will have lead responsibility for safeguarding and online safety and the IT service provider will have technical responsibility.

Filtering

- The headteacher and a governor, are responsible for ensuring the DfE technical standards for Schools and Colleges filtering standards are met. Roles and responsibilities of staff and third parties, for example, in-house or third-party IT support are clearly defined
- the school manages access to content across its systems for all users and on all devices using the schools internet provision. The filtering provided meets the standards defined in the DfE Filtering standards for schools and colleges.
- illegal content (e.g., child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation URL list and the police assessed list of unlawful terrorist content, produced on behalf of the Home Office. Content lists are regularly updated
- there are established and effective routes for users to report inappropriate content, recognising that no system can be 100% effective. These are acted upon in a timely manner, within clearly established procedures
- there is a clear process in place to deal with, and log, requests/approvals for filtering changes
- filtering logs are regularly reviewed and alert the Designated Safeguarding Lead to breaches of the filtering policy, which are then acted upon.
- Checks of the effectiveness of the filtering systems are made in Autumn, Spring and Summer terms. Checks are undertaken across a range of devices at least termly and the results recorded and analysed to inform and improve provision. The DSL and Governor are involved in the process and aware of the findings. The school uses SWGfL Testfiltering.com for these checks.
- Devices that are provided by the school have school-based filtering applied irrespective of their location.
- the school has provided enhanced/differentiated user-level filtering
- younger learners will use [SWGfL Swiggle](#) as their search engine. This is set as the homepage on Chromebooks.
- the school has a mobile phone policy and where personal mobile devices have internet access through the school network, content is managed in ways that are consistent with school policy and practice.
- access to content through non-browser services (e.g. apps and other mobile technologies) is managed in ways that are consistent with school policy and practice.

If necessary, the school will seek advice from, and report issues to, the SWGfL [Report Harmful Content](#) site.

Monitoring

The school follows the UK Safer Internet Centre [Appropriate Monitoring](#) guidance.

The school has monitoring systems in place, agreed by senior leaders and technical staff, to protect the school, systems and users:

- The school monitors all network use across all its devices and services.
- monitoring reports are urgently picked up, acted on and outcomes are recorded by the Designated Safeguarding Lead on CPOMs, all users are aware that monitoring is in place.
- There are effective protocols in place to report abuse/misuse. There is a clear process for prioritising response to alerts that require rapid safeguarding intervention.
- Management of serious safeguarding alerts is consistent with safeguarding policy and practice.

- The monitoring provision is reviewed at least once every academic year and updated in response to changes in technology and patterns of online safety incidents and behaviours. The review should be conducted by members of the senior leadership team, the designated safeguarding lead, and technical staff. It will also involve the responsible governor. The results of the review will be recorded and reported as relevant.
- Devices that are provided by the school have school-based monitoring applied irrespective of their location.
- monitoring enables alerts to be matched to users and devices.
- where AI –supported monitoring is used, the purpose and scope of this is clearly communicated

Technical Security

The school technical systems will be managed in ways that ensure that the school meets recommended standards in the [DfE Technical Standards for Schools and Colleges](#)

- responsibility for technical security resides with SLT who may delegate activities to identified roles.
- A documented access control model is in place, clearly defining access rights to school systems and devices. This is reviewed annually. All users (staff and learners) have responsibility for the security of their username and password and must not allow other users to access the systems using their log on details. Users must immediately report any suspicion or evidence that there has been a breach of security
- password policy and procedures are implemented and are consistent with guidance from the National Cyber Security Centre
- all school networks, devices and system will be protected by secure passwords.
- there is a risk-based approach to the allocation of learner usernames and passwords.
- there will be regular reviews and audits of the safety and security of school technical systems
- servers, wireless systems and cabling are securely located and physical access restricted
- appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems and devices from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up-to-date endpoint software.
- there are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud,

- Soltech ICT is responsible for ensuring that all software purchased by and used by the school is adequately licenced and that the latest software updates (patches) are applied.
- an appropriate system is in place for users to report any actual/potential technical incident/security breach to the relevant person, as agreed)
- use of school devices out of school and by family members is regulated by an acceptable use statement that a user consents to when the device is allocated to them
- personal use of any device on the school network is regulated by acceptable use statements that a user consents to when using the network
- staff members are not permitted to install software on a school-owned devices without the consent of the SLT/IT service provider
- removable media is not permitted unless approved and provided by the SLT/IT service provider
- systems are in place to control and protect personal data and data is encrypted at rest and in transit.
- mobile device security and management procedures are in place
- guest users are provided with appropriate access to school systems based on an identified risk profile.
- systems are in place that prevent the unauthorised sharing of personal / sensitive data unless safely encrypted or otherwise secured.
- Care will be taken when using Artificial Intelligence services to avoid the input of sensitive information, such as personal data, internal documents or strategic plans, into third-party AI systems unless explicitly vetted for that purpose. Staff must always recognise and safeguard sensitive data.
- dual-factor authentication is used for sensitive data or access outside of a trusted network
- where AI services are used for technical security, their effectiveness is regularly reviewed, updated and monitored for vulnerabilities.
- Where AI services are used, the school will work with suppliers to understand how these services are trained and will regularly review flagged incidents to ensure equality for all users e.g. avoiding bias

Social media

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to learners through:

- ensuring that personal information is not published.
- education/training being provided including acceptable use, age restrictions, social media risks, digital and video images policy, checking of settings, data protection and reporting issues.
- clear reporting guidance, including responsibilities, procedures, and sanctions.
- risk assessment, including legal risk.
- guidance for learners, parents/carers

School staff should ensure that:

- No reference should be made in social media to learners, parents/carers or school staff.
- they do not engage in online discussion on personal matters relating to members of the school community.
- personal opinions should not be attributed to the school.

- security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.
- they act as positive role models in their use of social media

When official school social media accounts are established, there should be:

- a process for approval by senior leaders
- clear processes for the administration, moderation, and monitoring of these accounts – involving at least two members of staff
- a code of behaviour for users of the accounts
- systems for reporting and dealing with abuse and misuse
- understanding of how incidents may be dealt with under school disciplinary procedures.

Personal use

- personal communications are those made via personal social media accounts. In all cases, where a personal account is used which associates itself with, or impacts on, the school it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy
- personal communications which do not refer to or impact upon the school are outside the scope of this policy
- where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken
- the school permits reasonable and appropriate access to personal social media sites during school hours

Monitoring of public social media

- As part of active social media engagement, the school may pro-actively monitor the Internet for public postings about the school.
- the school should effectively respond to social media comments made by others according to a defined policy or process.
- when parents/carers express concerns about the school on social media we will urge them to make direct contact with the school, in private, to resolve the matter. Where this cannot be resolved, parents/carers should be informed of the school complaints procedure.

School use of social media for professional purposes will be checked regularly by a senior leader and the Online Safety Lead to ensure compliance with the social media, data protection, communications, digital image and video policies. In the event of any social media issues that the school is unable to resolve support may be sought from the Professionals Online Safety Helpline.

Digital and video images

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

The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- the school may use live-streaming or video-conferencing services in line with national and local safeguarding guidance / policies.
- when using digital images, staff will inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images.
- staff/volunteers must be aware of those learners whose images must not be taken/published. Those images should only be taken on school devices. The personal devices of staff should not be used for such purposes
- in accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other learners in the digital/video images
- staff and volunteers are allowed to take digital/video images to support educational aims, but must follow school policies concerning the sharing, storage, distribution and publication of those images
- care should be taken when sharing digital/video images that learners are appropriately dressed
- learners must not take, use, share, publish or distribute images of others without their permission
- photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with Online Safety Policy
- learners' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- written permission from parents or carers will be obtained before photographs of learners are taken for use in school or published on the school website/social media. Permission is not required for images taken solely for internal purposes
- parents/carers will be informed of the purposes for the use of images, how they will be stored and for how long – in line with the school data protection policy
- images will be securely stored in line with the school retention policy
- learners' work can only be published with the permission of the learner and parents/carers.

Online Publishing

The school communicates with parents/carers and the wider community and promotes the school through

- Public-facing website
- Online newsletters

The school website is managed/hosted by fdesign. The school ensures that online safety policy has been followed in the use of online publishing e.g., use of digital and video images, copyright, identification of young people, publication of school calendars and personal information – ensuring that there is least risk to members of the school community, through such publications.

Where learner work, images or videos are published, their identities are protected, and full names are not published.

Data Protection

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

The school:

- has a Data Protection Policy.
- implements the data protection principles and can demonstrate that it does so
- has paid the appropriate fee to the Information Commissioner's Office (ICO)
- has appointed an appropriate Data Protection Officer (DPO) who has effective understanding of data protection law and is free from any conflict of interest.
- has a 'Record of Processing Activities' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- the Record of Processing Activities lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis is listed
- has an 'information asset register' in place and knows exactly [what personal data is held](#), where, why and which member of staff has responsibility for managing it
- information asset register lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis will have also been listed
- will hold the minimum personal data necessary to enable it to perform its function and will not hold it for longer than necessary for the purposes it was collected for. The school 'retention schedule' supports this
- data held is accurate and up to date and is held only for the purpose it was held for. Systems are in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- provides staff, parents, volunteers, teenagers, and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice (see Privacy Notice section in the appendix)
- has procedures in place to deal with the individual rights of the data subject,
- carries out Data Protection Impact Assessments (DPIA) where necessary e.g. to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier
- has undertaken appropriate due diligence and has data protection compliant contracts in place with any data processors
- understands how to share data lawfully and safely with other relevant data controllers.
- has clear and understood policies and routines for the deletion and disposal of data
- [reports any relevant breaches to the Information Commissioner](#) within 72hrs of becoming aware of the breach as required by law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents
- has a Freedom of Information Policy which sets out how it will deal with FOI requests
- provides data protection training for all staff at induction and appropriate refresher training thereafter. 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

- ensures that where AI services are used, data privacy is prioritised

When personal data is stored on any mobile device or removable media the:

- data will be encrypted, and password protected.
- device will be password protected.
- device will be protected by up-to-date endpoint (anti-virus) software
- data will be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete.
- The device must be approved and provided by the school/IT service provider.

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
- can help data subjects understand their rights and know how to handle a request whether verbal or written and know who to pass it to in the school
- only use encrypted data storage for personal data
- will not transfer any school personal data to personal devices.
- use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data
- transfer data using encryption, a secure email account (where appropriate), and secure password protected devices.

Cyber Security

[The DfE Cyber security standards for schools and colleges explains:](#)

"Cyber incidents and attacks have significant operational and financial impacts on schools and colleges. These incidents or attacks will often be an intentional and unauthorised attempt to access, change or damage data and digital technology. They could be made by a person, group, or organisation outside or inside the school or college and can lead to:

- safeguarding issues due to sensitive personal data being compromised
- impact on student outcomes
- a significant data breach
- significant and lasting disruption, including the risk of repeated future cyber incidents and attacks, including school or college closure
- financial loss
- reputational damage"

- the school has reviewed the DfE Cyber security standards for schools and colleges and is working toward meeting these standards
- the school's governance and IT policies reflect the importance of good cyber security
- staff and Governors receive training on the common cyber security threats and incidents that schools experience
- the school's education programmes include cyber awareness for learners
- the school has a business continuity and incident management plan in place
- there are processes in place for the reporting of cyber incidents. All students and staff have a responsibility to report cyber risk or a potential incident or attack, understand how to do this feel safe and comfortable to do so.

Outcomes

The impact of the Online Safety Policy and practice is regularly evaluated through the review/audit of online safety incident logs; behaviour/bullying reports; surveys of staff, learners; parents/carers and is reported to relevant groups:

- there is balanced professional debate about the evidence taken from the reviews/audits and the impact of preventative work e.g., online safety education, awareness, and training
- there are well-established routes to regularly report patterns of online safety incidents and outcomes to school leadership and Governors
- parents/carers are informed of patterns of online safety incidents as part of the school's online safety awareness raising
- online safety (and related) policies and procedures are regularly updated in response to the evidence gathered from these reviews/audits/professional debate
- the evidence of impact is shared with other schools, agencies and LAs to help ensure the development of a consistent and effective local online safety strategy.

Appendices

Appendix A1 - KS2 Learner Acceptable Use Agreement

I agree to use the school's digital systems safely and responsibly to protect me, other learners and the school.

Keeping Safe Online

- The school will check how I use devices and the internet to keep everyone safe.
- I will keep my usernames and passwords private and tell a trusted adult if someone else knows them.
- I will be careful when talking to people online and will only talk to people I know and trust.
- I will not share personal information like my name, address, or photos without asking a trusted adult.
- I will only take or share images of myself, or others, when fully dressed.
- If I see or hear something online that worries or upsets me, I will tell a trusted adult straight away.
- I will only meet people I have spoken to online if a trusted adult is with me.

Using Computers and the Internet Sensibly

- I will only use devices, apps and sites that I am allowed to, and will check if I am unsure.
- I will always ask permission and check with a trusted adult before using someone else's work or pictures.
- I will make sure the information I find online is true by checking carefully.
- I will only use apps or tools, like AI, that my teacher has said are OK, and I will ask for help if I'm unsure.
- I will not copy or use music, videos, or games unless I have permission.
- I will tell a trusted adult about any damage to devices or if anything else goes wrong.
- I will check with trusted adults before clicking on any unexpected messages or links (even if these look as though they are from people that I already know).

Being Respectful and Responsible

- I will treat others kindly online, just as I do in real life.
- I will make good choices about what I share online to protect myself and others.
- I will spend a healthy amount of time using devices and make time for other activities too.
- I will always think about how my behaviour online could affect me, my friends, and my school.

What Happens If I Break These Rules

- If I don't follow these rules, my teacher may stop me from using computers or devices, speak to my parents, or take other actions to help me make better choices in the future.

By following these rules, I can enjoy using technology safely and responsibly.

I have read and understand the above and agree to follow these guidelines when:

- I use the school systems and devices (both in and out of school)
- I use my own devices in the school (when allowed) e.g. mobile phones, gaming devices USB devices, cameras etc.
- I am out of school and involved in any online behaviour that might affect the school or other members of the school.

Appendix – A2 EYFS/KSI Learner Acceptable Use Agreement

Our Technology Rules

I will follow these rules to use computers, tablets and the internet safely at school.

Staying Safe

- My teacher will watch what I do on computers, tablets and the internet to keep me safe.
- I will keep my passwords secret and tell my teacher if I need help.
- I understand that people online are not always who they say they are. I will only talk to people online if my teacher or a trusted adult says it's OK.
- I will not share my name, address, or pictures without asking my teacher or a trusted adult first.
- If I see something that makes me feel worried or upset, I will tell my teacher or a trusted adult straight away.
- I will only use apps, games or websites my teacher says are safe.

Using Technology Kindly

- I will be kind when using technology, just like I am in real life.
- I will take care of the computers and tablets I use.
- I will only look at things my teacher says are OK.

Making Good Choices

- I will ask my teacher before I use someone else's pictures or work.
- I will take breaks from screens and do other fun things too.
- I know that I can say no / please stop to anyone online who makes me feel sad, uncomfortable, embarrassed or upset.
- I will ask for help from a trusted adult if I am not sure what to do or if I think I may have done something wrong.

What Happens If I Forget the Rules

- If I forget the rules, my teacher will help me learn to make better choices next time.

These rules help us all stay safe and have fun using computers and tablets at school!

Appendix A3 Parent/Carer Acceptable Use Agreement

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies provide powerful tools, which open new opportunities for everyone. They can stimulate discussion, promote creativity, and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This acceptable use policy is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that parents and carers are aware of the importance of online safety and are involved in the education and guidance of young people with regard to their on-line behaviour.

The school will try to ensure that learners have good access to digital technologies to enhance their learning and will, in return, expect the learners to agree to be responsible users. A copy of the learner acceptable use agreement is attached to this permission form, so that parents/carers will be aware of the school expectations of the young people in their care.

Appendix A4- Acceptable Use Agreement for Community Users

This acceptable use agreement is intended to ensure:

- that community users of school digital technologies will be responsible users and stay safe while using these systems and devices
- that school systems, devices and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that users are protected from potential harm in their use of these systems and devices

Acceptable Use Agreement

I understand that I must use school systems and devices in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems, devices and other users. This agreement will also apply to any personal devices that I bring into the school:

- I understand that my use of school systems and devices will be monitored
- I will not use a personal device that I have brought into school for any activity that would be inappropriate in a school setting.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, terrorist and extremist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.
- I will not access, copy, remove or otherwise alter any other user's files, without permission.
- I will ensure that if I take and/or publish images of others I will only do so with their permission. I will not use my personal equipment to record these images, without permission. If images are published it will not be possible to identify by name, or other personal information, those who are featured.
- I will not publish or share any information I have obtained whilst in the school on any personal website, social networking site or through any other means, unless I have permission from the school.
- I will not, without permission, make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a school device, nor will I try to alter computer settings, unless I have permission to do so.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will immediately report any damage or faults involving equipment or software, whatever the cause.
- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).
- I understand that if I fail to comply with this acceptable use agreement, the school has the right to remove my access to school systems/devices

I have read and understand the above and agree to use the school systems (both in and out of school) and my own devices (in school and when carrying out communications related to the school) within these guidelines.

Name: Signed: Date: