



THE SOCIETAS TRUST

Online Safety Policy

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Statement of intent

The Societas Trust understands that using online services is an important aspect of raising educational standards, promoting pupil achievement and enhancing teaching and learning.

The use of online services is embedded throughout the school; therefore, there are a number of controls in place to ensure the safety of pupils and staff.

The breadth of issues classified within online safety is considerable, but they can be categorised into three areas of risk:

- **Content:** Being exposed to illegal, inappropriate or harmful material, e.g. pornography, fake news, and racist or radical and extremist views.
- **Contact:** Being subjected to harmful online interaction with other users, e.g. commercial advertising and adults posing as children or young adults.
- **Conduct:** Personal online behaviour that increases the likelihood of, or causes, harm, e.g. sending and receiving explicit messages, and cyberbullying.

The measures implemented to protect pupils and staff revolve around these areas of risk. Our school has created this policy with the aim of ensuring appropriate and safe use of the internet and other digital technology devices by all pupils and staff.

1. Legal framework

1.1. This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- Voyeurism (Offences) Act 2019
- The General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2021) 'Harmful online challenges and online hoaxes'
- DfE (2021) 'Keeping children safe in education 2020'
- Department for Digital, Culture, Media and Sport and UK Council for Internet Safety (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2019) 'Teaching online safety in school'
- DfE (2018) 'Searching, screening and confiscation'
- National Cyber Security Centre (2017) 'Cyber Security: Small Business Guide'
- UK Council for Child Internet Safety 'Education for a Connected World'
- UK Council for Child Internet Safety (2020) 'Education for a Connected World – 2020 edition'

1.2. This policy operates in conjunction with the following school policies:

Behaviour

Anti - Bullying

GDPR Data Protection and the Information Security policy (list is not exhaustive).

2. Roles and responsibilities

2.1. The Directors' Board is responsible for:

- Ensuring that this policy is effective and complies with relevant laws and statutory guidance.
- Ensuring the DSL's remit covers online safety.
- Reviewing this policy on an annual basis.
- Ensuring their own knowledge of online safety issues is up-to-date.
- Ensuring all staff undergo safeguarding and child protection training (including online safety) at induction.

- Ensuring that there are appropriate filtering and monitoring systems in place.
- Ensuring that all relevant school policies have an effective approach to planning for, and responding to, online challenges and hoaxes embedded within them.

2.2. The headteacher is responsible for:

- Supporting the DSL (if not the headteacher) and any deputies by ensuring they have enough time and resources to carry out their responsibilities in relation to online safety.
- Ensuring staff receive regular, up-to-date and appropriate online safety training and information as part of their induction and safeguarding training.
- Ensuring online safety practices are audited and evaluated.
- Supporting staff to ensure that online safety is embedded throughout the curriculum so that all pupils can develop an appropriate understanding of online safety.
- Organising engagement with parents to keep them up-to-date with current online safety issues and how the school is keeping pupils safe.
- Working with the DSL and ICT technicians to conduct termly light-touch reviews of this policy.
- Working with the DSL and Directors' Board to update this policy on an annual basis.

2.3. The DSL is responsible for:

- Taking the lead responsibility for online safety in the school.
- Acting as the named point of contact within the school on all online safeguarding issues.
- Undertaking training so they understand the risks associated with online safety and can recognise additional risks that pupils with SEND face online.
- Liaising with relevant members of staff on online safety matters, e.g. the SENCO and ICT technicians.
- Ensuring online safety is recognised as part of the academy's safeguarding responsibilities and that a coordinated approach is implemented.

- Ensuring appropriate referrals are made to external agencies, as required.
- Staying up-to-date with current research, legislation and online trends.
- Coordinating the school's participation in local and national online safety events, e.g. Safer Internet Day.
- Establishing a procedure for reporting online safety incidents and inappropriate internet use, both by pupils and staff.
- Ensuring all members of the school community understand the reporting procedure.
- Maintaining records of reported online safety concerns as well as the actions taken in response to concerns.
- Monitoring online safety incidents to identify trends and any gaps in the school's provision, and using this data to update the school's procedures.
- Reporting to the governing board about online safety on a termly basis.
- Working with the headteacher and ICT technicians to conduct termly light-touch reviews of this policy.
- Working with the headteacher and Directors' Board to update this policy on an annual basis.

2.4. ICT technicians are responsible for:

- Providing technical support in the development and implementation of the school's online safety policies and procedures.
- Implementing appropriate security measures as directed by the headteacher.
- Ensuring that the school's filtering and monitoring systems are updated as appropriate.
- Working with the DSL and headteacher to conduct termly light-touch reviews of this policy.

2.5. All staff members are responsible for:

- Taking responsibility for the security of ICT systems and electronic data they use or have access to.
- Modelling good online behaviours.
- Maintaining a professional level of conduct in their personal use of technology.
- Having an awareness of online safety issues.
- Reporting concerns in line with the academy's reporting procedure.

- Where relevant to their role, ensuring online safety is embedded in their teaching of the curriculum.

2.6. Pupils are responsible for:

- Adhering to this policy, the Acceptable Use Agreement and other relevant policies.
- Seeking help from school staff if they are concerned about something they or a peer has experienced online.
- Reporting online safety incidents and concerns in line with the procedures within this policy.

3. The curriculum

3.1. Online safety is embedded throughout the curriculum; however, it is particularly addressed in the following subjects:

- RSE and Health Education
- PSHE
- Computing

3.2. The curriculum and the school's approach to online safety is developed in line with the UK Council for Child Internet Safety's 'Education for a Connected World' framework and the DfE's 'Teaching online safety in school' guidance.

3.3. Pupils are taught the underpinning knowledge and behaviours that can help them to navigate the online world safely and confidently regardless of the device, platform or app they are using.

3.4. Online safety teaching is always appropriate to pupils' ages and developmental stages.

3.5. The underpinning knowledge and behaviours pupils learn through the curriculum include the following:

- How to evaluate what they see online
- How to recognise techniques used for persuasion
- Acceptable and unacceptable online behaviour
- How to identify online risks
- How and when to seek support
- How to identify when something is deliberately deceitful or harmful
- How to recognise when something they are being asked to do puts them at risk or is age-inappropriate

- 3.6. The online risks pupils may face online are always considered when developing the curriculum. The risks that are considered and how they are covered in the curriculum can be found in [Appendix 1](#) of this policy.
- 3.7. The DSL is involved with the development of the school's online safety curriculum.
- 3.8. The school recognises that, while any pupil can be vulnerable online, there are some pupils who may be more susceptible to online harm or have less support from family and friends in staying safe online, e.g. pupils with SEND and LAC. Relevant members of staff, e.g. the SENCO and designated teacher for LAC, work together to ensure the curriculum is tailored so these pupils receive the information and support they need.
- 3.9. Class teachers review external resources prior to using them for the online safety curriculum, to ensure they are appropriate for the cohort of pupils. When reviewing these resources, the following questions are asked:
 - Where does this organisation get their information from?
 - What is their evidence base?
 - Have they been externally quality assured?
 - What is their background?
 - Are they age appropriate for pupils?
 - Are they appropriate for pupils' developmental stage?
- 3.10. External visitors may be invited into school to help with the delivery of certain aspects of the online safety curriculum. The headteacher and DSL decide when it is appropriate to invite external groups into school and ensure the visitors selected are appropriate.
- 3.11. Before conducting a lesson or activity on online safety, the class teacher and DSL consider the topic that is being covered and the potential that pupils in the class have suffered or may be suffering from online abuse or harm in this way. The DSL advises the staff member on how to best support any pupil who may be especially impacted by a lesson or activity.
- 3.12. Lessons and activities are planned carefully so they do not draw attention to a pupil who is being or has been abused or harmed online, to avoid publicising the abuse.
- 3.13. During an online safety lesson or activity, the class teacher ensures a safe environment is maintained in which pupils feel comfortable to say what they feel and are not worried about getting into trouble or being judged.

- 3.14. If a staff member is concerned about anything pupils raise during online safety lessons and activities, they will make a report in line with sections [15](#) and [16](#) of this policy.
- 3.15. If a pupil makes a disclosure to a member of staff regarding online abuse following a lesson or activity, the staff member will follow the reporting procedure outlined in sections [15](#) and [16](#) of this policy.

4. Staff training

- 4.1. All staff receive safeguarding and child protection training, which includes online safety training, during their induction.
- 4.2. Online safety training for staff is updated annually and is delivered in line with advice from the local safeguarding partners.
- 4.3. In addition to this training, staff also receive regular online safety updates as required and at least annually.
- 4.4. The DSL and any deputies undergo training to provide them with the knowledge and skills they need to carry out their role, this includes online safety training. This training is updated at least every two years.
- 4.5. In addition to this formal training, the DSL and any deputies receive regular online safety updates to allow them to keep up with any developments relevant to their role. In relation to online safety, these updates allow the DSL and their deputies to:
 - Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and capability required to keep pupils safe while they are online at school.
 - Recognise the additional risks that pupils with SEND face online and offer them support to stay safe online.
- 4.6. All staff receive a copy of this policy upon their induction and are informed of any changes to the policy.
- 4.7. Staff are required to adhere to the Code of Conduct for Adults at all times, which includes provisions for the acceptable use of technologies and the use of social media.
- 4.8. All staff are informed about how to report online safety concerns, in line with sections [15](#) and [16](#) of this policy.
- 4.9. The DSL acts as the first point of contact for staff requiring advice about online safety.

5. Educating parents/carers

- 5.1. The school works in partnership with parents/carers to ensure pupils stay safe online at school and at home.
- 5.2. Parents/carers are provided with information about the school's approach to online safety and their role in protecting their children. Parental awareness is raised in the following ways:
 - Parents' workshops
 - Website information
 - Newsletters
- 5.3. Parents/carers are provided with a copy of the acceptable use agreement upon enrolment and are encouraged to go through this with their child to ensure their child understands the document and the implications of not following it.
- 5.4. Parents will be made aware of the various ways in which their children may be at risk online, including, but not limited to:
 - Child sexual abuse, including grooming.
 - Exposure to radicalising content.
 - Sharing of indecent imagery of pupils, e.g. sexting.
 - Cyberbullying
 - Exposure to age-inappropriate content, e.g. pornography.
 - Exposure to harmful content, e.g. content that encourages self-destructive behaviour.
- 5.5. Parents will be informed of the ways in which they can prevent their child from accessing harmful content at home, e.g. by implementing parental controls to block age-inappropriate content.
- 5.6. Parental awareness regarding how they can support their children to be safe online is raised in the following ways:
 - Parents' evenings
 - Twilight training sessions
 - Newsletters
 - Online resources

6. Classroom use

- 6.1. A wide range of technology is used during lessons, including the following:
 - Computers

- Laptops
 - Tablets
 - Intranet
 - Email
 - Cameras
- 6.2. Prior to using any websites, tools, apps or other online platforms in the classroom, or recommending that pupils use these platforms at home, the class teacher always reviews and evaluates the resource.
- 6.3. Class teachers ensure that any internet-derived materials are used in line with copyright law.
- 6.4. Pupils are supervised when using online materials during lesson time – this supervision is suitable to their age and ability.

7. Use of Smart Technology

While the school recognises that the use of smart technology can have educational benefits, there are also a variety of associated risks which the school will ensure it manages.

Pupils will be educated on the acceptable and appropriate use of personal devices and will use technology in line with the schools Acceptable use agreement for pupils.

Staff will use all smart technology and personal technology in line with the schools Staff Acceptable use Agreement and Code of Conduct.

The school recognises that pupil's unlimited and unrestricted access to the internet via mobile phone networks means that some pupils may use the internet in a way that breaches the school's acceptable use if ICT agreement for pupils.

Inappropriate use of smart technology may include:

- Using mobile and smart technology to sexually harass, troll or intimidate peers
- Sharing indecent images, both consensually and non-consensually
- Viewing or sharing pornography and other harmful content

Pupils will not be permitted to use smart devices or any other personal technology whilst in school.

8. Internet access

- 8.1. Pupils, staff and other members of the school community are only granted access to the school's internet network once they have read and signed the Acceptable Use Agreement.
- 8.2. A record is kept of users who have been granted internet access in the academy office.
- 8.3. All members of the school community are encouraged to use the school's internet network, instead of 3G, 4G and 5G networks, as the network has appropriate filtering and monitoring to ensure individuals are using the internet appropriately.

9. Filtering and monitoring online activity

- 9.1. The governing board ensures the school's ICT network has appropriate filters and monitoring systems in place.
- 9.2. The headteacher and ICT technicians undertake a risk assessment to determine what filtering and monitoring systems are required.
- 9.3. The filtering and monitoring systems the school implements are appropriate to pupils' ages, the number of pupils using the network, how often pupils access the network, and the proportionality of costs compared to the risks.
- 9.4. The governing board ensures 'over blocking' does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding.
- 9.5. ICT technicians undertake monthly checks on the filtering and monitoring systems to ensure they are effective and appropriate.
- 9.6. Requests regarding making changes to the filtering system are directed to the headteacher.
- 9.7. Prior to making any changes to the filtering system, ICT technicians and the DSL conduct a risk assessment.
- 9.8. Any changes made to the system are recorded by ICT technicians.
- 9.9. Reports of inappropriate websites or materials are made to an ICT technician immediately, who investigates the matter and makes any necessary changes.
- 9.10. Deliberate breaches of the filtering system are reported to the DSL and ICT technicians, who will escalate the matter appropriately.
- 9.11. If a pupil has deliberately breached the filtering system, they will be disciplined in line with the Behavioural Policy.

- 9.12. If a member of staff has deliberately breached the filtering system, they will be disciplined in line with the Disciplinary Policy and Procedure.
- 9.13. If material that is believed to be illegal is accessed, inadvertently or deliberately, this material will be reported to the appropriate agency immediately, e.g. the Internet Watch Foundation (IWF), CEOP and/or the police.
- 9.14. The school's network and school-owned devices are appropriately monitored.
- 9.15. All users of the network and school-owned devices are informed about how and why they are monitored.
- 9.16. Concerns identified through monitoring are reported to the DSL who manages the situation in line with sections 15 and 16 of this policy.

10. Network security

- 10.1. Technical security features, such as anti-virus software, are kept up-to-date and managed by ICT technicians.
- 10.2. Firewalls are switched on at all times.
- 10.3. ICT technicians review the firewalls on a regular basis to ensure they are running correctly, and to carry out any required updates.
- 10.4. Staff and pupils are advised not to download unapproved software or open unfamiliar email attachments.
- 10.5. Staff members and pupils report all malware and virus attacks to ICT technicians.
- 10.6. All members of staff have their own unique usernames and private passwords to access the school's systems.
- 10.7. Pupils in class year or key stage and above are provided with their own unique username and private passwords.
- 10.8. Staff members and pupils are responsible for keeping their passwords private.
- 10.9. Passwords have a minimum and maximum length and require a mixture of letters, numbers and symbols to ensure they are as secure as possible.
- 10.10. Passwords expire termly, after which users are required to change them.
- 10.11. Users are not permitted to share their login details with others and are not allowed to log in as another user at any time.

- 10.12. Users are required to lock access to devices and systems when they are not in use.
- 10.13. Users inform ICT technicians if they forget their login details, who will arrange for the user to access the systems under different login details.
- 10.14. If a user is found to be sharing their login details or otherwise mistreating the password system, the headteacher is informed and decides the necessary action to take.
- 10.15. Full details of the school's network security measures can be found in the Data Protection Policy.

11. Emails

- 11.1. Access to and the use of emails is managed in line with the Data Protection Policy, Acceptable Use Agreement and Confidential Reporting Policy.
- 11.2. Staff and pupils are given approved school email accounts and are only able to use these accounts at school and when doing school-related work outside of school hours.
- 11.3. Prior to being authorised to use the email system, staff and pupils must agree to and sign the relevant acceptable use agreement.
- 11.4. Personal email accounts are not permitted to be used on the school site.
- 11.5. Any email that contains sensitive or personal information is only sent using secure and encrypted email.
- 11.6. Staff members and pupils are required to block spam and junk mail, and report the matter to ICT technicians.
- 11.7. The school's monitoring system can detect inappropriate links, malware and profanity within emails – staff and pupils are made aware of this.
- 11.8. Chain letters, spam and all other emails from unknown sources are deleted without being opened.
- 11.9. Any cyberattacks initiated through emails are managed in line with the Data Protection Policy.

12. Social networking

Personal use

- 12.1. Access to social networking sites is filtered as appropriate.

- 12.2. Staff and pupils are not permitted to use social media for personal use during lesson time.
- 12.3. Staff can use personal social media during break and lunchtimes in the staffroom and rooms that children do not access;
- 12.4. Staff members are advised that their conduct on social media can have an impact on their role and reputation within the school.
- 12.5. Staff receive annual updates on how to use social media safely and responsibly.
- 12.6. Staff are not permitted to communicate with pupils or parents over social networking sites and are reminded to alter their privacy settings to ensure pupils and parents are not able to contact them on social media.
- 12.7. Where staff have an existing personal relationship with a parent or pupil, and thus are connected with them on social media, e.g. they are close family friends with a parent at the school, they will disclose this to the [DSL](#) and [headteacher](#) and will ensure that their social media conduct relating to that parent is appropriate for their position in the school.
- 12.8. Pupils are taught how to use social media safely and responsibly through the online safety curriculum.
- 12.9. Concerns regarding the online conduct of any member of the school community on social media are reported to the headteacher and managed in accordance with the relevant policy, e.g. Anti-Bullying Policy, Code of Conduct for Adults and Behaviour Management Policy.

Use on behalf of the school

- 12.10. The school's official social media channels are only used for official educational or engagement purposes.
- 12.11. Staff members must be authorised by the headteacher to access to the school's social media accounts.
- 12.12. All communication on official social media channels by staff on behalf of the school is clear, transparent and open to scrutiny.
- 12.13. The Code of Conduct for Adults contains information on the acceptable use of social media – staff members are required to follow these expectations at all times.

13. Online hoaxes and harmful online challenges

- 13.1. For the purposes of this policy, an “**online hoax**” is defined as a deliberate lie designed to seem truthful, normally one that is intended to scaremonger or to

distress individuals who come across it, spread on online social media platforms.

- 13.2. For the purposes of this policy, “**harmful online challenges**” refers to challenges that are targeted at young people and generally involve users recording themselves participating in an online challenge, distributing the video through social media channels and daring others to do the same. Although many online challenges are harmless, an online challenge becomes harmful when it could potentially put the participant at risk of harm, either directly as a result of partaking in the challenge itself or indirectly as a result of the distribution of the video online – the latter will usually depend on the age of the pupil and the way in which they are depicted in the video.
- 13.3. The DSL ensures that pupils are taught about how to critically identify when online content is untrue or harmful and how to respond to this content, in line with [section 3](#) of this policy.
- 13.4. The DSL will work with the **SENCO** to assess whether some pupils, e.g. pupils who have been identified as being vulnerable or pupils with SEND, need additional help with identifying harmful online challenges and hoaxes, and tailor support accordingly.
- 13.5. The school will ensure all pupils are aware of who to report concerns to surrounding potentially harmful online challenges or hoaxes, e.g. by displaying posters.
- 13.6. Where staff suspect there may be a harmful online challenge or online hoax circulating amongst pupils in the school, they will report this to the DSL immediately.
- 13.7. The DSL will conduct a case-by-case assessment for any harmful online content brought to their attention, establishing the scale and nature of the possible risk to pupils, and whether the risk is one that is localised to the school or the local area, or whether it extends more widely across the country.
- 13.8. Where the harmful content is prevalent mainly in the local area, the DSL will consult with the LA about whether quick local action can prevent the hoax or challenge from spreading more widely.
- 13.9. The DSL will check the factual basis of harmful online challenges or hoaxes against a known, reliable and trustworthy source, e.g. the UK Safer Internet Centre, and will carefully consider if a challenge or story is a hoax or is harmful prior to providing any direct warnings to pupils or parents.
- 13.10. The school understands that discussing or naming a specific online hoax can, in some cases, needlessly increase pupils’ exposure to distressing content, and will avoid showing pupils distressing content where doing so is not

considered absolutely necessary for preventing its spread or easing fears amongst the school community.

- 13.11. Where the DSL's assessment finds an online challenge to be putting pupils at risk of harm, e.g. it encourages children to participate in age-inappropriate activities that could increase safeguarding risks or become a child protection concern, they will ensure that the challenge is directly addressed to the relevant pupils, e.g. those within a particular age range that is directly affected or even to individual children at risk where appropriate.
- 13.12. The DSL and headteacher will only implement a school-wide approach to highlighting potential harms of a hoax or challenge when the risk of needlessly increasing pupils' exposure to the risk is considered and mitigated as far as possible.
- 13.13. Prior to deciding how to respond to a harmful online challenge or hoax, the DSL and the headteacher will decide whether each proposed response is:
 - Factual and avoids needlessly scaring or distressing pupils.
 - Not inadvertently encouraging pupils to view the hoax or challenge where they would not have otherwise come across it, e.g. where content is explained to younger pupils that is almost exclusively being shared amongst older pupils.
 - Proportional to the actual or perceived risk.
 - Helpful to the pupils who are, or are perceived to be, at risk.
 - Age-appropriate and appropriate for the relevant pupils' developmental stage.
 - Supportive.
 - In line with [section 16](#) and [section 17](#) of this policy.

14. The academy website

- 14.1. The headteacher is responsible for the overall content of the academy website – they will ensure the content is appropriate, accurate, up-to-date and meets government requirements.
- 14.2. The website complies with guidelines for publications including accessibility, data protection, respect for intellectual property rights, privacy policies and copyright law.
- 14.3. Personal information relating to staff and pupils is not published on the website.
- 14.4. Images and videos are only posted on the website if the provisions in the Mobile Phone and Photography Policy are met.

15. Use of academy-owned devices

- 15.1. Staff members are issued with the following devices to assist with their work:

- Laptop (if appropriate)
 - Tablet (if appropriate)
- 15.2. Pupils are provided with school-owned devices as necessary to assist in the delivery of the curriculum, e.g. laptops/tablets to use during lessons.
- 15.3. School-owned devices are used in accordance with the Device User Agreement.
- 15.4. Staff and pupils are not permitted to connect school-owned devices to public Wi-Fi networks.
- 15.5. All school-owned devices are password protected.
- 15.6. All mobile school-owned devices are logged by the IT technician
- 15.7. All school-owned devices are fitted with software to ensure they can be remotely accessed, in case data on the device needs to be protected, retrieved or erased.
- 15.8. ICT technicians review all school-owned devices on a monthly basis to carry out software updates and ensure there is no inappropriate material on the devices.
- 15.9. No software, apps or other programmes can be downloaded onto a device without authorisation from ICT technicians.
- 15.10. Staff members or pupils found to be misusing school-owned devices are disciplined in line with the Disciplinary Policy and Procedure and Behavioural Policy.

16. Use of personal devices

- 16.1. Use of personal devices/mobile phones is permitted at the academy; however, this is strictly regulated and must be done in accordance with this policy. To minimise any risks, all personal mobiles must not be used where children are present.
- 16.2. Any personal electronic device that is brought into school is the responsibility of the user and must be stored securely, inaccessible to children.
- 16.3. Staff members are not permitted to use their personal devices to take photos or videos of pupils.
- 16.4. Staff members report concerns about their colleagues' use of personal devices on the school premises in line with the Confidential Reporting Policy.

- 16.5. If a member of staff is thought to have illegal content saved or stored on a personal device, or to have committed an offence using a personal device, the headteacher will inform the police and action will be taken in line with the Confidential Reporting Policy.
- 16.6. Pupils are not permitted to use their personal devices during lesson time or when moving between lessons.
- 16.7. If a pupil needs to contact their parents during the school day, they are allowed to use the phone in the school office.
- 16.8. The headteacher may authorise the use of mobile devices by a pupil for safety or precautionary use.
- 16.9. Pupils' devices, if found on school premises, can be searched, screened and confiscated in accordance with the latest safeguarding guidance.
- 16.10. If a staff member reasonably believes a pupil's personal device has been used to commit an offence or may provide evidence relating to an offence, the device will be handed to the police.
- 16.11. Appropriate signage is displayed to inform visitors to the school of the expected use of personal devices.
- 16.12. Any concerns about visitors' use of personal devices on the school premises are reported to the headteacher.

17. Managing reports of online safety incidents

- 17.1. Staff members and pupils are informed about what constitutes inappropriate online behaviour in the following ways:
 - Staff training
 - The online safety curriculum
 - Assemblies
- 17.2. Concerns regarding a staff member's online behaviour are reported to the headteacher who decides on the best course of action in line with the relevant policies, e.g. Code of Conduct for Adults, Confidential Reporting Policy, Disciplinary Policy and Procedures.
- 17.3. Concerns regarding a pupil's online behaviour are reported to the DSL who investigates concerns with relevant staff members, e.g. the headteacher and ICT technicians.
- 17.4. Concerns regarding a pupil's online behaviour are dealt with in accordance with relevant policies depending on their nature, e.g. Behaviour Management Policy and Child Protection and Safeguarding Policy.

- 17.5. Where there is a concern that illegal activity has taken place, the headteacher contacts the police.
- 17.6. The school avoids unnecessarily criminalising pupils, e.g. calling the police, where criminal behaviour is thought to be inadvertent and as a result of ignorance or normal developmental curiosity, e.g. a pupil has taken and distributed indecent imagery of themselves. The DSL will decide in which cases this response is appropriate and will manage such cases in line with the [Child Protection and Safeguarding Policy](#).
- 17.7. All online safety incidents and the school's response are recorded by the DSL.
- 17.8. Section 16 of this policy outlines how the school responds to specific online safety concerns, such as cyberbullying and peer-on-peer abuse.

18. Responding to specific online safety concerns

Cyberbullying

- 18.1. Cyberbullying, against both pupils and staff, is not tolerated.
- 18.2. Any incidents of cyberbullying are dealt with quickly and effectively whenever they occur.
- 18.3. Information about the school's full response to incidents of cyberbullying can be found in the Anti-Bullying Policy.

Online sexual violence and sexual harassment between children (peer-on-peer abuse)

- 18.4. Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and developmentally expected, and sexual behaviour that is inappropriate and/or harmful.
- 18.5. The school recognises that peer-on-peer abuse can take place online. Examples include the following:
 - Non-consensual sharing of sexual images and videos
 - Sexualised cyberbullying
 - Online coercion and threats
 - Unwanted sexual comments and messages on social media
 - Online sexual exploitation
- 18.6. The school responds to all concerns regarding online peer-on-peer abuse, whether or not the incident took place on the school premises or using school-owned equipment.

- 18.7. Concerns regarding online peer-on-peer abuse are reported to the DSL who will investigate the matter in line with the Child Protection and Safeguarding Policy.
- 18.8. Information about the school's full response to incidents of online peer-on-peer abuse can be found in the Child Protection and Safeguarding Policy.

Upskirting

- 18.9. Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.
- 18.10. A "specified purpose" is namely:
- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).
 - To humiliate, distress or alarm the victim.
- 18.11. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion activated camera.
- 18.12. Upskirting is not tolerated by the school.
- 18.13. Incidents of upskirting are reported to the DSL who will then decide on the next steps to take, which may include police involvement, in line with the Child Protection and Safeguarding Policy.

Youth produced sexual imagery (sexting)

- 18.14. Youth produced sexual imagery is the sending or posting of sexually suggestive images of under-18s via mobile phones or over the internet. Creating and sharing sexual photos and videos of individuals under 18 is illegal.
- 18.15. All concerns regarding sexting are reported to the DSL.
- 18.16. Where there is reason to believe the incident will cause harm to the pupil depicted, or where the incident is classified as 'aggravated', the following process is followed:
- The DSL holds an initial review meeting with appropriate school staff;
 - Subsequent interviews are held with the pupils involved, if appropriate;

- Parents are informed at an early stage and involved in the process unless there is a good reason to believe that involving the parents would put the pupil at risk of harm;
 - At any point in the process if there is a concern a pupil has been harmed or is at risk of harm, a referral will be made to children's social care services and/or the police immediately;
 - The interviews with staff, pupils and their parents are used to inform the action to be taken and the support to be implemented.
- 18.17. When investigating a report, staff members will not view nude and semi-nude images unless there is a good and clear reason to do so.
- 18.18. If a staff member believes there is a good reason to view nude or semi-nude imagery as part of an investigation, they discuss this with the DSL and headteacher first.
- 18.19. The decision to view imagery is based on the professional judgement of the DSL and always complies with the Child Protection and Safeguarding Policy.
- 18.20. If a decision is made to view the imagery, the DSL will be satisfied that viewing:
- Is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any pupil involved.
 - Is necessary in order to report the image to a website or suitable reporting agency to have the image taken down, or to support the pupil in taking down the image or in making a report.
 - Is unavoidable because a pupil has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network.
- 18.21. Where it is necessary to view the imagery the DSL will:
- Never copy, print, share, store or save images; this is illegal.
 - Discuss the decision with the headteacher.
 - Undertake the viewing themselves, or make sure viewing is undertaken by another member of the safeguarding team with delegated authority from the headteacher.
 - Make sure viewing takes place with the headteacher or another member of the SLT in the room; additional people in the room will not view the imagery.
 - Only view the imagery on the school premises.
 - Record how and why the decision was made to view the imagery in line with the Record Management Policy and the Child Protection and Safeguarding Policy.
 - Make sure that images are viewed by a member of staff of the same sex as the pupil, where appropriate.

- Ensure that, if devices need to be passed on to the police, the device is confiscated, disconnected from Wi-Fi and data and turned off immediately to avoid imagery being accessed remotely; the device will be secured until it can be collected by police.
- 18.22. Imagery will not be purposefully viewed where it will cause significant harm or distress to any pupil involved, in line with the DSL's professional judgement.
- 18.23. Any accidental or intentional viewing of imagery that is undertaken as part of an investigation is recorded.
- 18.24. Where a staff member has accidentally viewed a nude or semi-nude image, the DSL will ensure they are provided with the appropriate support, as viewing nude or semi-nude imagery of pupils can be distressing.
- 18.25. Following a report of sexting, the following process is followed:
- The DSL/Deputy DSL holds an initial review meeting with appropriate school staff
 - Subsequent interviews are held with the pupils involved, if appropriate
 - Parents are informed at an early stage and involved in the process unless there is a good reason to believe that involving the parents would put the pupil at risk of harm
 - At any point in the process if there is a concern a pupil has been harmed or is at risk of harm, a referral will be made to children's social care services and/or the police immediately
 - The interviews with staff, pupils and their parents are used to inform the action to be taken and the support to be implemented
- 18.26. When investigating a report, staff members do not view the youth produced sexual imagery unless there is a good and clear reason to do so.
- 18.27. If a staff member believes there is a good reason to view youth produced sexual imagery as part of an investigation, they discuss this with the headteacher first.
- 18.28. The decision to view imagery is based on the professional judgement of the DSL and always complies with the Child Protection and Safeguarding Policy.
- 18.29. Any accidental or intentional viewing of youth produced sexual imagery that is undertaken as part of an investigation is recorded.
- 18.30. If it is necessary to view the imagery, it will not be copied, printed or shared.

Online abuse and exploitation

- 18.31. Through the online safety curriculum, pupils are taught about how to recognise online abuse and where they can go for support if they experience it.
- 18.32. The school responds to concerns regarding online abuse and exploitation, whether or not it took place on the school premises or using school-owned equipment.
- 18.33. All concerns relating to online abuse and exploitation, including child sexual abuse and exploitation and criminal exploitation, are reported to the DSL and dealt with in line with the Child Protection and Safeguarding Policy.

Online hate

- 18.34. The school does not tolerate online hate content directed towards or posted by members of the school community.
- 18.35. Incidents of online hate are dealt with in line with the relevant school policy depending on the nature of the incident and those involved, e.g. Code of Conduct for Adults and Anti-Bullying Policy.

Online radicalisation and extremism

- 18.36. The school's filtering system protects pupils and staff from viewing extremist content.
- 18.37. Concerns regarding a staff member or pupil being radicalised online are dealt with in line with the Child Protection and Safeguarding Policy and Prevent Policy.

19. Monitoring and review

- 19.1. The policy was approved by the Directors' Board on 26th June 2022. The next scheduled review date for this policy is the summer term 2023.
- 19.2. The school recognises that the online world is constantly changing; therefore, the DSL, ICT technicians and the headteacher conduct half-termly light-touch reviews of this policy to evaluate its effectiveness.
- 19.3. The Directors' Board, headteacher and DSL review this policy in full on an annual basis and following any online safety incidents.
- 19.4. Any changes made to this policy are communicated to all members of the school community.

Appendix 1: Online Safety Rules and Consent

Online-Safety Rules

All pupils use computer facilities including Internet access as an essential part of learning, as required by the National Curriculum. Both pupils and their parents/carers are asked to sign to show that the Online Safety Rules have been understood and agreed.

Pupil:

Year:

Pupil's Agreement

- I have read and I understand the academy Online-Safety Rules.
- I will use the computer, network, mobile phones, Internet access and other new technologies in a responsible way at all times.
- I know that network and Internet access may be monitored.

Signed:

Date:

Parent's Consent for Web Publication of Work

I agree that my son/daughter's work may be electronically published.

Parent's Consent for Internet Access

I have read and understood the academy online-safety rules and give permission for my son / daughter to access the Internet. I understand that the academy will take all reasonable precautions to ensure that pupils cannot access inappropriate materials but I appreciate that this is a difficult task.

I understand that the academy cannot be held responsible for the content of materials accessed through the Internet. I agree that neither The Societas Trust nor the Academy are liable for any damages arising from use of the Internet facilities.

Signed:

Date:

Please print name:

Please complete, sign and return to your child's class teacher

Appendix 2: Online Safety Posters - Key Stage 1

Think then Click

These rules help us to stay safe on the Internet



We only use the internet when an adult is with us

We can click on the buttons or links when we know what they do.



We can search the Internet with an adult.

We always ask if we get lost on the Internet.



We can send and open emails together.

We can write polite and friendly emails to people that we know.



B. Stoneham & J. Barrett



Online Safety Posters - Key Stage 2

Think then Click

Online-Safety Rules for Key Stage 2

- We ask permission before using the Internet.
- We only use websites that an adult has chosen.
- We tell an adult if we see anything we are uncomfortable with.
- We immediately close any webpage we not sure about.
- We only e-mail people an adult has approved.
- We send e-mails that are polite and friendly.
- We never give out personal information or passwords.
- We never arrange to meet anyone we don't know.
- We do not open e-mails sent by anyone we don't know.
- We do not use Internet chat rooms.



Appendix 3

Staff Acceptable Use Agreement / Code of conduct



Computing and the related technologies such as email, the internet and mobile phones are an expected part of our daily working life in school. This policy is designed to ensure that all staff are aware of their professional responsibilities when using any form of Computing. All staff are expected to sign this policy and adhere at all times to its contents. Any concerns or clarification should be discussed with Summerbank Academy Online-Safety leader.

- I will only use the academy's 's email / Internet / Intranet / Learning Platform and any related technologies for professional purposes or for uses deemed 'reasonable' by the Head or Governing Body.
- I will comply with the computing system security and not disclose any passwords provided to me by the academy or other related authorities.
- I will ensure that all electronic communications with pupils and staff are compatible with my professional role
- I will only use the approved, secure email system(s) for any academy business.
- I will ensure that personal data (such as data held on SIMS) is kept secure and is used appropriately, whether in school, taken off the academy premises or accessed remotely.
- I will not browse, download or upload material that could be considered offensive or illegal.
- I will not send to pupils or colleagues material that could be considered offensive or illegal. Images of pupils will only be taken and used for professional purposes and will not be distributed outside the academy network without the permission of the parent/ carer.
- I understand that all my use of the Internet and other related technologies can be monitored and logged and can be made available, on request, to my Line Manager or Head Teacher.
- I will respect copyright and intellectual property rights.
- I will support and promote the academy's Online-Safety policy and help pupils to be safe and responsible in their use of Computing and related technologies.

User Signature

I agree to follow this code of conduct and to support the safe use of Computing throughout the academy

Signature _____

Date _____

Full Name _____

Appendix 4: Online harms and risks – curriculum coverage

[The table below contains information from the DfE’s ‘Teaching online safety in schools’ guidance (June 2019) about what areas of online risk schools should teach pupils about. You can use this to assist your school in developing its own online safety curriculum; however, you must develop your curriculum in line with your local needs and the needs of your pupils.]

Subject area	Description and teaching content	Curriculum area the harm or risk is covered in
How to navigate the internet and manage information		
Age restrictions	<p>Some online activities have age restrictions because they include content which is not appropriate for children under a specific age.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • That age verification exists and why some online platforms ask users to verify their age • Why age restrictions exist • That content that requires age verification can be damaging to under-age consumers • What the age of digital consent is (13 for most platforms) and why it is important 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education • Computing curriculum
How content can be used and shared	<p>Knowing what happens to information, comments or images that are put online.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • What a digital footprint is, how it develops and how it can affect pupils’ futures • How cookies work • How content can be shared, tagged and traced • How difficult it is to remove something once it has been shared online • What is illegal online, e.g. youth-produced sexual imagery (sexting) 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE • Computing curriculum
Disinformation, misinformation and hoaxes	<p>Some information shared online is accidentally or intentionally wrong, misleading or exaggerated.</p> <p>Teaching includes the following:</p>	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education

	<ul style="list-style-type: none"> • Disinformation and why individuals or groups choose to share false information in order to deliberately deceive • Misinformation and being aware that false and misleading information can be shared inadvertently • Online hoaxes, which can be deliberately and inadvertently spread for a variety of reasons • That the widespread nature of this sort of content can often appear to be a stamp of authenticity, making it important to evaluate what is seen online • How to measure and check authenticity online • The potential consequences of sharing information that may not be true 	<ul style="list-style-type: none"> • Computing curriculum
Fake websites and scam emails	<p>Fake websites and scam emails are used to extort data, money, images and other things that can either be used by the scammer to harm the person targeted or sold on for financial, or other, gain.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • How to recognise fake URLs and websites • What secure markings on websites are and how to assess the sources of emails • The risks of entering information to a website which is not secure • What pupils should do if they are harmed/targeted/groomed as a result of interacting with a fake website or scam email • Who pupils should go to for support 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education • Computing curriculum
Online fraud	<p>Fraud can take place online and can have serious consequences for individuals and organisations.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • What identity fraud, scams and phishing are • That children are sometimes targeted to access adults' data • What 'good' companies will and will not do when it comes to personal details 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education • Computing curriculum
Password phishing	<p>Password phishing is the process by which people try to find out individuals' passwords so they can access protected content.</p> <p>Teaching includes the following:</p>	<p>This risk or harm is covered in the following curriculum area(s):</p>

	<ul style="list-style-type: none"> • Why passwords are important, how to keep them safe and that others might try to get people to reveal them • How to recognise phishing scams • The importance of online security to protect against viruses that are designed to gain access to password information • What to do when a password is compromised or thought to be compromised 	<ul style="list-style-type: none"> • RSHE education
Personal data	<p>Online platforms and search engines gather personal data – this is often referred to as ‘harvesting’ or ‘farming’.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • How cookies work • How data is farmed from sources which look neutral • How and why personal data is shared by online companies • How pupils can protect themselves and that acting quickly is essential when something happens • The rights children have with regards to their data • How to limit the data companies can gather 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education • Computing curriculum
Persuasive design	<p>Many devices, apps and games are designed to keep users online for longer than they might have planned or desired.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • That the majority of games and platforms are designed to make money – their primary driver is to encourage people to stay online for as long as possible • How notifications are used to pull users back online 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education • Computing curriculum
Privacy settings	<p>Almost all devices, websites, apps and other online services come with privacy settings that can be used to control what is shared.</p> <p>Teaching includes the following:</p>	<p>This risk or harm is covered in the following curriculum area(s):</p>

	<ul style="list-style-type: none"> • How to find information about privacy settings on various devices and platforms • That privacy settings have limitations 	<ul style="list-style-type: none"> • RSHE education • Computing curriculum
Targeting of online content	<p>Much of the information seen online is a result of some form of targeting.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • How adverts seen at the top of online searches and social media have often come from companies paying to be on there and different people will see different adverts • How the targeting is done • The concept of clickbait and how companies can use it to draw people to their sites and services 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education • Computing curriculum
How to stay safe online		
Online abuse	<p>Some online behaviours are abusive. They are negative in nature, potentially harmful and, in some cases, can be illegal.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • The types of online abuse, including sexual harassment, bullying, trolling and intimidation • When online abuse can become illegal • How to respond to online abuse and how to access support • How to respond when the abuse is anonymous • The potential implications of online abuse • What acceptable and unacceptable online behaviours look like 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education • Computing curriculum
Challenges	<p>Online challenges acquire mass followings and encourage others to take part in what they suggest.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • What an online challenge is and that, while some will be fun and harmless, others may be dangerous and even illegal 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education

	<ul style="list-style-type: none"> • How to assess if the challenge is safe or potentially harmful, including considering who has generated the challenge and why • That it is okay to say no and to not take part in a challenge • How and where to go for help • The importance of telling an adult about challenges which include threats or secrecy – ‘chain letter’ style challenges 	
Content which incites	<p>Knowing that violence can be incited online and escalate very quickly into offline violence.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • That online content (sometimes gang related) can glamorise the possession of weapons and drugs • That to intentionally encourage or assist in an offence is also a criminal offence • How and where to get help if they are worried about involvement in violence 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education
Fake profiles	<p>Not everyone online is who they say they are.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • That, in some cases, profiles may be people posing as someone they are not or may be ‘bots’ • How to look out for fake profiles 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education • Computing curriculum
Grooming	<p>Knowing about the different types of grooming and motivations for it, e.g. radicalisation, child sexual abuse and exploitation (CSAE) and gangs (county lines).</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • Boundaries in friendships with peers, in families, and with others • Key indicators of grooming behaviour • The importance of disengaging from contact with suspected grooming and telling a trusted adult • How and where to report grooming both in school and to the police 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education

	<p>At all stages, it is important to balance teaching pupils about making sensible decisions to stay safe whilst being clear it is never the fault of the child who is abused and why victim blaming is always wrong.</p>	
Live streaming	<p>Live streaming (showing a video of yourself in real-time online either privately or to a public audience) can be popular with children, but it carries a risk when carrying out and watching it.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • What the risks of carrying out live streaming are, e.g. the potential for people to record livestreams and share the content • The importance of thinking carefully about who the audience might be and if pupils would be comfortable with whatever they are streaming being shared widely • That online behaviours should mirror offline behaviours and that this should be considered when making a livestream • That pupils should not feel pressured to do something online that they would not do offline • Why people sometimes do and say things online that they would never consider appropriate offline • The risk of watching videos that are being livestreamed, e.g. there is no way of knowing what will be shown next • The risks of grooming 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education
Unsafe communication	<p>Knowing different strategies for staying safe when communicating with others, especially people they do not know or have not met.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • That communicating safely online and protecting your privacy and data is important, regardless of who you are communicating with • How to identify indicators of risk and unsafe communications • The risks associated with giving out addresses, phone numbers or email addresses to people pupils do not know, or arranging to meet someone they have not met before 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education • Computing curriculum

	<ul style="list-style-type: none"> • What online consent is and how to develop strategies to confidently say no to both friends and strangers online 	
Wellbeing		
Impact on quality of life, physical and mental health and relationships	<p>Knowing how to identify when online behaviours stop being fun and begin to create anxiety, including that there needs to be a balance between time spent online and offline.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • How to evaluate critically what pupils are doing online, why they are doing it and for how long (screen time) • How to consider quality vs. quantity of online activity • The need for pupils to consider if they are actually enjoying being online or just doing it out of habit due to peer pressure or the fear of missing out • That time spent online gives users less time to do other activities, which can lead some users to become physically inactive • The impact that excessive social media usage can have on levels of anxiety, depression and other mental health issues • That isolation and loneliness can affect pupils and that it is very important for them to discuss their feelings with an adult and seek support • Where to get help 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • Health education
Online vs. offline behaviours	<p>People can often behave differently online to how they would act face to face.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • How and why people can often portray an exaggerated picture of their lives (especially online) and how that can lead to pressures around having perfect/curated lives • How and why people are unkind or hurtful online when they would not necessarily be unkind to someone face to face 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSHE education