

# THE CHARTER SCHOOLS

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## EDUCATIONAL TRUST

# Online Safety Policy

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## Statement of intent

The Charter Schools Educational Trust (the '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 Trust's schools and 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 four areas of risk:

- **Content:** Being exposed to illegal, inappropriate or harmful material, e.g. pornography, fake news, self-harm and suicide, and discriminatory or extremist views.
- **Contact:** Being subjected to harmful online interaction with other users, e.g. peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children.
- **Conduct:** Personal online behaviour that increases the likelihood of, or causes, harm, e.g. sending and receiving explicit messages, and cyberbullying.
- **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

The measures implemented to protect pupils and staff revolve around these areas of risk. The Trust 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 in all its schools.

The purpose of this policy statement is to:

- ensure the safety and wellbeing of children and young people is paramount when adults, young people or children are using the internet, social media or mobile devices
- provide staff and volunteers with the overarching principles that guide our approach to online safety
- ensure that, as a multi-academy trust, we operate in line with our values and within the law in terms of how we use online devices.

The policy statement applies to all staff, volunteers, children and young people and anyone involved in the Trust and its schools' activities

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

- Voyeurism (Offences) Act 2019
- The UK 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 2021'
- 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 (2018) 'Small Business Guide: Cyber Security'
- UK Council for Child Internet Safety (2020) 'Education for a Connected World – 2020 edition'

This policy operates in conjunction with the following Trust/school policies:

- Allegations of Abuse Against Staff Policy
- Acceptable Use Agreement
- Child Protection and Safeguarding Policy
- Anti-Bullying Policy
- RSE and Health Education Policy
- Staff Code of Conduct
- Behaviour Principles and Policy
- Disciplinary Policy and Procedures
- Data Protection Policy
- Photography Policy
- Staff Mobile Device and Remote Working Policy
- Pupil Remote Learning Policy
- Technology Acceptable Use Agreement - Pupils
- Technology Acceptable Use Agreement – Staff

## 1. Roles and responsibilities

### **The Trust Board and Local Governing Bodies**

The Trust Board is ultimately responsible for safeguarding in the Trust's schools but the day-to-day monitoring of safeguarding standards, including online safety within each individual school, is delegated to the Local Governing Body (LGB). The Trust Board have the strategic leadership responsibility for their schools' online safety arrangements and will ensure that they comply with their statutory duties and ensure that the policies, procedures and training in the schools are effective and comply with the law.

Trustees and local governors will receive appropriate training on safeguarding at induction that is updated regularly. In addition, they will receive information (for example, via emails, e-bulletins and

newsletters) on safeguarding including online safety at least annually so that they can demonstrate knowledge of their responsibilities relating to the protection of children, young people and vulnerable adults.

The Trust Board will:

- Ensure that this policy is effective and complies with relevant laws and statutory guidance.
- Review this policy on an **annual** basis.
- Ensure their own knowledge of online safety issues is up-to-date.
- Ensure all staff undergo safeguarding and child protection training, including online safety, at induction.
- Ensure that there are appropriate filtering and monitoring systems in place.
- Ensure that all relevant Trust policies have an effective approach to planning for, and responding to, online challenges and hoaxes embedded within them.

The Local Governing Body is responsible for:

- Ensuring that that their school incorporates the principles of online safety across all elements of school life.
- Ensuring that the principles of online safety are reflected in the school's policies and practice where appropriate and that they are communicated with staff, pupils and parents.

**The Headteacher (read also Executive Headteacher and Head of School) is responsible for:**

- Ensuring that online safety is a running and interrelated theme throughout the school's policies and procedures, including in those related to the curriculum, teacher training and safeguarding.
- Supporting the Designated Safeguarding Lead (DSL) and the deputy DSL 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.

**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 school’s safeguarding responsibilities and that a coordinated approach is implemented.
- Ensuring safeguarding is considered in the school’s approach to remote learning.
- Ensuring appropriate referrals are made to external agencies, as required.
- Keeping 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 Local Governing Body about online safety on an annual basis as a minimum as part of the annual Safeguarding report, but more frequently should serious incidents or concerns arise.
- Working with the Headteacher and ICT technicians to conduct **Termly** light-touch reviews of this policy.
- Working with the Head of Trust Governance and Compliance to update this policy on an **annual** basis.

**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.

**All staff members are responsible for:**

- Adhering to the Acceptable Use Agreement and other relevant policies.
- 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.
- Ensuring they are familiar with, and understand, the indicators that pupils may be unsafe online.
- Reporting concerns in line with the school’s reporting procedure.
- Where relevant to their role, ensuring online safety is embedded in their teaching of the curriculum.

### **Pupils are responsible for:**

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

## **2. Managing online safety**

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues affecting young people, particularly owing to the rise of social media and the increased prevalence of children using the internet.

The DSL has overall responsibility for the school's approach to online safety, with support from deputies and the Headteacher where appropriate, and will ensure that there are strong processes in place to handle any concerns about pupils' safety online.

The importance of online safety is integrated across all school operations in the following ways:

- Staff receive regular training
- Staff receive regular email updates regarding online safety information and any changes to online safety guidance or legislation
- Online safety is integrated into learning throughout the curriculum but specifically in ICT, PSHE, and RSE
- Assemblies are conducted termly on the topic of remaining safe online
- Regular updates on online safety are shared with parents via school newsletters, school websites and in parents' information evenings including information about new trends and threats to online safety.

### **Handling online safety concerns**

Any disclosures made by pupils to staff members about online abuse, harassment or exploitation, whether they are the victim or disclosing on behalf of another child, will be handled in line with the Trust Child Protection and Safeguarding Policy.

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, including the Staff Code of Conduct, Allegations of Abuse Against Staff Policy, and Disciplinary Policy and Procedures. If the concern is about the Headteacher, it is reported to the CEO.

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, and manages concerns in accordance with relevant policies depending on their nature, including the school's Behaviour Policy and the Trust Child Protection and Safeguarding Policy.

Where there is a concern that illegal activity has taken place, the Headteacher contacts the police.

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 Trust Child Protection and Safeguarding Policy.

All online safety incidents and the school's response are recorded by the DSL.

### 3. Cyberbullying

Cyberbullying can include the following:

- Threatening, intimidating or upsetting text messages
- Threatening or embarrassing pictures and video clips sent via mobile phone cameras
- Silent or abusive phone calls or using the victim's phone to harass others, to make them think the victim is responsible
- Threatening or bullying emails, possibly sent using a pseudonym or someone else's name
- Menacing or upsetting responses to someone in a chatroom
- Unpleasant messages sent via instant messaging
- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g. Facebook, Snap Chat, WhatsApp, Instagram and TikTok.

Cyberbullying against pupils or staff is not tolerated under any circumstances. Incidents of cyberbullying are dealt with quickly and effectively wherever they occur in line with the schools Anti-bullying Policy.

### 4. Peer-on-peer sexual abuse and harassment

Pupils may also use the internet and technology as a vehicle for sexual abuse and harassment. Staff will understand that this abuse can occur both in and outside of school and off and online, and will remain aware that pupils are less likely to report concerning online sexual behaviours, particularly if they are using websites that they know adults will consider to be inappropriate for their age.

The following are examples of online harmful sexual behaviour of which staff will be expected to be aware:

- Threatening, facilitating or encouraging sexual violence
- Upskirting, i.e. taking a picture underneath a person's clothing without consent and with the intention of viewing their genitals, breasts or buttocks
- Sexualised online bullying, e.g. sexual jokes or taunts
- Unwanted and unsolicited sexual comments and messages
- Consensual or non-consensual sharing of sexualised imagery

Staff will be aware that creating, possessing, and distributing indecent imagery of other children, i.e. individuals under the age of 18, is a criminal offence, even where the imagery is created, possessed, and distributed with the permission of the child depicted, or by the child themselves.

The schools will respond to all concerns regarding online peer-on-peer sexual abuse and harassment, regardless of whether the incident took place on the school premises or using school-owned

equipment. All concerns regarding online peer-on-peer abuse are reported to the school's DSL, who will investigate the matter in line with the Trust Child Protection and Safeguarding Policy.

## 5. Grooming and exploitation

Grooming is defined as the situation whereby an adult builds a relationship, trust and emotional connection with a child with the intention of manipulating, exploiting and/or abusing them.

Staff will be aware that grooming often takes place online and that pupils who are being groomed are commonly unlikely to report this behaviour for many reasons, including the following:

- The pupil believes they are talking to another child, when they are actually talking to an adult masquerading as someone younger with the intention of gaining their trust to abuse them.
- The pupil does not want to admit to talking to someone they met on the internet for fear of judgement, feeling embarrassed, or a lack of understanding from their peers or adults in their life.
- The pupil may have been manipulated into feeling a sense of dependency on their groomer due to the groomer's attempts to isolate them from friends and family.
- Talking to someone secretly over the internet may make the pupil feel 'special', particularly if the person they are talking to is older.
- The pupil may have been manipulated into feeling a strong bond with their groomer and may have feelings of loyalty, admiration, or love, as well as fear, distress and confusion.

Due to the fact pupils are less likely to report grooming than other online offences, it is particularly important that staff understand the indicators of this type of abuse. The DSLs will ensure that online safety training covers online abuse, the importance of looking for signs of grooming, and what the signs of online grooming are, including:

- Being secretive about how they are spending their time.
- Having an older boyfriend or girlfriend, usually one that does not attend the school and whom their close friends have not met.
- Having money or new possessions, e.g. clothes and technological devices, that they cannot or will not explain.

### **Child sexual exploitation (CSE) and child criminal exploitation (CCE)**

Although CSE often involves physical sexual abuse or violence, online elements may be prevalent, e.g. sexual coercion and encouraging children to behave in sexually inappropriate ways through the internet. In some cases, a pupil may be groomed online to become involved in a wider network of exploitation, e.g. the production of child pornography or forced child prostitution and sexual trafficking.

CCE is a form of exploitation in which children are forced or manipulated into committing crimes for the benefit of their abuser, e.g. drug transporting, shoplifting and serious violence. While these crimes often take place in person, it is increasingly common for children to be groomed and manipulated into participating through the internet.

Where staff have any concerns about pupils with relation to CSE or CCE, they will bring these concerns to the respective DSL without delay, who will manage the situation in line with the Trust Child Protection and Safeguarding Policy.

## Radicalisation

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. This process can occur through direct recruitment, e.g. individuals in extremist groups identifying, targeting and contacting young people with the intention of involving them in terrorist activity, or by exposure to violent ideological propaganda. Children who are targets for radicalisation are likely to be groomed by extremists online to the extent that they believe the extremist has their best interests at heart, making them more likely to adopt the same radical ideology.

Staff members will be aware of the factors which can place certain pupils at increased vulnerability to radicalisation, as outlined in the Trust Child Protection (Safeguarding) Policy. Staff will be expected to exercise vigilance towards any pupils displaying indicators that they have been, or are being, radicalised.

Where staff have a concern about a pupil relating to radicalisation, they will report this to the DSL without delay, who will handle the situation in line with the Trust Child Protection (Safeguarding) Policy.

## 6. Mental health

The internet, particularly social media, can be the root cause of a number of mental health issues in pupils, e.g. low self-esteem, anxiety, depression and suicidal ideation.

Staff will be aware that online activity both in and outside of school can have a substantial impact on a pupil's mental state, both positively and negatively. The DSL will ensure that training is available to help ensure that staff members understand popular social media sites and terminology, the ways in which social media and the internet in general can impact mental health, and the indicators that a pupil is suffering from challenges in their mental health.

If staff have a mental health concern about a pupil that is also a safeguarding concern, this will be shared with the school DSL with a view to referring to appropriate agencies following the referral procedures. Otherwise, this will be shared with the appropriate pastoral leader.

## 8. Online hoaxes and harmful online challenges

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.

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.

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.

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, in discussion with the Trust DSL group, or whether it extends more widely across the country. 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.

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:

- In line with any advice received from a known, reliable source, e.g. the UK Safer Internet Centre, when fact-checking the risk of online challenges or hoaxes.
- Careful to avoid 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 but 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.
- Appropriate for the relevant pupils' age and developmental stage.
- Supportive.
- In line with the Trust Child Protection (Safeguarding) Policy.

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.

This information will be shared with the Trust DSL group, and those schools with similar aged range pupils will assess whether information regarding the challenge and its risks should also be addressed to those age-range pupils across all the Trust schools.

The DSLs and Headteachers will only implement a school-wide or Trust-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.

## 7. Cyber-crime

Cyber-crime is criminal activity committed using computers and/or the internet. There are two key categories of cyber-crime:

- **Cyber-enabled** – these crimes can be carried out offline; however, are made easier and can be conducted at higher scales and speeds online, e.g. fraud, purchasing and selling of illegal drugs, and sexual abuse and exploitation.
- **Cyber-dependent** – these crimes can only be carried out online or by using a computer, e.g. making, supplying or obtaining malware, illegal hacking, and 'booting', which means overwhelming a network, computer or website with internet traffic to render it unavailable.

The schools will factor into their approach to online safety the risk that pupils with a particular affinity or skill in technology may become involved, whether deliberately or inadvertently, in cyber-crime. Where there are any concerns about a pupil's use of technology and their intentions with regard to using their skill and affinity towards it, the DSL will consider a referral to the [Cyber Choices programme](#), which aims to intervene where children are at risk of committing cyber-crime and divert them to a more positive use of their skills and interests.

The DSL and Headteacher will ensure that pupils are taught, throughout the curriculum, how to use technology safely, responsibly and lawfully, and will ensure that pupils cannot access sites or areas of the internet that may encourage them to stray from lawful use of technology, e.g. the 'dark web', on school-owned devices or on school networks through the use of appropriate firewalls.

## 8. Online safety training for staff

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

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

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

Trustees and local governors will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

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

## 9. Online safety and the curriculum

Online safety is embedded throughout the curriculum. From September 2020 all schools have been required to teach:

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

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

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

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

- Use technology safely, respectfully and responsibly
- Recognise acceptable and unacceptable behaviour

- Identify a range of ways to report concerns about content and contact

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

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

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

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

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

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

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

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

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

The school will use assemblies to raise pupils' awareness of the dangers that can be encountered online and may also invite speakers to talk to pupils about this. Online safety teaching is always appropriate to pupils' ages and developmental stages.

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. 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
- What healthy and respectful relationships, including friendships, look like
- Body confidence and self-esteem
- Consent, e.g. with relation to the sharing of indecent imagery or online coercion to perform sexual acts
- 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

The online risks pupils may face online are always considered when developing the curriculum.

The DSL is involved with the development of the school's online safety curriculum. Pupils will be consulted on the online safety curriculum, where appropriate, due to their unique knowledge of the kinds of websites they and their peers frequent and the kinds of behaviours in which they engage online.

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.

The school will also endeavour to take a more personalised or contextualised approach to teaching about online safety for more susceptible children, and in response to instances of harmful online behaviour from pupils.

Class/subject 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?

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.

Before conducting a lesson or activity on online safety, the class/subject 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. 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.

During an online safety lesson or activity, the class/subject teacher ensures a safe environment is maintained in which pupils feel comfortable to say what they feel and ask questions, and are not worried about getting into trouble or being judged.

If a staff member is concerned about anything pupils raise during online safety lessons and activities, they will make a report in line with the Trust Child Protection (Safeguarding) Policy.

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 the Trust Child Protection (Safeguarding) Policy.

## 9. Use of technology in the classroom

A wide range of technology is used during lessons, including the following:

- Computers
- Laptops
- Tablets
- Email
- Cameras (Video and Still)
- Document sharing software including Microsoft Teams and Google Drive
- Virtual classrooms

Prior to using any websites, tools, apps or other online platforms as resources in the classroom, or recommending that pupils use these at home, the class/subject teacher always reviews and evaluates the resource and where required will refer to the DSL, the Headteacher and the Data Protection Officer (where pupils are asked to share their personal data) for approval. Class/subject teachers ensure that any internet-derived materials are used in line with copyright law.

Pupils are supervised when using online materials during lesson time – this supervision is suitable to their age and ability.

## 10. Use of smart technology

While the Trust recognises that the use of smart technology can have educational benefits, there are also a variety of associated risks which the Trust and its schools will ensure it manages. Smart technology includes, but is not limited to: mobile phones, smart watches, tablets.

Pupils will be educated on the acceptable and appropriate use of personal devices and will use technology in line with the school's Technology Acceptable Use Agreement for Pupils.

Staff will use all smart technology and personal technology in line with the Trust's Technology Acceptable Use Agreement for staff.

The Trust recognises that pupils' unlimited and unrestricted access to the internet via mobile phone networks means that some pupils may use the internet in a way which breaches the individual school's Technology Acceptable Use Agreement for Pupils.

Inappropriate use of smart technology may include:

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

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

Where it is deemed necessary, the school will ban pupil's use of personal technology whilst on school site.

Where there is a significant problem with the misuse of smart technology among pupils, the school will discipline those involved in line with the individual school's Behaviour Policy.

The schools will hold assemblies, where appropriate, which address any specific concerns related to the misuse of smart technology and outline the importance of using smart technology in an appropriate manner.

The Trust and its schools will seek to ensure that they are kept up to date with the latest devices, platforms, apps, trends and related threats.

The Trust's schools will consider the 4C's (content, contact, conduct and commerce) when educating pupils about the risks involved with the inappropriate use of smart technology and enforcing the appropriate disciplinary measures.

## 11. Educating parents

The Trusts schools work in partnership with parents (and carers) to ensure pupils stay safe online at school and at home. Parents are provided with information about the school's approach to online safety and their role in protecting their children. Parents are sent a copy of the school's Acceptable Use Agreement at **the beginning of each academic year** and are encouraged to go through this with their child to ensure their child understands the document and the implications of not following it.

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.

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.

Parental awareness regarding how they can support their children to be safe online is raised in the following ways:

- Parents' information evenings
- School Newsletters
- School Websites
- Signposting to online information and resources

## 12. Internet access

Pupils, staff and other members of the individual school communities are only granted access to the school's internet network once they have read and signed the school's Acceptable Use Agreement. A record is kept of users who have been granted internet access in the **school office**.

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.

## 13. Filtering and monitoring online activity

The local governing body (LGB) ensures the individual school's ICT network has appropriate filters and monitoring systems in place. The LGB ensures 'over blocking' does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding.

The Headteacher and ICT technicians undertake a risk assessment to determine what filtering and monitoring systems are required. 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. ICT technicians undertake **monthly** checks on the filtering and monitoring systems to ensure they are effective and appropriate.

Requests regarding making changes to the filtering system are directed to the Headteacher. Prior to making any changes to the filtering system, ICT technicians and the DSL conduct a risk assessment. Any changes made to the system are recorded by ICT technicians. Reports of inappropriate websites or materials are made to an ICT technician immediately, who investigates the matter and makes any necessary changes.

Deliberate breaches of the filtering system are reported to the DSL and ICT technicians, who will escalate the matter appropriately. If a pupil has deliberately breached the filtering system, they will be disciplined in line with the school's Behaviour Policy. If a member of staff has deliberately breached the filtering system, they will be disciplined in line with the Staff Disciplinary Policy and Procedure.

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.

The school's network and school-owned devices are appropriately monitored. All users of the network and school-owned devices are informed about how and why they are monitored. Concerns identified through monitoring are reported to the DSL who manages the situation in line with the Trust Child Protection and Safeguarding Policy.

## 14. Network security

Technical security features, such as anti-virus software, are kept up-to-date and managed by ICT technicians. Firewalls are switched on at all times. ICT technicians review the firewalls on a **weekly** basis to ensure they are running correctly, and to carry out any required updates.

Staff and pupils are advised not to download unapproved software or open unfamiliar email attachments or click on any links in emails from suspicious or unrecognised senders, and are expected to report all malware and virus attacks to ICT technicians immediately.

All members of staff have their own unique usernames and private passwords to access the school's systems. Where appropriate to the age-range, pupils are provided with their own unique username and private passwords. Staff members and pupils are responsible for keeping their passwords private. Passwords should have a minimum and maximum length and require a mixture of letters, numbers and symbols to ensure they are as secure as possible.

Users inform ICT technicians if they forget their login details, who will arrange for the user to access the systems under different login details. Users are not permitted to share their login details with others and are not allowed to log in as another user at any time. 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.

Users are required to lock access to devices and systems when they are not in use, or if the device is left unattended for any period of time.

Full details of the school's network security measures can be found in the Data and Cyber-security Breach Prevention and Management Plan.

## 15. Emails

Access to and the use of emails is managed in line with the Trust Data Protection Policy, Acceptable Use Agreement, and the Trust Privacy notices for Staff, Pupils, Parents and Volunteers.

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. Prior to being authorised to use the email system, staff and pupils must agree to and sign the Acceptable Use Agreement. Personal email accounts are not permitted to be used for any Trust or school related work and should not be accessed using school owned devices. Any emails that contains sensitive or personal information should only sent using secure and encrypted email.

Staff members and pupils are required to block spam and junk mail and report the matter to ICT technicians. The school's monitoring system can detect inappropriate links, malware and profanity within emails – staff and pupils are made aware of this. Chain letters, spam and all other emails from

unknown sources must be deleted without being opened. The DSL and ICT technicians will organise an **annual** update for both staff and pupils where they explain what a phishing email and other malicious emails might look like – this will include information on the following:

- How to determine whether an email address is legitimate
- The types of address a phishing email could use
- The importance of asking “does the email urge you to act immediately?”
- The importance of checking the spelling and grammar of an email

Any cyber-attacks initiated through emails are managed in line with the Data and Cyber-security Breach Prevention and Management Plan.

## 16. Social networking

### Personal use

Access to social networking sites is filtered as appropriate. Staff and pupils are not permitted to use social media for personal use during lesson time. Staff and pupils can use personal social media during break and lunchtimes; however, inappropriate, or excessive use of personal social media during school hours may result in the removal of internet access or further action. Staff members are advised that their conduct on social media can have an impact on their role and reputation within the school, as well as the reputation of the school and the Trust. The Staff Code of Conduct contains information on the acceptable use of social media – staff members are required to follow these expectations at all times.

Staff receive training as part of their induction on how to use social media safely and responsibly and will receive annual updates as social media platforms and functionality changes. 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. 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 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.

Pupils are taught how to use social media safely and responsibly through the online safety curriculum.

Concerns regarding the online conduct of any member of the school community on social media are reported to the DSL and managed in accordance with the relevant policy, e.g. Anti-Bullying Policy, Staff Code of Conduct and Behaviour Policy.

### Use on behalf of the school

The use of social media on behalf of the school is conducted in line with the [Trust Staff Code of Conduct](#). The Trust/school’s official social media channels are only used for official educational or engagement purposes. Staff members must be authorised by the CEO or the respective school’s Headteacher to access to the Trust/school’s social media accounts.

All communication on official social media channels by staff on behalf of the Trust/school is clear, transparent and open to scrutiny.

## 17. The Trust/school websites

The CEO is responsible for the overall content of the Trust website – they will ensure the content is appropriate, accurate, up-to-date and meets government requirements.

The Headteacher is responsible for the overall content of the school website – they will ensure the content is appropriate, accurate, up-to-date and meets government requirements.

All Trust and school websites will comply with guidelines for publications including accessibility, data protection, respect for intellectual property rights, privacy policies and copyright law. Personal information relating to staff and pupils is not published on the website. Images and videos are only posted on the website if the provisions in Trust Data Protection policies and the Staff Code of Conduct are met.

## 18. Use of devices

### School-owned devices

Staff members may be issued with the following devices to assist with their work:

- Desktop Computer
- Laptop
- Tablet
- Mobile Phone

Pupils are provided with school-owned devices as necessary to assist in the delivery of the curriculum, e.g. tablets or laptops to use during lessons or to access online learning at home.

School-owned devices are used in accordance with the [Trust Mobile Device and Remote Working Policy](#) and the [Trust Acceptable use of Technology Agreement](#). Staff and pupils are not permitted to connect school-owned devices to public Wi-Fi networks. All school-owned devices are password protected. 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.

ICT technicians review all school-owned devices on a **half-termly** basis to carry out software updates and ensure there is no inappropriate material or malware on the devices. No software, apps or other programmes can be downloaded onto a device without authorisation from ICT technicians.

Cases of staff members or pupils found to be misusing school-owned devices will be managed in line with the Staff Disciplinary Policy and Procedure and the school Behaviour Policy respectively.

### Personal devices

Personal devices are used in accordance with this policy and the Staff and Pupils' Technology Acceptable Use Agreements. Any personal electronic device that is brought into school is the responsibility of the user.

Staff members are not permitted to use their personal devices during lesson time, other than in an emergency. Staff members are not permitted to use their personal devices to take photos or videos of pupils unless they have been given permission to do so by the Headteacher. Where permission has been granted, these images must be saved to the school system and deleted from the personal device as soon as is practicable.

Staff members report concerns about their colleagues' use of personal devices on the school premises in line with the Allegations of Abuse Against Staff Policy. 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 Allegations of Abuse Against Staff Policy.

Pupils are not permitted to use their personal devices during lesson time or when moving between lessons, unless they are in the sixth form, in which case this will be permitted in line with the school's policy for sixth form students. If a pupil needs to contact their parents during the school day, they are allowed to use the phone in **the school office**. The Headteacher may authorise the use of mobile devices by a pupil for safety or precautionary use.

Where a pupil uses accessibility features on a personal device to help them access education, e.g. where a pupil who is deaf uses their mobile phone to adjust the settings on an internal hearing aid in response to audible stimuli during class, the arrangements and rules for conduct for this are developed and managed on a case-by-case basis.

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.

Appropriate signage is displayed to inform visitors to the school of the expected use of personal devices. Any concerns about visitors' use of personal devices on the school premises are reported to the DSL.

## 19. Remote learning

All remote learning is delivered in line with the school's Remote Learning Policy.

The school will risk assess the technology used for remote learning prior to use and ensure that there are no privacy issues or scope for inappropriate use. The school will consult with parents prior to the period of remote learning about what methods of delivering remote teaching are most suitable – alternate arrangements will be made where necessary.

The school will ensure that all school-owned equipment and technology used for remote learning has suitable anti-virus software installed, can establish secure connections, can recover lost work, and allows for audio and visual material to be recorded or downloaded, where required.

During the period of remote learning, the school will maintain regular contact with parents to:

- Reinforce the importance of children staying safe online.
- Ensure parents are aware of what their children are being asked to do, e.g. sites they have been asked to use and staff they will interact with.
- Encourage them to set age-appropriate parental controls on devices and internet filters to block malicious websites.
- Direct parents to useful resources to help them keep their children safe online.

The school will not be responsible for providing access to the internet off the school premises and will not be responsible for providing online safety software, e.g. anti-virus software, on devices not owned by the school.

## 20. Monitoring and review

The Trust recognises that the online world is constantly changing; therefore, the DSLs, ICT technicians and the Headteachers conduct **half-termly** light-touch reviews of this policy to evaluate its effectiveness.

The Trust Board, Trust Executive and Trust DSL group review this policy in full on an **annual** basis and following any online safety incidents.

The next scheduled review date for this policy is **October 2022**.

Any changes made to this policy are communicated to all members of the school community.

## APPENDIX A – Useful resources

- [UK Safer Internet Centre](#)

This is a partnership of three leading organisations: [Childnet International](#), [Internet Watch Foundation](#) and [SWGfL](#), with one mission - to promote the safe and responsible use of technology for young people.

- [Child Exploitation and Online Protection Command](#) (CEOP)

CEOP are part of the police who investigate and deal with cases of online grooming. Their Child Protection Advisors are fully trained to offer support and guidance to any young people who are worried about online grooming

- [Keeping Children Safe online - NSPCC](#)

NSPCC's advice, tools and resources to help keep every child safe online.

- [National Online Safety](#)

National Online Safety's mission is to make the internet a safer place for children by equipping school staff, parents and children with the knowledge they need to understand online dangers and how best to react should an incident arise.