

St Mary Abbots Church of England Primary School



Online Safety Policy 2023-24

At St Mary Abbots School we grow little seeds into mighty trees. Our children's development is rooted in our Christian ethos and values. We ensure that our children experience learning of the highest standard and are nurtured to flourish in all things across the curriculum; as well as physically, socially, emotionally and spiritually.



Introduction

Key people / dates

St Mary Abbots Primary School	Designated Safeguarding Lead (DSL), with lead responsibility for filtering and monitoring	Miss Stephanie Henning
	Deputy Designated Safeguarding Leads / DSL Team Members	Ms Isabella Chakiris, Miss Emily Rees, Mrs Zara Shuttleworth, Miss Isabella James & Mr John Primrose
	Link governor for safeguarding	Ms Martina Sadovsky
	Link governor for webfiltering	Ms Martina Sadovsky
	Curriculum leads with relevance to online safeguarding and their role	Mrs Zara SHuttleworth (RSE), Miss Freya Jones (PSHE) & Ms Anne Kemlo (Computing)
	Network manager / other technical support	Jartech Consultants
	Date this policy was reviewed and by whom	17 th October at FGB
	Date of next review and by whom	September 2024



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Overview

Aims

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

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

Scope

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

Roles and responsibilities

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



In 2023/2024, it is vital that all members understand their responsibilities and those of others when it comes to filtering and monitoring. All staff have a key role to play in feeding back on potential issues-Please see Annex A.

Education and curriculum

At SMA we have established a carefully sequenced curriculum for online safety that builds on what pupils have already learned and identifies subject content that is appropriate for their stage of development. We use Purple Mash. Please see the Computing Curriculum Overview linked below.

As well as teaching about the underpinning knowledge and behaviours that can help pupils navigate the online world safely and confidently regardless of the device, platform or app, through Purple Mash, children learn about Online Safety in accordance with the National Curriculum e.g. 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.

The following subjects have the clearest online safety links (see the relevant role descriptors above for more information):

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

At SMA, it is the role of all staff to identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils).

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

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

Please see the Purple Mash Computing Curriclum Overview on the school website outlining how Online Safety is covered in accordance with the National Curriculum.

An annual online safety audit, including a review of the Computing curriculum will be led by Stephanie Henning.



Handling safeguarding concerns and incidents

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

General concerns must be handled in the same way as any other safeguarding concern; safeguarding is often referred to as a jigsaw puzzle, so all stakeholders should err on the side of caution and talk to the designated safeguarding lead to contribute to the overall picture or highlight what might not yet be a problem.

School procedures for dealing with online safety will be mostly detailed in the following policies (primarily in the first key document):

- Safeguarding and Child Protection Policy
- Anti-Bullying Policy
- Behaviour Policy (including school sanctions)
- Acceptable Use Policies
- Data Protection Policy, agreements and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc)

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

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

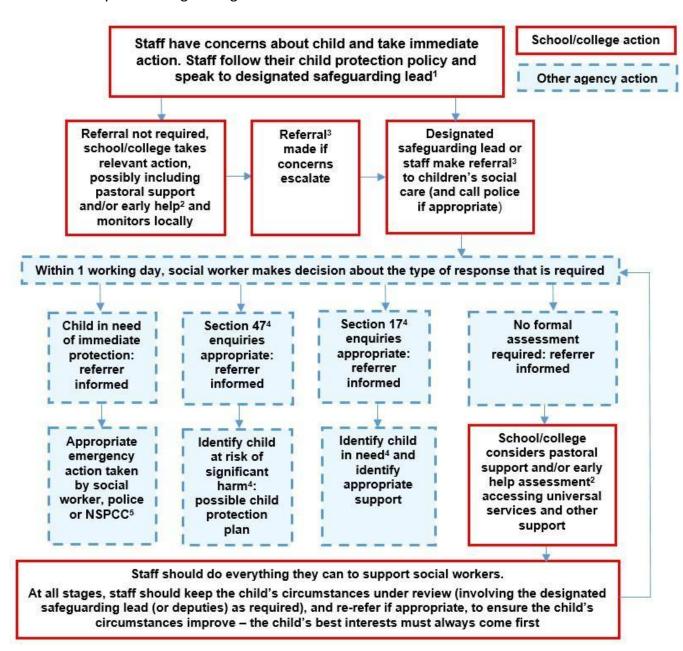
Any concern or allegation about staff misuse is always referred directly to the Headteacher, unless the concern is about the Headteacher in which case the complaint is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer). Staff may also use the NSPCC Whistleblowing Helpline

We will inform parents and carers of online-safety incidents involving their children, and the Police where staff or pupils engage in or are subject to behaviour which we consider is particularly concerning or breaks the law (particular procedures are in place for sexting and upskirting; see section below).



Actions where there are concerns about a child

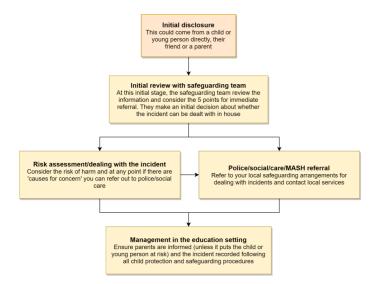
The following flow chart (it cannot be edited) is taken from page 22 of Keeping Children Safe in Education 2022 as the key education safeguarding document. As outlined previously, online safety concerns are no different to any other safeguarding concern.





Sexting - sharing nudes and semi-nudes

The school DSL will in turn use the full guidance document, <u>Sharing nudes and semi-nudes – advice for educational settings</u> to decide next steps and whether other agencies need to be involved.



*Consider the 5 points for immediate referral at initial review:

- 1. The incident involves an adult
- 2. There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
- 3. What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- 4. The images involves sexual acts and any pupil in the images or videos is under 13
- 5. You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

It is important that everyone understands that whilst sexting is illegal, pupils can come and talk to members of staff if they have made a mistake or had a problem in this area.

Upskirting

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

Bullying

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



Child-on-child sexual violence and sexual harassment

Part 5 of Keeping Children Safe in Education covers 'Child-on-child sexual violence and sexual harassment' and all staff to be aware of many aspects outlined there to support a whole-school response; including use of case studies to support with ongoing training.

Any incident of sexual harassment or violence (online or offline) is reported to the DSL who will follow the full guidance. Staff should work to foster a zero-tolerance culture and maintain an attitude of 'it could happen here'. At SMA staff must take all forms of sexual violence and harassment seriously, understanding that it exists on a continuum and that behaviours incorrectly viewed as 'low level' are treated seriously and not allowed to perpetuate. Part 5 of Keeping Children Safe makes specific reference to behaviours such as bra-strap flicking and the careless use of language.

In the online environment, the recent proliferation of misogynistic content is particularly relevant when it comes to considering reasons for and how to combat this kind of behaviour.

Misuse of school technology (devices, systems, networks or platforms)

Clear and well communicated rules and procedures are essential to govern pupil and adult use of school networks, connections, internet connectivity and devices, cloud platforms and social media (both when on school site and outside of school).

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

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

The new responsibilities for filtering and monitoring, led by the DSL and following the new DfE standards, may mean that more such incidents will be discovered in the coming year but the school will do its best to remind pupils and staff of this increased scrutiny at the start of the year.

Social media incidents

See the social media section later in this document for rules and expectations of behaviour for children and adults in the St Mary Abbots School community. These are also governed by the school's Acceptable Use Policy.

Breaches will be dealt with in line with the school Behaviour Policy (for pupils) or Code of Conduct (for staff).

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



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

Data protection and cybersecurity

All pupils, staff, governors, volunteers, contractors and parents are bound by the school's data protection and cybersecurity policy. Schools are reminded of this in KCSIE 2023, which also refers to the DfE Standards of Cybersecurity for the first time.

Schools should remember that data protection does not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in *Data protection in schools*, 2023, "It's not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child." And in KCSIE 2023, "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children."

Appropriate filtering and monitoring

Keeping Children Safe in Education has long asked schools to ensure "appropriate" webfiltering and monitoring systems which keep children safe online but do not "overblock".

Since KCSIE 2023, in recognition of the importance of these systems to keeping children safe, the designated safeguarding lead now has lead responsibility for filtering and monitoring (see page 1 for the DSL name and the named governor with responsibility for filtering and monitoring).

Schools are also asked to follow the new DfE filtering and monitoring standards, which require them to:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

As schools get to grips with these new standards, the challenge for DSLs and SLT is to better understand, review and drive the rationale behind decisions in this area. Tech teams and safeguarding teams will need to work much more closely together for this to be possible and technicians will be charged to carry out regular checks and feed back to DSL teams.

ALL STAFF need to be aware of the changes and renewed emphasis and play their part in feeding back about areas of concern, potential for students to bypass systems and any potential overblocking. They can submit concerns at any point by speaking with Stephanie Henning and logging this concern on CPOMS and will be asked for feedback at the time of the regular checks which will now take place.



Staff will be reminded of the systems in place and their responsibilities at induction and start of year safeguarding as well as via AUPs and regular training reminders in the light of the annual review and regular checks that will be carried out. The DSL will carry out half termly monitoring, or as needed if issues arise. Any updates will be shared amongst the wider staff community.

It is very important that schools understand the difference between filtering and monitoring, the meaning of overblocking and other terms, as well as how to get the best out of systems. There are guidance videos and flyers to help with this at https://safefiltering.lgfl.net and training is provided for all staff / safeguarding teams / technical teams as appropriate.

At St Mary Abbots School:

- web filtering is provided by LGFL Webscreen 3 Filtering on school site and for school devices used in the home
- changes can be made by Stephanie Henning
- overall responsibility is held by the DSL Stephanie Henning
- technical support and advice, setup and configuration are from Jartech Consultants
- regular checks are made half termly by the DSL to ensure filtering is still active and functioning everywhere. These are evidenced in the safeguarding action plan.
- an annual review of Online Safety is carried out as part of the safeguarding audit to ensure a whole school approach.

At SMA, a variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users
- live supervision by staff on a console with device management software where platforms allow
- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services

Messaging/commenting systems (incl. email, learning platforms & more) Authorised systems

Staff use the email system (Microsoft Outlook) provided by Jartech Consultants for all school emails. They never use a personal or private email account (or other messaging platform) to communicate with children or parents, or to colleagues when relating to school/child data, using a non-school-administered system. Staff are permitted to use this email system to communicate with members of staff, parents, other schools and external organisations linked to school trips, visits or bookings.

Staff at this school use SchoolComms to communicate with parents or emails sent via the info@ address.



Any systems above are centrally managed and administered by the school or authorised IT partner (i.e. they can be monitored/audited/viewed centrally; are not private or linked to private accounts). This is for the mutual protection and privacy of all staff, pupils and parents, supporting safeguarding best-practice, protecting children against abuse, staff against potential allegations and in line with UK data protection legislation.

Use of any new platform with communication facilities or any child login or storing school/child data must be approved in advance by the school and centrally managed by the headteacher.

Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member).

Behaviour / usage principles

More detail for all the points below are given in the <u>Social media</u> section of this policy as well as the school's acceptable use agreements, behaviour policy and staff code of conduct.

Appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff.

Data protection principles will be followed at all times when it comes to all school communications, in line with the school Data Protection Policy and only using the authorised systems mentioned above.

Online storage or learning platforms

For all these, it is important to consider data protection and cybersecurity before adopting such a platform or service and at all times when using it. SMA has a clear data protection policy which staff, governors and volunteers must follow at all times.

School website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. The Headteacher and Governors have delegated the day-to-day responsibility of updating the content of the website and ensuring compliance with DfE stipulations to Patty Kool, NEO.

The site is managed by The Education Space.

Where staff submit information for the website, they are asked to remember that schools have the same duty as any person or organisation to respect and uphold copyright law.

Digital images and video



When a pupil joins the school, parents and carers are asked if they give consent for their child's image to be captured in photographs or videos, for what purpose (beyond internal assessment, which does not require express consent) and for how long. Parents answer as follows:

- For use in paper-based school marketing
- For the school website
- For the school Twitter- X account
- For the borough website
- For use on external websites
- For teaching resources used within the borough

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

Any pupils shown in public facing materials are never identified with their name (and photo file names/tags do not include full names to avoid accidentally sharing them).

All staff are governed by their contract of employment and the school's Acceptable Use Policy, which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. Members of staff may occasionally (when a school device is unavailable), use personal phones to capture photos or videos of pupils, but these will be appropriate, linked to school activities, taken without secrecy and not in a one-to-one situation, and always moved to school storage as soon as possible, after which they are deleted from personal devices or cloud services.

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

Staff are reminded annually at Safeguarding and Code of Conduct training about the importance of not sharing without permission, due to reasons of child protection (e.g. looked-after children often have restrictions for their own protection), data protection, religious or cultural reasons, or simply for reasons of personal privacy. Parents are reminded annually about digital images and video permissions.

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

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

Pupils are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location. We teach them about the need to keep their data secure and what to do if they or a friend are subject to bullying or abuse.



Social media

Our SM presence

St Mary Abbots School works on the principle that if we don't manage our social media reputation, someone else will.

Accordingly, we manage and monitor our social media footprint carefully to know what is being said about the school and to respond to criticism and praise in a fair, responsible manner.

Ms Isabella Chakiris is responsible for managing our X-Twitter account and checking our Wikipedia and Google reviews and other mentions online.

Staff, pupils' and parents' SM presence

As stated in the acceptable use policies which all members of the school community sign, we expect everybody to behave in a positive manner, engaging respectfully with the school and each other on social media, in the same way as they would face to face.

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

If parents have a concern about the school, we would urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, the school complaints procedure should be followed.

Many social media platforms have a minimum age of 13 (note that WhatsApp is 16+), but the school occasionally deals with issues arising on social media involving pupils under the age of 13. We ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use.

Online safety lessons will look at social media and other online behaviour, how to be a good friend online and how to report bullying, misuse, intimidation or abuse. However, children will often learn most from the models of behaviour they see and experience, which will often be from adults.

Parents can best support this by talking to their children about the apps, sites and games they use, with whom, for how long, and when.

Although the school has an official X-Twitter account and will respond to general enquiries about the school, it asks parents and carers not to use this channel, especially not to communicate about their children.

Email is the official electronic communication channel between parents and the school. Social media, including chat apps such as WhatsApp, are not appropriate for school use.



Pupils are not allowed to be 'friends' with or make a friend request* to any staff, governors, volunteers and contractors or otherwise communicate via social media.

Pupils are discouraged from 'following' staff, governor, volunteer or contractor public accounts (e.g. following a staff member with a public Instagram account) as laid out in the AUPs. However, we accept that this can be hard to control (but this highlights the need for staff to remain professional in their private lives). In the reverse situation, however, staff must not follow such public student accounts.

* Any attempt to do so may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member).

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

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

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

Device usage

The Acceptable Use Policy reminds those with access to school devices about rules on the misuse of school technology – devices used at home should be used just like if they were in full view of a teacher or colleague.

Personal devices including wearable technology and bring your own device (BYOD)

- Pupils in Year 6 are allowed to bring mobile phones in for emergency use only. During lessons, phones must remain turned off at all times and be locked away in the school office. Any attempt to use a phone in lessons without permission or to take illicit photographs or videos will lead to parents being informed, a discussion with the child and receiving a minimum Red Stage 3 consequence according to the school's Behaviour Policy. Important messages and phone calls to or from parents can be made at the school office, which will also pass on messages from parents to pupils in emergencies.
 - All staff who work directly with children should leave their mobile phones on silent and only
 use them in private staff areas during school hours. See also the 'Digital images and video'
 section of this document and other relevant policies. Child/staff data should never be
 downloaded onto a private phone. If a staff member is expecting an important personal call



when teaching or otherwise on duty, they may leave their phone with the school office to answer on their behalf or ask for the message to be left with the school office.

- Volunteers, contractors, governors should leave their phones in their pockets and turned off.
 Under no circumstances should they be used in the presence of children or to take
 photographs or videos. If this is required (e.g. for contractors to take photos of equipment or
 buildings), permission of the headteacher should be sought (the headteacher may choose to
 delegate this) and this should be done in the presence of a member staff.
- Parents are asked to leave their phones in their pockets and turned off when they are on site.
 They should ask permission before taking any photos, e.g. of displays in corridors or
 classrooms, and avoid capturing other children. When at school events, please refer to the
 Digital images and video section of this document on page 13. Parents are asked not to call
 pupils on their mobile phones during the school day; urgent messages can be passed via the
 school office.

Use of school devices

Staff and pupils are expected to follow the terms of the school acceptable use policies for appropriate use and behaviour when on school devices, whether on site or at home.

School devices are not to be used in any way which contravenes AUPs, behaviour policy or staff code of conduct.

Wifi is accessible to staff and visitors for school-related internet use or within the framework of the Acceptable Use Policy. All such use is monitored.

School devices for staff or students are restricted to the apps/software installed by the school, for use at school, and may be used for learning and appropriate school based use.

All and any usage of devices and/or systems and platforms may be tracked.

Trips / events away from school

For school trips or events away from school, teachers will use their personal phone in an emergency only and will ensure that the number is hidden to avoid a parent or student accessing a teacher's private phone number.

Searching and confiscation

In line with the DfE guidance 'Searching, screening and confiscation: advice for schools', the Headteacher and staff authorised by them, have a statutory power to search pupils/property on school premises. This includes the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material, including but not exclusive to sexual



images, pornography, violence or bullying. Details of the school's search procedures are available in the school Behaviour Policy.



Appendix – Roles

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

All school staff must read the "All Staff" section as well as any other relevant to specialist roles

Roles:

- All Staff
- Headteacher/Principal
- Designated Safeguarding Lead
- Governing Body, led by Online Safety / Safeguarding Link Governor
- PSHE / RSHE Lead/s
- Computing Lead
- Subject / aspect leaders
- Network Manager/technician
- Data Protection Officer (DPO): David Coy
- Volunteers and contractors (including tutor)
- Pupils
- Parents/carers
- External groups including parent associations

All staff

All staff should sign and follow the staff Acceptable Use Policy in conjunction with this policy, the school's main Safeguarding policy, the Code of Conduct and relevant parts of Keeping Children Safe in Education to support a whole-school safeguarding approach.

This includes reporting any concerns, no matter how small, to the Designated Safety Lead as named in the AUP, maintaining an awareness of current online safety issues and guidance (such as KCSIE), modelling safe, responsible and professional behaviours in their own use of technology at school and beyond and avoiding scaring, victim-blaming language.

Staff should also be aware of the new DfE standards and relevant changes to filtering and monitoring and play their part in feeding back about overblocking, gaps in provision or pupils bypassing protections.

Headteacher/Principal - Mr John Primrose

Key responsibilities:

• Foster a culture of safeguarding where online-safety is fully integrated into whole-school safeguarding



- Oversee and support the activities of the designated safeguarding lead team and ensure they work technical colleagues to complete an online safety audit in line with KCSIE (including technology in use in the school)
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and Local Safeguarding Children Partnership support and guidance
- Ensure ALL staff undergo safeguarding training (including online-safety) at induction and with regular updates and that they agree and adhere to policies and procedures
- Ensure ALL governors and trustees undergo safeguarding and child protection training and updates (including online-safety) to provide strategic challenge and oversight into policy and practice and that governors are regularly updated on the nature and effectiveness of the school's arrangements
- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including remote systems are implemented according to child-safety first principles
- Better understand, review and drive the rationale behind decisions in filtering and monitoring as per the new DfE standards—through regular liaison with technical colleagues and the DSL—in particular understand what is blocked or allowed for whom, when, and how as per KCSIE.
 - In 2023/4 this will involve starting regular checks and annual reviews, upskilling the DSL and appointing a filtering and monitoring governor
- Liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information
- Support safeguarding leads and technical staff as they review protections for pupils in the home and remote-learning procedures, rules and safeguards.
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
- Ensure the school website meets statutory requirements



Designated Safeguarding Lead / Online Safety Lead - Miss Stephanie Henning

- The DSL should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- Ensure an effective whole school approach to online safety as per KCSIE
- In 2023/4 working to take up the new responsibility for filtering and monitoring by working
 closely with technical colleagues and the new filtering governor to learn more about this area,
 better understand, review and drive the rationale behind systems in place and initiate regular
 checks and annual reviews, including support for devices in the home.
- Where online-safety duties are delegated and in areas of the curriculum where the DSL is not directly responsible but which cover areas of online safety (e.g. RSHE), ensure there is regular review and open communication and that the DSL's clear overarching responsibility for online safety is not compromised or messaging to pupils confused
- Ensure ALL staff and supply staff undergo safeguarding and child protection training (including online-safety) at induction and that this is regularly updated.
 - In 2023/4 this must include filtering and monitoring and help them to understand their roles
 - o all staff must read KCSIE Part 1 and all those working with children
 - o cascade knowledge of risks and opportunities throughout the organisation
- Ensure that ALL governors and trustees undergo safeguarding and child protection training (including online-safety) at induction to enable them to provide strategic challenge and oversight into policy and practice and that this is regularly updated.
- Take day-to-day responsibility for safeguarding issues and be aware of the potential for serious child protection concerns.
- Be mindful of using appropriate language and terminology around children when managing concerns, including avoiding victim-blaming language.
- Remind staff of safeguarding considerations as part of a review of remote learning procedures and technology, including that the same principles of online-safety and behaviour apply
- Work closely with SLT, staff and technical colleagues to complete an online safety audit (including technology in use in the school).
- Work with the headteacher, DPO and governors to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Stay up to date with the latest trends in online safeguarding and "undertake Prevent awareness training."
- Review and update this policy, other online safety documents (e.g. Acceptable Use Policies) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others) and submit for review to the governors.
- Receive regular updates in online-safety issues and legislation, be aware of local and school trends.



- Ensure that online-safety education is embedded across the curriculum in line with the statutory RSHE guidance and beyond, in wider school life
- Promote an awareness of and commitment to online-safety throughout the school community, with a strong focus on parents, including hard-to-reach parents.
- Communicate regularly with SLT and the safeguarding governor to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring work and have been functioning/helping.
- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident.
- Ensure adequate provision for staff to flag issues when not in school and for pupils to disclose issues when off site, especially when in isolation/quarantine.
- Ensure staff adopt a zero-tolerance, whole school approach to all forms of child-on-child abuse, and don't dismiss it as banter (including bullying).
- Pay particular attention to **online tutors**, both those engaged by the school as part of the DfE scheme who can be asked to sign the contractor AUP.

Governing Body, led by Online Safety / Safeguarding Link Governor — Ms Martina Sadovsky

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

- Approve this policy and strategy and subsequently review its effectiveness, e.g. by asking the
 questions in the helpful document from the UK Council for Child Internet Safety (UKCIS)
 Online safety in schools and colleges: Questions from the Governing Board
- Undergo (and signpost all other governors and Trustees to attend) safeguarding and child protection training (including online safety) at induction to provide strategic challenge and into policy and practice, ensuring this is regularly updated.
- Ensure that all staff also receive appropriate safeguarding and child protection (including online) training at induction and that this is updated
- Appoint a filtering and monitoring governor to work closely with the DSL on the new filtering and monitoring standards.
- Support the school in encouraging parents and the wider community to become engaged in online safety activities.
- Have regular strategic reviews with the online-safety coordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings.
- Work with the DPO, DSL and headteacher to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information.
- Check all school staff have read Part 1 of KCSIE; SLT and all working directly with children have read Annex B
- Ensure that all staff undergo safeguarding and child protection training (including online safety and now also reminders about filtering and monitoring



• Ensure that children are taught about safeguarding, including online safety [...] as part of providing a broad and balanced curriculum [...] Consider a whole school or college approach to online safety [with] a clear policy on the use of mobile technology.

PSHE / RSHE Lead/s - Mrs Zara Shuttleworth (RSE) & Miss Freya Jones (PSHE)

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online as well as raising awareness of the risks and challenges from recent trends in self-generative artificial intelligence, financial extortion and sharing intimate pictures online into the PSHE / Relationships education, relationships and sex education (RSE) and health education curriculum. This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age appropriate way that is relevant to their pupils' lives.
- Focus on the underpinning knowledge and behaviours outlined in <u>Teaching Online Safety in Schools</u> in an age appropriate way to help pupils to navigate the online world safely and confidently regardless of their device, platform or app.
- Assess teaching to "identify where pupils need extra support or intervention [through] tests, written assignments or self evaluations, to capture progress" to complement the computing curriculum.
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSHE.
- Note that an RSHE policy should be included on the school website.
- Work closely with the Computing subject leader to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach

Computing Lead – Ms Anne Kemlo

- As listed in the 'all staff' section, plus:
- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum
- Work closely with the RSHE lead to avoid overlap but ensure a complementary whole-school approach
- Work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing



• Collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements

Subject / aspect leaders

Key responsibilities:

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

Network Manager/other technical support roles – Jartech Consultants

- As listed in the 'all staff' section, plus:
- Collaborate regularly with the DSL and leadership team to help them make key strategic decisions around the safeguarding elements of technology.
- Note that KCSIE changes expect a great understanding of technology and its role in safeguarding when it comes to filtering and monitoring and in 2023/4 you will be required to support safeguarding teams to understand and manage these systems and carry out regular reviews and annual checks.
- Support DSLs and SLT to carry out an annual online safety audit as now recommended in KCSIE. This should also include a review of technology, including filtering and monitoring systems (what is allowed, blocked and why and how 'over blocking' is avoided as per KCSIE) to support their role as per the new DfE standards.
- Keep up to date with the school's online safety policy and technical information in order to
 effectively carry out their online safety role and to inform and update others as relevant
- Work closely with the designated safeguarding lead to ensure that school systems and networks reflect school policy and there are no conflicts between educational messages and practice.
- Ensure the above stakeholders understand the consequences of existing services and of any
 changes to these systems (especially in terms of access to personal and sensitive records /
 data and to systems such as YouTube mode, web filtering settings, sharing permissions for
 files on cloud platforms etc
- Maintain up-to-date documentation of the school's online security and technical procedures
- To report online-safety related issues that come to their attention in line with school policy



- Manage the school's systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption and backup for data, including disaster recovery plans, and auditable access controls.
- Ensure the data protection policy and cybersecurity policy are up to date, easy to follow and practicable. At SMA Jartech use the following software as part of our package to help protect the network and users on it:
- Meraki for ipad management
- Sophos anti virus (Antivirus on computers)
- Sophos Intercept X (Antivirus on computers)
- Sophos Phish (Send fake scam emails to staff as a test)
- Cloud Ready / Neverware (Convert Laptops to Chromebooks)
- Work with the Headteacher to ensure the school website meets statutory DfE requirements

Data Protection Officer (DPO) - David Coy

Key responsibilities:

- Alongside those of other staff, provide data protection expertise and training and support the DP and cybersecurity policy and compliance with those and legislation and ensure that the policies conform with each other and with this policy.
- Not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in *Data protection in schools*, 2023, "It's not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child." And in KCSIE 2023, "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children."
- Note that retention schedules for safeguarding records may be required to be set as 'Very long term need (until pupil is aged 25 or older)'. However, some local authorities require record retention until 25 for <u>all</u> pupil records.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited

Volunteers and contractors (including tutor)

- Read, understand, sign and adhere to an acceptable use policy (AUP)
- Report any concerns, no matter how small, to the designated safety lead



- Maintain an awareness of current online safety issues and guidance
- Model safe, responsible and professional behaviours in their own use of technology at school and as part of remote teaching or any online communications
- Note that as per AUP agreement a contractor will never attempt to arrange any meeting, including tutoring session, without the full prior knowledge and approval of the school, and will never do so directly with a pupil. The same applies to any private/direct communication with a pupil.

Pupils

Key responsibilities:

As age appropriate, read, understand, sign and adhere to the student/pupil Acceptable Use Policy

Parents/carers

Key responsibilities:

 Read, sign and adhere to the school's parental Acceptable Use Policy (AUP), read the pupil AUP and encourage their children to follow it

External groups including parent associations

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