# Online Safety Policy

**Contents**

At Blessed Christopher Wharton Catholic Academy Trust schools, we educate our children to prepare them for this life and the next, to grow in love for God and love for their neighbour as Christ Himself. We aim for our young people to enjoy the process of unlocking their potential and experience success: to remain healthy and safe as they grow into being responsible citizens who care for others.

We are guided by these same principles in our duties to staff, parents and the wider community with due regard to legal requirements and the teaching and traditions of the Catholic Church.

**Policy statement**

The use of technology has become a significant component of many safeguarding issues. Therefore, this Online Safety Policy should be recognised as part of the safeguarding suite of policies and falls within the role and responsibilities of each individual schools Designated Safeguarding Lead (DSL) and Safeguarding Governor. This policy applies to all staff, pupils, governing body, leadership team, external agencies, visitors, volunteers, parents and those working on behalf of school, whether paid or unpaid (collectively referred to as 'staff' in this policy). It refers to all access to the internet and use of technology, including personal devices, setting devices for use off-site e.g. work laptops, tablets or mobile phones.

The Education and Inspections Act 2006 empowers trusts/executive headteachers/headteachers to such extent as is reasonable, to regulate the behaviour of students/pupils when they are off our schools site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of online-bullying or other online safety incidents covered by this policy, which may take place outside of a Trust school, but is linked to membership of the individual school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data. In the case of both acts, action can only be taken over issues covered by the schools Behaviour Policy.

Tour schools will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents/carers of incidents of inappropriate online safety behaviour that take place out of school.

It takes into account the:

- Keeping Children Safe in Education (2020)
- Coronavirus COVID-19: Guidance of Full Opening of Schools
- Safeguarding and remote education during coronavirus (COVID-19)
- Early Years and Foundation Stage (2017)
- Working Together to Safeguard Children (2018)
- Education and Inspections Act 2006
- Education Act 2011
- Prevent duty guidance (2015)
- UK Council for Internet Safety (2019)
- Teaching Online Safety guidance (2019)
- The Education and Inspections Act (2006)
- Bradford Safeguarding Partnership procedures

**Aims and Scope**

- Safeguard and protect all members of the Trust and school community online
- Identify approaches to educate and raise awareness of online safety
- Enable staff to work safely and responsibly to role model positive behaviour online, manage professional standards and practice when using technology
- Provide clear procedures to use when responding to online safety concerns

**Coronavirus (COVID-19)**
It is more important than ever that schools provide a safe environment, including online. We will continue to ensure that appropriate filters and monitoring systems are in place to protect children when they are online on the school IT systems or recommended resources.

We will have regard to:

- Safeguarding and Remote Education During Coronavirus (COVID-19)
- The UK Council for Internet Safety provides information to help governing boards and proprietors assure themselves that any new arrangements continue to effectively safeguard children online.
- The UK Safer Internet Centre's professional online safety helpline provides support for professionals with any online safety issues.

Children and online safety away from school
We will do what we reasonably can to keep all of our children safe. In most cases, the majority of our children will not be physically attending the school. We acknowledge the importance of staff who interact with children, including online, continue to look out for signs a child may be at risk. All staff are made aware that any such concerns should be dealt with as per our Safeguarding and Child Protection Policy and where appropriate referrals will still be made to children's social care and as required the police.

We follow DfE guidance Safeguarding and Remote Education During Coronavirus (COVID-19) on providing education remotely. It sets out 4 key areas that should be considered as part of any remote learning strategy. This includes the use of technology. Recently published guidance from the UK Safer Internet Centre on safe remote learning and from the London Grid for Learning on the use of videos and livestreaming also helps plan online lessons and/or activities and plan them safely.

The safety of our children when they are asked to work online is of utmost importance. The starting point for online teaching shares the same principles as set out in our Staff Behaviour Policy. This policy includes acceptable use of technologies, staff pupil/student relationships and communication including the use of social media and safer working practices as set out in guidance for Safer Working Practice for those Working with Children and Young People in Education settings published by the Safer Recruitment Consortium. The Staff Behaviour Policy applies equally to any existing or new online and distance learning arrangements which are introduced. We will, as much as is reasonably possible, consider if our existing policies adequately reflect the new reality of so many children (and in some cases staff) working remotely online and will review them regularly to ensure they are robust and effective. We will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

An essential part of the online planning process will be ensuring children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online. As well as reporting routes back to our schools, and also signpost children to age-appropriate practical support from the likes of:

- Childline - for support
- UK Safer Internet Centre - to report and remove harmful online content
- CEOP - for advice on making a report about online abuse

We will endeavour to reinforce the importance of children being safe online during our contacts with parents and carers, making them aware of what their children are being asked to do online, including the sites they will asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

Parents and carers may choose to supplement the school online offer with support from online companies and in some cases individual tutors. In our communications with parents and carers, we will emphasise the importance of securing online support from a reputable organisation/individual who can provide evidence that they are safe and can be trusted to have access to children. Support and information for parents and carers to keep their children safe online can be found in this policy useful information and support section.

**Trust schools:**

- Believe that online safety is an essential part of safeguarding and acknowledges its duty to ensure all staff and pupils are protected from potential harm online.
- Aims to create a secure and safe environment which develops technology skills and provides staff and pupils with awareness of potential online safety scenarios that may arise
- Identifies that the internet and associated devices, computers, tablets, mobile phones and gaming consoles, are deemed important to everyday life
- Will support staff and pupils to be empowered, build resilience, and develop strategies to manage and respond to online risk

**Roles and responsibilities**

Our schools DSL has the lead responsibility for safeguarding and child protection, which includes online safety. Activities of the DSL may be delegated to an appropriately trained deputy, therefore activities which reference DSL also refer to deputy DSL throughout this policy. However, overall, the ultimate lead for safeguarding and child protection remains with the DSL. Our schools recognise that all members of staff have important roles and responsibilities to play with regards online safety.

**The Trust:**

Are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the Trust by receiving regular information about online safety incidents and monitoring reports. A member of the Trust has taken on the role of Online Safety Director.

**The Online Safety Committee:**

Our schools have an Online Safety Committee which is responsible for the implementation and reviewing the effectiveness of the Online Safety Policy. They will meet regularly to discuss and review policies, monitoring of filtering systems, recorded online safety incidents and report findings back to the Academy Council and Trust.

**The Academy Council:**

Will do all that they reasonably can to limit pupil's exposure to the following from our school's IT system:

We identify that the issues classified within online safety are considerable, but can broadly be categorised into three areas of risk:

1. **Content -** being exposed to illegal, inappropriate, or harmful material
2. **Contact -** being subjected to harmful online interaction with other users
3. **Conduct -** personal online behaviour that increases the likelihood of, or causes, harm

The role of the academy council will include:

- Attending online safety committee meetings
- Undertake a risk assessment to ensure appropriate filters and monitoring systems are in place, as required by the Prevent Duty
- Limiting pupil's exposure to online risks
- Whilst considering the above they will be careful that "over blocking" does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding
- Consider a whole school approach to online safety, including a clear policy on the use of mobile technology in the school
- Ensure pupils are taught about safeguarding, including online safety and minimising the risk of peer on peer/child on child abuse
- Online safety awareness training for staff is integrated, aligned, and considered as part of the overarching safeguarding approach and is included in induction for all new staff
- Monitoring and reviewing online safety concerns and incidents

**Executive Headteacher/Headteacher/Head of School and Leadership Team will ensure:**

- Online safety is viewed as a safeguarding issue and that practices are in accordance with national and local requirements
- Ensure the safety (inc, online safety) of members of the school community, though the day-to-day responsibility for online safety may be delegated to the Online Safety Lead (OSL) or Designated Safeguarding Lead (DSL)
- Robust policies and procedures, including the Staff Handbook and Acceptable Use Policy are up to date in line with the latest guidance
- That they and (at least) another member of SLT should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff
- Suitable and appropriate filtering and monitoring systems are in place. Work with IT staff to monitor the safety and security of our online systems and networks
- Online safety is embedded within a differentiated, broad and balanced curriculum, which enables all pupils to understand age-appropriate understanding of online safety
- Support the OSL/DSL by providing sufficient time and resources to fulfil their online responsibilities
- Robust and clearly understood reporting channels regarding online safety concerns, including internal, local and national support
- Appropriate risk assessments are undertaken regarding the safe use of technology
- OSL/DSL receives suitable CPD to enable them to carry out their duties and to train other staff as appropriate
- Ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those who take on important monitoring roles
- Audit and evaluate online safety practice, identifying strengths and areas for improvement.

**The Online Safety Lead/Designated Safeguarding Lead (DSL) will:**

- Lead the Online Safety Group
- Act as named point of contact on all online safeguarding issues, liaising with other members of staff, Trust, and multi-agencies, where appropriate
- Work with the deputy DSLs to ensure online safety is recognised and understood as part of the school safeguarding responsibilities
- Be trained in online safety issues and be aware of the potential for serious child protection/safeguarding issues raised from
    - Sharing of personal data
    - Access to illegal/inappropriate materials
    - Inappropriate online contact with adults/strangers
    - Potential or actual incidents of grooming
    - Online/peer on peer/child on child bullying
- Access regular and appropriate training to support staff's understanding of the unique risks associated with online safety, including how to recognise the additional risks that pupils with SEN and disabilities (SEND) may face online
- Keep up to date with current research, legislation and trends around online safety and disseminate this information to staff
- Ensure all staff receive regular up-to-date and appropriate online safety training including the risks associated for pupils with SEND
- Work in accordance with the best practice Teaching Online Safety published guidance
- Participate in local and national events to promote positive online behaviour e.g. Safer Internet Day
- Promote online safety to parents, carers and the wider community through a variety of channels and approaches
- Receive reports of online safety incidents and create logs of incidents, identify gaps and trends, using the findings to form response, understanding and update policies

- Maintain records of online safety concerns, recording actions, decisions and reason for decisions
- Monitor and evaluate online safety
- Report online safety concerns to the executive headteacher/headteacher/head of school or academy council
- Support leadership team with reviewing and updating online safety policies and procedures
- Meet regularly with nominated safeguarding academy member or online safety committee

**IT Technician ensures:**

- Our school's IT infrastructures are secure and not open to misuse or malicious attack, whilst allowing learning opportunities to be maximised
- Our schools keep up to date with online safety technical information and updates the OSL/DSL as relevant
- Monitoring software and antivirus software is implemented and updated in order that any misuse/attempted misuse can be reported to the executive headteacher/headteacher/head of school for investigation/action/sanction
- That users may only access the networks and devices through properly enforced password protection policy
- Share any concerns with the OSL/DSL and leadership team
- Provide technical support and perspective to the OLS/DSL and leadership team, to enable them to take appropriate safeguarding action if/when required

**All staff will:**

- Contribute to the development of online safety policies and practices
- Read, understand and adhere to online safety and acceptable use policies
- Have an awareness of online safety matters and of the current Trust Online Safety Policy and practices
- Keep an up-to-date awareness of online safety matters and the current online safety policy through staff meetings and training sessions
- Understand the procedures for reporting online safety incidents within their school including recording the incident in CPOMS
- Report any suspicious misuse or problem to the OSL/DSL for investigation/action/sanction
- Know when and how to escalate online safety issues, including signposting to appropriate support, internally and externally
- Take responsibility for the security of school settings and the data they use of have access to
- Model best practice when using technology and maintain a professional level of conduct in their personal use of technology, both on and off site
- Ensure digital communications with pupils are professional and only carried out on official school systems
- Ensure online safety issues are embedded in all aspects of the curriculum
- All digital communications with pupils/parents/carers should be on a professional level and only carried out using official school systems
- Ensure online safety lessons are planned and taught and that the lessons are age appropriate/reflect the needs of the age group in accordance with published guidance
- Ensure pupils understand and follow their schools pupil Acceptable Use Policy. Training will be provided on these policies at the beginning of each new academic year and at induction for any new starters who join at a later stage
- Ensure they are aware of the online safety issues related to the use of mobile phones, cameras and mobile devices and that they monitor their use and implement current school policies with regards to these devices
- Ensure that confidential files are saved in an encrypted file and that the password for this file remains confidential
- Ensure that at the end of the academic year photographs are deleted or where applicable stored in an agreed location for school use. At the end of Year 6 all photographs are to be deleted
- Take personal responsibility for professional development in this area

**Pupils will:**

- Contribute to the development of online safety policies
- Take age-appropriate responsibility for using the school IT systems and equipment in accordance with the Pupil Acceptable Use Policy
- Be briefed annually on the content of the online safety policies, and asked to read and adhere to the acceptable use pupil agreement
- Respect the feelings and rights of others both on and offline
- Know and understand policies on the taking/use of images and on online bullying
- Take responsibility for keeping themselves and others safe online adapting good online safety practice when using digital technologies out of school and realise that the Trust Online Safety Policy cover their actions our of school, if related to their membership of the school
- Be encouraged through online safety/PSHE lessons to share any online safety concerns and know how to do so

**Parents/Carers**

Parents/carers play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way. Our schools will take every opportunity to help parents/carers to understand online safety issues. We will raise awareness of the key issues in the following ways:

- Information about online safety and parental resources are available on the school website
- Information is also shared via letters and newsletters

It is the responsibility of the parents and carers to:

- Read the acceptable use policies and encourage their children to adhere to them
- Support the school with our online safety approaches by discussing online safety issues with their children, reinforcing appropriate use of technology and online behaviour at home
- Role model safe and appropriate use of technology and social media
- Abide by the home-school agreement and acceptable use policies
- Be aware of changes in behaviour that could indicate their child may be at risk of harm
- Seek help from school or other appropriate agencies if they or their child encounter risk or concerns online
- Take responsibility for their own awareness in relation to the risks and opportunities posed by new and emerging technologies

**Community users/School visitors**

Community users and school visitors should speak with their school contact to discuss options available to access the school IT system and expected behaviour.

**Education**

**Pupil Education**

The education of pupils in online safety is a crucial part of our schools online safety provision. Pupils need the help and support of the school to recognise and avoid online safety risks and to build their awareness of how to keep themselves safe and promote safe and responsible internet use. Online safety education will be provided in the following ways:

- Broad and balanced curriculum covering the safe and responsible use internet access
- Online safety in Personal, Social, Health and Economic (PSHE), Relationships and Sex Education (RSE)
- Pupils are taught in all lessons to be aware of the content that they access online and learn how to determine the accuracy of the information they find
- Provide online safety education, rules for acceptable use at the beginning of each academic year and with any new starters as they join school

- Pupils are taught how to search for information safely, including the skills of knowledge location, safe search engines and education
- Pupils are made aware of the process to follow if they see anything online which they find upsetting, or which is unsuitable for children
- Pupils know that any events of cyber-bullying are taken seriously by the school and they understand the importance of sharing their concerns with a trusted adult
- Inform pupils network and internet use will be monitored for safety and security and in accordance with legislation
- Use external agency support to complement and support our internal online safety approaches

Our schools recognise that some pupils are more vulnerable online due to a range of factors. This may include, but is not limited to:

- Children in care
- Children with SEND or mental health needs
- Children with English as an additional language (EAL)
- Children experiencing trauma or loss (ACEs)

We will ensure that ability appropriate online safety education, access and support is provided to vulnerable pupils. When implementing our online safety policies, we will seek input from appropriate staff, including the SENCO, Designated Teacher for Looked After and Previously Looked After Children, Mental Health Champion.

In planning our online safety curriculum, we will have regard to:

- Teaching Online Safety in Schools
- Education for a Connected Word Framework
- SWGfL Project Evolve – online safety curriculum programme and resources

**Staff Education**

It is essential that all staff receive regular and appropriate online safety training and to ensure they understand their responsibilities, as outlined in this policy. Training and support will be offered as follows:

- A planned programme of formal online safety awareness training will be made available to all staff. This will be regularly updated and reinforced. An audit of online safety training needs of staff will be carried our regularly
- All new staff will receive online safety awareness training and the opportunity to discuss online safety policy, acceptable use agreements and procedures as part of their induction programme
- Recognise the expertise staff build by undertaking training and provide opportunity for staff to contribute to and shape our policies and procedures
- OSL/DSL will receive regular updates through the attendance at training events and by reviewing guidance documents
- All staff will receive regular up-to-date online safety training, with updates at least annually covering potential risks posed to pupils (Content, Contact and Conduct) as well as expected professional practice
- Planning and online safety work will be monitored regularly and will be used to direct training
- All staff will receive a briefing and a copy of the Acceptable Use and Online Safety Policy annually
- Both policies are included in the induction pack for new starters
- Make staff aware our IT systems are monitored, and activity can be traced to individual users.
- Remind staff to behave professionally and in accordance with legislation and our policies when accessing our systems and devices
- Remind staff that their online conduct outside of the school, including personal use of social media, could have an impact on their professional role and reputation
- Highlight useful age-appropriate educational resources and tools for use with pupils
- Ensure staff are aware of the procedures to follow regarding online safety concerns

**Academy Council Education**
The academy council, with particular importance for those who are members with safeguarding responsibilities, will invited to take part in relevant online safety awareness training sessions with staff to ensure they are aware of online safety updates through regular online safety committee meetings or through subject meetings with the OSL/DSL.

**Internet provision**
Our schools recognise that the internet is a constantly changing environment with new and emerging technology. Our schools ensure that the internet system works in accordance with Keeping Children Safe in Education guidance and makes sure appropriate filtering and monitoring systems are in place, taking reasonable precautions to ensure that users can only access appropriate material. A report is generated tracking inappropriate user activity. However, due to the global nature of the internet, it is not possible to guarantee that unsuitable material cannot be accessed via our computers or devices.

**Filtering, monitoring and inappropriate material**
The Trust and our schools understand are responsibilities to ensure that our service provider carries out all the online safety measures that would otherwise be the responsibility of the school. We ensure our service providers are aware of the Trust Online Safety Policy/Acceptable Use agreements.

We have education broadband connectivity that blocks sites which are categorised as inappropriate or of an illegal nature.

If a pupil discovers an unsuitable site, they are required to:
- Turn off the monitor/screen and report the concern immediately to the staff member
- The staff member will report the concern (including URL of the site if possible) to the DSL or IT Technician and record on the incident CPOMS
- The breach will be escalated as appropriate
- Parents/carers will be informed of the filtering breach involving their child
- Any material believed to be of an illegal nature will be reported immediately to the appropriate agencies.

If a concern is identified via the monitoring systems, the DSL will take appropriate action in line with our child protection procedures, recording actions, decisions, and reasons for the decisions.

All users are informed that the use of our systems can be monitored and that all monitoring will be in line with data protection, human rights and privacy legislation.

**Managing ICT systems, security and access**
Staff and pupils are made aware of our expectations regarding safe and appropriate behaviour online and the importance of not posting any content, comments, images or videos which could cause harm, distress or offence. All staff and pupils are required to sign our Acceptable Use Policy before being given access to our IT systems. Access to IT systems is managed by the DSL and IT Technician.

All pupils at our schools receive logins and accounts for relevant school systems. These accounts are managed through administrator privileges which are agreed by the leadership team, OSL, DSL and IT Technician. Accounts are created for new starters at the beginning of the academic year and then for new starters that join during the school year. Accounts are deleted annually for any leavers including those children in year 6.
Adult accounts and passwords are also created in the same way. Adults are given accounts for school systems, e-mail etc. Account creation and deletion are managed by the OSL/DSL and IT Technician.

Our schools take appropriate steps to ensure the security of our information systems, including

We have education broadband connectivity that:

- Will be managed in ways that ensure the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems
- Severs, wireless systems and cabling must be securely located and physical access restricted
- All users have clearly defined access rights to school systems and devices
- Internet access is filtered for all users
- Internet filtering/monitoring should ensure that all pupils are safe from terrorist and extremist materials when accessing the internet
- There is differentiated user level filtering
- Security measure are in place to protect servers, firewalls, routers, wireless systems, workstations, mobile devices etc. from accidental or malicious attempts which might threaten the security of the school system and data. These are tested regularly.
- Individual devices are protected, and virus protection is regularly updated
- Encryption of all data taken off site via portable media storage
- An agreed policy is in place regarding the extent of personal use that users and their family members are allowed on school devices that may be used out of school
- Not using portable media without specific permission
- Scanning portable media by an anti-virus/malware software before use
- Not downloading unapproved software or opening unfamiliar attachments
- Regularly checking files on our network
- Individual user login and passwords (expect for early years, foundation stage and some pupils with SEND)
- All users are required to log-off or lock screens if leaving them unattended

**Passwords and Protection**

All users (staff and pupils) have the responsibility for the security of their username and password and must not allow other users to access the systems using their log on details (as per acceptable use policies). Any concerns about sharing passwords or log on details must be reported to the OSL/DSL.

- Data must be encrypted, and password protected
- Devices must be protected by up-to-date data virus, malware checking software and password protected
- Use of strong passwords
- Regularly change passwords in line with school guidance
- Members of staff are made aware of the school's password rules through induction, the acceptable use policy and the online safety policy
- Pupils are made aware of the school's password rules through IT/online safety lessons and through the pupil acceptable use policy

**Age-Appropriate Safe Use of Technology**

Early Years Foundation Stage and Key Stage 1

- Access to the internet will be by adult demonstration, with occasional supervised access to age appropriate specific and approved online materials, which supports planned learning outcomes

Key Stage 2

- Pupils will use age-appropriate search engines and online tools
- Pupils will be directed by the teacher to online materials and resources, which supports planned learning outcomes

**Personal Data Protection**

Personal data will be recorded, processed, transferred, and made available online in accordance with General Data Protection Regulations and Data Protection legislation (GDPR). Full details can be found in our Data Protection and Information Sharing Policy.

**Use of digital and video images (photographic and video)**

- Staff should inform and educate pupils about the risk associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risk attached to publishing their own images on the internet e.g. on social networking sites
- We will ensure all images and videos shared online are used in accordance with associated policies
- Staff are allowed to take digital/video images to support educational aims. These images should only be taken on school equipment. Personal equipment must not be used for these purposes.
- Written parental/carer consent will be obtained before photographs of pupils are published on the school website/social media/local press
- Photographs will be published without names. In incidences where names are required (some newspapers) parental permission will be sought
- Teaching staff are responsible for storing photographs and images safely and securely. Staff will also ensure that images are deleted annually/once the child has left the school

**Managing emails**

Access to our schools email systems will always be in accordance with data protection legislation and our suite of policies. Staff are advised:

- Sensitive or personnel information must only be sent by encrypted email
- The forwarding of any chain messages/emails is not permitted
- School emails must not be used for personal and/or social media accounts
- Offensive communication must be reported to the DSL immediately, and will be recorded
- The use of social email should be limited to break times, before and after school hours and definitely not permitted when pupils are present.
- The use of personal email addresses by staff for any official school business is not permitted

Pupil email – whole class or group email addresses may be used for communicating outside of the school.

**Accessing emails via your mobile phone**

It is accepted business practice that staff will access business emails via their personal phone. However, please be aware that if you lose your phone or it is stolen, unauthorised people may be able to access your work email. If at all possible, protect your phone with a biometric sign in (thumb print or facial recognition) or set up the ability to wipe the phone remotely if you do not have it in your possession. If you are unable to do this, please make sure you advise the headteacher or school business manager if you lose your phone, or have it stolen and work emails can be accessed via the phone. Arrangement will be made to reset your email password to prevent unauthorised access.

**Responding to incidents of misuse**

It is hoped that all members of staff will be responsible users of IT. However, there may be incidents when infringements of the policy could take place, through careless or irresponsible or, very rarely, through deliberate misuse.

If apparent or actual misuse appears to involve illegal activity such as:

- Child sexual abuse images
- Adult material which breaches the Obscene Publications Act
- Criminally racist material
- Other criminal conduct, activity or materials

Then staff should immediately notify the DSL. It is important that the device is not shut down as evidence could be erased but that it is removed to secure site. See flowchart in Appendix B

If misuse has taken place which is not illegal it is important that any incidents are dealt with in a proportionate manner, and that members of staff are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour/disciplinary procedures.

Whilst it is impossible to record possible sanctions for every eventuality a list of types of misuse and sanctions are included in the appendix to this policy.

**Cyber-bullying**
Cyber-bullying, along with all other forms of bullying, will not be tolerate in our schools. Cyber-bullying is the use of electronic communication to bully a person, typically by sending messages of an intimidating or threatening nature. Examples of electronic communication are social networking web sites and apps, sexting, texting, use of other mobile or tablet apps, email or online software.

Pupils are taught about cyber-bullying through online safety and PSHE lessons. Pupils are encouraged to share concerns of cyber-bullying with a trusted adult. The adults in school will support the child by:

- Collecting evidence of the bullying taking place by recording the date, time and where possible screen captures
- Advising the child not to forward on messages to other people as this will continue the bullying
- Advising the child not to reply to the messages

Full details of how our schools manage incidences of bullying can be found in our Anti-bullying Policy. Our schools may report serious cyber-bullying incidents to the police.

**Social Media**

**Social Media (Staff)**
The expectations regarding safe and responsible use of social media applies to all staff. All staff are expected to engage in social media in a positive, safe and responsible manner. They must keep their personal and professional lives separate on social media. Social media may include blogs, wikis, social networking sites, forums, bulletin boards, online gaming, apps, video/photo sharing sites, chatrooms – *this list is not exhaustive.*

Our schools advise staff not to publish personal opinions, detailed private thoughts, concerns, pictures or messages on any social media site, especially content that may be considered threatening, hurtful, or defamatory to others. Posts must not be attributed to the school, without full permission. The use of social media should be limited to break times, before and after school hours and definitely not permitted when pupils are present.

Concerns regarding the online conduct of a member of staff on social media, should be reported to the DSL and will be managed in accordance with our anti-bullying, allegations against staff, behaviour, staff handbook and child protection policies.

All staff are reminded that their online conduct on social media can have an impact on their role and reputation within our schools. Civil, legal, or disciplinary action may be taken if staff are found to bring the profession or Trust into disrepute or if something is felt to have undermined confidence in their professional behaviour. It is the responsibility of the staff member to notify the leadership team immediately if they consider any content shared on social media sites conflict with their role and ability to work with children.

Staff are advised not to communicate with or add as friends any current or past pupils or their family members via personal social media sites, applications or profiles. Any pre-existing relationships that may compromise this must be discussed with the DSL. Staff will not use personal social media accounts to contact pupils or parents, except whereby prior approval has been given by the DSL/executive headteacher/headteacher/head

of school. Any communication from pupils and parents on social media accounts must be reported to the DSL.

The safe use of social networking and online communications will be discussed as part of our school's staff induction and throughout staff online safety training sessions. This will include:

- Setting privacy levels on personal sites
- Being aware of location sharing services
- Opting out of public listings on social network sites
- Logging out of accounts after use
- Safeguarding and strong passwords
- Not representing their personal view as that of the setting

**Social Media (Pupil)**

Pupils will be taught about the safe, expected behaviour, age restrictions, and appropriate use of social media as part of a broad and balanced age-appropriate curriculum. Concerns regarding inappropriate pupil use of social media will be dealt with under existing safeguarding policies. This may include concerns being shared with parents/carers as appropriate.

Pupils will be advised:

- Risks associated with sharing personal data on social media sites, which could identify them and/or their location
- Only accept and invite known friends, deny access to others by making profiles private
- Never meet any online friend without being accompanied by a trusted adult
- Use strong and safe passwords
- Only use age and ability appropriate social media sites
- How to block and report unwanted communications
- To whom, and how concerns should be raised in school and externally

Our schools use of social media for professional purposes will be checked regularly by the online safety committee to ensure compliance with this policy.

**Sexting**

Our schools recognise youth produced sexual imagery (known as sexting) as a safeguarding issue, all concerns will be reported to and dealt with by the DSL.

Sexting is when someone shares sexual, naked, or semi-naked images or videos of themselves or others or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages. Sexting can be seen as harmless but creating or sharing explicit images of a child is illegal, even if the person doing it is a child.

A young person is breaking the law if they:

- take an explicit photo or video of themselves or a friend
- share an explicit image or video of a child, even if it is shared between children of the same age
- possess, download, or store an explicit image or video of a child, even if the child gave their permission for it to be created.

There are many reasons why a child may want to send a naked or semi-naked picture, video or message to someone else:

- joining in because they think that 'everyone is doing it'
- boosting their self-esteem
- flirting with others and testing their sexual identity
- exploring their sexual feelings

- to get attention and connect with new people on social media
- they may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent

Our schools have regard to and will follow the UK Council for Child Internet Safety guidance; Sexting in schools and colleges: responding to incidents and safeguarding young people if necessary. We will ensure all staff and pupils are made aware of the potential social, psychological and criminal consequences of sexting and how they must respond to incidents by offering specific staff and age-appropriate pupil training.

**Online Sexual Violence and Sexual Harassment between Children**
Our school has accessed and understood Sexual violence and sexual harassment between children in schools and colleges (2018) guidance and part 5 of Keeping Children Safe in Education (2020).

Our schools recognise that sexual violence and sexual harassment between children can take place online. Examples may include non-consensual sharing of sexual images and videos, sexualised online bullying, online coercion and threats, unwanted sexual comments and messages on social media, and online sexual exploitation.

Full details of how we will respond to concerns relating to sexual violence and sexual harassment between children can be found within our Safeguarding and Child protection and Anti-bullying policies.

Our schools:
- Recognise that internet brings the potential for the impact of any sexual violence and sexual harassment concerns to extend further than the local community, and for a victim or alleged perpetrator to become marginalised and excluded by online communities.
- Recognise the potential for repeat victimisation in the future if abusive content continues to exist somewhere online.
- Will ensure that all staff and pupils are made aware of the potential social, psychological and criminal consequences of online sexual violence and sexual harassment between children by implementing a range of age and ability appropriate educational methods as part of our PSHE and RSE curriculum.
- Will ensure that all members of staff are aware of sources of support regarding online sexual violence and sexual harassment between children.
- Will respond to concerns regarding online sexual violence and sexual harassment between children, regardless of whether the incident took place on our premises or using our equipment.

If made aware of online sexual violence and sexual harassment, we will:
- Immediately notify the DSL and act in accordance with our child protection and anti-bullying policies.
- If content is contained on pupils electronic devices, they will be managed in accordance with the DfE 'searching screening and confiscation' advice.
- Provide the necessary safeguards and support for all pupils involved, such as offering specific advice on blocking, reporting and removing online content, as well as providing appropriate counselling/pastoral support.
- Implement appropriate sanctions
- Inform parents and carers, if appropriate, about the incident and how it is being managed.
- If appropriate, make a referral to Safeguarding Partners.
- If the concern involves children and young people at a different educational setting, work in partnership with other DSLs to ensure appropriate safeguarding action is taken in the wider local community.
- If a criminal offence has been committed, the DSL will discuss this with the police first to ensure that investigations are not compromised.
- Review the handling of any incidents to ensure that best practice was implemented, and policies/procedures are appropriate.

**Online Child Sexual Abuse and Exploitation (OCSAE)**
Our schools will ensure that all staff are aware of online child abuse, including exploitation and grooming, the consequences, possible approaches which may be employed by offenders to target children and how to respond to concerns. We recognise online child sexual abuse and exploitation (including criminal exploitation) as a safeguarding issue and, as such, all concerns will be reported to and dealt with by the DSL.

The DSL will:

- Implement preventative approaches for online child sexual abuse and exploitation (including criminal exploitation) via a range of age and ability appropriate education for pupils, staff and parents/carers
- Ensure support is available regarding online child sexual abuse and exploitation (including criminal exploitation), both locally and nationally.
- Raise pupil awareness of the importance of the 'Click CEOP' report button and where this can be accessed, e.g. school websites

If made aware of an incident involving OCSAE act in accordance with our child protection and national and Bradford Safeguarding Partners procedures:

- If appropriate, store any devices involved securely.
- Make a referral to the Safeguarding Partners (if required/appropriate) and immediately inform the police via 101, or 999 if a child is at immediate risk.
- Carry out a risk assessment which considers any vulnerabilities of pupils(s) involved (including carrying out relevant checks with other agencies).
- Inform parents/carers about the incident and how it is being managed.
- Provide the necessary safeguards and support for pupils, such as, offering counselling or pastoral support.
- Review the handling of any incidents to ensure that best practice is implemented; leadership team will review and update any management procedures, where necessary.
- We will respond to concerns regarding online child sexual abuse and exploitation (including criminal exploitation), regardless of whether the incident took place on our premises or using setting provided or personal equipment.
- Where possible, pupils will be involved in decision making and if appropriate, will be empowered to report concerns such as via the Click CEOP report: https://www.ceop.police.uk/safety-centre/
- If we are unclear whether a criminal offence has been committed, the DSL will obtain advice immediately through the Safeguarding Partners
- If made aware of intelligence or information which may relate to child sexual exploitation (on or offline), it will be passed through to the Child Sexual Exploitation Team (CSET) by the DSL.
- If pupils at other setting are believed to have been targeted, the DSL will seek support from the Safeguarding Partners first to ensure that potential investigations are not compromised.

**Indecent Images of Children (IIOC)**
Our schools will ensure that all staff are made aware of the possible consequences of accessing Indecent Images of Children (IIOC).

- We will respond to concerns regarding IIOC on our equipment and/or personal equipment, even if access took place off site.
- Will seek to prevent accidental access to IIOC by using an internet service provider (ISP) which subscribes to the Internet Watch Foundation block list and by implementing appropriate filtering, firewalls and anti-spam software.
- If we are unclear if a criminal offence has been committed, the DSL will obtain advice immediately through the Safeguarding Partners.

If made aware of IIOC, we will:

- Act in accordance with our child protection and Bradford Safeguarding Partnership procedures.
- Store any devices involved securely.
- Immediately inform appropriate organisations, such as the Internet Watch Foundation (IWF), police or the LADO.

If made aware that a member of staff or a pupil has been inadvertently exposed to indecent images of children, we will:

- Ensure the DSL is informed
- Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via www.iwf.org.uk.
- Ensure that any copies that exist of the image, for example in emails, are deleted.
- Report concerns, as appropriate to parents and carers.

If made aware that indecent images of children have been found on the setting provided devices, we will:

- Ensure that the DSL is informed.
- Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via www.iwf.org.uk.
- Ensure that any copies that exist of the image, for example in emails, are deleted.
- Inform the police via 101 (999 if there is an immediate risk of harm) and the Safeguarding Partners (as appropriate).
- Only store copies of images (securely, where no one else has access to them and delete all other copies) at the request of the police only.
- Report concerns, as appropriate to parents and carers.

If made aware that a member of staff/supply staff/volunteer or other adult is in possession of indecent images of children on setting provided devices, we will:

- Ensure that the executive headteacher/headteacher/head of school is informed in line with our Managing Allegations Against Staff and other Adults Policy.
- Inform the Local Authority Designated Officer (LADO) and other relevant organisations in accordance with our managing allegations against staff policy.
- Quarantine any devices until police advice has been sought.

**Online Radicalisation and Extremism**

We will take all reasonable precautions to ensure that pupils and staff are safe from terrorist and extremist material when accessing the internet on site.

- If we are concerned that a child or parent/carer may be at risk of radicalisation online, the DSL will be informed immediately, and action will be taken in line with our Safeguarding and Child Protection Policy.
- If we are concerned that member of staff may be at risk of radicalisation online, the DSL/executive headteacher/head of school will be informed immediately, and action will be taken in line with the safeguarding and child protection and allegations policies.

**Mobile devices**

Our schools recognises that personal communication through mobile technologies is an accepted part of everyday life for pupils, staff and parents/carers, but technologies need to be used safely and appropriately within the setting.

**Expectations**

**Expectations (Staff)**
All use of personal devices (including but not limited to; tablets, games consoles and 'smart' watches) and mobile phones will take place in accordance with the law and other appropriate policies, such as anti-bullying, behaviour and child protection.

- Electronic devices of any kind that are brought onto site are the responsibility of the user.
- All staff are advised to take steps to protect their mobile phones or devices from loss, theft or damage; we accept no responsibility for the loss, theft or damage of such items on our premises.
- All staff are advised to use passwords/pin numbers to ensure that unauthorised calls or actions cannot be made on their phones or devices; passwords and pin numbers should be kept confidential and mobile phones and personal devices should not be shared.
- Mobile phones and personal devices are not permitted to be used in lessons, during teaching time, while on playground duty and during meetings mobile phones will be switched off or put on 'silent' or 'discreet' mode. In accordance with the acceptable use policy staff must not use personal devices for photography in school. Only school cameras or devices are to be used.

Staff are advised to ensure that their mobile phones and personal devices do not contain any content which may be offensive, derogatory or would otherwise contravene our behaviour or child protection procedures. The sending of abusive or inappropriate messages or content via mobile phones or personal devices is forbidden by any member of staff any breaches will be dealt with as part of our Staff Behaviour Policy.

**Mobile devices (Pupils)**
Our schools do not allow pupils to bring mobile phones into class. All mobile phones must be handed in at the start of the day and are stored in a lockable container, kept in a designated location. They will be returned at the end of the school day. Pupils are taught about the dangers of using mobile phones, the fact that location services can say exactly where you are and how quickly children can post content online before thinking about the consequences.

**School mobile devices**
Our schools have a variety of mobile devices including iPads, all the statements included in the acceptable use policy apply to these mobile devices. Staff and pupils know that they must not take pictures on school devices of other people without their permission. They are not allowed to download or install apps on any device. These devices are subject to the same levels of internet filtering as all the school computers accessed by children.

**Visitor mobile devices**
Parents/carers and visitors (including volunteers and contractors) must use their mobile phones and personal devices in accordance with our acceptable use policy and other associated policies. We will ensure appropriate signage and information is displayed and provided to inform parents, carers and visitors of expectations of use.

Members of staff are expected to challenge visitors if they have concerns and will always inform the DSL/executive headteacher/headteacher/head of school of any breaches our policy.

**Monitoring, review and impact**
We acknowledge technology evolves and changes rapidly. The Trust will review this policy at least annually or following revised national or local policy requirements, child protection concerns or changes in technical infrastructure. We filter and regularly monitor internet use and evaluate online mechanisms to ensure this policy is consistently applied.

Our schools will monitor the impact of the policy using:

- Logs of reported online safety incidents
- Monitoring of network activity
- Pupil online safety survey data which is gathered through annual questionnaires during Online Safety Week
- Evaluation of children's work
- Discussions at children's groups i.e. school council
- Monitoring planning and evidence of work

Data from the above will be monitored annually and is used to develop staff training, parent coffee mornings, planning and teaching.

The DSL will ensure the executive headteacher/headteacher/head of school is informed of any online safety concerns.

The chair of governors/safeguarding governor will report on a regular basis to the academy council on online safety practices, concerns and/or incidents, including actions, decisions, reasons for those decisions and outcomes. Any identified concerns or incidents will be incorporated in our action planning.

**Useful information and support**

- CEOP:
  - www.thinkuknow.co.uk
  - www.ceop.police.uk
- Childnet: www.childnet.com
- Internet Matters: www.internetmatters.org
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Lucy Faithfull Foundation: www.lucyfaithfull.org
- NSPCC: www.nspcc.org.uk/onlinesafety
  - ChildLine: www.childline.org.uk
  - Net Aware: www.net-aware.org.uk
- The Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- UK Safer Internet Centre: www.saferinternet.org.uk
  - Professional Online Safety Helpline: www.saferinternet.org.uk/about/helpline
- 360 Safe Self-Review tool for schools: www.360safe.org.uk

**National Links and Resources for Parents/Carers**

- Action Fraud: www.actionfraud.police.uk
- CEOP:
    - www.thinkuknow.co.uk
    - www.ceop.police.uk
- Childnet: www.childnet.com
- Get Safe Online: www.getsafeonline.org
- Internet Matters: www.internetmatters.org
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Lucy Faithfull Foundation: www.lucyfaithfull.org
- NSPCC: www.nspcc.org.uk/onlinesafety
    - ChildLine: www.childline.org.uk
    - Net Aware: www.net-aware.org.uk
- The Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- UK Safer Internet Centre: www.saferinternet.org.uk

**Appendix A: Sanctions for misuse**

1) Sanctions for misuse (Pupils)
2) Sanctions for misuse (Staff)

The following policies include statements regarding Online Safety: Child Protection and Safeguarding, Staff Handbook, Acceptable Use and Behaviour.

These are available to be viewed online or within school if required.

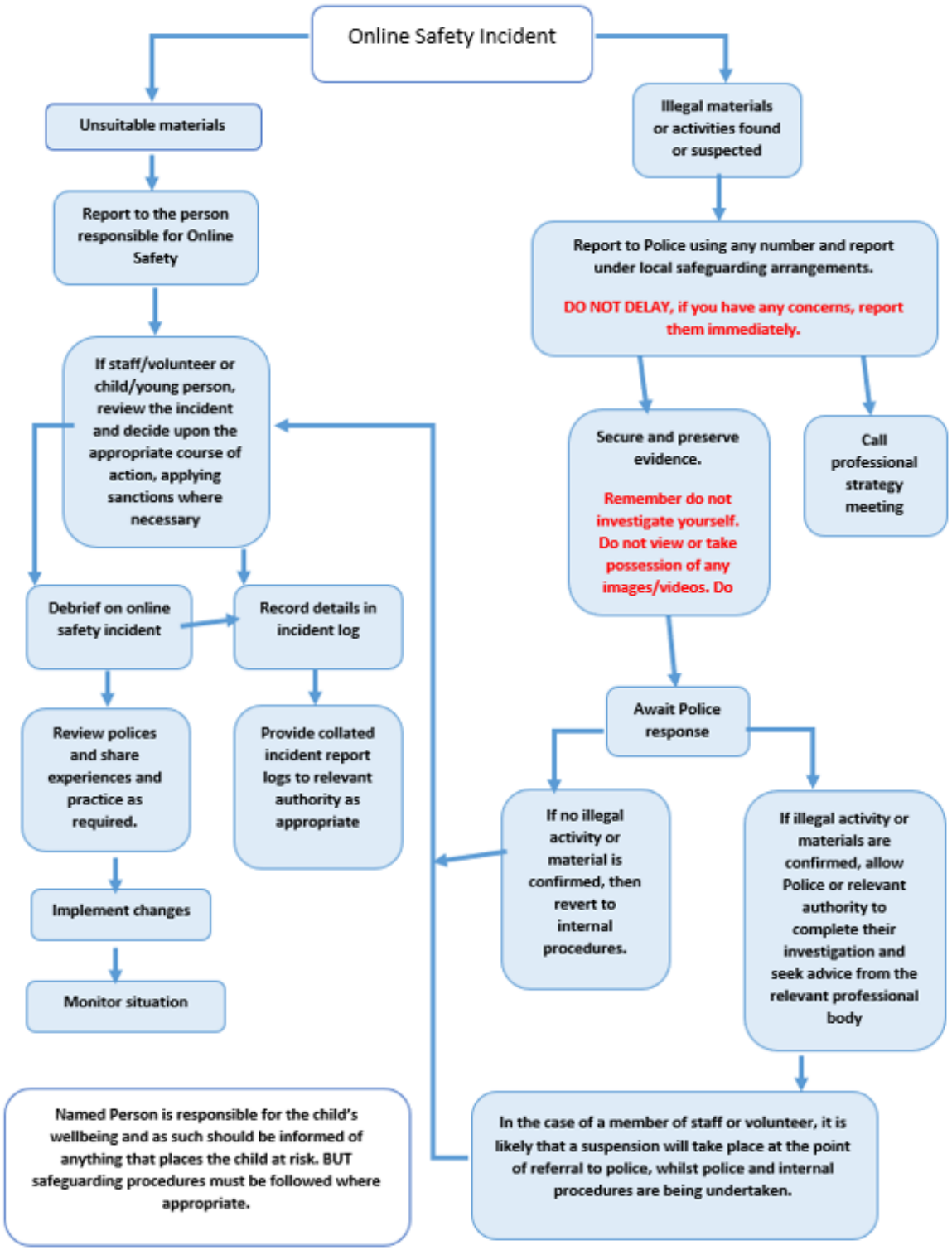
**Sanctions for misuse (Pupils)**

| **Incident** | **Actions/Sanctions** |
|---|---|
| Deliberately accessing or trying to access material that could be considered illegal | - Refer to DSL<br>- Inform parents/carers<br>- Refer to Police (if appropriate)<br>- Removal of network/Internet access rights<br>- Update CPOMS |
| Unauthorised use of sites, mobile devices, social networking, downloading, or uploading files | - Refer to DSL<br>- Inform parents/carers<br>- Warning given<br>- Update CPOMS |
| Allowing others to share usernames/passwords/using other student's accounts/staff accounts | - Inform DSL/IT Technician<br>- Warning given<br>- Update CPOMS |
| Corrupting or destroying the data of other users | - Inform DSL/IT Technician<br>- Warning given<br>- Update CPOMS |
| Sending an e-mail, text or instant message that is regarded as offensive, harassment or bullying | - Refer to DSL<br>- Inform parents/carers<br>- Removal of network/Internet access rights<br>- Update CPOMS |
| Deliberately accessing offensive or pornographic material. | - Refer to DSL<br>- Inform parents/carers<br>- Refer to Police (if appropriate)<br>- Removal of network/Internet access rights<br>- Update CPOMS |
| Continued infringement of the above, following previous sanctions/warnings. | - Refer to DSL<br>- Inform parents/carers<br>- Removal of network/Internet access rights<br>- Update CPOMS |

**Sanctions for misuse (Staff)**

| Incident | Actions/Sanctions |
|---|---|
| Deliberately accessing or trying to access material that could be considered illegal | - Refer to DSL/Executive Headteacher/Headteacher/ Head of School<br>- Refer to DSL<br>- Inform Local Authority/HR<br>- Refer to Police (if appropriate)<br>- Record<br>- Suspension/disciplinary action |
| Unauthorised use of sites, mobile devices, social networking, downloading or uploading files | - Refer to DSL<br>- Warning given<br>- Record |
| Using personal email/social networking/instant or text messaging to communicate with pupils | - Refer to DSL/Executive Headteacher/Headteacher/ Head of School<br>- Inform Local Authority/HR<br>- Record<br>- Suspension/disciplinary action |
| Allowing others to access school network by sharing username and passwords or using another person's account. | - Refer to DSL<br>- Warning given<br>- Record |
| Sending an e-mail, text or instant message that is regarded as offensive, harassment or bullying | - Refer to DSL/Executive Headteacher/Headteacher/ Head of School<br>- Inform Local Authority/HR<br>- Record<br>- Warning/Suspension |
| Careless use of personal data e.g. holding or transferring data in an insecure manner | - Refer to DSL/Executive Headteacher/Headteacher/ Head of School<br>- Warning given<br>- Record |
| Deliberately accessing offensive or pornographic material. | - Refer to DSL/Executive Headteacher/Headteacher/ Head of School<br>- Refer to Police (if appropriate)<br>- Removal of network/Internet access rights<br>- Record |
| Continued infringement of the above, following previous sanctions/warnings. | - Refer to DSL/Executive Headteacher/Headteacher/ Head of School<br>- Inform Local Authority/HR<br>- Removal of network/Internet access rights<br>- Record<br>- Suspension/ disciplinary action |

## Appendix B: Online Safety Incident flowchart



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