AHS Online Safety Policy

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

Current Review Date	September 2023
Next Review Date	September 2024
Related documentation	
Related documentation	Safeguarding and Child Protection Behaviour Policy Anti-bullying Policy

Introduction

AHS Online Safety Policy is reviewed annually and, if necessary, more frequently in response to any significant new technological developments or trends in technology related behaviours.

The DfE Keeping Children Safe in Education statutory guidance requires Local Authorities, Multi Academy Trusts, and schools in England to ensure learners are safe from harm:

*"It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to **online safety** empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate"*

*"Governing bodies and proprietors should ensure **online safety** is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies and procedures. This will include considering how **online safety** is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement"*

The DfE Keeping Children Safe in Education guidance also recommends:

Reviewing online safety *… Technology, and risks and harms related to it, evolve, and change rapidly. Schools and colleges should consider carrying out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face.*

The DfE Keeping Children Safe in Education guidance suggests that:

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

content: *being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.*

contact: *being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.*

conduct: *online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and*

commerce: *risks such as online gambling, inappropriate advertising, phishing and or financial scams.*

Schools in England are subject to an increased level of scrutiny of their online safety practices by Ofsted Inspectors during inspections, while the Counter Terrorism and Securities Act 2015 requires schools to ensure that children and young people are safe from terrorist and extremist material on the internet.

Scope of the Online Safety Policy

This Online Safety Policy outlines the commitment of Avenue House School (AHS) to safeguard members of our school community online in accordance with statutory guidance and best practice.

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

AHS 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.

Policy development, monitoring and review

This Online Safety Policy has been developed by the AHS SMT, DSL, IT Coordinator and the school governors.

Schedule for development, monitoring and review

This Online Safety Policy was approved by the *school governing body on:*	*January 2024*
The implementation of this Online Safety Policy will be monitored by:	*DSL and IT Coordinator*
Monitoring will take place at regular intervals:	*Monthly or more often if necessary (alerts are sent if there is a breech)*
The *governing body* will receive a report on the implementation of the Online Safety Policy generated by the monitoring group (which will include anonymous details of online safety incidents) at regular intervals:	*Summer Term of each academic year*
The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new technological developments, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	*September 2024*
Should serious online safety incidents take place, the following external persons/agencies should be informed:	*J. Sheppard DSL who will make the necessary referrals with external agencies*

Process for monitoring the impact of the Online Safety Policy

The school will monitor the impact of the policy using:
- *logs of reported incidents*
- *Filtering and monitoring logs*
- *internal monitoring data for network activity*
- *surveys/questionnaires of:*
  - *learners*
  - *parents and carers*
  - *staff.*

Policy and leadership

Responsibilities

To ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviours, learning from each other and from good practice elsewhere, reporting inappropriate online behaviours, concerns, and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals[1] and groups within the school.

Headteacher and senior leaders

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding, though the day-to-day responsibility for online safety is held by the Designated Safeguarding Lead, as defined in Keeping Children Safe in Education.
- The headteacher and (at least) another member of the senior leadership team 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[2].
- The headteacher/senior leaders are responsible for ensuring that the Designated Safeguarding Lead / Online Safety Lead, IT provider/technical staff, and other relevant staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.
- The headteacher/senior leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role.
- The headteacher/senior leaders will receive regular monitoring reports from the Designated Safeguarding Lead / Online Safety Lead.
- The headteacher/senior leaders will work with the responsible Governor, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring.

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Governors

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

A member of the governing body (currently the Governor responsible for Safeguarding) will take on the role of Online Safety Governor to include:

- regular meetings with the Designated Safeguarding Lead / Online Safety Lead
- regularly receiving (collated and anonymised) reports of online safety incidents
- checking that provision outlined in the Online Safety Policy (e.g. online safety education provision and staff training is taking place as intended)
- Ensuring that the filtering and monitoring provision is reviewed and recorded, at least annually.
- reporting to the Chair

The governing body will also support the school in encouraging parents/carers and the wider community to become engaged in online safety activities.

Designated Safety Lead (DSL)

The DSL will:

- hold the lead responsibility for online safety, within their safeguarding role.
- Receive relevant and regularly updated training in online safety to enable them to understand the risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online
- meet regularly with the online safety governor to discuss current issues, review (anonymised) incidents and filtering and monitoring logs and ensuring that annual (at least) filtering and monitoring checks are carried out
- attend relevant governing body meetings/groups
- report regularly to headteacher/senior leadership team
- **be responsible for receiving reports of online safety incidents and handling them,** and deciding whether to make a referral by liaising with relevant agencies, **ensuring that all incidents are recorded.**
- liaise with staff and IT providers on matters of safety and safeguarding and welfare (including online and digital safety)

Online Safety Lead

The Online Safety Lead will:
- lead the Online Safety Group
- work closely on a day-to-day basis with the Designated Safeguarding Lead (DSL)

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

Deputy Head Academic

DHA will work with the DSL/OSL to develop a planned and coordinated online safety programme

This will be provided through:
- PHSE and SRE programmes
- A mapped cross-curricular programme
- assemblies and pastoral programmes
- through relevant national initiatives and opportunities e.g. [Safer Internet Day](#) and [Anti-bullying week.](#)

Teaching and support staff

School staff are responsible for ensuring that:
- they have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices
- they understand that online safety is a core part of safeguarding
- they have read, understood, and signed the staff acceptable use agreement (AUA)
- they immediately report any suspected misuse or problem to the DSL or Headteacher for investigation/action, in line with the school safeguarding procedures

- all digital communications with learners and parents/carers are on a professional level *and only carried out using official school systems*
- online safety issues are embedded in all aspects of the curriculum and other activities
- ensure learners understand and follow the Online Safety Policy and acceptable use agreements, have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they supervise and monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other school activities (where allowed) and implement current policies regarding these devices
- in lessons where internet use is pre-planned learners are guided to sites checked as suitable for their use *and that processes are in place for dealing with any unsuitable material that is found in internet searches*
- where lessons take place using live-streaming or video-conferencing, there is regard to national safeguarding guidance and local safeguarding policies
- there is a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc
- they model safe, responsible, and professional online behaviours in their own use of technology, including out of school and in their use of social media.

IT Provider

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

Learners

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement and Online Safety Policy
- should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology.
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school, if related to their membership of the school.

Parents and carers

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

- publishing the school Online Safety Policy on the school website
- providing them with a copy of the learners' acceptable use agreement
- publish information about appropriate use of social media relating to posts concerning the school.
- seeking their permissions concerning digital images, cloud services etc

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

- *reinforcing the online safety messages provided to learners in school.*
- *the safe and responsible use of their children's personal devices in the school*

Online Safety Group

The Online Safety Group has the following members

- Designated Safeguarding Lead
- Online Safety Lead
- SMT
- online safety governor
- technical staff
- teacher and support staff members
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Members of the Online Safety Group will assist the DSL/OSL with:

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

- reviewing network/filtering/monitoring/incident logs, where possible
- encouraging the contribution of learners to staff awareness, emerging trends and the school online safety provision

Professional Standards

There is an expectation that required professional standards will be applied to online safety as in other aspects of school life i.e., policies and protocols are in place for the use of online communication technology between the staff and other members of the school and wider community, using officially sanctioned school mechanisms.

Policy

Online Safety Policy

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

Acceptable use

The school has defined what it regards as acceptable/unacceptable use and this is shown in the tables below.

Acceptable use agreements

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

- staff induction and handbook
- communication with parents/carers
- built into education sessions
- school website
- peer support.

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not access online content (including apps, games, sites) to make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	**Any illegal activity for example:** - Child sexual abuse imagery* - Child sexual abuse/exploitation/grooming - Terrorism - Encouraging or assisting suicide - Offences relating to sexual images i.e., revenge and extreme pornography - Incitement to and threats of violence - Hate crime - Public order offences - harassment and stalking - Drug-related offences - Weapons / firearms offences - Fraud and financial crime including money laundering N.B. Schools should refer to guidance about dealing with self-generated images/sexting – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges					X

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not undertake activities that might be classed as cyber-crime under the Computer Misuse Act (1990)	• Using another individual's username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised) • Gaining unauthorised access to school networks, data and files, through the use of computers/devices • Creating or propagating computer viruses or other harmful files • Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords) • Disable/Impair/Disrupt network functionality through the use of computers/devices • Using penetration testing equipment (without relevant permission) N.B. Schools will need to decide whether these should be dealt with internally or by the police. Serious or repeat offences should be reported to the police. The National Crime Agency has a remit to prevent learners becoming involved in cyber-crime and harness their activity in positive ways– further information here					X
Users shall not undertake activities that are not illegal but are classed as unacceptable in school policies:	Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs)			X	X	
	Promotion of any kind of discrimination				X	
	Using school systems to run a private business				X	
	Using systems, applications, websites or other mechanisms that bypass the filtering/monitoring or other safeguards employed by the school				X	
	Infringing copyright				X	

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

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

- when communicating in a professional capacity, staff should ensure that the technologies they use are officially sanctioned by the school.
- any digital communication between staff and learners or parents/carers (e-mail, social media, learning platform, etc.) must be professional in tone and content. *Personal e-mail addresses, text messaging or social media must not be used for these communications.*
- staff should be expected to follow good practice when using personal social media regarding their own professional reputation and that of the school and its community
- users should immediately report to a nominated person – in accordance with the school policy – the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
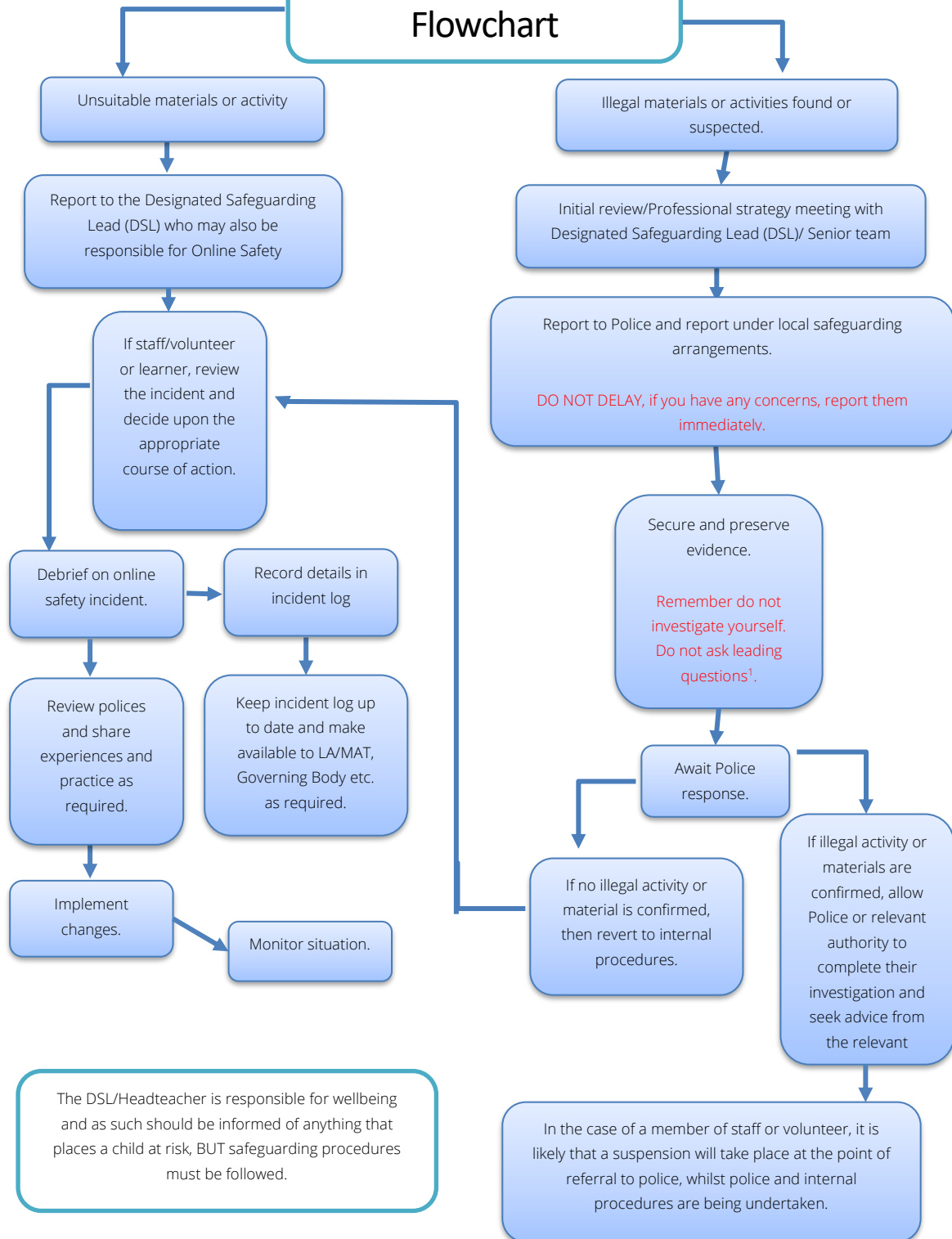
Reporting and responding

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

- all members of the school community will be made aware of the need to report online safety issues/incidents
- reports will be dealt with as soon as is practically possible once they are received
- the Designated Safeguarding Lead, Online Safety Lead and other responsible staff have appropriate skills and training to deal with online safety risks.
- any concern about staff misuse will be reported to the Headteacher, unless the concern involves the Headteacher, in which case the complaint is referred to the Chair of Governors.
- where there is no suspected illegal activity, devices may be checked using the following procedures:

- one or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- conduct the procedure using a designated device that will not be used by learners and, if necessary, can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). Use the same device for the duration of the procedure.
- ensure that the relevant staff have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed, and attached to the form
- once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:
  - internal response or discipline procedures
  - involvement by local authority
  - police involvement and/or action
- it is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively
- there are support strategies in place e.g., peer support for those reporting or affected by an online safety incident
- incidents would be logged on the Securly dashboard and logged on Staff Safe
- relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority/police/CEOP
- those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions
- learning from the incident (or pattern of incidents) will be provided to:
  - *the Online Safety Group for consideration of updates to policies or education programmes and to review how effectively the report was dealt with*
  - *staff, through regular briefings*
  - *learners, through assemblies/lessons*
  - *governors, through regular safeguarding updates*

Online Safety Incident Flowchart

Left branch

Unsuitable materials or activity

↓

Report to the Designated Safeguarding Lead (DSL) who may also be responsible for Online Safety

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If staff/volunteer or learner, review the incident and decide upon the appropriate course of action.

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Debrief on online safety incident. → **Record details in incident log**

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Review polices and share experiences and practice as required.   **Keep incident log up to date and make available to LA/MAT, Governing Body etc. as required.**

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Implement changes. → **Monitor situation.**

The DSL/Headteacher is responsible for wellbeing and as such should be informed of anything that places a child at risk, BUT safeguarding procedures must be followed.

Right branch

Illegal materials or activities found or suspected.

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Initial review/Professional strategy meeting with Designated Safeguarding Lead (DSL)/ Senior team

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Report to Police and report under local safeguarding arrangements.

DO NOT DELAY, if you have any concerns, report them immediately.

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Secure and preserve evidence.

Remember do not investigate yourself. Do not ask leading questions[1].

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Await Police response.

↙   ↘

If no illegal activity or material is confirmed, then revert to internal procedures.   **If illegal activity or materials are confirmed, allow Police or relevant authority to complete their investigation and seek advice from the relevant**

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In the case of a member of staff or volunteer, it is likely that a suspension will take place at the point of referral to police, whilst police and internal procedures are being undertaken.

School actions

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

Online Safety Education Programme

Keeping Children Safe in Education states:
Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:

- A planned online safety curriculum for all year groups matched against a nationally agreed framework
- Lessons are matched to need; are age-related and build on prior learning
- Lessons are context-relevant with agreed objectives leading to clear and evidenced outcomes
- Learner need and progress are addressed through effective planning and assessment
- Digital competency is planned and effectively threaded through the appropriate digital pillars in other curriculum areas e.g. PHSE; SRE; Literacy etc
- it incorporates/makes use of relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week
- the programme will be accessible to learners at different ages and abilities such as those with additional learning needs or those with English as an additional language.
- vulnerability is actively addressed as part of a personalised online safety curriculum e.g., for victims of abuse and SEND.
- the online safety education programme should be relevant and up to date to ensure the quality of learning and outcomes.

Staff/volunteers

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

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

- the training will be an integral part of the school's annual safeguarding and data protection training for all staff
- all new staff will receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements. It includes explicit reference to classroom management, professional conduct, online reputation and the need to model positive online behaviours.

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

- participation in school training / information sessions for staff or parents

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

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

Families

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

- *regular communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes via the school newsletter and parent evenings*
- *the learners – who are encouraged to pass on to parents the online safety messages they have learned in lessons and by learners leading sessions at parent/carer evenings.*

Technology

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

Filtering & Monitoring

The school filtering and monitoring provision is agreed by senior leaders, governors and the IT Service Provider and is regularly reviewed (at least annually) and updated in response to changes in technology and patterns of online safety incidents/behaviours

Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The DSL will have lead responsibility for safeguarding and online safety and the IT service provider will have technical responsibility

The filtering and monitoring provision is reviewed annually by senior leaders, the Designated Safeguarding Lead and a governor with the involvement of the IT Service Provider.

- checks on the filtering and monitoring system are carried out by the IT Service Provider with the involvement of a senior leader, the Designated Safeguarding Lead and a governor, in **particular when** a safeguarding risk is identified, there is a change in working practice.

Filtering

- the school manages access to content across its systems for all users and on all devices using the schools internet provision. The filtering provided meets the standards defined in the DfE **Filtering standards for schools and colleges** and the guidance provided in the UK Safer Internet Centre [Appropriate filtering.](#)
- illegal content (e.g., child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation URL list and the police assessed list of unlawful terrorist content, produced on behalf of the Home Office. Content lists are regularly updated
- there are established and effective routes for users to report inappropriate content, recognising that no system can be 100% effective
- there is a clear process in place to deal with, and log, requests/approvals for filtering changes
- filtering logs are regularly reviewed and alert the Designated Safeguarding Lead to breaches of the filtering policy, which are then acted upon.

Monitoring

The school has monitoring systems in place to protect the school, systems and users:
- The school monitors all network use across all its devices and services.

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

The school follows the UK Safer Internet Centre [Appropriate Monitoring](#) guidance and protects users and school systems through the use of the appropriate blend of strategies informed by the school's risk assessment.

- physical monitoring (adult supervision in the classroom)
- internet use is logged, regularly monitored and reviewed
- filtering logs are regularly analysed and breaches are reported to senior leaders
- use of a third-party assisted monitoring service to review monitoring logs and report issues to school monitoring lead(s)

Technical Security

The school technical systems will be managed in ways that ensure that the school meets recommended technical requirements . Responsibility for technical security resides with SLT who may delegate activities to identified roles.
- all users have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the IT service provider and will be reviewed, at least annually, by the SLT/Online Safety Group
- password policy and procedures are implemented.
- the security of their username and password and must not allow other users to access the systems using their log on details.
- all users have responsibility for the security of their username and password and must not allow other users to access the systems using their log on details.
- all school networks and system will be protected by secure passwords. Passwords must not be shared with anyone.
- the administrator passwords for school systems are kept in a secure place, e.g. school safe.
- there is a risk-based approach to the allocation of learner usernames and passwords.
- there will be regular reviews and audits of the safety and security of school technical systems
- servers, wireless systems and cabling are securely located and physical access restricted

- appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems and devices from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up-to-date endpoint software.
- there are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud,
- The school IT technician is responsible for ensuring that all software purchased by and used by the school is adequately licenced and that the latest software updates (patches) are applied.
- an appropriate system is in place for users to report any actual/potential technical incident/security breach to the relevant person, as agreed)
- use of school devices out of school and by family members is regulated by an acceptable use statement that a user consents to when the device is allocated to them
- personal use of any device on the school network is regulated by acceptable use statements that a user consents to when using the network
- staff members are not permitted to install software on a school-owned devices without the consent of the SLT/IT service provider
- removable media is not permitted unless approved by the SLT/IT service provider
- systems are in place to control and protect personal data and data is encrypted at rest and in transit.
- mobile device security and management procedures are in place (
- guest users are provided with appropriate access to school systems based on an identified risk profile.

Mobile technologies

The school acceptable use agreements for staff, learners, parents, and carers outline the expectations around the use of mobile technologies.

The school allows:

	School devices			Personal devices		
	School owned for individual use	School owned for multiple users	Authorised device[3]	Student owned	Staff owned	Visitor owned
Allowed in school	**Yes**	**Yes**	**Yes**	Yes	Yes	Yes
Full network access	Yes	Yes	Yes	No	No	No
Internet only					Yes	Yes
No network access				Yes		

Social media

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to learners through:
- ensuring that personal information is not published.
- education/training being provided including acceptable use, age restrictions, social media risks, digital and video images policy, checking of settings, data protection and reporting issues.
- clear reporting guidance, including responsibilities, procedures, and sanctions.
- risk assessment, including legal risk.
- guidance for learners, parents/carers

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

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

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

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

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

Digital and video images

The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:
- the school may use live-streaming or video-conferencing services in line with national and local safeguarding guidance / policies during school times and for educational purpose only

(such as EYFS Zoom meeting to meet with the teacher, parents and pupil online for an introduction)

- when using digital images, staff will inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images.
- staff/volunteers must be aware of those learners whose images must not be taken/published. Those images should only be taken on school devices. The personal devices of staff should not be used for such purposes. There are dedicated cameras for use on school trips and educational purposes at school.
- in accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other *learners* in the digital/video images
- A pupil's full name will not be used anywhere on a website or blog, particularly in association with photographs.
- written permission from parents or carers will be obtained before photographs of learners are taken for use in school or published on the school website/social media.
- parents/carers will be informed of the purposes for the use of images, how they will be stored and for how long – in line with the school data protection policy
- images will be securely stored in line with the school retention policy

Online Publishing

The school communicates with parents/carers and the wider community and promotes the school through:
- Public-facing website
- Social media
- Online newsletters

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

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

Data Protection

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

The school:
- has a Data Protection Policy.
- implements the data protection principles and can demonstrate that it does so
- has paid the appropriate fee to the Information Commissioner's Office (ICO)
- has appointed an appropriate Data Protection Officer (DPO) who has effective understanding of data protection law and is free from any conflict of interest.
- will hold the minimum personal data necessary to enable it to perform its function and will not hold it for longer than necessary for the purposes it was collected for. The school retention schedule supports this
- data held is accurate and up to date and is held only for the purpose it was held for. Systems are in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- provides staff, parents, volunteers, teenagers, and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice
- has undertaken appropriate due diligence and has data protection compliant contracts in place with any data processors
- understands how to share data lawfully and safely with other relevant data controllers.
- has clear and understood policies and routines for the deletion and disposal of data
- provides data protection training for all staff at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff

Staff must ensure that they:
- at all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse
- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- can help data subjects understand their rights and know how to handle a request whether verbal or written and know who to pass it to in the school
- only use encrypted data storage for personal data

- will not transfer any school personal data to personal devices.
- transfer data using encryption, a secure email account (where appropriate), and secure password protected devices.

Outcomes

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

- there is balanced professional debate about the evidence taken from the reviews/audits and the impact of preventative work e.g., online safety education, awareness, and training
- there are well-established routes to regularly report patterns of online safety incidents and outcomes to school leadership and Governors
- online safety (and related) policies and procedures are regularly updated in response to the evidence gathered from these reviews/audits/professional debate