



# School Online Safety and Cyber Security Policy

Date First Published	September 2020
Version	5
Cycle	Annual
Date approved by Trust Board	September 2025
Date ratified by LGB	13.10.25
Review Date	September 2026

## Contents

Char	nges to	this edition	1
1.	Purpo	ose and Aims	2
2.	Links	to other documents	3
3. Roles and responsibilities			4
	3.1	Trust Board	4
	3.2	The Headteacher	5
	3.3	The Designated Safeguarding Lead	6
	3.4	The Online Safety Coordinator	6
	3.5	Central IT Support Services	7
	3.6	All staff and volunteers	7
	3.7	Parents	9
	3.8	Students	9
4.	Educa	ating students about online safety	10
5.	Onlin	e safety and the curriculum	10
6.	Learn	ing technologies in school	13
7.	Emerging technologies		
8.	Educa	ating parents about online safety	15
9.	Child-	on-child sexual abuse and harassment	16
10.	Cyber	-bullying	17
	10.1	Definition	17
	10.2	Preventing and addressing cyber-bullying	18
	10.3	Examining Electronic Devices	18
11.	Cyber	r-crime	19
12.	Groor	ming and exploitation	19
13.	Onlin	e hoaxes and harmful online challenges	21
14.	Accep	otable use of the internet in school	22
15.	Filteri	ng internet access	22
16.	Mana	ging IT systems and access	23
17.	Netwo	ork security	23
18.	Email	S	24
19.	Gene	rative Artificial Intelligence (AI)	25
20.	How	the school will respond to issues of misuse and online safety incidents	26
21.	Staff	using work devices outside school	27

22.	Student Remote Learning	27
23.	Training	28
24.	Recording and reporting	29
25.	Monitoring and evaluation	29
26.	Equality Impact Assessment	29
Appe	endix 1: Acceptable Use Agreement (students and parents/carers)	30
Foun	dation/ KS1 Student Acceptable Use Policy Agreement	30
KS2/	3/4/5 Student Acceptable Use Policy Agreement	31
Appe	endix 2: Acceptable Use Agreement (staff, governors, volunteers and visitors)	32
Appe	endix 3: Online Safety Training Needs – Self-audit for staff	34
Appe	endix 4: Online Safety Incident Report Log	35
Appe	endix 5: Online Safety Curriculum Overview	36

## **Changes to this edition**

• Updated key policies eg- KCSIE 2025.

## 1. Purpose and Aims

The school recognises the immense benefits that IT, the internet and a wide range of electronic communication devices and social media platforms that provide for the development of high-quality learning experiences across our school community.

We wish to actively promote engagement in the range of technologies available throughout our whole school community. With the advent of student and parental engagement through Parent Portal, a whole new level of communication and active engagement is available to us which enables us to operate within a wholly transparent and cohesive learning environment.

The school also recognises the need to balance the benefits of these technologies bring to the personal, social and health education of our students with a thorough awareness of the potential risks. It is vital that our whole school community understands and adheres to the online safety policy that ensures safe, appropriate and responsible use of such technologies and reduces the risk of exposure to adverse media and the potential impact on the mental health and wellbeing. This policy is designed to reflect our commitment to the safeguarding and well-being of our students.

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

- **Content**: Being exposed to illegal, inappropriate or harmful material, for example:
- Pornography.
- Racism.
- Misogyny.
- Self-harm.
- Suicide.
- Discrimination.
- Radicalisation.
- Extremism.
- Misinformation.
- Disinformation, including fake news.
- Conspiracy theories.
- **Contact**: Being subjected to harmful online interaction with other users, for example:
- Peer-to-peer pressure.
- Commercial advertising.
- Adults posing as children or young adults with the intention to groom or exploit children for sexual, criminal, financial or other purposes.
- **Conduct**: Personal online behaviour that increases the likelihood of, or causes, harm, for example:
- Making, sending and receiving explicit messages.
- Consensual and non-consensual sharing of nudes and semi-nudes.
- Sharing of pornography.
- Sharing other explicit images.
- Online bullying.
- **Commerce**: Risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

The measures implemented to protect students and staff will revolve around these areas of risk.

Our school has created this policy with the aim of ensuring appropriate and safe use of the internet and other digital technology devices by all students and staff.

Our school aims to:

- Have robust processes in place to ensure the online safety of students, staff, volunteers and governors
- Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

### 2. Links to other documents

This policy is based on the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and its advice for schools on preventing and tackling bullying and searching, screening and confiscation. It also refers to the Department's guidance on protecting children from radicalisation.

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

- Online Safety Act (2023)
- Voyeurism (Offences) Act 2019
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2025) Filtering and Monitoring Standards for Schools and Colleges
- DfE (2021) 'Harmful online challenges and online hoaxes'
- DfE (2025) 'Keeping children safe in education 2025'
- DfE (2019) 'Teaching online safety in school'
- DfE (2018) 'Searching, screening and confiscation'
- DfE (2023) 'Generative artificial intelligence in education'
- Department for Digital, Culture, Media and Sport and UK Council for Internet Safety (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- UK Council for Child Internet Safety (2020) 'Education for a Connected World 2020 edition'
- National Cyber Security Centre (2018) 'Small Business Guide: Cyber Security'
- UK Safer Internet Centre: "appropriate" filtering and monitoring
- DfE Teaching Online Safety in Schools

This policy operates in conjunction with the following school policies:

- Trust Allegations of Abuse Against Staff Policy
- Trust Low-level Safeguarding Concerns Policy
- Trust Acceptable Use Agreement
- Trust Disciplinary Policy and Procedures
- Trust Data Protection Policy
- Trust Searching, Screening and Confiscation Policy
- Trust Staff Code of Conduct
- School Child Protection and Safeguarding Policy
- School Anti-Bullying Policy
- School PSHE Policy (if applicable)
- School RSE and Health Education Policy

- School Behaviour and Exclusions Policy
- School Remote Learning Policy

The policy also takes into account the National Curriculum computing programmes of study.

## 3. Roles and responsibilities

#### 3.1 Trust Board

- The Trust Board has overall responsibility for monitoring this policy and ensuring it complies with relevant laws and statutory guidance
- Holding the Executive Team and headteacher to account for its implementation and ensuring all staff undergo relevant training to support its implementation.
- Ensuring that this policy is effective and complies with relevant laws and statutory guidance.
- Ensuring the DSL's remit covers online safety.
- Ensuring this policy is reviewed by schools on an annual basis.
- Ensuring their own knowledge of online safety issues is up-to-date.
- Ensuring all staff undergo safeguarding and child protection training, including online safety, at induction and at regular intervals.
- Ensuring that there are appropriate filtering and monitoring systems in place.
- Ensuring that the effectiveness of filtering and monitoring systems is reviewed at least annually in liaison with ICT staff and service providers.
- Ensuring that the SLT and other relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, and manage them effectively and know how to escalate concerns when identified.
- Ensuring that all relevant school policies have an effective approach to planning for, and responding to, online challenges and hoaxes embedded within them.
- Ensuring compliance with the DfE's 'Meeting digital and technology standards in schools and colleges',
   with particular regard to the filtering and monitoring standards in relation to safeguarding.

#### 3.2 Executive Team

- The Executive Team have overall responsibility for developing this policy and ensuring its implementation in all schools and areas of the Trust
- Ensuring appropriate training and support is provided on an annual basis for all staff, students, parents/carers and Local Governors.
- Ensuring effective filtering and monitoring systems are in place across the Trust and that they are in line with the DfE monitoring and filtering standards.

#### 3.2 The Headteacher

- Ensuring that online safety is a running and interrelated theme throughout the school's policies and procedures, including in those related to the curriculum, teacher training and safeguarding.
- Supporting the DSL, deputy DSL and Online Safety Coordinator by ensuring they have enough time and resources to carry out their responsibilities in relation to online safety.
- Ensuring staff receive regular, up-to-date and appropriate online safety training and information as part of their induction and safeguarding training; ensuring they understand their responsibilities in relation to filtering and monitoring.
- Ensuring online safety practices are audited and evaluated, and that the policy is being implemented consistently across the school.
- Supporting staff to ensure that online safety is embedded throughout the curriculum so that all students can develop an appropriate understanding of online safety.
- Organising engagement with parents to keep them up-to-date with current online safety issues and how the school is keeping students safe.
- Ensuring the Safeguarding Lead Governors are engaged is involved in the monitoring and impact of this policy.
- Working with the DSL and ICT technicians to conduct termly light-touch reviews of this policy.
- Working with the DSL to update this policy on an annual basis.
- Identifying and assigning roles and responsibilities to manage the school's filtering and monitoring systems.
- Appointing/designating a member of staff as the Online Safety Coordinator and ensuring they complete the relevant training.
- Appointing an SLT digital lead.

#### 3.3 The Designated Safeguarding Lead

- Working closely with the Online Safety Coordinator to implement this policy.
- Undertaking training so they understand the risks associated with online safety and can recognise additional risks that students with SEND face online.
- Liaising with relevant members of staff on online safety matters, e.g. the Online Safety Coordinator, SENDCO and ICT technicians.
- Ensuring online safety is recognised as part of the school's safeguarding responsibilities and that a coordinated approach is implemented.
- Understanding the filtering and monitoring processes in place at the school.
- Contributing to the planning and delivery of staff training on online safety (Appendix 3 contains a selfaudit for staff on online safety training needs); ensuring they are aware of their responsibilities in regard to filtering and monitoring.
- Ensuring that, at induction, staff are aware of their responsibilities for online safety and the response required to filtering and monitoring alerts.
- Maintaining records of reported online safety concerns as well as the actions taken in response to concerns.
- Monitoring online safety incidents to identify trends and any gaps in the school's provision, and using this data to update the school's procedures.
- Reporting to the Lead Governor for Safeguarding about online safety.
- Keeping up-to-date with current research, legislation and online trends.
- Ensuring appropriate referrals are made to external agencies, as required.
- Working closely with the police during police investigations.
- Working with the Online Safety Coordinator to establish a procedure for reporting, recording and dealing with online safety incidents and inappropriate internet use, both by students and staff.
- Ensuring all members of the school community understand the reporting procedure.
- Reporting to the governing body about online safety on a termly basis.

#### 3.4 The Online Safety Coordinator

- Supporting the headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school.
- Working with the DSL to establish a procedure for reporting online safety incidents and inappropriate internet use, both by students and staff
- Ensuring all members of the school community understand the reporting procedure.
- Ensuring safeguarding is considered in the school's approach to remote learning.
- Undertaking training so they understand the risks associated with online safety and can recognise additional risks that students with SEND face online.
- Understanding the filtering and monitoring processes in place at the school.
- Providing specialist knowledge in relation to filtering system management, e.g. the content and websites students should and should not be able to access.
- Ensuring that all safeguarding training given to staff includes an understanding of the expectations,
   roles and responsibilities in relation to filtering and monitoring systems at the school.
- Maintaining records of reported online safety concerns as well as the actions taken in response to
- Updating and delivering staff training on online safety (Appendix 3 contains a self-audit for staff on online safety training needs); ensuring they are aware of their responsibilities in regard to filtering and monitoring.
- Liaising with relevant members of staff on online safety matters, e.g. the SENDCO and ICT technicians.

- Ensuring online safety is recognised as part of the school's safeguarding responsibilities and that a coordinated approach is implemented.
- Ensuring a robust and high quality Online Safety curriculum is planned and delivered as set out in Appendix 5.
- Coordinating the school's participation in local and national online safety events, e.g. Safer Internet Day.
- Ensuring safeguarding is considered in the school's approach to remote learning.
- Ensuring that any online safety incidents are logged (see Appendix 4) and dealt with appropriately in line with this policy.
- Working with the headteacher, ICT manager and other staff, as necessary, to address any online safety issues or incidents.
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy.
- Monitoring online safety incidents to identify trends and any gaps in the school's provision, and using this data to update the school's procedures.
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the headteacher and/or governing board.
- Working with the headteacher and ICT technicians to conduct termly light-touch reviews of this policy.

#### 3.5 Central IT Support Services

- Providing technical support in the development and implementation of the school's online safety policies and procedures.
- Implementing appropriate security measures across the Trust; ensuring regular reviews of systems, processes and cyber security measures.
- Ensuring that the school's filtering and monitoring systems are fit for purpose, in line with the DfE standards and updated as appropriate.
- Putting in place appropriate filtering and monitoring systems, which are updated on a regular basis and keep students safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material.
- Ensuring that the school's IT systems are secure and protected against viruses and malware and that such safety mechanisms are updated regularly.
- Conducting a full security check and monitoring the school's ICT systems on a weekly basis.
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are reported, logged (see Appendix 4) and dealt with appropriately in line with this policy; as and when they occur.
- Supporting the investigation of any incidents of cyber security and cyber-bullying to ensure they are dealt with appropriately in line with the school behaviour policy.
- Working with the DSL and headteacher to conduct termly light-touch reviews of this policy.
- Providing specialist support in relation to the implementation of filtering and monitoring software.

#### 3.6 All staff and volunteers

All staff, including contractors, agency staff, and volunteers are responsible for:

- Maintaining an understanding of this policy.
- Implementing this policy consistently.

- Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet (Appendix 2), and ensuring that students follow the school's terms on acceptable use (Appendix 1).
- Taking responsibility for the security of ICT systems and electronic data they use or have access to.
- Modelling good online behaviours.
- Maintaining a professional level of conduct in their personal use of technology.
- Having an awareness of online safety issues.
- Actively participating in training on Online Safety training and cyber safety to understand their role in keeping children safe online and action required should filtering and monitoring system alerts occur.
- Ensuring they are familiar with, and understand, the indicators that students may be unsafe online.
- Where relevant to their role, ensuring online safety is embedded in their teaching of the curriculum.
- Ensuring any online safety incidents about a child are logged (see Appendix 4) and reporting concerns in line with the school's reporting procedure.
- Ensure firewall alerts or alerts from the school's filtering and monitoring system are immediately sent to the DSL and/ or Online Safety Coordinator for investigation.
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy.
- Ensuring that only sanctioned platforms for communication with students and parents/carers are used, as set out in the Trust Code of Conduct and that personal devices, phone numbers and social networks are not used in line with this.

This list is not intended to be exhaustive. Please note that any visitors to the school who may be shadowing or supporting a department must only access the school network under the supervision of a member of staff. Supply staff and volunteers who work in the school regularly will receive a briefing on online safety before being issued with logins and passwords to enable them to access the system independently. If appropriate, they will be expected to agree to the terms of acceptable use (Appendix 2).

#### 3.7 Parents

Parents are expected to:

- Help and support your school in promoting online safety.
  - Read, understand and promote the school student Acceptable Use Policy with your children.
- Take responsibility for learning about the benefits and risks of using the Internet and other social media platforms and technologies that your children use in school and at home. Help and guidance can be sought via the school's subscription to National Online Safety.
- Take responsibility for their own awareness and learning in relation to the opportunities and risks posed by new and emerging technologies
- Discuss online safety concerns with your children, show an interest in how they are using technology,
   and encourage them to behave safely and responsibly when using technology and online platforms
- Model safe and responsible behaviours in your own use of technology
  - Consult with the school if you have any concerns about your children's use of technology
  - Notify a member of staff or the headteacher of any concerns or queries regarding this policy
  - Ensure their child has read, understood and agreed to the terms on acceptable use of the school's ICT systems and internet (Appendix 1).

Parents can seek further guidance on keeping children safe online from the following organisations and websites:

- What are the issues?, UK Safer Internet Centre: Link
  - Hot topics, Childnet International: Link
- Parent factsheet, Childnet International: Link

#### 3.8 Students

All students are expected to:

- Abide by the school's acceptable use policy
- Ensure they use technology in a safe and responsible manner
- Protect their own passwords and personal information
- Seeking help from school staff if they are concerned about something they or a peer has experienced online.
- Reporting online safety incidents and concerns in line with the procedures within this policy.

## 4. Educating students about online safety

We believe that the key to developing safe and responsible behaviours online, not only for students but for everyone within our school community, lies in effective education. We know that the Internet and other technologies are embedded in our students' lives, not just in school but outside as well, and we believe we have a duty to help prepare our students to safely benefit from the opportunities the Internet brings. We will provide a series of specific online safety-related lessons in every year group as part of the curriculum. We will celebrate and promote online safety through planned assemblies.

We will discuss, remind or raise relevant online safety messages with students routinely wherever suitable opportunities arise during all lessons; including the need to protect personal information, consider the consequences their actions may have on others, the need to check the accuracy and validity of information they use, and the need to respect and acknowledge ownership of digital materials.

We will ensure that all students are made aware of where to seek help or advice or make a report if they experience problems when using the internet and related technologies, including social media.

We will remind students about their responsibilities through an end-user Acceptable Use Policy which every student must agree to, to allow them to use a device on first log on. The student Acceptable Use Policy will be displayed in each IT suite and displayed when students log on.

Staff will model safe and responsible behaviour in their own use of technology during lessons.

The school will report any potential risks and will ensure that online safety is considered consistently through planning the curriculum, staff training, the work of the designated safeguarding lead and parental engagement. The school has a specific policy for remote learning provision.

The safe use of social media and the internet will also be covered in other subjects where relevant. The school will use assemblies to raise students' awareness of the dangers that can be encountered online and may also invite speakers to talk to students about this.

The breadth of issues classified within online safety is considerable, 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:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.
- **Commerce** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

## 5. Online safety and the curriculum

Students across all key stages will be taught using a spiralised curriculum which grows in depth and age-appropriate content. An overview of this can be found in Appendix 5. This will be quality assured in line with the school's quality assurance procedures.

Online Safety is taught through a combination of discrete lessons and, when appropriate, throughout the curriculum, including Tutor Time and Assemblies. Discrete online safety lessons are identified within our Computing, RSHE or PHSEE lessons. Appropriate resources are available through our National Online Safety membership.

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

- Life (including the assembly programme)
- Personal Development
- Computing IT (KS3), DiT and Computer Science (KS4)

Online safety teaching is always appropriate for students' ages and developmental stages.

Students are taught the underpinning knowledge and behaviours that can help them to navigate the online world safely and confidently, regardless of the device, platform or app they are using. The underpinning knowledge and behaviours students learn through the curriculum include the following:

- How to evaluate what they see online
- How to recognise techniques used for persuasion
- Acceptable and unacceptable online behaviour
- How to identify online risks
- How and when to seek support
- Knowledge and behaviours that are covered in the government's online media literacy strategy

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

The school's approach to teaching online safety in the curriculum will reflect the ever-evolving nature of online risks, ensuring students develop the knowledge and resilience to navigate digital spaces safely and responsibly. Online safety education will address four key categories of risk: content, contact, conduct, and commerce.

#### **Content Risks**

Students will be taught how to critically evaluate online content and identify material that is illegal, inappropriate, or harmful. The curriculum will include discussions around harmful content such as pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news), and conspiracy theories. Lessons will equip students with the skills to question sources, verify information, and understand the dangers of engaging with such content.

#### **Contact Risks**

The school will educate students about the potential dangers of interacting with others online. Students will explore topics such as peer pressure, commercial exploitation, and grooming tactics used by adults who pose as children or young adults. They will learn how to recognise unsafe interactions, use privacy settings effectively, and report any concerning behaviour or messages to trusted adults and platforms.

#### **Conduct Risks**

Students will be guided on how their own online behaviour can impact both themselves and others. The curriculum will address the risks associated with creating, sharing, or receiving explicit images, including both consensual and non-consensual exchanges of nudes and semi-nudes. Online bullying, including the use of social media and messaging platforms to harass or intimidate others, will also be a key focus. Students will be taught responsible digital conduct and the legal and emotional consequences of harmful behaviour.

#### **Commerce Risks**

The curriculum will also include education on online commercial risks. Students will be informed about the dangers of online gambling, exposure to inappropriate advertising, and financial scams such as phishing. They will learn how to recognise fraudulent schemes, protect their personal and financial information, and seek help when confronted with suspicious online activity.

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

Relevant members of staff, e.g. the SENDCO and designated teacher for CLA, will work together to ensure the curriculum is tailored so that students who may be more vulnerable to online harms, e.g. students with SEND and CLA, receive the information and support they need.

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

Class teachers will review external resources before using them for the online safety curriculum, to ensure they are appropriate for the cohort of students.

External visitors may be invited into the school to help with the delivery of certain aspects of the online safety curriculum. The headteacher and DSL will decide when it is appropriate to invite external groups into school and ensure the visitors selected are appropriate.

Before conducting a lesson or activity on online safety, the class teacher and DSL will consider the topic that is being covered and the potential that students in the class have suffered or may be suffering from online abuse or harm in this way. The DSL will advise the staff member on how to best support any student who may be especially impacted by a lesson or activity. Lessons and activities will be planned carefully so they do not draw attention to a student who is being or has been abused or harmed online, to avoid publicising the abuse.

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

If a staff member is concerned about anything students raise during online safety lessons and activities, they will make a report in line with the Child Protection and Safeguarding Policy and log on to CPOMS.

If a student makes a disclosure to a member of staff regarding online abuse following a lesson or activity, the staff member will follow the reporting procedure outlined in the Child Protection and Safeguarding Policy.

## 6. Learning technologies in school

Any use of mobile devices and smart technology in students by students must be in line with the Acceptable Use Agreement (see Appendix 1). Any breach of the acceptable use agreement by a student may trigger disciplinary action in line with the school behaviour policy, which may result in the confiscation of their device.

Our policy on staff and student use of a range of learning technologies is summarised in the following table. Staff and students should also refer to the Acceptable Use Policy whenever engaging with such technologies.

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

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

Staff will use all smart technology and personal technology in line with the school's Staff ICT and Electronic Devices Policy.

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

Inappropriate use of smart technology may include:

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

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

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

The school will seek to ensure that it is kept up to date with the latest devices, platforms, apps, trends and related threats.

The school will consider the 4Cs (content, contact, conduct and commerce) when educating students about the risks involved with the inappropriate use of smart technology and enforcing the appropriate disciplinary measures.

The table below outlines when and where mobile devices and smart technologies may/may not be used in school:

	Students	Staff
Student/Staff Personal mobile phones brought into school outside	Students are allowed for use outside of the school site only.	Staff allowed in appropriate places at appropriate times.
Mobile phones used in lessons	Students are not allowed to use these in lessons.	Staff are not allowed to use these in lessons.
Bring your own device (BYOD)	Is not permitted unless this is authorised for a specific learning need.	Is permitted in line with the school policy, and ensuring security of the network is maintained.
Smart devices	Students are not allowed to use these in lessons unless provided these are by the school.	Staff allowed as part of a learning activity in exceptional circumstances.
Taking photographs or videos on personal equipment	Students not allowed.	Staff not allowed.
Taking photographs or videos on school devices	Students are allowed with permission as part of a learning activity. There must be prior consent from the student under GDPR.	Staff are allowed as part of the teaching activity. Staff Acceptable Use Policy must be followed. Prior consent by the student is required under GDPR.
Use of personal email addresses in school	Students are not allowed. Students are provided with a school email address that should be used for learning activities.	Staff are allowed as long as the IT Acceptable Use Policy is followed.
Use of school email address for personal correspondence	Students are allowed as long as the IT Acceptable Use Policy is followed.	Staff are allowed as long as the IT Acceptable Use Policy is followed.

Use of Social Media	Students not allowed.	Staff allowed during designated breaks in appropriate places.
Use of Web Services	Students are allowed with permission as part of a learning activity, as long as the IT Acceptable Use Policy is followed.	Staff are allowed as part of a school-based activity as long as the IT Acceptable Use Policy is followed.

Prior to using any websites, tools, apps or other online platforms in the classroom, or recommending that students use these platforms at home, the class teacher will review and evaluate the resource. Class teachers will ensure that any internet-derived materials are used in line with copyright law.

Students will be supervised when using online materials during lesson time – this supervision is suitable to their age and ability.

## 7. Emerging technologies

The school will take steps to prepare students for changing and emerging technologies, e.g. Generative AI and how to use them safely and appropriately, with consideration given to students' age.

The school will ensure its IT system includes appropriate filtering and monitoring systems to enable the safe and appropriate use of emerging technologies to support curriculum delivery. Any concerns about misuse of emerging technologies or AI should be dealt with in line with the school's behaviour policy.

The school will take steps to educate staff and students in safe and effective use of emerging technologies, which may include training and education to ensure that personal and sensitive data is not entered into generative AI tools.

The school will make use of any guidance and support that enables it to have a safe, secure and reliable foundation in place before using more powerful technology such as generative AI.

## 8. Educating parents about online safety

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

Parents will be made aware of the various ways in which their children may be at risk online, including, but not limited to (update according to school provision):

- Child sexual abuse, including grooming.
- Exposure to radicalising content.
- Sharing of indecent imagery of students, e.g. sexting.
- Cyberbullying.
- Exposure to age-inappropriate content, e.g. pornography.
- Exposure to harmful content, e.g. content that encourages self-destructive behaviour.

Parents will be informed of the ways in which they can prevent their child from accessing harmful content at home, e.g. by implementing parental controls to block age-inappropriate content.

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

- Parents' evenings
- Online-safety sessions for parents
- Twilight training sessions for staff
- Newsletters
- Online resources

#### 9. Child-on-child sexual abuse and harassment

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

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

- Threatening, facilitating or encouraging sexual violence
- Up-skirting, i.e., taking a picture underneath a person's clothing without consent and with the intention of viewing their genitals, breasts or buttocks
- Sexualised online bullying, e.g. sexual jokes or taunts
- Unwanted and unsolicited sexual comments and messages
- Consensual or non-consensual sharing of sexualised imagery
- Abuse between young people in intimate relationships online, i.e. teenage relationship abuse

All staff will be aware of and promote a zero-tolerance approach to sexually harassing or abusive behaviour, and any attempts to pass such behaviour off as trivial or harmless. Staff will be aware that allowing such behaviour could lead to a school culture that normalises abuse and leads to students becoming less likely to report such conduct.

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

The school will be aware that interactions between the victim of online harmful sexual behaviour and the alleged perpetrator(s) are likely to occur over social media following the initial report, as well as interactions with other students taking "sides", often leading to repeat harassment.

The school will respond to all concerns regarding online child-on-child sexual abuse and harassment, regardless of whether the incident took place on the school premises or using school-owned equipment. Concerns regarding online child-on-child abuse are reported to the DSL, who will investigate the matter in line with the Child Protection and Safeguarding Policy.

## 10. Cyber-bullying

#### 10.1 Definition

Cyberbullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power.

Cyberbullying can include, but is not limited to, the following:

- Threatening, intimidating or upsetting text messages
- Threatening or embarrassing pictures and video clips sent via mobile phone cameras
- Silent or abusive phone calls or using the victim's phone to harass others, to make them think the victim is responsible
- Threatening or bullying emails, possibly sent using a pseudonym or someone else's name
- Unpleasant messages sent via instant messaging
- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites,
   e.g. Facebook
- Abuse between young people in intimate relationships online i.e. teenage relationship abuse
- Discriminatory bullying online i.e. homophobia, racism, misogyny/misandry.

The school will be aware that certain students can be more at risk of abuse and/or bullying online, such as LGBTQ+ students and students with SEND.

Cyberbullying against students or staff is not tolerated under any circumstances. Incidents of cyberbullying are dealt with quickly and effectively wherever they occur in line with the school's Behaviour & Exclusions Policy and Anti-bullying Policy.

#### 10.2 Preventing and addressing cyber-bullying

To help prevent cyberbullying, we will ensure that students understand what it is and what to do if they become aware of it happening to them or others. We will ensure that students know how they can report any incidents and are encouraged to do so, including when they are witnesses rather than the victim.

The school will actively discuss cyberbullying with students, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Class teachers will discuss cyberbullying with their groups, and the issue will be addressed in assemblies.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.

All staff, governors and volunteers (where appropriate) receive training on cyberbullying, its impact and ways to support students, as part of safeguarding training (see section 14 for more detail).

The school may also send information/leaflets on cyberbullying to parents so that they are aware of the signs, how to report it and how they can support children who may be affected or may utilise the resources available through the National Online Safety programme.

In relation to a specific incident of cyberbullying, the school will follow the processes set out in the school behaviour policy. Where illegal, inappropriate or harmful material has been spread among students, the school will use all reasonable endeavours to ensure the incident is contained and reported to the necessary authorities.

The DSL and Online Safety Coordinator will consider whether the incident should be reported to the police if it involves illegal material, and will work with external services if it is deemed necessary to do so.

#### 10.3 Examining Electronic Devices

School staff have the specific power under the Education and Inspections Act 2006 (which has been increased by the Education Act 2011) to search for and, if necessary, delete inappropriate images or files on students' electronic devices, including mobile phones, iPads and other tablet devices, where they believe there is a 'good reason' to do so.

When deciding whether there is a good reason to examine or erase data or files on an electronic device, staff must reasonably suspect that the data or file in question has been, or could be, used to:

- Cause harm, and/or
- Disrupt teaching, and/or
- Break any of the school rules

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL or other member of the senior leadership team to decide whether they should:

- Delete that material, or
- Retain it as evidence (of a criminal offence or a breach of school discipline), and/or
- Report it to the police

Any searching of students will be carried out in line with the DfE's latest guidance on <u>screening</u>, <u>searching and confiscation</u> and the school's policy on Screening, Searching and Confiscation.

Any complaints about searching for or deleting inappropriate images or files on students' electronic devices will be dealt with through the school's complaints procedure.

## 11. Cyber-crime

Cybercrime is a criminal activity committed using computers and/or the internet. There are two key categories of cybercrime:

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

The school will factor into its approach to online safety the risk that students with a particular affinity or skill in technology may become involved, whether deliberately or inadvertently, in cybercrime. Where there are any concerns about a student's use of technology and their intentions with regard to using their skill and affinity towards it, the DSL will consider a referral to the Cyber Choices programme, which aims to intervene where children are at risk of committing cybercrime and divert them to a more positive use of their skills and interests.

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

## 12. Grooming and exploitation

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

Staff will be aware that grooming often takes place online and that students who are being groomed are commonly unlikely to report this behaviour for many reasons, e.g. the student may have been manipulated into feeling a strong bond with their groomer and may have feelings of loyalty, admiration, or love, as well as fear, distress and confusion.

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

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

#### Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

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

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

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

#### **Radicalisation**

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

Staff members will be made aware of the factors which can place certain students at increased susceptibility to radicalisation, as part of the annual safeguarding training. Staff will be expected to exercise vigilance towards any students displaying indicators that they have been, or are being, radicalised.

Where staff have a concern about a student relating to radicalisation, they will report this to the DSL without delay, who will handle the situation in line with the Prevent Duty Policy.

## 13. Online hoaxes and harmful online challenges

For this policy, an **"online hoax"** is defined as a deliberate lie designed to seem truthful, normally one that is intended to scaremongers or to distress individuals who come across it, spread on online social media platforms.

For this policy, "harmful online challenges" refers to challenges that are targeted at young people and generally involve users recording themselves participating in an online challenge, distributing the video through social media channels and daring others to do the same. Although many online challenges are harmless, an online challenge becomes harmful when it could potentially put the participant at risk of harm, either directly as a result of partaking in the challenge itself or indirectly as a result of the distribution of the video online – the latter will usually depend on the age of the student and the way in which they are depicted in the video.

Where staff suspect there may be a harmful online challenge or online hoax circulating amongst students in the school, they will report this to the DSL immediately.

The DSL will conduct a case-by-case assessment for any harmful online content brought to their attention, establishing the scale and nature of the possible risk to students, and whether the risk is one that is localised to the school or the local area, or whether it extends more widely across the country. Where the harmful content is prevalent mainly in the local area, the DSL will consult with the LA about whether quick local action can prevent the hoax or challenge from spreading more widely.

Prior to deciding how to respond to a harmful online challenge or hoax, the DSL and the headteacher will decide whether each proposed response is:

- In line with any advice received from a known, reliable source, e.g. the UK Safer Internet Centre, when fact-checking the risk of online challenges or hoaxes.
- Careful to avoid needlessly scaring or distressing students.
- Not inadvertently encouraging students to view the hoax or challenge where they would not have otherwise come across it, e.g. where content is explained to younger students but is almost exclusively being shared amongst older students.
- Proportional to the actual or perceived risk.
- Helpful to the students who are, or are perceived to be, at risk.
- Appropriate for the relevant students' age and developmental stage.
- Supportive.
- In line with the Child Protection and Safeguarding Policy.

Where the DSL's assessment finds an online challenge to be putting students at risk of harm, they will ensure that the challenge is directly addressed to the relevant students, e.g. those within a particular age range that are directly affected or individual students at risk, where appropriate.

The DSL and headteacher will only implement a school-wide approach to highlighting potential harms of a hoax or challenge when the risk of needlessly increasing students' exposure to the risk is considered and mitigated as far as possible.

## 14. Acceptable use of the internet in school

All students, parents, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of the school's ICT systems and the Internet (Appendices 1 and 2). Visitors will be expected to read and agree to the school's terms of acceptable use if relevant.

Use of the school's internet must be for educational purposes only or for the purpose of fulfilling the duties of an individual's role. We will monitor the websites visited by students, staff, volunteers, governors and visitors (where relevant) to ensure they comply with the above. More information is set out in the Acceptable Use Agreement in Appendices 1 and 2.

## 15. Filtering internet access

The school uses an Internet service provided by Virgin Media Broadband. These are uncontested private fibre lines in each school. The filtering and monitoring are delivered using a Smoothwall web filter device. If users discover a website with inappropriate or potentially illegal content, this should be reported to a member of staff who will inform a member of the IT Support Team.

The IT Support Team will report, record and adjust filtering as required. The school uses software to monitor all users' activity on the school's workstations. The IT Support Team have access to AB Tutor to review and investigate any issues. If required, reports will be made to the Safeguarding Team and to appropriate agencies. The school will regularly review the filtering and other security systems to ensure they meet the needs of all users and that they meet the DfE filtering and monitoring standards.

Requests regarding making changes to the filtering system, to allow access to websites or for certain websites to be blocked, should be submitted through the school's IT ticket system or by emailing icthelpdesk@minervalearningtrust.co.uk. Any changes requested will be considered by the ICT technician and discussed with the DSL, Headteacher or Trust Network Manager if necessary. Any changes made to the system will be recorded by ICT technicians. Reports of inappropriate websites or materials will be made to an ICT technician immediately, who will investigate the matter and make any necessary changes.

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

If material that is believed to be illegal is accessed, inadvertently or deliberately, this material will be reported to the appropriate agency immediately, e.g. the Internet Watch Foundation (IWF), CEOP and/or the police.

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

The school will carry out an annual review of its approach to online safety and filtering and monitoring, supported by an annual risk assessment that considers and reflects the risks faced by students and tests that filtering and monitoring systems are working effectively. The school will also undertake an annual review to ensure it is meeting IT service and digital equipment standards. The DfE Plan

Technology for Your School audit tool will be utilised to undertake this review which will inform an action plan

## 16. Managing IT systems and access

The school will be responsible for ensuring that access to the IT systems is as safe and secure as reasonably possible. The school will take all reasonable precautions to ensure that users do not access inappropriate material. However, it is not possible to guarantee that access to unsuitable material will never occur.

Servers and other key hardware or infrastructure will be located securely, with only appropriate staff permitted access. Servers, workstations and other hardware and software will be kept updated as appropriate. Virus protection is installed on all appropriate hardware and will be kept active and upto-date. The school will agree on which users should and should not have Internet access, and the appropriate level of access and supervision they should receive.

By using any school device or device in school, all users agree to an end-user Acceptable Use Policy provided by the Trust (see Appendix 1 and 2). Users will be made aware that they must take responsibility for their use of, and behaviour whilst using the school IT systems and that such activity will be monitored and checked.

The school will audit IT use to establish if the online safety policy is adequate and that the implementation of the online safety policy is appropriate on an annual basis. We will regularly review our Internet access provision, and review new methods to identify, assess and minimise risks.

Details of all IT equipment, including hardware and software, will be recorded in a school inventory. All redundant IT equipment will be thoroughly checked to ensure all school-related information, including personal or school-specific information, has been thoroughly removed. All redundant IT equipment will be disposed of appropriately, including recycling with partner primaries where possible. All IT assets written off must be notified to central finance (<a href="mailto:finance@minervalearningtrust.co.uk">finance@minervalearningtrust.co.uk</a>) for noting on the asset register and reporting to the Trust Board.

## 17. Network security

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

Staff and students will be advised not to download unapproved software or open unfamiliar email attachments and will be expected to report all malware and virus attacks to ICT technicians.

A secure and robust username and password protocol exists for all system access. Staff and students will have a unique individually named user account and password for access to IT available within the school and via remote access. All staff and students have a responsibility for the security of their username and password.

In line with current password guidance from the <u>National Cyber Security Centre</u>, the password policy for staff, visitors, governors, and students is as follows:

- Passwords will have a minimum of 12 characters, but users are encouraged to use three nonconnected words with a number and a symbol.
- There is no requirement to change the password at certain intervals, as this often leads to weaker passwords being selected.
- Passwords to school computers and Microsoft or Google services must be unique and not used for other systems.
- When not on site, users are forced to use two-factor authentication to access their accounts.

In line with staff and student Acceptable Use Policies, users must not allow other users to access systems using their log-on details and must report any suspicion or evidence of any breach of security. Members of staff will access the Internet using an individual log-on, which they will keep secure. They will ensure they log out after each session, and not allow students to access the Internet through their log-on. They will abide by the school's Acceptable Use Policy at all times.

Users will inform ICT technicians if they forget their login details, who will arrange for the user to access the systems under different login details. Users will not be permitted to share their login details with others and will not be allowed to log in as another user at any time. If a user is found to be sharing their login details or otherwise mistreating the password system, the headteacher will be informed and will decide the necessary action to take.

Users will be required to lock access to devices and systems when they are not in use.

Full details of the school's network security measures can be found in the Cybersecurity Policy.

### 18. Emails

Access to and the use of emails will be managed in line with the Data Protection Policy, Acceptable Use Agreement, and the relevant Privacy Notices.

Staff and students will be given approved school email accounts and will only be able to use these accounts at school and when doing school-related work outside of school hours. Before being authorised to use the email system, staff and students must agree to and sign the Acceptable Use Agreement. Personal email accounts will not be permitted to be used on the school site. Any email that contains sensitive or personal information will only be sent using secure and encrypted email.

Staff members and students will be required to block spam and junk mail and report the matter to ICT technicians. The school's monitoring system can detect inappropriate links, malware and profanity within emails – staff and students will be made aware of this. Chain letters, spam and all other emails from unknown sources will be deleted without being opened. The school will organise an **annual** assembly where they explain what a phishing email and other malicious emails might look like – this assembly will include information on the following:

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

## 19. Generative Artificial Intelligence (AI)

When deciding whether to use generative AI, safety will be the top priority. Any use of AI tools by staff and students will be carefully considered and assessed, evaluating the benefits and risks of its use in the school. The use of Microsoft Co-Pilot in school is encouraged due to the level of data protection it provides. Use of other AI tools is strongly discouraged.

AI tools will only be used in situations where there are specified clear benefits that outweigh the risks, e.g. where it can reduce teacher workload, and the school will ensure that any use of AI tools comply with wider statutory obligations, including those outlined in KCSIE.

Students will only be permitted to use generative AI in the school with appropriate safeguards in place, e.g. close supervision and the use of tools with appropriate filtering and monitoring features in place.

For any use of AI, the school will:

- Comply with age restrictions set by AI tools and open access large language models (LLMs).
- Consider online safety, including AI, when creating and implementing the school's approach to safeguarding and related policies and procedures.
- Consult KCSIE to ensure all statutory safeguarding obligations and AI tools are used safely and appropriately.
- Refer to the DfE's generative AI product safety expectations and filtering and monitoring standards.

The school will take steps to prepare students for changing and emerging technologies, e.g. generative AI and how to use them safely and appropriately, with consideration given to students' age.

The Trust will ensure its IT system includes appropriate filtering and monitoring systems to limit students' ability to access or create harmful or inappropriate content through generative AI.

The school will ensure that students are not accessing or creating harmful or inappropriate content, including through generative AI.

The school will take steps to ensure that personal and sensitive data is not entered into generative AI tools and that it is not identifiable.

The school will make use of any guidance and support that enables it to have a safe, secure and reliable foundation in place before using more powerful technology such as generative AI.

Whilst no current AI usage policy is in place across the trust if it is believed that at any point a policy is needed to ensure AI safeguarding, one will be released. As mentioned above guidance is in place currently.

## 20. How the school will respond to issues of misuse and online safety incidents

Where a student misuses the school's ICT systems or the internet, we will follow the procedures set out in the behaviour policy. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the school's ICT systems or the internet or misuses a personal device, where the action constitutes misconduct, the matter will be dealt with in accordance with the staff disciplinary procedures. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

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

Staff will be aware that harmful online sexual behaviour can progress on a continuum, and appropriate and early intervention can prevent abusive behaviour in the future. Staff will also acknowledge that students displaying this type of behaviour are often victims of abuse themselves and should be suitably supported.

The victim of online harmful sexual behaviour may ask for no one to be told about the abuse. The DSL will consider whether sharing details of the abuse would put the victim in a more harmful position, or whether it is necessary in order to protect them from further harm. Ultimately, the DSL will balance the victim's wishes against their duty to protect the victim and other young people. The DSL and other appropriate staff members will meet with the victim's parents to discuss the safeguarding measures that are being put in place to support their child and how the report will progress.

Confidentiality will not be promised, and information may still be shared lawfully, for example, if the DSL decides that there is a legal basis under UK GDPR, such as the public task basis, whereby it is in the public interest to share the information. If the decision is made to report abuse to children's social care or the police against the victim's wishes, this must be handled extremely carefully – the reasons for sharing the information should be explained to the victim, and appropriate specialised support should be offered.

Concerns regarding a staff member's online behaviour should be reported in line with the procedure set out in the school's Child Protection and Safeguarding Policy.

Concerns regarding a student's online behaviour should be reported to the DSL, who should investigate and manages concerns in accordance with relevant policies depending on their nature, e.g. the Behaviour Policy and Child Protection and Safeguarding Policy.

The school will consider whether incidents which involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

The school avoids unnecessarily criminalising students, e.g. calling the police, where criminal behaviour is thought to be inadvertent and as a result of ignorance or normal developmental curiosity, e.g. a student has taken and distributed indecent imagery of themselves. The DSL will decide in which cases this response is appropriate and will manage such cases in line with the Child Protection and Safeguarding Policy.

All online safety incidents and the school's response should be recorded by the DSL on CPOMS.

## 21. Staff using work devices outside school

Work devices must be used solely for work activities. Staff members using a work device outside the school must not install any unauthorised software on the device and must not use the device in any way which would violate the school's terms of acceptable use, as set out in Appendix 2.

Staff must ensure that their work device is secure and password-protected and that they do not share their password with others. They must take all reasonable steps to ensure the security of their work device when using them outside school. Any USB devices or other portable media containing data relating to the school must be encrypted.

If staff have any concerns over the security of their device, they must seek advice from the Online Safety Coordinator.

## 22. Student Remote Learning

All remote learning is delivered in line with the school's Remote Learning Policy. School devices may be loaned to students where appropriate. These devices currently have no internet filtering or monitoring when used off-site. Students are expected to use within the terms of the Acceptable Use Policy.

Where students are expected to use online resources from home, on school or personal devices, parents and carers should be made aware of what students are being asked, including online tasks and websites the students are being asked to use. Parents and carers should also be made aware of any school staff with whom students will be interacting online, and how they might be contacted.

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

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

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

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

## 23. Training

The DSL and the Online Safety Coordinator will ensure that all safeguarding training given to staff includes elements of online safety, including how the internet can facilitate abuse and exploitation, and understanding the expectations, roles and responsibilities relating to filtering and monitoring systems. All staff will be made aware that students are at risk of abuse, by their peers and by adults, online as well as in person, and that, often, abuse will take place concurrently via online channels and in daily life.

Staff training will include a specific focus on harmful online narratives such as misinformation, disinformation, and conspiracy theories, helping staff to recognise the signs of influence or vulnerability among students.

Training will equip staff with the knowledge and confidence to identify signs of online harm, respond appropriately to disclosures or concerns, and support students in developing critical thinking skills and safe online behaviours.

Staff will also be guided on how to embed online safety themes across the wider curriculum, promoting a consistent, whole-school approach to digital safeguarding.

All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues, including cyber-bullying and the risks of online radicalisation. They will also be made aware of the school's filtering and monitoring systems and what action should be taken in response to an incident.

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

The DSL and deputy will undertake child protection and safeguarding training, which will include online safety, at least every 2 years. They will also update their knowledge and skills on the subject of online safety at regular intervals, and at least annually. In line with the requirements of both Sheffield and Derbyshire Children's Safeguarding Partnership, the online safety co-ordinator will be trained to the same level as the DSL. Online Safety co-ordinator training is available through Learn Sheffield Schools and through Education Data Hub for Derbyshire Schools.

Governors will receive training on safe internet use and online safeguarding issues as part of their safeguarding training. This will take place on an annual basis with contextual online safety updates

shared termly. Volunteers will receive appropriate training and updates, if applicable. More information about safeguarding training is set out in our child protection and safeguarding policy.

## 24. Recording and reporting

The Online Safety Coordinator will log behaviour and safeguarding issues related to online safety. An incident report log can be found in Appendix 4. This should be kept up to date and saved in a secure location.

The DSL will ensure that all relevant issues are logged on a child's CPOM records and that any appropriate action to keep children safe is taken in line with Keeping Children Safe in Education (2025) and the school's Child Protection and Safeguarding Policy.

## 25. Monitoring and evaluation

This policy will be reviewed annually in line with any statutory changes and approved by the Trust Board.

## 26. Equality Impact Assessment

The Trust will carry out an Equality Impact Assessment in order to ensure that policies, procedures and practices cater for individuals who share protected characteristics in relation to the Equality Act 2010. The purpose of these assessments is to ensure that policies, procedures and practices within the organisation are fair to all. If unfairness is highlighted, the assessment will also seek to show how this can be changed and, where it can't be changed, how it can be improved.

The Trust will monitor the impact of the policy to assess whether there is evidence of a detrimental impact on anyone with a protected characteristic as a result of the application of this policy. The assessment will include consideration of adaptations or changes which can be made to address any issues identified.

## Appendix 1: Acceptable Use Agreement (students and parents/carers)

## Foundation/ KS1 Student Acceptable Use Policy Agreement

This is how we stay safe when we use computers:

- I ask a teacher or suitable adult if I want to use the computers/tablets
- I only use activities that a teacher or suitable adult has told or allowed me to use
- I take care of the computer and other equipment
- I keep my personal information and passwords safe.
- I only send messages online which are polite and friendly.
- Iask for help from a teacher or suitable adult if I am not sure what to do or if I think I have done something wrong
- I tell a teacher or suitable adult if I see something that upsets me on the screen
- I know that if I break the rules, I might not be allowed to use a computer/tablet.

## Think before you click



I will only use the Internet and email with an adult



I will only click on icons and links when I know they are safe



I will only send friendly and polite messages



If I see something I don't like on a screen, I will always tell an adult

## KS2/3/4/5 Student Acceptable Use Policy Agreement

Acceptable use of the IT systems in school and internet, or school IT systems offsite: agreement for students and parents/carers.

This policy covers the use of all school-owned IT provision (e.g. computers, Wi-Fi networks, mobile devices) and the use of personal technology on the school site. The use of school-owned IT provision is granted to students as a privilege, and it is for educational use only. If students choose to use their own devices in school, they must follow the rules set out in this agreement, in the same way as if I was using school equipment. By using any IT system or device, students agree to the following.

When using the school's ICT systems and accessing the internet in school:

- My behaviour online is always of a high standard.
- I only use IT systems for educational purposes.
- I use them with a teacher being present, or with a teacher's permission.
- I only access appropriate websites.
- I only access social networking sites when my teacher has expressly allowed this as part of a learning activity.
- I only open any attachments in emails, or follow any links in emails, after first checking with a teacher I will only post pictures or videos on the internet if they are safe and appropriate, and if I have permission.
- I always use appropriate language when communicating online, including in emails.
- I keep my password safe and secure and only log in to the school's network using my own credentials.
- I keep my personal information safe and secure (including my name, address or telephone number) only sharing such information with the permission of my teacher or parent/carer.
- I only arrange to meet anyone offline after first consulting my parent/carer, or with adult supervision.
- I understand that the school internet filter is there to protect me, and I will not try to bypass it.
- I respect other people's information and copyright by giving a reference and asking permission before using images or text from online sources.
- I always check that any information I use online is reliable and accurate.
- I make sure that my internet use is safe and legal, and I am aware that online actions have offline consequences.
- My use of personal devices in school, including, but not exclusively, mobile phones and personal laptops, is within the specific school policy.
- I immediately let a teacher or other member of staff know if I find any material which might upset, distress or harm me or others.
- I know that if I break the rules I might not be allowed to use school systems.

I will always use the school's ICT systems and internet responsibly.

## Appendix 2: Acceptable Use Agreement (staff, governors, volunteers and visitors)

Acceptable use of the school's ICT systems and the Internet: agreement for staff, governors, volunteers and visitors

As a professional organisation with responsibility for safeguarding, all members of staff are expected to use Trust and School IT systems in a professional, lawful, and ethical manner. To ensure that members of staff understand their professional responsibilities when using technology and provide appropriate curriculum opportunities for learners, all staff, governors, volunteers and visitors are expected to have read the Acceptable Usage Policy (AUP) and by using any IT systems they are agreeing to abide by the policy.

Our AUP is not intended to unduly limit the ways in which members of staff teach or use technology professionally, or indeed how they use the internet personally; however, the AUP will help ensure that all staff understand Minerva Learning Trust expectations regarding safe and responsible technology use, and can manage the potential risks posed. The AUP will also help to ensure that school systems are protected from any accidental or deliberate misuse, which could put the safety and security of our systems or members of the community at risk.

#### **Policy Scope**

I understand that this AUP applies to my use of technology systems and services provided to me or accessed as part of my role within Minerva Learning Trust, both professionally and personally. This may include use of laptops, mobile phones, tablets, digital cameras, and email, as well as IT networks, data and data storage, remote learning and online and offline communication technologies.

I understand that the Acceptable Usage Policy (AUP) should be read and followed in line with the Trust staff code of conduct, and that by using any IT systems in school, I am agreeing to abide by this policy.

I am aware that this AUP does not provide an exhaustive list; all staff should ensure that technology use is consistent with the Trust ethos, staff behaviour and safeguarding policies, national and local education and child protection guidance, and the law.

#### **Security and Practice**

When using the Trust's ICT systems, or my own devices with permission, and accessing the internet in school, or outside school on a work device:

I only use the Trust's ICT systems and access the internet in school, or outside school on a work device, for educational purposes or for the purpose of fulfilling the duties of my role, excluding but not limited to material of a violent, criminal or pornographic nature.

I only use IT systems in any way which could not harm the trust's or school's reputation. I do not access social networking sites or chat rooms, unless as an agreed part of my role. I always use appropriate language when communicating online, including in emails or other messaging services.

I agree that the trust will monitor my IT system use and the websites I visit.

I do not attempt to bypass any filtering and/or security systems put in place by the trust and I will report any filtering breaches to the Online Safety Coordinator and the designated safeguarding lead (DSL).

I keep all passwords safe and secure and only log in to each school's network using my own credentials. I lock my device when left unattended.

I take all reasonable steps to ensure that work devices are secure and password-protected when using them outside school and keep all data securely stored in accordance with this policy and the trust's data protection policy. All portable storage devices I use are encrypted and are used in accordance with school policies.

I will let the Online Safety Coordinator and the designated safeguarding lead (DSL) know if a student informs me they have found any material which might upset, distress or harm them or others, and will also do so if I encounter any such material.

If I lose any trust or school-related documents or files, I will report this to IT support and the school or trust Data Protection Officer as soon as possible.

I always use the trust's ICT systems and internet responsibly and ensure that students in my care do so too.

I only install authorised software, including browser toolbars and add-ons.

I do not open any hyperlinks or attachments in emails unless they are from a known and trusted source. If I have any concerns about email content sent to me, I will report them to IT support.

I will promote online safety and security with the learners in my care and will help them to develop a responsible attitude to safety online, system use and to the content they access in line with the Online Safety Curriculum.

## **Appendix 3: Online Safety Training Needs — Self-audit for staff**

Online safety training needs audit	
Name of staff member/volunteer:	Date:
Do you know the name of the person who has lead responsibility for online safety in school?	
Do you know what you must do if a student approaches you with a concern or issue?	
Are you familiar with the school's acceptable use agreement for staff, volunteers, governors and visitors?	
Are you familiar with the school's acceptable use agreement for students and parents?	
Are you familiar with the school's approach to tackling cyberbullying?	
Are there any areas of online safety in which you would like training/futhem here.	urther training? Please record

## **Appendix 4: Online Safety Incident Report Log**

Online safety incident report log				
and signature of staff recording the incident				
_				

## **Appendix 5: Online Safety Curriculum Overview**

This section should be updated with the school's online safety curriculum overview for each key stage. Schools must pay regard to the following two resources when developing the curriculum: Education for a Connected World UKCIS Education for a Connected World .pdf (publishing.service.gov.uk) and Teaching online safety in schools Teaching online safety in schools - GOV.UK (www.gov.uk)



#### Self-image and identity

This strand explores the differences between online and offline identity beginning with self-awareness, shaping online identities and media influence in propagating stereotypes. It identifies effective routes for reporting and support and explores the impact of online technologies on self-image and behaviour.



#### Managing online information

This strand explores how online information is found, viewed and interpreted. It offers strategies for effective searching, critical evaluation of data, the recognition of risks and the management of online threats and challenges. It explores how online threats can pose risks to our physical safety as well as online safety. It also covers learning relevant to ethical publishing.



#### Online relationships

This strand explores how technology shapes communication styles and identifies strategies for positive relationships in online communities. It offers opportunities to discuss relationships, respecting, giving and denying consent and behaviours that may lead to harm and how positive online interaction can empower and amplify voice.



#### Online reputation

This strand explores the concept of reputation and how others may use online information to make judgements. It offers opportunities to develop strategies to manage personal digital content effectively and capitalise on technology's capacity to create effective positive profiles.



#### Online bullying

This strand explores bullying and other online aggression and how technology impacts those issues. It offers strategies for effective reporting and intervention and considers how bullying and other aggressive behaviour relates to legislation.



#### Health, well-being and lifestyle

This strand explores the impact that technology has on health, well-being and lifestyle e.g. mood, sleep, body health and relationships. It also includes understanding negative behaviours and issues amplified and sustained by online technologies and the strategies for dealing with them.



#### Privacy and security

This strand explores how personal online information can be used, stored, processed and shared. It offers both behavioural and technical strategies to limit impact on privacy and protect data and systems against compromise.



#### Copyright and ownership

This strand explores the concept of ownership of online content. It explores strategies for protecting personal content and crediting the rights of others as well as addressing potential consequences of illegal access, download and distribution.