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Hamp Nursery and Infants School

Online Safety Policy 2026/2027

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Introduction

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. A free online safety self-review tool for schools can be found via the* 360 safe self-review tool.

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 non-consensual 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 Hamp Nursery and Infant School 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 exceptions have been made by Headteacher).

Where online safety concerns or incidents occur outside school and are known to the school, Hamp Nursery and Infant School will respond in line with this policy and related procedures, including the school's Safeguarding, Behaviour and Anti-Bullying policies. Where appropriate, parents/carers will be informed of incidents involving inappropriate online behaviour that take place out of school.

Policy development, monitoring and review

This Online Safety policy has been developed by the Online Safety Committee:

- *Michelle Foord - Teacher, SLT, Previous Online safety Lead.*
- *Mary Weatherburn – Headteacher, DSL*
- *Charlotte Beresford – Deputy Head teacher, SLT, governor, deputy DSL*
- *Claire Pappin - School Business Manager, Data Protection Manager*
- *Chelsie Hall – Teacher, SLT, Early Years Leader*
- *Jessica Clements – SLT, PSHE Leader, Class Teacher*
- *Matthew Loveday – Online Safety Governor*
- *Tallena Wynn- Teacher, reviewed Policy as new Online safety lead in Autumn 2025.*

Consultation with the whole school community has taken place through a range of formal and informal meetings.

Schedule for development, monitoring and review

This Online Safety Policy was approved by the *school governing body on:*	
The implementation of this Online Safety Policy will be monitored by:	*Tallena Wynn (Online Safety Leader)*
Monitoring will take place at regular intervals:	*Planning Scrutiny – every half term* *Lesson observation – annual observation of each class teacher.*
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:	*Annually*
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:	*Autumn 2027*
Should serious online safety incidents take place, the following external persons/agencies should be informed:	*Police* *LADO* *Somerset Safeguarding Leads*

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*
- *Reviews of the effectiveness of the filtering systems*
- *surveys/questionnaires (as appropriate) of: Learners, Parents/ carers, Staff.*

Policy and leadership

Responsibilities

Online safety is a shared responsibility. All members of the school community are expected to model safe, responsible behaviour, report concerns promptly and learn from incidents and good practice. The roles below clarify accountability.

Headteacher and senior leaders

Senior leaders set the culture and ensure that systems are effective. In line with KCSIE, the DSL holds day-to-day lead responsibility.

Responsibilities

Headteacher and senior leaders will;

- Ensure 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
- Be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff
- 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.
- Ensure that children are taught about how to keep themselves and others safe online, recognising that effective education will be tailored to the specific needs and vulnerabilities of individual children.
- 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
- Receive regular monitoring reports from the Designated Safeguarding Lead / Online Safety Lead.
- Establish a nominated SLT Lead to work with the DSL and IT provider on the review of the effectiveness on filtering and monitoring systems and ensure these are recorded.

Governors

The DfE guidance "Keeping Children Safe in Education" states:

> "Governing bodies and proprietors should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare …. this includes … online safety"
>
> "Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)"

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. The current online safety governor is Mr Matthew Loveday. KCSIE requires them to:

- Ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring- at induction and regularly updated.
- Ensure that children be taught about safeguarding, including in relation to online safety.
- Review the DfE Filtering and Monitoring Standards and discuss with IT staff and service providers what more needs to be done to support the school in meeting this standard.

This review will be carried out by the school's governors whose members will receive regular information about online safety incidents and monitoring reports.

A member of the governing body 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. (The review will be conducted by members of the SLT, the DSL, and the IT service provider and involve the responsible governor) - in-line with the DfE Filtering and Monitoring Standards
- Reporting to relevant governors group/meeting
- Receiving (at least) basic cyber-security training to enable the governors to check that the school meets the DfE Cyber-Security Standards

- Membership of the school Online Safety Group

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)

Keeping Children Safe in Education states that:

> *"The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description."*
>
> *They (the DSL) "are able to understand the unique 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 at school or college"*
>
> *They (the DSL) "*can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online"

While the responsibility for online safety is held by the DSL and cannot be delegated, the school may choose to appoint an Online Safety Lead or other relevant persons to work in support of the DSL in carrying out these responsibilities. It is recommended that the school reviews the sections below for the DSL and OSL and allocate roles depending on the structure it has chosen

The DSL will:

- Lead safeguarding, including online safety, with clear responsibilities in their job description.
- Maintain up-to-date knowledge of online risks, filtering/monitoring and cyber security.
- Coordinate and record online safety concerns and incidents, escalating and referring in line with safeguarding procedures.
- Liaise with SLT, the Online Safety Governor, the IT provider and relevant external partners as required.
- Review anonymised incident patterns and filtering/monitoring information.
- With the nominated SLT Lead and the IT provider lead the (at least annual) review of the effectiveness on filtering and monitoring systems and ensure that these are recorded.
- Report regularly to SLT and drive continuous improvement across relevant policies and practice, using evidence (e.g. incident data, monitoring, self-review such as 360 safe).

- Ensure appropriate support for learners with SEND.

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
- Liaise with curriculum leaders to 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 (particularly by learners) with regard to the areas defined In Keeping Children Safe in Education:
    - content
    - contact
    - conduct
    - commerce

The Online Safety Leader will work with the DSL to develop a planned and coordinated online safety education programme.

This will be provided through:

- an explicitly taught programme – Active Bytes
- links with PHSE - Jigsaw
- cross-curricular links
- half termly online safety assemblies and pastoral programmes
- through relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week.
- School Newsletter and Google classroom.

- Digital Leaders Group
- Annual Staff training sessions

Teaching and support staff

All staff are expected to uphold professional standards online and contribute to a strong safeguarding culture.

Staff will:

- Have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices
- Understand that online safety is a core part of safeguarding
- Have read, understood, and signed the staff acceptable use agreement (AUA)
- Immediately report any suspected misuse or problem to the DSL 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*
- Ensure 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
- 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
- Ensure that 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 found in internet searches.
- Ensure that where lessons take place using live-streaming or video-conferencing, there is due regard to national safeguarding guidance and local safeguarding policies.
- Have a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc
- 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 DfE Filtering and Monitoring Standards says:

> *"Senior leaders should work closely with governors or proprietors, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring. Your IT service provider may be a staff technician or an external service provider."*
>
> *"Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The DSL should work closely together with IT service providers to meet the needs of your setting. You may need to ask filtering or monitoring providers for system specific training and support."*
>
> *"The IT service provider should have technical responsibility for:*
>
> - *maintaining filtering and monitoring systems*
> - *providing filtering and monitoring reports*
> - *completing actions following concerns or checks to systems"*
>
> *"The IT service provider should work with the senior leadership team and DSL to:*
>
> - *procure systems*
> - *identify risk*
> - *carry out reviews*
> - *carry out checks"*
>
> "We are aware that there may not be full-time staff for each of these roles and responsibility may lie as part of a wider role within the school, college, or trust. However, it must be clear who is responsible, and it must be possible to make prompt changes to your provision."

The school's technology service is provided by an outside contractor, namely Computing Cubed. It remains the responsibility of the school to ensure that the provider carries out all the online safety measures that the school's obligations and responsibilities require. It is also important that the provider follows and implements school Online Safety Policy and procedures.

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 / MAT 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 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
- *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

Parents and carers play a crucial role in ensuring that their children understand the need to use the online services and devices in an appropriate way.

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 which they must sign
- publish information about appropriate use of social media relating to posts concerning the school
- seeking their permissions concerning digital images, cloud services etc
- parents'/carers' evenings, newsletters, website, social media and information about national/local online safety campaigns and literature.

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 at home*
- *Having discussions with their children based on the online safety information posted on Google classroom each half term*

Visitors/ External Agencies

Community users who access school systems/website/learning platform as part of the wider school provision will be expected to sign a community user AUA before being provided with access to school systems.

The school encourages the engagement of agencies/members of the community who can provide valuable contributions to the online safety provision and actively seeks to share its knowledge and good practice with other schools and the community.

Online Safety Group

The Online Safety Group provides a consultative group that has wide representation from the school community, with responsibility for issues regarding online safety and monitoring the Online Safety Policy including the impact of initiatives. Depending on the size or structure of the school this group may be part of the safeguarding group. The group will also be responsible for regular reporting to senior leaders and the governing body.

The Online Safety Group has the following members

- Designated Safeguarding Lead
- Online Safety Lead
- senior leaders
- online safety governor
- Data Protection Lead
- teacher and support staff members
- learners
- parents/carers

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

- consulting stakeholders – including staff/parents/carers about the online safety provision
- monitoring improvement actions identified through use of the 360-degree safe self-review tool

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 DfE guidance "Keeping Children Safe in Education" states:

> "Online safety and the school or college's approach to it should be reflected in the child protection 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
- Supports compliance with KCSIE, DfE Technical Standards and UK GDPR.
- 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 made available to staff at induction, on the school's website and also on the staff public drive
    - Promotes learners' digital competence and critical understanding.

Implementation, monitoring and review

- Developed through the Online Safety Group and reviewed at least annually (KCSIE Para 121), and sooner if risks/technology change.
- Monitored by the DSL/OSL and governors using anonymised incident trends, filtering/monitoring reports and education review activity (e.g. 360 safe,)
- Findings inform improvement planning and staff training priorities.

Communication and accessibility

- Shared at staff induction and reinforced through training.
- Communicated to learners and parents/carers through AUAs and awareness activity.
- 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

An Acceptable Use Agreement is a document that outlines a school's expectations on the responsible use of technology by its users. In most schools they are signed or acknowledged by their staff as part of their conditions of employment. Some may also require learners and parents/carers to sign them, though it is more important for these to be regularly promoted, understood and followed rather than just signed.

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

- pupil induction pack
- staff induction pack
- Staff training
- Newsletters/Google classroom
- posters/notices around where technology is used
- communication with parents/carers
- built into education sessions
- school website
- Digital Leaders

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
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)					X

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
	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					
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	
	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	

Consideration should be given for the following activities when undertaken for non-educational purposes: Schools may wish to add further activities to this list.	Staff and other adults				Learners			
	Not allowed	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission/awa
Online gaming	X						X	
Online shopping/commerce			X		X			
File sharing		X			X			
Social media	X				X			
Messaging/chat	X				X			
Entertainment streaming e.g. Netflix, Disney+			X				X	
Use of video broadcasting, e.g. YouTube, Twitch, TikTok	X				X			
Mobile phones may be brought to school	X				X			
Use of mobile phones for learning at school	X				X			
Use of mobile phones in social time at school	X				X			

Taking photos on mobile phones/cameras	X				X			
Use of other personal devices, e.g. tablets, gaming devices	X				X			
Use of personal e-mail in school, or on school network/wi-fi	X				X			
Use of school e-mail for personal e-mails			X		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
- relevant policies and permissions should be followed when posting information online e.g., school website and social media. Only school e-mail addresses should be used to identify members of staff and learners

Reporting and responding

The 2021 Ofsted "Review of Sexual Abuse in Schools and Colleges" highlighted the need for schools to understand that reporting systems do not always respond to the needs of learners. While the report looks specifically at harmful sexual behaviours, schools may wish to address these issues more generally in reviewing their reporting systems. KCSIE suggests that staff should have a professional curiosity and speak to the designated safeguarding lead if they have concerns about a child. The Ofsted review suggested:

> *"School and college leaders should create a culture where sexual harassment and online sexual abuse are not tolerated, and where they identify issues and intervene early to better protect children and young people. ..In order to do this, they should assume that sexual harassment and online sexual abuse are happening in their setting, even when there are no specific reports, and put in place a whole-school approach to address them. This should include:*

- *routine record-keeping and analysis of sexual harassment and sexual violence, including online, to identify patterns and intervene early to prevent abuse"*

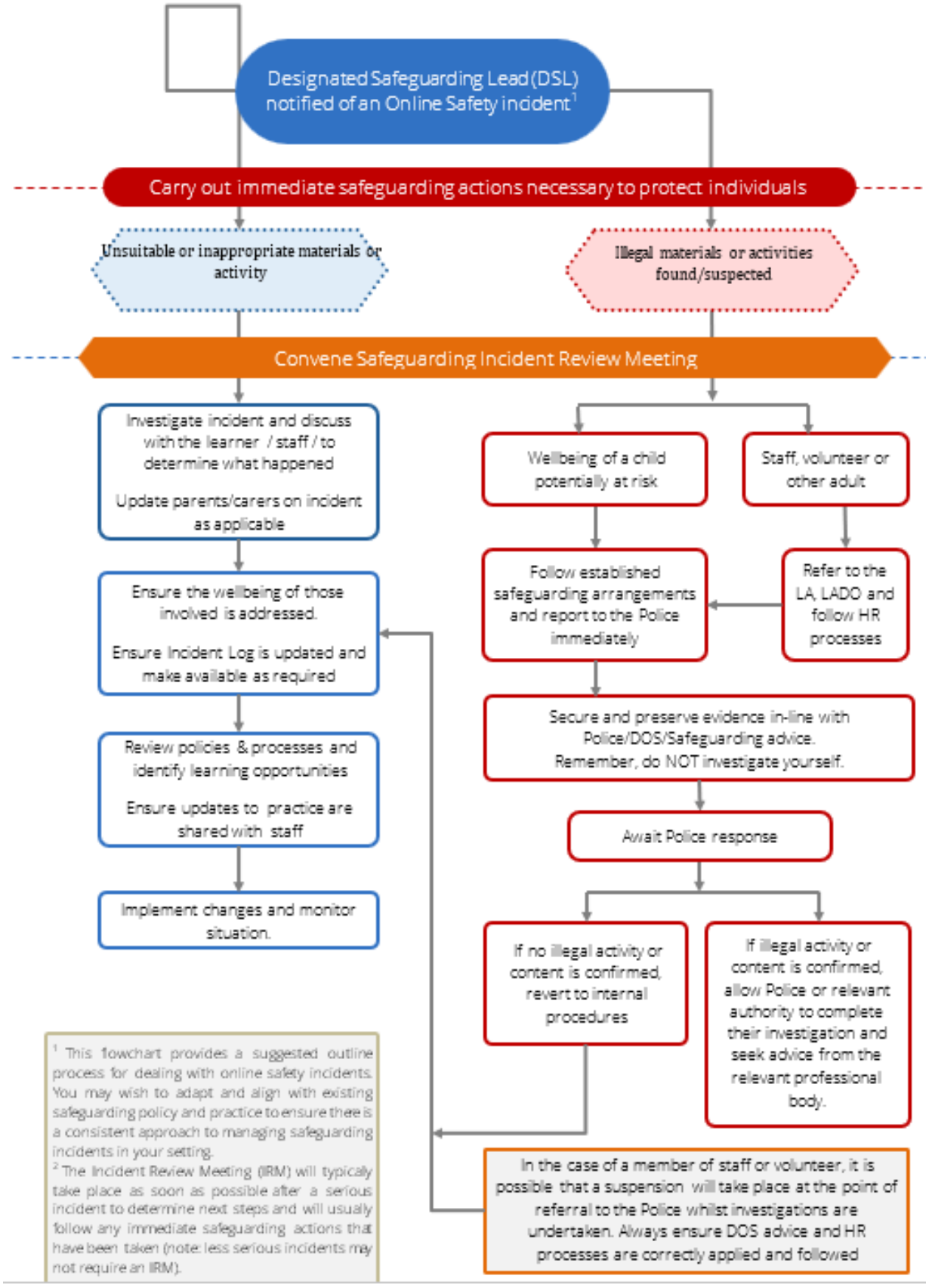
The school will take all reasonable precautions to ensure online safety for all school users but recognises that incidents may occur inside and outside of the school (with impact on the school) which will need intervention. The school will ensure:

- there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the school safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies
- 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
- if there is any suspicion that the incident involves any illegal activity or the potential for serious harm the incident must be escalated through the agreed school safeguarding procedures, as per the online incident flowchart displayed across the school. This may include
    - Non-consensual images
    - Self-generated images
    - Terrorism/extremism
    - Hate crime/ Abuse
    - Fraud and extortion
    - Harassment/stalking
    - Child Sexual Abuse Material (CSAM)
    - Child Sexual Exploitation Grooming
    - Extreme Pornography
    - Sale of illegal materials/substances
    - Cyber or hacking offences under the Computer Misuse Act
    - Copyright theft or piracy
- 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 and the local authority.
- 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 / MAT (as relevant)
    - 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 should be logged on the school's safeguarding system.
- relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority; police; Professionals Online Safety Helpline; Reporting Harmful Content; CEOP.
- those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions (as relevant)
- 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*
    - *parents/carers, through newsletters, school social media, website*
    - *governors, through regular safeguarding updates*
    - *local authority/external agencies, as relevant*

The school will make the flowchart below available to staff to support the decision-making process for dealing with online safety incidents. These are displayed in all classrooms and offices. They are also available on the online safety display and other communal areas.


Designated Safeguarding Lead (DSL) notified of an Online Safety incident[1]
Carry out immediate safeguarding actions necessary to protect individuals
Unsuitable or inappropriate materials or activity
Illegal materials or activities found/suspected
Convene Safeguarding Incident Review Meeting
Investigate incident and discuss with the learner / staff / to determine what happened
Update parents/carers on incident as applicable
Ensure the wellbeing of those involved is addressed.
Ensure Incident Log is updated and make available as required
Review policies & processes and identify learning opportunities
Ensure updates to practice are shared with staff
Implement changes and monitor situation.
Wellbeing of a child potentially at risk
Staff, volunteer or other adult
Follow established safeguarding arrangements and report to the Police immediately
Refer to the LA, LADO and follow HR processes
Secure and preserve evidence in-line with Police/DOS/Safeguarding advice.
Remember, do NOT investigate yourself.
Await Police response
If no illegal activity or content is confirmed, revert to internal procedures
If illegal activity or content is confirmed, allow Police or relevant authority to complete their investigation and seek advice from the relevant professional body.
In the case of a member of staff or volunteer, it is possible that a suspension will take place at the point of referral to the Police whilst investigations are undertaken. Always ensure DOS advice and HR processes are correctly applied and followed
[1] This flowchart provides a suggested outline process for dealing with online safety incidents. You may wish to adapt and align with existing safeguarding policy and practice to ensure there is a consistent approach to managing safeguarding incidents in your setting.
[2] The Incident Review Meeting (IRM) will typically take place as soon as possible after a serious incident to determine next steps and will usually follow any immediate safeguarding actions that have been taken (note: less serious incidents may not require an IRM).

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 as follows:

Responding to Learner Actions

Incidents	Refer to class teacher/tutor	Refer to Head of Department / Principal Teacher / Deputy Head	Refer to Headteacher	Refer to Police/Social Work	Refer to local authority technical support for advice/action	Inform parents/carers	Remove device/ network/internet access	Issue a warning	Further sanction, in line with behaviour policy
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on User Actions on unsuitable/inappropriate activities).		X	X	X					
Attempting to access or accessing the school network, using another user's account (staff or learner) or allowing others to access school network by sharing username and passwords									
Corrupting or destroying the data of other users.									
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature									
Unauthorised downloading or uploading of files or use of file sharing.									
Using proxy sites or other means to subvert the school's filtering system.									

Accidentally accessing offensive or pornographic material and failing to report the incident.									
Deliberately accessing or trying to access offensive or pornographic material.									
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act.									
Unauthorised use of digital devices (including taking images)									
Unauthorised use of online services									
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.									
Continued infringements of the above, following previous warnings or sanctions.									

Responding to Staff Actions

Incidents	Refer to line manager	Refer to Headteacher/ Principal	Refer to local authority/MAT/HR	Refer to Police	Refer to LA / Technical Support Staff for action re filtering, etc.	Issue a warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities)		X	X	X				
Deliberate actions to breach data protection or network security rules.		X	X					
Deliberately accessing or trying to access offensive or pornographic material		X	X	X				
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software		X	X	X				
Using proxy sites or other means to subvert the school's filtering system.		X						
Unauthorised downloading or uploading of files or file sharing		X						
Breaching copyright or licensing regulations.		X						
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account.		X						

Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature		x	x					
Using personal e-mail/social networking/messaging to carry out digital communications with learners and parents/carers		x	x					
Inappropriate personal use of the digital technologies e.g. social media / personal e-mail		x						
Careless use of personal data, e.g. displaying, holding or transferring data in an insecure manner		x						
Actions which could compromise the staff member's professional standing		x						
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.		x						
Failing to report incidents whether caused by deliberate or accidental actions		x						
Continued infringements of the above, following previous warnings or sanctions.			x					

Use of Artificial Intelligence (AI)

A more detailed policy is on our SharePoint and website.

Generative AI (Gen AI) is developing rapidly and its use in education is increasing. In schools, AI is typically used in three areas: learner support, teacher support, and school operations. All use must be safe, ethical and responsible.

We recognise that Gen AI can introduce risks. These risks can be reduced through our existing safeguarding, data protection and technical security arrangements, and by updating procedures where needed. Safeguarding of learners and staff remains central to our approach.

KSCIE 2026 recognises that learners may be subject to harmful online interation with other users or generative AI applications that simulate these.

Policy statements

The school will:

- Support appropriate use of AI to enhance learning and teaching, improve outcomes, streamline administration and reduce workload. Staff remain professionally responsible and accountable for any work supported by AI.
- Comply with relevant law and guidance, including Keeping Children Safe in Education (KCSIE) and UK GDPR.
- Provide training and guidance for staff and governors on the benefits, risks and safe use of AI, and identify further development needs.
- Teach about AI through the curriculum where appropriate, helping learners understand how Gen AI works, its benefits and limitations, and its ethical and social impacts.

Safe use, data protection and security

The school will:

- Protect personal and sensitive data. Staff must not enter personally identifiable or sensitive information into AI tools. Where AI is used, staff should use anonymised data only.
- Require UK GDPR compliance. Staff must ensure any AI tool used meets data protection and security requirements before use.
- Approve tools and accounts. Only school-approved AI tools may be used for schoolwork, and staff should use school-provided AI accounts where available to support oversight and reduce risk.
- Safeguard sensitive information. Internal documents, strategic plans or other sensitive material must not be entered into third-party AI tools unless the tool and purpose have been explicitly approved.

Quality, fairness and integrity

The school will:

- Maintain human oversight. AI may support work but must not replace professional judgement—especially in decisions that affect people. AI outputs must be checked for accuracy before sharing or publishing.
- Promote transparency. Where AI has materially supported an output (e.g. documents, presentations, communications), staff should make this clear where appropriate.

- Address bias and discrimination. We recognise AI outputs may reflect bias. The school will use appropriate safeguards, review processes and procurement checks to prioritise fairness and safety.
- Protect copyright and intellectual property. The school will take steps to avoid copyright infringement and protect the intellectual property of staff and learners, including ensuring learners' work is not used to train AI systems without appropriate consent.

Reporting, monitoring and accountability

The school will:

- Require prompt reporting of AI-related concerns, including misuse, data incidents or inappropriate outputs, to DSL and report to my concern.
- Maintain an inventory of AI tools in use, with purposes and risks recorded, and carry out regular review using the risk assessment matrices in Appendix C7.
- Engage parents/carers with clear information about how AI is used in school (e.g. an "AI in our school" guide).

Misuse and disciplinary action

Improper use of AI—including breaches of this policy, data protection failures, misuse of sensitive information, or failure to follow agreed processes—may result in action under the school's Staff Disciplinary Policy.

Online Safety Education Programme

While regulation and technical solutions are particularly important, their use must be balanced by educating learners to take a responsible approach. The education of learners in online safety is therefore an essential part of the school's online safety provision. Learners need the help and support of the school to recognise and avoid online safety risks and develop their resilience.

The 2021 Ofsted "Review of Sexual Abuse in Schools and Colleges" highlighted the need for:

> *"a carefully sequenced RSHE curriculum, based on the Department for Education's (DfE's) statutory guidance, that specifically includes sexual harassment and sexual violence, including online. This should include time for open discussion of topics that children and young people tell us they find particularly difficult, such as consent and the sending of 'nudes'.."*

Keeping Children Safe in Education states:

> "*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 ..."

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 e.g. Education for a Connected Work Framework by UKCIS/DCMS and the SWGfL Project Evolve and regularly taught in a variety of contexts
- 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
- learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school. Acceptable use is reinforced across the curriculum, with opportunities to discuss how to act within moral and legal boundaries online, with reference to the Computer Misuse Act 1990
- staff should act as good role models in their use of digital technologies the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that learners should be 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 learners are allowed to freely search the internet, staff should be vigilant in supervising the learners and monitoring the content of the websites the young people visit
- it is accepted that from time to time, for good educational reasons, students may need to research topics, (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff should be able to request the temporary removal of those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need

- the online safety education programme should be relevant and up to date to ensure the quality of learning and outcomes.

Contribution of Learners

The school acknowledges, learns from, and uses the skills and knowledge of learners in the use of digital technologies. We recognise the potential for this to shape the online safety strategy for the school community and how this contributes positively to the personal development of young people. Their contribution is recognised through:

- *mechanisms to canvass learner feedback and opinion.*
- *appointment of digital leaders*
- *learners contribute to the online safety education programme e.g. peer education, digital leaders leading lessons for younger learners, online safety campaigns*
- *contributing to online safety events with the wider school community e.g. parents' evenings, Safer Internet day*
- Understand why online services us minimum- age requirements and how these may support safety, privacy and wellbeing.
- Make informed decisions about participation in social media, messaging, gaming and other online communities, including services they may not yet be permitted to use.
- Understand they legal or platform restrictions do not remove the need to learn about online relationships, harmful content, image sharing, scams, exploitation and digital wellbeing
- Understand the schools mobile-phone requirements and the safeguarding, behaviour, learning and wellbeing reasons that underpin them.

Where internet use is planned, learners are guided to appropriate resources and supported if unsuitable content is encountered. Where open searching is permitted, staff supervise and remain vigilant. Filtering may be temporarily adjusted for legitimate curriculum research, with auditable approval and clear rationale.

Learner voice is actively used to strengthen the school's approach through feedback, learner representation (e.g. on an Online Safety Group), and opportunities such as digital leaders, peer mentoring, campaigns, and contribution to acceptable use and community-facing online safety activities. Learners are given appropriate opportunities to discuss changes affecting their digital lives and to express concerns about friendship, belonging, access, exclusion and wellbeing.

Staff/volunteers

The DfE guidance "Keeping Children Safe in Education" states:

> "All staff should receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively."
>
> "Governing bodies and proprietors should ensure… that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning."

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
- the Online Safety Lead and Designated Safeguarding Lead (or other nominated person) will receive regular updates through attendance at external training events, (e.g. UKSIC / SWGfL/ LA / other relevant organisations) and by reviewing guidance documents released by relevant organisations
- this Online Safety Policy and its updates will be presented to and discussed by staff in staff/team meetings/INSET days
- the Designated Safeguarding Lead/Online Safety Lead (or other nominated person) will provide advice/guidance/training to individuals as required.
- staff understand the school's filtering and monitoring requirements, the responsibilities relevant to their role and how concerns or alerts must be reported
- staff understand that filtering and monitoring supports - but does not replace - effective supervision, professional curiosity and safeguarding judgement
- staff are informed of the outcome of the school's annual filtering and monitoring review where relevant to their roles
- staff understand and consistently apply the school's mobile-phone requirements, including expectations for their own professional use of personal devices. They know how authorised exceptions for learners are approved and managed.

- staff follow cyber security policy and requirements.

Governors

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:

- attendance at training provided by the local authority
- participation in school training / information sessions for staff or parents (this may include attendance at assemblies/lessons).

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 understand the school's filtering and monitoring provision, in order that they can participate in the required checks and review

Families

Many parents and carers have only a limited understanding of online safety risks and issues, yet they play an essential role in the education of their children and in the monitoring/regulation of the children's online behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

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

- regular clear communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes
- regular opportunities for engagement with parents/carers on online safety issues through awareness workshops / parent/carer evenings etc
- 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.
- letters, newsletters, website, learning platform,
- high profile events / campaigns e.g. Safer Internet Day
- reference to the relevant web sites/publications, e.g. SWGfL; www.saferinternet.org.uk/; www.childnet.com/parents-and-carers (see Appendix for further links/resources).
- Sharing good practice with other schools in clusters and or the local authority/MAT

- clear communication about the school's mobile-phone arrangements, the reasons for the policy, authorised exceptions and the consequences of breaches
- accurate, balanced and age-appropriate information about changes affecting social media and other online services
- guidance and support for parents on managing and supporting their children's online experiences and how to report and manage issues.
- guidance to help parents encourage their children to report online safeguarding concerns, regardless of any restrictions in place
- mechanisms that evaluate the efficacy of school's strategy on mobile phones, online services and family engagement

Adults and Agencies

The school will provide opportunities for local community groups and members of the wider community to gain from the school's online safety knowledge and experience. This may be offered through the following:

- online safety messages targeted towards families and relatives.
- *providing family learning courses in use of digital technologies and online safety*
- *providing online safety information via their website and social media for the wider community*
- *supporting community groups, e.g. early years settings, childminders, youth/sports/voluntary groups to enhance their online safety provision*

Technology

The DfE Filtering and Monitoring Standards states that "**Your IT service provider may be a staff technician or an external service provider".** If the school has an external technology provider, it is the responsibility of the school to ensure that the provider carries out all the online safety and security measures that would otherwise be the responsibility of the school. It is also important that the technology provider is fully aware of the school Online Safety Policy/acceptable use agreements and the school has a Data Processing Agreement in place with them. The school should also check their local authority/other relevant body policies on these technical and data protection issues if the service is not provided by the authority and will need to ensure that they have completed a Data Protection Impact Assessment (DPIA) for this contract.

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 DfE guidance (for England) on filtering and monitoring in "Keeping Children Safe in Education" states:

> "It is essential that governing bodies and proprietors ensure that appropriate filtering and monitoring systems are in place …governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the … risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified…
>
> The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty. To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards…"

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 or if incidents occur 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, e.g. remote access or BYOD or new technology is introduced

Filtering

- the school manages access to content across its systems for all users and on all devices using the school's 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
- the school has provided enhanced/differentiated user-level filtering
- younger learners will use child friendly/age-appropriate search engines
- the school has a strict ban on personal devices (including mobile phones) being used on school property unless prior agreement is made by Head teacher/ DSL.
- access to content through non-browser services (e.g. apps and other mobile technologies) is managed in ways that are consistent with school policy and practice
- where Generative AI products are used they must effectively and reliably prevent users from accessing harmful or inappropriate content and filtering mechanisms should be embedded within these products
- the technical limitations of the filtering system are understood, including whether the solution can monitor and filter real-time, dynamic, personalised or AI generated content
-

If necessary, the school will seek advice from, and report issues to, the SWGfL Report Harmful Content site.

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. These may include:

- 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
- *pro-active alerts inform the school of breaches to the filtering policy, allowing effective intervention*
- *where possible, school technical staff regularly monitor and record the activity of users on the school technical systems*
- *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 Business Manager 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 device 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 DfE guidance "Keeping Children Safe in Education" states:

> *"The school or college should have a clear policy on the use of mobile and smart technology. Amongst other things this will reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. Schools and colleges should carefully consider how this is managed on their premises and reflect this in their mobile and smart technology policy and their child protection policy.*

Mobile technology devices must be school owned and might include smartphone, tablet, wearable devices, notebook/laptop or other technology that usually has the capability of utilising the school's wireless network. The device then has access to the wider internet which may include the school learning platform and other cloud-based services such as e-mail and data storage.

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[1]	Student owned	Staff owned	Visitor owned
Allowed in school	**Yes**	**Yes**	**No**	No	No	No
Full network access	Yes	Yes	No			
Internet only						
No network access						

School owned/provided devices:

- *all school devices are managed though the use of Mobile Device Management software*
- *there is an asset log that clearly states whom a device has been allocated to. There is clear guidance on where, when and how use is allowed*
- *any designated mobile-free zone is clearly signposted*
- *personal use (e.g. online banking, shopping, images etc.) is clearly defined and expectations are well-communicated*
- *the use of devices on trips/events away from school is clearly defined and expectation are well-communicated*

- *liability for damage aligns with current school policy for the replacement of equipment*
- *education is in place to support responsible use*

Personal devices:

- *there is a clear policy covering the use of personal mobile devices on school premises for all users*
- *where devices are used to support learning, staff have been trained in their planning, use and implementation, ensuring that all learners can access a required resource*
- *where personal devices are brought to school, but their use is not permitted, appropriate, safe and secure storage should be made available*
- *use of personal devices for school business is defined in the acceptable use policy and staff handbook. Personal devices commissioned onto the school network are segregated effectively from school-owned systems*
- *the expectations for taking/storing/using images/video aligns with the school's acceptable use policy and use of images/video policy. The non-consensual taking/using of images of others is not permitted*
- *liability for loss/damage or malfunction of personal devices is clearly defined*
- *there is clear advice and guidance at the point of entry for visitors to acknowledge school requirements*
- *education about the safe and responsible use of mobile devices is included in the school online safety education programmes*

Social media

With widespread use of social media for professional and personal purposes a policy that sets out clear guidance for staff to manage risk and behaviour online is essential. Core messages should include the protection of learners, the school and the individual when publishing any material online.

Expectations for teachers' professional conduct are set out in the DfE Teachers Standards but all adults working with children and young people must understand that the nature and responsibilities of their work place them in a position of trust and that their conduct should reflect this.

All schools and local authorities have a duty of care to provide a safe learning environment for learners and staff. Schools could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, bully online, discriminate on the grounds of sex, race, or disability or who defame a third party may render the school liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

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, or their working environment or conditions.
- 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, nor hold the profession or school in any disrepute.
- 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
- *the school does NOT permit access to personal social media sites during school hours*

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

School use of social media for professional purposes will be checked regularly by a senior leader and the Online Safety Lead to ensure compliance with the social media, data protection, communications, digital image and video policies. In the event of any social media issues that the school is unable to resolve support may be sought from the Professionals Online Safety Helpline.

Digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and learners instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and learners need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for online bullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees.

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.
- 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
- staff and volunteers are allowed to take digital/video images to support educational aims, but must follow school policies concerning the sharing, storage, distribution and publication of those images
- care should be taken when sharing digital/video images that learners are appropriately dressed

- learners must not take, use, share, publish or distribute images of others without their permission
- *photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with Online Safety Policy*
- learners' full names 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. Permission is not required for images taken solely for internal purposes
- 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
- learners' work can only be published with the permission of the learner and parents/carers.

Online Publishing

The school communicates with parents/carers and the wider community and promotes the school through

- Public-facing website
- Online Platform (Google Classroom)
- Online newsletters
- Email

The school website is managed/hosted by Primarysite. 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.

The school public online publishing provides information about online safety e.g., publishing the schools Online Safety Policy and acceptable use agreements; curating latest advice and guidance; news articles etc, creating an online safety page on the school website.

The website includes an online reporting process for parents and the wider community to register issues and concerns to complement the internal reporting process.

Data Protection

Personal data will be recorded, processed, transferred, and made available according to the current data protection legislation. (The Data (Use and Access) Act 2025 makes additional requirements on schools – particularly that online services accessed by pupils meet higher protection standards)

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
- has a 'Record of Processing Activities' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- the Record of Processing Activities lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis is listed
- has an 'information asset register' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- information asset register lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis will have also been listed
- 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 procedures in place to deal with the individual rights of the data subject.
- carries out Data Protection Impact Assessments (DPIA) where necessary e.g. to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier
- 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
- reports any relevant breaches to the Information Commissioner within 72hrs of becoming aware of the breach as required by law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents
- has a Freedom of Information Policy which sets out how it will deal with FOI requests
- 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.
- where AI and Automated Decision-Making are in use, human oversight will be maintained for significant decisions, risk assessments will be conducted and the school will ensure automated systems are transparent and explainable

The use of removable media is prohibited. When personal data is stored on a school provided mobile device:

- device will be password protected.
- device will be protected by up-to-date endpoint (anti-virus) software
- data will be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete.

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. Work laptops are provided and staff have access to the remote desktop and SharePoint.
- use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data

- transfer data using encryption, a secure email account (where appropriate), and secure password protected devices.

The Personal Data Advice and Guidance in the appendix (B2) provides more detailed information on the school's responsibilities and on good practice.

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
- parents/carers are informed of patterns of online safety incidents as part of the school's online safety awareness raising
- online safety (and related) policies and procedures are regularly updated in response to the evidence gathered from these reviews/audits/professional debate
- the evidence of impact is shared with other schools, agencies and LAs to help ensure the development of a consistent and effective local online safety strategy.

Appendix

Copies of the more detailed template policies and agreements, contained in the appendix, can be found in the links and resources section of the relevant aspects in the 360safe self-review tool and online on the SWGfL website. The appendices are as follows:

A1 - Learner Acceptable Use Agreement Template – for older learners
A2 - Learner Acceptable Use Agreement Template – KS2
A3 - Learner Acceptable Use Agreement Template – for younger learners (Foundation/KS1)
A4 - Parent/Carer Acceptable Use Agreement Template
A5 - Staff (and Volunteer) Acceptable Use Policy Agreement Template
A6 - Community Users Acceptable Use Agreement Template
A7 – Online Safety Group Terms of Reference Template
A8 - Harmful Sexual Behaviour Policy Template (new template added September 2022)
A9 - Computer Misuse and Cyber Choices Policy Template
A10 - Responding to incidents of misuse – flow chart
A11 - Record of reviewing devices/internet sites (responding to incidents of misuse)
A12 - Reporting Log

B1 - Training Needs Audit Log
C1 - Technical Security Policy Template (including filtering and passwords)
C2 - Personal Data Advice and Guidance
C3 - School Online Safety Policy Template: Electronic Devices - Searching Screening and Confiscation (new DfE guidance from September 2022)
C4 - Mobile Technologies Policy Template (inc. BYOD/BYOT)
C5 - Social Media Policy Template
Legislation
Links to other organisations and resources
Glossary of Terms

SWGfL would like to acknowledge a range of individuals and organisations whose policies, documents, advice, and guidance have contributed to the development of this school Online Safety Policy template and of the 360 safe online safety self-review tool:

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Signed:  Date: 19 March 2026

Michelle Martin - Chair of Governors