



# Online Safety policy and guidance

Stopsley Community Primary School and Nursery

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# 1. Aims

Our school aims to:

- › Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- › Identify and support groups of pupils that are potentially at greater risk of harm online than others
- › Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- › Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

## The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- › **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- › **Contact** – being subjected to harmful online interaction with other users, such as 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, such as 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

# 2. Legislation and guidance

This policy is based on the Department for Education's (DfE) statutory safeguarding guidance, [Keeping Children Safe in Education](#), and its advice for schools on:

- › [Teaching online safety in schools](#)
- › [Preventing and tackling bullying](#) and [cyber-bullying: advice for headteachers and school staff](#)
- › [Relationships and sex education](#) and [Searching, screening and confiscation](#)

It also refers to the Department's guidance on [protecting children from radicalisation](#).

It reflects existing legislation, including but not limited to the [Education Act 1996](#) (as amended), the [Education and Inspections Act 2006](#) and the [Equality Act 2010](#). In addition, it reflects the [Education Act 2011](#), which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on pupils' electronic devices where they believe there is a 'good reason' to do so.

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

### 3. Roles and responsibilities

#### 3.1 The governing board

The governing board has overall responsibility for monitoring this policy and holding the headteacher to account for its implementation.

The governing board will make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.

The governing board will also make sure all staff receive regular online safety updates (via email, e-bulletins and staff meetings), as required and at least annually, to ensure they are continually provided with the relevant skills and knowledge to effectively safeguard children.

The governing board will co-ordinate regular meetings with appropriate staff to discuss online safety, requirements for training, and monitor online safety logs as provided by the designated safeguarding lead (DSL).

The governing board should ensure children are taught how to keep themselves and others safe, including keeping safe online.

The governing board must ensure the school has appropriate filtering and monitoring systems in place on school devices and school networks, and will regularly review their effectiveness. The board will review the DfE filtering and monitoring standards, and discuss with IT staff and service providers what needs to be done to support the school in meeting those standards, which include:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems;
- Reviewing filtering and monitoring provisions at least annually;
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning;
- Having effective monitoring strategies in place that meet their safeguarding needs.

All governors will:

- Ensure they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet (appendix 3)
- Ensure that online safety is a running and interrelated theme while devising and implementing their whole-school or college approach to safeguarding and related policies and/or procedures
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable

### **3.2 The headteacher**

The headteacher is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school.

### **3.3 The designated safeguarding lead**

Details of the school's designated safeguarding lead (DSL) and deputies are set out in our child protection and safeguarding policy, as well as relevant job descriptions.

The DSL takes lead responsibility for online safety in school, in particular:

- Supporting the headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school
- Working with the headteacher and governing board to review this policy annually and ensure the procedures and implementation are updated and reviewed regularly
- Taking the lead on understanding the filtering and monitoring systems and processes in place on school devices and school networks
- Working with the ICT manager to make sure the appropriate systems and processes are in place
- Working with the headteacher, ICT manager and other staff, as necessary, to address any online safety issues or incidents
- Managing all online safety issues and incidents in line with the school's child protection policy
- Ensuring that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety (appendix 4 contains a self-audit for staff on online safety training needs)
- 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
- Undertaking annual risk assessments that consider and reflect the risks children face
- Providing regular safeguarding and child protection updates, including online safety, to all staff, at least annually, in order to continue to provide them with relevant skills and knowledge to safeguard effectively

This list is not intended to be exhaustive.

### **3.4 The ICT manager**

The school has an ICT management support agreement provided by In Term IT Ltd. The school ensures that the technical staff carries out all e-Safeguarding measures. The support link at Luton Borough Council provides a member of staff to support In Term at timely intervals.

The ICT management support is responsible for:

- Putting in place appropriate filtering and monitoring systems, which are updated on a regular basis and keep pupils safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
- Ensuring that the school's ICT 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 monthly basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files

This list is not intended to be exhaustive.

The school has a managed filtering service provided by an outside contractor (currently E2BN Protex Limited). Therefore it is the responsibility of the school to ensure that the managed service provider carries out all the e-Safeguarding measures that would otherwise be the responsibility of the school. In the event of any issue the procedure is for E2BN to contact Luton Borough Council who would then in turn contact the school.

### **3.5 All staff and volunteers**

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

- Maintaining an understanding of this policy If anything is not understood it should be brought to the attention of the e-safety lead.
- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet and ensuring that pupils follow the school's terms on acceptable use
- Knowing that the DSL is responsible for the filtering and monitoring systems and processes, and being aware of how to report any incidents of those systems or processes failing by reporting directly to the DSL.
- Working with the DSO to ensure that any online safety incidents are logged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy
- Ensuring that they have an up to date awareness of online safety matters and the current school policy and practices.
- Ensuring that all digital communication with pupils and parents/ carers should be on a professional level and only carried out using official school systems.
- Online safety issues being embedded in all aspects of the curriculum and other activities and implement current policies with regard to the use of digital technologies, mobile devices, cameras etc in lessons.
- Ensuring that lessons, where internet use is pre-planned, guide pupils 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
- The reporting flowcharts contained within this online safety policy are understood and followed

This list is not intended to be exhaustive.

### 3.6 Parents

Parents are expected to:

- Notify a member of staff or the headteacher/e-safety Lead 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

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

- What are the issues? - [UK Safer Internet Centre](#)
- Hot topics - [Childnet International](#)
- Parent factsheet - [Childnet International](#)

### 3.7 Visitors and members of the community

Visitors and members of the community who use the school's ICT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use

## 4. Educating pupils about online safety

4.1 Pupils will be taught about online safety as part of the [National Curriculum computing programmes of study](#),

From September 2020, children will also learn about online safety through [Relationships education and health education](#).

Pupils in **Key Stage 1** will be taught to:

- Use technology safely and respectfully, keeping personal information private
- Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies

Pupils in **Key Stage 2** will be taught to:

- Use technology safely, respectfully and responsibly
- Recognise acceptable and unacceptable behaviour
- Identify a range of ways to report concerns about content and contact

*By the **end of primary school**, pupils will know:*

- *That people sometimes behave differently online, including by pretending to be someone they are not.*

- › *That the same principles apply to online relationships as to face-to-face relationships, including the importance of respect for others online including when we are anonymous*
- › *The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them*
- › *How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met*
- › *How information and data is shared and used online*
- › *How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know*

In addition, at Stopsley:

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 pupils' awareness of the dangers that can be encountered online and may also invite speakers to talk to pupils about this.

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.

## **5. Educating parents about online safety**

The school will raise parents' awareness of internet safety in letters or other communications home, and in information via our website. Parents will be made aware of the sites children will be asked to access and who from the school (if anyone) their child will be interacting with online. This policy will also be shared with parents.

Online safety will also be covered through parental workshops or presentations and may be discussed during parents' evenings.

If parents have any queries or concerns in relation to online safety, these should be raised in the first instance with their class teacher and/or the E-Safety lead.

## **6. Cyber-bullying**

### **6.1 Definition**

Cyber-bullying 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. (See also the school behaviour policy.)

### **6.2 Preventing and addressing cyber-bullying**

To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.



The school will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Class teachers will discuss cyber-bullying with their class, 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 cyber-bullying, its impact and ways to support pupils, as part of safeguarding training (see section 11 for more detail).

The school also sends information/leaflets on cyber-bullying to parents so that they are aware of the signs, how to report it and how they can support children who may be affected.

In relation to a specific incident of cyber-bullying, the school will follow the processes set out in the school behaviour policy. Where illegal, inappropriate or harmful material has been spread among pupils, the school will use all reasonable endeavours to ensure the incident is contained.

The DSO 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.

### **6.3 Examining electronic devices**

The headteacher, and any member of staff authorised to do so by the headteacher, can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or pupils, and/or
- Is identified in the school rules as a banned item for which a search can be carried out, and/or
- Is evidence in relation to an offence

Before a search, the authorised staff member will:

- Make an assessment of how urgent the search is, and consider the risk to other pupils and staff
- Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it
- Seek the pupil's cooperation

Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so.

When deciding whether there is a 'good reason' to examine data or files on an electronic device, the staff member should reasonably suspect that the device has, or could be used to:

- Cause harm, and/or
- Undermine the safe environment of the school or disrupt teaching, and/or
- Commit an offence

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSO / headteacher to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response.

When deciding if there is a good reason to erase data or files from a device, staff members will consider if the material may constitute evidence relating to a suspected offence. In these instances, they will not delete the material and the device will be handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if:

- They reasonably suspect that its continued existence is likely to cause harm to any person, and/or
- The pupil and/or the parent refuses to delete the material themselves

If a staff member **suspects** a device **may** contain an indecent image of a child (also known as a nude or semi-nude image), they will:

- **Not** view the image
- Confiscate the device and report the incident to the DSL (or equivalent) immediately, who will decide what to do next. The DSL will make the decision in line with the DfE's latest guidance on [screening, searching and confiscation](#) and the UK Council for Internet Safety (UKCIS) guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

Any searching of pupils will be carried out in line with:

- The DfE's latest guidance on [searching, screening and confiscation](#)
- UKCIS guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- Our behaviour policy

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

## 6.4 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

SCPS&N recognises that AI has many uses to help pupils learn, but may also have the potential to be used to bully others. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

SCPS&N will treat any use of AI to bully pupils in line with our behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out a risk assessment where new AI tools are being used for school business.

## **7. Acceptable use of the ICT in school**

### **7.1 Use of the internet**

All pupils, parents, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of the school's ICT systems and the internet. Visitors will be expected to read and agree to the school's terms on 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 pupils, staff, volunteers, governors and visitors (where relevant) to ensure they comply with the above. The outside contractor (currently E2BN Protext Ltd) regularly monitors and records activity of users on the school's ICT network.

More information is set out in the acceptable use agreements.

### **7.2 Use of digital and video images**

Staff, parents and pupils need to be aware of the significant benefits to learning as well as risks associated with publishing digital images on the internet. Such images may provide avenues for cyberbullying 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.

The school will inform and educate users about these risks to reduce the likelihood of the potential for harm:

- When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular, they should recognise the risks attached to publishing their own images on the internet.
- In accordance with guidance from the Information Commissioner's Office, parents are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents /carers comment on any activities involving other pupils in the digital/video images.
- Staff and volunteers are allowed to take digital/video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those images should only be taken on school equipment; the personal equipment of staff should not be used for such purposes.
- Pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' 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 pupils are published on the school website (covered as part of the AUP signed by parents or carers at the start of the year)

The school has a separate Distance Learning Policy which covers the protocol and acceptable usage for staff and children in the event of a school closure and lessons moving to a digital platform.

### **7.3 Use of mobile phones and smart watches by staff or visitors to the school.**

Staff, parents and visitors to the school should ensure their mobile devices are turned off or placed in a lockable drawer/locker whilst walking around the school or in classrooms.

- No device should be used in the presence of children.
- Smart watches can be worn in school but apps that link to mobile phones and allow access via the watch should be disabled and not used in the presence of children.

## **8. Pupils bringing mobile/smart devices into school**

Pupils may bring mobile devices into school, but they must be handed to their class teacher upon entering the classroom, for them to be handed back at the end of the school day. They are not permitted to use them in any way on school property. No pupil is allowed to wear a smart watch when on school property and any brought into school must be handed in to the class teacher upon entering the classroom.

Any breach of the acceptable use agreement by a pupil may trigger disciplinary action in line with the school behaviour policy, which may result in the confiscation of their device.

## **9. Staff using work devices outside school**

Staff members using a work device outside 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.

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 it outside school. Any USB devices 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 ICT manager.

Work devices must be used solely for work activities.

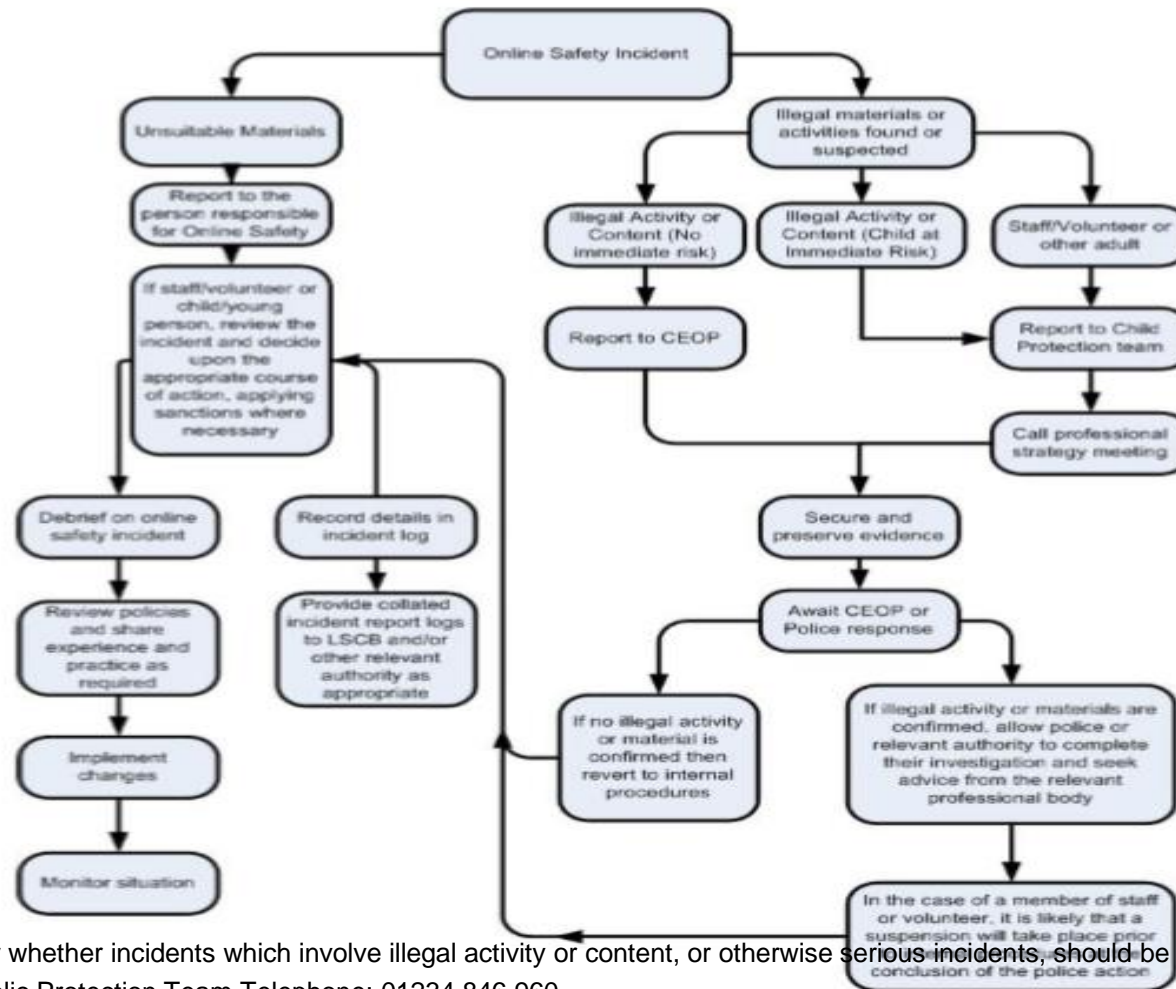
## **10. How the school will respond to issues of misuse**

### **10.1 Response to any incident**

Where a pupil misuses the school's ICT systems or internet, we will follow the procedures set out in our 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 code of conduct. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The flowchart below offers guidance for staff when dealing with any online safety incident and the appropriate action required.



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

Bedfordshire Police Public Protection Team Telephone: 01234 846 960

Catherine Barrett Business Manager Luton Safeguarding Children Board

Email: [catherine.barrett@luton.gov.uk](mailto:catherine.barrett@luton.gov.uk)

Telephone: 01582 547 590

If members of staff suspect that misuse might have taken place, but that the misuse is not illegal (as above), it is essential that correct procedures are used to investigate, preserve evidence and protect those who carry out their investigation. In such events the 'Procedure for Reviewing Internet Sites for Suspected Harassment and Distress' should be followed. This guidance recommends that more than one member of staff is involved in the investigation which should be carried out on a 'clean' designated computer.

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.

The school will take all reasonable precautions to ensure e-Safeguarding. However, owing to their international scale and linked nature of internet content, the availability of mobile technologies and speed of change, it is not possible to guarantee that unsuitable materials will never appear on a school computer or mobile device. Neither the school nor the Local Authority can accept liability for material accessed, or any consequences of Internet access.

## 10.2 PREVENT

In accordance with the Prevent Strategy, which aims to prevent children and young people being exposed to extremist views and at risk of radicalisation, staff are all trained on the channel programme [http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html). This responsibility extends to online safety and protecting children from extremist material online. Through this training, staff are aware of how the internet is used to radicalise people. Filtering should prevent access to such extremist sites but any material accessed at school should be treated as an online safety incident and dealt with accordingly. Disclosures or concerns regarding exposure outside of school should be treated as a safeguarding incident and dealt with in accordance with the Safeguarding policy and procedures (cf. Safeguarding policy).

## 11. Training

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.

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, e-bulletins and staff meetings).

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, e-bulletins and staff meetings).

By way of this training, all staff will be made aware that:

- Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse
- Children can abuse their peers online through:

- Abusive, harassing and misogynistic messages
  - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
  - Sharing of abusive images and pornography, to those who don't want to receive such content
- Physical abuse, sexual violence and initiation/hazing type violence can all contain an online element

Training will also help staff:

- Develop better awareness to assist in spotting the signs and symptoms of online abuse
- Develop the ability to ensure pupils can recognise dangers and risks in online activity and can weigh up the risks
- Develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term

The DSO [and deputies] 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.

Governors will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

More information about safeguarding training is set out in our child protection and safeguarding policy.

## **12. Monitoring arrangements**

The DSO logs behaviour and safeguarding issues related to online safety. This policy will be reviewed every year by the e-Safety lead. At every review, the policy will be shared with the governing board.

## **13. Links with other policies**

This online safety policy is linked to our:

- Child protection and safeguarding policy
- Behaviour policy
- Staff disciplinary procedures
- Data protection policy and privacy notices

- Complaints procedure
- IT and Internet Acceptable use policies (children; employees; parents and carers)
- Distance Learning policy



## Appendix 1: online safety training needs – self audit for staff

### ONLINE SAFETY TRAINING NEEDS AUDIT

<b>Name of staff member/volunteer:</b>	<b>Date:</b>
<b>Question</b>	<b>Yes/No (add comments if necessary)</b>
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 pupil 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 filtering and monitoring systems on the school's devices and networks?	
Do you understand your role and responsibilities in relation to filtering and monitoring?	
Are you familiar with the school's acceptable use agreement for pupils and parents?	
Do you regularly change your password for accessing the school's ICT systems?	
Are you familiar with the school's approach to tackling cyber-bullying?	

## ONLINE SAFETY TRAINING NEEDS AUDIT

Are there any areas of online safety in which you would like training/further training?	
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