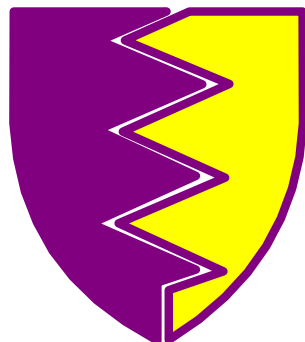


ST. MARY'S



'Dream, Believe, Achieve!'


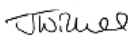
'With God, all things are possible.' Matthew 19:26

St Mary's C of E Primary School

Psalm 25:4

'Show me your ways, LORD, teach me your path'.

Online Safety Policy

Policy Date:	February 2025
Policy Review:	February 2026
Signature of Headteacher:	
Ratified by Governors:	February 2025
Signature of Chair:	

Online Safety Policy

Introduction

Key people / dates

St Mary's C of E Primary School	Designated Safeguarding Lead (DSL) team	Rachel Ayres Helen Talbot Samantha Perkins Alexandra Nethercot
	Online-safety / safeguarding link governor	Mr Benjamin Pearson
	PSHE/RSHE lead	Sarah Mosedale
	Network manager / other technical support	Gavin King
	Date this policy was reviewed	January 2025
	Date of next review	January 2026

What is this policy?

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. Accordingly, this policy is written in line with 'Keeping Children Safe in Education' 2024 (KCSIE), 'Teaching Online Safety in Schools' 2019, statutory RSHE guidance 2019 and other statutory documents. It complements existing and forthcoming subjects including Health, Relationships and Sex Education, Citizenship and Computing; it is designed to sit alongside our school's statutory Safeguarding Policy. Any issues and concerns with online safety must follow our school's safeguarding and child protection procedures.

Who is it for; when is it reviewed?

This policy should be a living document, subject to full annual review but also amended where necessary during the year in response to developments in the school and local area.

What are the main online safety risks today?

Online-safety risks are traditionally categorised as one of the 4 Cs: Content, Contact, Conduct or Commerce. These four areas remain a helpful way to understand the risks and potential school response, whether technological or educational. They do not stand in isolation, however, and it is important to understand the interplay between them all.

Content: age-inappropriate or unreliable content can be available to children.

Some online content is not suitable for children and may be hurtful or harmful. This is true for content accessed and viewed via social networks, online games, blogs and websites. It's important for children to consider the reliability of online material and be aware that it might not be true or written with a bias. Children may need your help as they begin to assess content in this way. There can be legal consequences for using or downloading copyrighted content, without seeking the author's permission.

Contact: children can be contacted by bullies or people who groom or seek to abuse them.

It is important for children to realise that new friends made online may not be who they say they are and that once a friend is added to an online account, they may be sharing personal information with them. Children need to review their friends list and check their privacy settings. If you have concerns that a child is, or has been, the subject of inappropriate sexual contact or approach by another person, it's vital that you report it to the police via the Child Exploitation and Online Protection Centre (www.ceop.police.uk).

Conduct: children may be at risk because of their own behaviour, for example, by sharing too much information. Children need to be aware of the impact that their online activity can have on both themselves and other people, and the digital footprint that they create on the internet. When using the internet, it's important to keep personal information safe and not share it with strangers.

Commerce: young people can be unaware of hidden costs and advertising in apps, games and websites. Young people's privacy and enjoyment online can sometimes be affected by advertising and marketing schemes, which can also mean inadvertently spending money online, for example within applications.

Many of these new risks are mentioned in KCSIE 2024, e.g. extra-familial harms where children are at risk of abuse or exploitation to multiple harms in situations outside their families including sexual exploitation, criminal exploitation, serious youth violence, upskirting and sticky design.

In past and potential future remote learning and lockdowns, there is a greater risk for grooming and exploitation (CSE, CCE and radicalisation) as children spend more time at home and on devices. There is a real risk that some of our pupils may have missed opportunities to disclose such abuse during the lockdowns or periods of absence.

Following the government's investigation into peer-on-peer sexual abuse and Ofsted review, schools will need to review their policies to ensure appropriate processes are in place to allow pupils to report sexual harassment and abuse concerns freely, knowing these will be taken seriously and dealt with swiftly and appropriately – ensure pupils are aware of the new NSPCC helpline (Report Abuse in Education 0800 136 663 or Email help@nspcc.org.uk) and your school's internal reporting channels.

How will this policy be communicated?

This policy can only impact upon practice if it is a (regularly updated) living document. It must be accessible to and understood by all stakeholders. It will be communicated in the following ways:

- Posted on the school website
- Available in the policy file/drive
- Part of school induction pack for all new staff (including temporary, supply and non-classroom-based staff)
- Integral to safeguarding updates and training for all staff (especially in September refreshers)
- Clearly reflected in the Acceptable Use Policies (AUPs) for staff, volunteers, contractors, governors, pupils and parents/carers (which must be in accessible language appropriate to these groups).
- Reviews of this online-safety policy will include input from staff, pupils and other stakeholders, helping to ensure further engagement

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Aims

This policy aims to:

- Set out expectations for all St. Mary's C of E Primary School community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline)
- Help all stakeholders to recognise that online/digital behaviour standards (including social media activity) must be upheld beyond the confines of the school gates and school day, and regardless of device or platform
- Facilitate the safe, responsible, respectful and positive use of technology to support teaching & learning, increase attainment and prepare children and young people for the risks and opportunities of today's and tomorrow's digital world, to survive and thrive online
- Help school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
 - o for the protection and benefit of the children and young people in their care, and
 - o for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice
 - o for the benefit of the school, supporting the school ethos, aims and objectives, and protecting the reputation of the school and profession
- Establish clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as Behaviour Policy or Anti-Bullying Policy)

Further Help and Support

Internal school channels should always be followed first for reporting and support, as documented in school policy documents, especially in response to incidents, which should be reported in line with your Safeguarding Policy. The DSL will handle referrals to local authority multi-agency safeguarding hubs (MASH) and normally the Headteacher will handle referrals to the LA designated officer (LADO). The local authority, academy trust or third-party support organisations you work with may also have advisors to offer general support.

Beyond this, the Professionals' Online-Safety Helpline from the UK Safer Internet Centre and the new NSPCC Report Abuse Helpline for sexual harassment or abuse, as well as hotlines for hate crime, terrorism and fraud might be useful to share with parents, and anonymous support for children and young people.

Scope

This policy applies to all members of the St Mary's C of E Primary School community (including teaching and support staff, supply teachers, governors, volunteers, contractors, students/pupils, parents/carers, visitors and community members) who have access to our digital technology, networks and systems, whether on-site or remotely, and at any time, or who use technology in their school role.

Roles and Responsibilities

St Mary's C of E Primary School is a community and all members have a duty to behave respectfully online and offline, to use technology for teaching and learning and to prepare for life after school, and to immediately report any concerns or inappropriate behaviour, to protect staff, pupils, families and the reputation of the school. We learn together, make honest mistakes together and support each other in a world that is online and offline at the same time.

Headteacher

Key responsibilities:

- Support safeguarding leads and technical staff as they review protections for pupils in the home and remote-learning procedures, rules and safeguards
- Foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding
- Oversee the activities of the designated safeguarding lead and ensure that the DSL responsibilities listed in the section below are being followed and fully supported
- Ensure that policies and procedures are followed by all staff
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and relevant Local Safeguarding Partnerships
- Liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including cloud systems are implemented according to child-safety first principles
- Be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles
- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
- Ensure that there is a system in place to monitor and support staff (e.g. network manager) who carry out internal technical online-safety procedures
- Ensure governors are regularly updated on the nature and effectiveness of the school's arrangements for online safety
- Ensure the school website meets statutory requirements

Designated Safeguarding Lead / Online Safety Lead

Key responsibilities (remember the DSL can delegate certain online safety duties, e.g. to the online safety coordinator, but not the overall responsibility; this assertion and all quotes below are from Keeping Children Safe in Education 2021):

- “The designated safeguarding lead should take lead responsibility for safeguarding and child protection [including online safety] ... this lead responsibility should not be delegated”

- Work with the HT and technical staff to review protections for pupils in the home and remote learning procedures, rules and safeguards
- Where the online-safety coordinator is not the named DSL or deputy DSL, ensure there is regular review and open communication between these roles and that the DSL's clear overarching responsibility for online safety is not compromised
- Ensure "An effective approach to online safety [that] empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate."
- "Liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies."
- Take day-to-day responsibility for online safety issues and be aware of the potential for serious child protection concerns
- Remind staff of safeguarding considerations as part of a review of remote learning procedures and technology, including that the same principles of online safety and behaviour apply
- Work with the Headteacher, DPO and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Stay up to date with the latest trends in online safeguarding and "undertake Prevent awareness training."
- Review and update this policy, other online safety documents (e.g. Acceptable Use Policies) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others) and submit for review to the governors/trustees.
- Receive regular updates in online safety issues and legislation, be aware of local and school trends
- Ensure that online safety education is embedded across the curriculum in line with the statutory RSHE guidance (e.g. by use of the updated UKCIS framework 'Education for a Connected World – 2020 edition') and beyond, in wider school life
- Promote an awareness of and commitment to online safety throughout the school community, with a strong focus on parents
- Communicate regularly with SLT and the designated safeguarding and online safety governor/committee to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring work and have been functioning/helping
- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident
- Monitor the use of school technology, online platforms and social media presence and that any misuse/attempted misuse is identified and reported in line with school policy
- Ensure adequate provision for staff to flag issues when not in school and for pupils to disclose issues when off site, especially when in isolation/quarantine/lockdown
- Oversee and discuss 'appropriate filtering and monitoring' with governors and ensure staff are also aware
- Ensure the updated 2021 DfE guidance on Sexual Violence & Sexual Harassment Between Children in Schools & Colleges Guidance is followed throughout the school and that staff adopt a zero-tolerance, whole school approach to this, as well as to bullying.

- Facilitate training and advice for all staff, including supply teachers:
 - o all staff must read KCSIE Part 1 and all those working with children Annex B
 - o Annex A is now a condensed version of Part one and can be provided (instead of Part one) to those staff who do not directly work with children, if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare and safeguard children.
 - o it would also be advisable for all staff to be aware of Annex D (online safety)
 - o cascade knowledge of risks and opportunities throughout the organisation

Governing Body, led by Online Safety / Safeguarding Link Governor

Key responsibilities (quotes are taken from Keeping Children Safe in Education 2021)

- Approve this policy and strategy and subsequently review its effectiveness, e.g. by asking the questions in the helpful document from the UK Council for Child Internet Safety (UKCIS) Online safety in schools and colleges: Questions from the Governing Board
- Ask about how the school has reviewed protections for pupils in the home and remote-learning procedures, rules and safeguards
- “Ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of DSL [with] lead responsibility for safeguarding and child protection (including online safety) [with] the appropriate status and authority [and] time, funding, training, resources and support...”
- Support the school in encouraging parents to become engaged in online safety activities
- Have regular strategic reviews with the online-safety coordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings
- Where the online-safety coordinator is not the named DSL or deputy DSL, ensure that there is regular review and open communication between these roles and that the DSL’s clear overarching responsibility for online safety is not compromised
- Work with the DPO, DSL and Headteacher to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Check all school staff have read Part 1 of KCSIE; SLT and all working directly with children have read Annex B; check that Annex D on Online Safety reflects practice in your school
- “Ensure that all staff undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated [...] in line with advice from the local three safeguarding partners [...] integrated, aligned and considered as part of the overarching safeguarding approach.”
- “Ensure appropriate filters and appropriate monitoring systems are in place [but...] be careful that ‘overblocking’ does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding”
- “Ensure that children are taught about safeguarding, including online safety [...] as part of providing a broad and balanced curriculum [...] Consider a whole school or college approach to online safety [with] a clear policy on the use of mobile technology.”

All staff

Key responsibilities:

- Pay attention to safeguarding provisions for home-learning and remote teaching technologies

- Recognise that RSHE is now statutory and that it is a whole-school subject requiring the support of all staff; online safety has become core to this new subject
- Understand that online safety is a core part of safeguarding; as such it is part of everyone's job – never think that someone else will pick it up
- Know who the Designated Safeguarding Lead (DSL) and Online Safety Lead (OSL) are
- Read Part 1, Annex B and Annex D of Keeping Children Safe in Education (whilst Part 1 is statutory for all staff, Annex B for SLT and those working directly with children, it is good practice for all staff to read all three sections). Annex A is now a condensed version of Part one and can be provided (instead of Part one) to those staff who do not directly work with children, if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare and safeguard children.
- Read and follow this policy in conjunction with the school's main safeguarding policy
- Record online-safety incidents in the same way as any safeguarding incident (CPOMS) and report in accordance with school procedures.
- Understand that safeguarding is often referred to as a jigsaw puzzle – you may have discovered the missing piece so do not keep anything to yourself
- Sign and follow the staff acceptable use policy and code of conduct/handbook
- Notify the DSL/OSL if policy does not reflect practice in your school and follow escalation procedures if concerns are not promptly acted upon
- Identify opportunities to thread online safety through all school activities as part of a whole school approach in line with the RSHE curriculum, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils)
- Whenever overseeing the use of technology in school or for homework or remote teaching, encourage and talk about appropriate behaviour and how to get help and consider potential risks and the age-appropriateness of websites
- When supporting pupils remotely, be mindful of additional safeguarding considerations
- Carefully supervise and guide pupils when engaged in learning activities involving online technology, supporting them with search skills, critical thinking, age appropriate materials and signposting, and legal issues such as copyright and GDPR.
- Be aware of security best-practice at all times, including password hygiene and phishing strategies.
- Prepare and check all online source and resources before using
- Encourage pupils/students to follow their acceptable use policy at home as well as at school, remind them about it
- Notify the DSL/OSL of new trends and issues before they become a problem
- Take a zero-tolerance approach to bullying and sexual harassment (your DSL will disseminate relevant information from the updated 2021 DfE document on this)
- Be aware that you are often most likely to see or overhear online-safety issues (particularly relating to bullying and sexual harassment and violence) in the playground, corridors, toilets and other communal areas outside the classroom – let the DSL/OSL know
- Receive regular updates from the DSL/OSL and have a healthy curiosity for online safeguarding issues

- Model safe, responsible and professional behaviours in their own use of technology. This includes outside the school hours and site, and on social media, in all aspects upholding the reputation of the school and of the professional reputation of all staff.

PSHE / RSHE Lead

As listed in the 'all staff' section, plus:

- Embed consent, mental wellbeing, healthy relationships and staying safe online into the PSHE / Relationships education, relationships and sex education (RSE) and health education curriculum. "This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age appropriate way that is relevant to their pupils' lives."
- This will complement the computing curriculum, which covers the principles of online safety at all key stages, with progression in the content to reflect the different and escalating risks that pupils face. This includes how to use technology safely, responsibly, respectfully and securely, and where to go for help and support when they have concerns about content or contact on the internet or other online technologies
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSHE
- Note that an RSHE policy should now be included on the school website
- Work closely with the Computing subject leader to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach

Computing Lead

Key responsibilities:

As listed in the 'all staff' section, plus:

- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum
- Work closely with the RSHE lead to avoid overlap but ensure a complementary whole-school approach
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements

Subject Leaders

Key responsibilities:

As listed in the 'all staff' section, plus:

- Look for opportunities to embed online safety in your subject or aspect, especially as part of the new RSHE curriculum, and model positive attitudes and approaches to staff and pupils alike
- Consider how the UKCIS framework Education for a Connected World and Teaching Online Safety in Schools can be applied in your context
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Ensure subject specific action plans also have an online-safety element

Network Manager/technician

As listed in the 'all staff' section, plus:

- Support the HT and DSL team as they review protections for pupils in the home and remote learning procedures, rules and safeguards
- Keep up to date with the school's online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- Work closely with the designated safeguarding lead / online safety lead / data protection officer to ensure that school systems and networks reflect school policy
- Ensure the above stakeholders understand the consequences of existing services and of any changes to these systems (especially in terms of access to personal and sensitive records / data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms etc
- Support and advise on the implementation of 'appropriate filtering and monitoring' as decided by the DSL and senior leadership team
- Maintain up-to-date documentation of the school's online security and technical procedures
- To report online-safety related issues that come to their attention in line with school policy
- Manage the school's systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption and backup for data, including disaster recovery plans, and auditable access controls

Data Protection Officer (DPO)

Key responsibilities:

- Be aware that of references to the relationship between data protection and safeguarding in key Department for Education documents 'Keeping Children Safe in Education' and 'Data protection: a toolkit for schools' (August 2018), especially this quote from the latter document:

"GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4) When Designated Safeguarding Leads in schools are considering whether, or not, to share safeguarding information (especially with other agencies) it is considered best practice for them to record who they are sharing that information with and for what reason. If they have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file. All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children."

The same document states that the retention schedule for safeguarding records may be required to be set as 'Very long term need (until pupil is aged 25 or older)'. However, some local authorities require record retention until 25 for all pupil records.

- Work with the DSL, Headteacher and governors to ensure frameworks are in place for the protection of data and of safeguarding information sharing as outlined above.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited

Volunteers and contractors

Key responsibilities:

- Read, understand and adhere to an acceptable use policy (AUP)
- Report any concerns, no matter how small, to the designated safety lead / online safety coordinator as named in the AUP
- Maintain an awareness of current online safety issues and guidance
- Model safe, responsible and professional behaviours in their own use of technology at school and as part of remote teaching or any online communications

Pupils

Key responsibilities:

- Read, understand and adhere to the student/pupil acceptable use policy and review this annually
- Treat home learning during any isolation/quarantine or bubble/school lockdown in the same way as regular learning in school and behave as if a teacher or parent were watching the screen
- Avoid any private communication or use of personal logins/systems to communicate with or arrange meetings with school staff
- Understand the importance of reporting abuse, misuse or access to inappropriate materials, including any concerns about a member of school staff or supply teacher
- Know what action to take if they or someone they know feels worried or vulnerable when using online technology, at school, home or anywhere else
- To understand the importance of adopting safe and responsible behaviours and good online safety practice when using digital technologies outside of school and realise that the school's acceptable use policies cover actions out of school, including on social media
- Remember the rules on the misuse of school technology – devices and logins used at home should be used just like if they were in full view of a teacher
- Understand the benefits/opportunities and risks/dangers of the online world and know who to talk to at school or outside school if there are problems

Parents/carers

Key responsibilities:

- Read and promote the pupil AUP and encourage their children to follow it
- Consult with the school if they have any concerns about their children's and others' use of technology
- Promote positive online safety and model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers
- Encourage children to engage fully in home-learning during any period of isolation/quarantine or bubble/school closure and flag any concerns
- Support the child during remote learning to avoid video calls in a bedroom if possible and if not, to ensure the child is fully dressed and not in bed, with the camera pointing away from beds/bedding/personal information etc. and the background blurred or changed where possible

External groups

Key responsibilities:

- Any external individual/organisation must adhere to our acceptable use policy prior to using technology or the internet within school
- Support the school in promoting online safety and data protection
- Model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers

Education and curriculum

The following subjects have the clearest online safety links (see the relevant role descriptors above for more information):

- Relationships education, relationships and sex education (RSE) and health (also known as RSHE or PSHE)
- Computing

However, as stated in the role descriptors above, it is the role of all staff to identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils).

Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc) in school or setting as homework tasks, all staff should encourage sensible use, monitor what pupils/students are doing and consider potential dangers and the age appropriateness of websites.

Equally, all staff should carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular, extended school activities if relevant and remote teaching), supporting them with search skills, critical thinking (e.g. fake news), age appropriate materials and signposting, and legal issues such as copyright and data law.

Handling online-safety concerns and incidents

It is vital that all staff recognise that online safety is a part of safeguarding (as well as being a curriculum strand of Computing and PSHE/RSHE). General concerns must be handled in the same way as any other safeguarding concern; safeguarding is often referred to as a jigsaw puzzle, so all stakeholders should err on the side of talking to the online safety lead / designated safeguarding lead to contribute to the overall picture or highlight what might not yet be a problem.

Support staff will often have a unique insight and opportunity to find out about issues first in the playground, corridors, toilets and other communal areas outside the classroom (particularly relating to bullying and sexual harassment and violence).

School procedures for dealing with online-safety will be mostly detailed in the following policies (primarily in the first key document):

- Safeguarding and Child Protection Policy
- Sexual Harassment / Peer on Peer Abuse Policy (if separate)
- Anti-Bullying Policy

- Behaviour Policy
- Acceptable Use Policies
- Prevent Risk Assessment / Policy
- Data Protection Policy, agreements and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc).

Our school commits to take all reasonable precautions to ensure online safety, but recognises that incidents will occur both inside school and outside school (and that those from outside school will continue to impact pupils when they come into school or during extended periods away from school). All members of the school are encouraged to report issues swiftly to allow us to deal with them quickly and sensitively through the school's escalation processes.

Any suspected online risk or infringement should be reported to the online safety lead / designated safeguarding lead on the same day – where clearly urgent, it will be made by the end of the lesson.

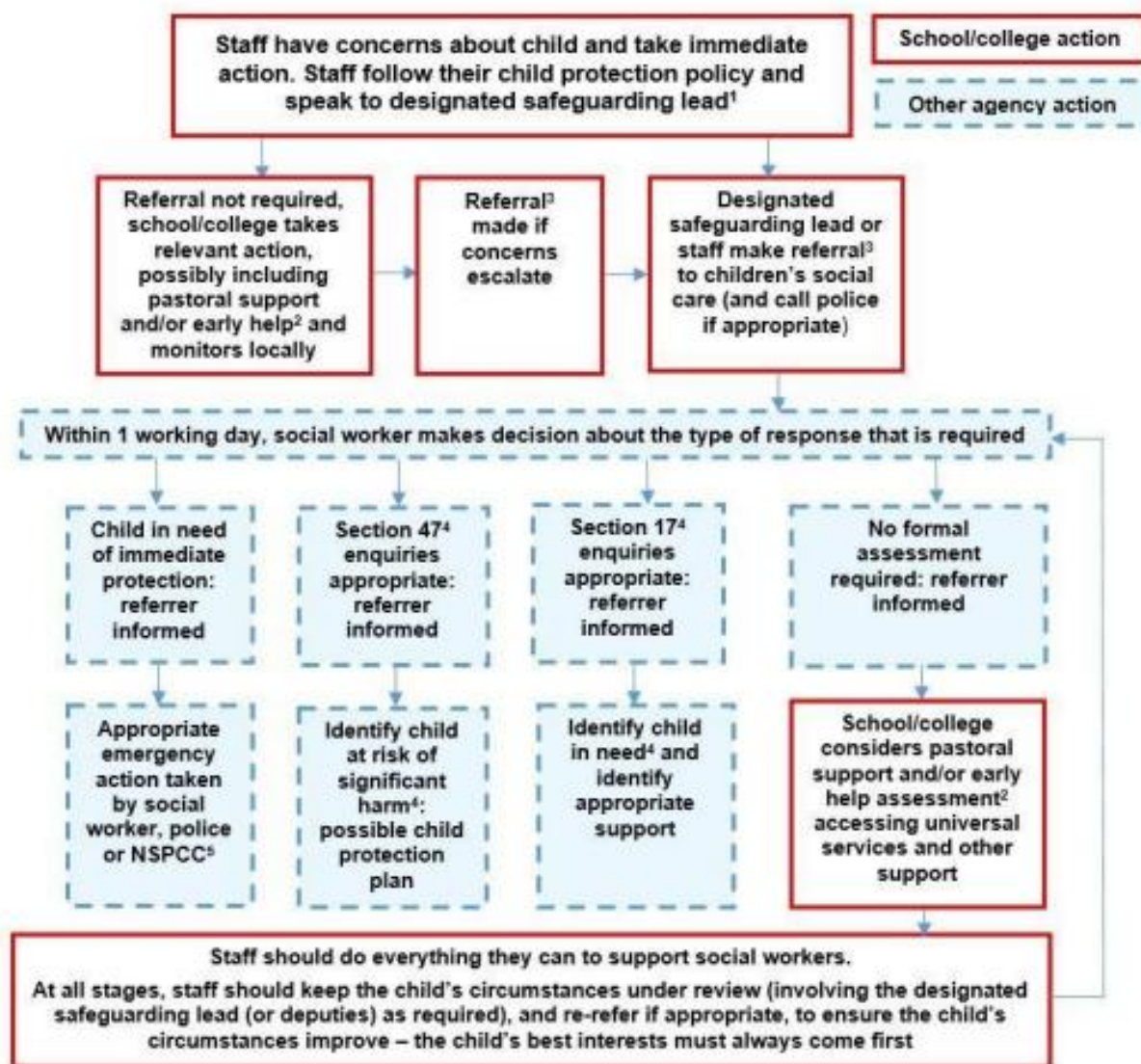
Any concern/allegation about staff misuse is always referred directly to the Headteacher, unless the concern is about the Headteacher in which case the complaint is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer). Staff may also use the NSPCC Whistleblowing Helpline.

The school will actively seek support from other agencies as needed (i.e. the local authority, UK Safer Internet Centre's Professionals' Online Safety Helpline (POSH), NCA CEOP, Prevent Officer, Police, IWF).

We will inform parents/carers of online-safety incidents involving their children, and the Police, where staff or pupils engage in or are subject to behaviour which we consider is particularly disturbing or breaks the law (particular procedures are in place for sexting and upskirting; see section below). The school should evaluate whether reporting procedures are adequate for any future closures/lockdowns/isolation etc and make alternative provisions in advance where these might be needed.

[Actions where there are concerns about a child](#)

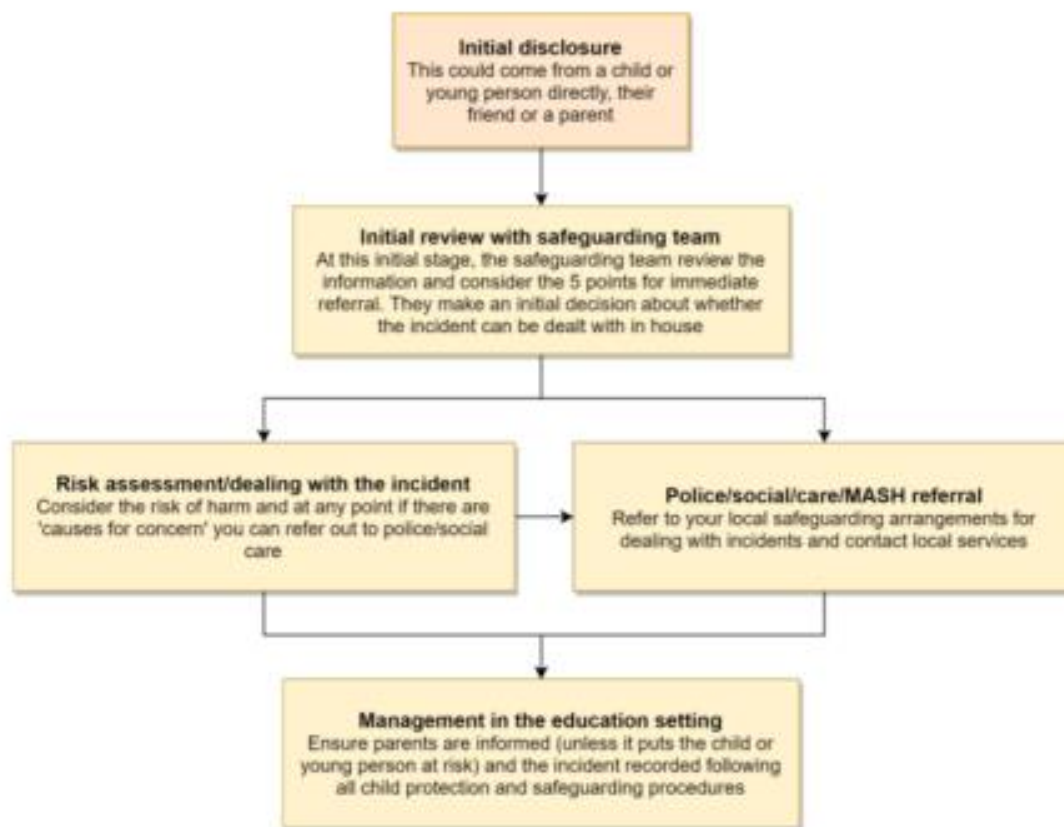
The following flow chart (it cannot be edited) is taken from page 22 of Keeping Children Safe in Education 2021 as the key education safeguarding document. As outlined previously, online safety concerns are no different to any other safeguarding concern.



Sexting – sharing nudes and semi-nudes

All schools (regardless of phase) should refer to the updated UK Council for Internet Safety (UKCIS) guidance on sexting - now referred to as Sharing nudes and semi-nudes: advice for education settings to avoid unnecessary criminalisation of children. NB - where one of the parties is over 18, this is no longer sexting but child sexual abuse.

There is a one-page overview called Sharing nudes and semi-nudes: how to respond to an incident for all staff (not just classroom-based staff) to read, in recognition of the fact that it is mostly someone other than the designated safeguarding lead (DSL) or online safety lead to first become aware of an incident, and it is vital that the correct steps are taken. Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL. The school DSL will in turn use the full guidance document, Sharing nudes and semi-nudes – advice for educational settings to decide next steps and whether other agencies need to be involved. See diagram on the next page:



*Consider the 5 points for immediate referral at initial review:

1. The incident involves an adult
2. There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
3. What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
4. The images involves sexual acts and any pupil in the images or videos is under 13
5. You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

It is important that everyone understands that whilst sexting is illegal, pupils/students can come and talk to members of staff if they have made a mistake or had a problem in this area.

Upskirting

It is important that everyone understands that upskirting (taking a photo of someone under their clothing, not necessarily a skirt) is now a criminal offence, as highlighted in Keeping Children Safe in Education and that pupils/students can come and talk to members of staff if they have made a mistake or had a problem in this area.

Bullying

Online bullying should be treated like any other form of bullying and the school bullying policy should be followed for online bullying, which may also be referred to as cyberbullying.

It is important not to treat online bullying separately to offline bullying and to recognise that much bullying will often have both online and offline elements.

Sexual violence and harassment

DfE guidance on sexual violence and harassment is referenced in Keeping Children Safe in Education and also a document in its own right. It would be useful for all staff to be aware of this guidance: paragraphs 45-49 cover the immediate response to a report and confidentiality which is highly relevant for all staff; the case studies section provides a helpful overview of some of the issues which may arise. Any incident of sexual harassment or violence (online or offline) should be reported to the DSL who will follow the full guidance. Staff work to foster a zero-tolerance culture. The guidance stresses that schools must take all forms of sexual violence and harassment seriously, explaining how it exists on a continuum and that behaviours incorrectly viewed as 'low level' are treated seriously and not allowed to perpetuate. The document makes specific reference to behaviours such as bra-strap flicking and the careless use of language

Misuse of school technology (devices, systems, networks or platforms)

Clear and well communicated rules and procedures are essential to govern pupil and adult use of school networks, connections, internet connectivity and devices, cloud platforms and social media (both when on school site and outside of school). These are defined in the relevant Acceptable Use Policy as well as in this document, for example in the sections relating to the professional and personal use of school platforms/networks/clouds, devices and other technology. Where pupils contravene these rules, the school behaviour policy will be applied; where staff contravene these rules, action will be taken as outlined in the staff code of conduct/handbook. It will be necessary to reinforce these as usual at the beginning of any school year but also to remind pupils that the same applies for any home learning that may take place in future periods of absence/ closure/quarantine etc. Further to these steps, the school reserves the right to withdraw – temporarily or permanently – any or all access to such technology, or the right to bring devices onto school property.

Social media incidents

See the social media section later in this document for rules and expectations of behaviour for children and adults in the St Mary's Primary community. These are also governed by school Acceptable Use Policies. Breaches will be dealt with in line with the school behaviour policy (for pupils) or code of conduct/handbook (for staff). Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community, St Mary's will request that the post be deleted and will expect this to be actioned promptly. Where an offending post has been made by a third party, the school may report it to the platform it is hosted on; and may contact the Professionals' Online Safety Helpline (run by the UK Safer Internet Centre) for support or help to accelerate this process.

Data protection and data security

There are references to the relationship between data protection and safeguarding in key Department for Education documents 'Keeping Children Safe in Education' and 'Data protection: a toolkit for schools' (August 2018), which the DPO and DSL will seek to apply. This quote from the latter document is useful for all staff: "GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4) When Designated Safeguarding Leads in schools are considering whether, or not, to share safeguarding information (especially with other agencies) it is considered best practice for them to record who they are sharing that information with and for what reason. If they have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file. All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing

information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children.”

All pupils, staff, governors, volunteers and parents are bound by the school's data protection policy and agreements. The Headteacher, data protection officer and governors work together to ensure a GDPR compliant framework for storing data, but which ensures that child protection is always put first and data-protection processes support careful and legal sharing of information. Staff are reminded that all safeguarding data is highly sensitive and should be treated with the strictest confidentiality at all times, and only shared via approved channels to colleagues or agencies with appropriate permissions. The use of Egress to encrypt all non-internal emails is used for sharing pupil data.

Appropriate filtering and monitoring

Keeping Children Safe in Education obliges schools to “ensure appropriate filters and appropriate monitoring systems are in place [and] not be able to access harmful or inappropriate material [but at the same time] be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.” At this school, the internet connection is provided by Lightspeed. This means we have a dedicated and secure, schoolsafe connection that is protected with firewalls and multiple layers of security, including a web filtering system called Netsweeper, which is made specifically to protect children in schools.

There are three types of appropriate monitoring identified by the Safer Internet Centre. These are: 1. Physical monitoring (adult supervision in the classroom, at all times) 2. Internet and web access 3. Active/Pro-active technology monitoring services. At St Mary's we have decided that option 1 is appropriate.

Electronic communications

Email

Staff at this school use Gmail for all school emails. Staff are responsible for setting a secure password and changing this password regularly to ensure security.

General principles for email use are as follows:

- Email may only be sent using the email system above. There should be no circumstances where a private email is used; if this happens by mistake, the DSL/Headteacher/DPO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately.
- Appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff
- Staff are not allowed to use the email system for personal use.

School website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. The site is hosted by PrimarySite. The DfE has determined information which must be available on a school website. Note that an RSHE policy is now included.

Where other staff submit information for the website, they are asked to remember:

- Schools have the same duty as any person or organisation to respect and uphold copyright law. Sources must always be credited and material only used with permission.
- Where pupil work, images or videos are published on the website, their identities are protected and full names are not published (remember also not to save images with a filename that includes a pupil's full name).

Cloud platforms

It is important to consider data protection before adopting a cloud platform or service – see our Data Protection Policy.

The following principles apply:

- Privacy statements inform parents and children when and what sort of data is stored in the cloud
- The DPO approves new cloud systems, what may or may not be stored in them and by whom. This is noted in a DPIA (data-protection impact statement) and parental permission is sought
- Staff are given training on Google Drive and if they are unsure, they should conduct their own training using Google's training videos and activities.
- Pupil images/videos are only made public with parental permission
- Only school-approved platforms are used by students or staff to store pupil work
- All stakeholders understand the difference between consumer and education products (e.g. a private Gmail account or Google Drive and those belonging to a managed educational domain)

Digital images and video

When a pupil/student joins the school, parents/carers are asked if they give consent for their child's image to be captured in photographs or videos, for what purpose (beyond internal assessment, which does not require express consent) and for how long.

Whenever a photo or video is taken/made, the member of staff taking it will check the latest database before using it for any purpose. Any pupils shown in public facing materials are never identified with more than first name (and photo file names/tags do not include full names to avoid accidentally sharing them). All staff are governed by their contract of employment and the school's Acceptable Use Policy. Photos are stored on the school network in line with the retention schedule of the school Data Protection Policy. Staff and parents are reminded annually about the importance of not sharing without permission, due to reasons of child protection (e.g. looked-after children often have restrictions for their own protection), data protection, religious or cultural reasons, or simply for reasons of personal privacy).

We encourage young people to think about their online reputation and digital footprint, so we should be good adult role models by not oversharing (or providing embarrassment in later life – and it is not for us to judge what is embarrassing or not). Pupils are taught about how images can be manipulated in their online safety education programme and also taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children. Pupils are advised to be very careful about placing any personal photos on social media. They are taught to understand the need to maintain privacy settings so as not to make public, personal information. Pupils are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location. We teach them about the need to keep their data secure and what to do if they / or a friend are subject to bullying or abuse.

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.

St Mary's 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. This includes deepfake pornography: pornographic content created using AI to include someone's likeness.

St Mary's will treat any use of AI to bully pupils in line with our anti-bullying/behaviour/safeguarding 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 by the school/trust. Staff will only use GDPR compliant AI software for tasks associated with St Mary's.

Social media at St Mary's C of E Primary

St Mary's C of E Primary School works on the principle that social media is a great place to inform and showcase all the good work we do at our school. Few parents will apply for a school place without first 'googling' the school, and the Ofsted pre-inspection check includes monitoring what is being said online. Negative coverage almost always causes some level of disruption. Up to half of all cases dealt with by the Professionals Online Safety Helpline (POSH: helpline@saferinternet.org.uk) involve schools' (and staff members') online reputation.

Accordingly, we manage and monitor our social media footprint carefully. We have a Twitter page to inform parents of any exciting things, things to remember or brilliant work. We work closely as a staff to keep our Twitter account up-to-date and well managed.

Staff, pupils' and parents' SM presence

Social media (including here all apps, sites and games that allow sharing and interaction between users) is a fact of modern life, and as a school, we accept that many parents, staff and pupils will use it. However, as stated in the acceptable use policies which all members of the school community sign, we expect everybody to behave in a positive manner, engaging respectfully with the school and each other on social media, in the same way as they would face to face. This positive behaviour can be summarised as not making any posts which are or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which might bring the school or (particularly for staff) teaching profession into disrepute. This applies both to public pages and to private posts, e.g. parent chats, pages or groups. If parents have a concern about the school, we would urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, the school complaints procedure be followed. Sharing complaints on social media is unlikely to help resolve the matter, but can cause upset to staff, pupils and parents, also undermining staff morale and the reputation of the school (which is important for the pupils we serve).

We ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use. However, the school has to strike a difficult balance of not encouraging underage use at the same time as needing to acknowledge reality in order to best help our pupils/students to avoid or cope with issues if they arise. Online safety lessons will look at social media and other online behaviour, how to be a good friend online and how to report bullying, misuse, intimidation or abuse. However, children will often learn most from the models of behaviour they see and experience, which will often be from adults. Parents can best support this by talking to their children about the apps, sites and games they use, with whom, for how long, and when (late at night / in bedrooms is not helpful for a good night's sleep and productive teaching and learning at school the next day). Links and advice for how to protect your child online plus guides to what social media, apps and games your child may be accessing can be found in the E-Safety section of the school's website.

Email is the official electronic communication channel between parents and the school. Pupils/students are not allowed to be 'friends' with or make a friend request to any staff, governors, volunteers and or otherwise communicate via social media. Pupils/students are discouraged from 'following' staff, governor or volunteer public accounts (e.g. following a staff member with a public Instagram account). However, we accept that this can be hard to control (but this highlights the need for staff to remain professional in their private lives). In the reverse situation, however, staff must not follow such public student accounts. Any attempt to do so may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member).

Staff are reminded that they are obliged not to bring the school or profession into disrepute and the easiest way to avoid this is to have the strictest privacy settings and avoid inappropriate sharing and oversharing online. They

should never discuss the school or its stakeholders on social media and be careful that their personal opinions might not be attributed to the school, trust or local authority, bringing the school into disrepute. The serious consequences of inappropriate behaviour on social media are underlined by the fact that during the last 5 years, there have been 263 Prohibition Orders issued by the Teacher Regulation Agency to teaching staff that involved misuse of social media/technology. The statements of the Acceptable Use Policies (AUPs) which all members of the school community have signed are also relevant to social media activity, as is the school's Data Protection Policy.

Device usage

Remind those with access to school devices about rules on the misuse of school technology – devices used at home should be used just like if they were in full view of a teacher or colleague. Please read the following in conjunction with acceptable use policies and the following sections of this document which all impact upon device usage: copyright, data protection, social media, misuse of technology, and digital images and video

Personal devices

- All staff who work directly with children should leave their mobile phones on silent and only use them in private staff areas during school hours.

Child/staff data should never be downloaded onto a private phone. If a staff member is expecting an important personal call when teaching or otherwise on duty, they must make appropriate arrangements with the Headteacher.

- Volunteers, contractors and governors should leave their phones in their pockets and turned off. Under no circumstances should they be used in the presence of children or to take photographs or videos. If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the Headteacher should be sought (the Headteacher may choose to delegate this) and this should be done in the presence of a member staff.
- Parents are asked to leave their phones in their pockets and turned off when they are on site. They should ask permission before taking any photos, e.g. of displays in corridors or classrooms, and avoid capturing other children. When at school events, parents are reminded not to share photos on social media platforms for the privacy and protection of all the members of St Mary's C of E School community. Parents are asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office.

Please see our Mobile Phone Policy for more details.

Network / internet access on school devices

- Volunteers, contractors, governors have no access to the school network or wireless internet on personal devices and have no access to networked files/drives.
- Parents have no access to the school network or wireless internet on personal devices.

Trips / events away from school

For school trips/events away from school, teachers using their personal phone in an emergency will ensure that the number is hidden to avoid a parent or student accessing a teacher's private phone number.

Teachers take their school iPad to capture photos and videos.

Searching and confiscation

In line with the DfE guidance 'Searching, screening and confiscation: advice for schools', the Headteacher and staff authorised by them have a statutory power to search pupils/property on school premises. This includes the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material, including but not exclusive to sexual images, pornography, violence or bullying.

ST. MARY'S

