

# Online Safety Policy

## Leehurst Swan School



<b>Approved by:</b>	  Headmaster    Chair of Governors	<b>Date:</b> 01/09/2024
<b>Last reviewed on:</b>	01/09/2024	
<b>Next review due by:</b>	01/09/2025	

Leehurst Swan School

Last Reviewed: 01/09/2024, Next Review: 01/09/2025 or as required by a change in regulatory legislation

**This policy applies to the whole school including EYFS and is available on the school website for parents to access.**

## **Introduction**

Designated Safeguarding Lead (DSL) team	Mr Clive Marriott (DSL) Mrs Tommie Gross (DDSL) Mrs Bridget Wright (DDSL) Miss Jasmine Veratau (DDSL)
Online-safety lead (if different)	Mr Clive Marriott (DSL)
Online-safety/safeguarding link governor	Mr Mathew Round
PSHE/RSHE lead	Ms Sam Collins
Network manager/other technical support	Mr Jawad Haq

Our pupils are growing up in an increasingly complex world, living their lives seamlessly on and offline. This presents many positive and exciting opportunities, but also challenges and risks.

The use of the latest technology is actively encouraged at Leehurst Swan School but with this comes a responsibility to protect both pupils and the school from abuse of the system.

### ***What is this policy?***

Online safety is an integral part of safeguarding. Accordingly, this policy is written in line with 'Keeping Children Safe in Education' 2024 (KCSIE) and other statutory documents; it is designed to sit alongside the school's Child Protection and Safeguarding Policy.

The Designated Safeguarding Lead (DSL) will take lead responsibility for any online safety issues and concerns and follow the school's safeguarding and child protection procedures.

- Facilitate the safe, responsible and respectful 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:

1. for the protection and benefit of the children and young people in their care, and
2. for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice

### ***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 on the internal staff network/drive
- Available in paper format in the staffroom
- 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

## **Contents**

Aims

Scope

Roles and responsibilities:

Headmaster – Mr Clive Marriott

Designated Safeguarding Lead / Online Safety Lead – Mr Clive Marriott

Governing Body, led by Online Safety / Safeguarding Link Governor – Mr Mathew Round

All staff

PSHE / RSHE Lead/s – Ms Sam Collins

Leehurst Swan School

Last Reviewed: 01/09/2024, Next Review: 01/09/2025 or as required by a change in regulatory legislation

Computing Lead – Mr Robert Maddison

Subject / aspect leaders

Network Manager/ technician – Mr Jawad Haq

Data Protection Officer (DPO) – Mr Clive Marriott

Volunteers and contractors

Pupils

Parents/carers

Education and curriculum

Handling online-safety concerns and incidents

Sexting

All schools (regardless of phase) should refer to the UK Council for Internet Safety (UKCIS) guidance on sexting (also referred to as ‘youth produced sexual imagery’) in schools. NB - where one of the parties is over 18, this is no longer sexting but child sexual abuse

Upskirting

Bullying

Sexual violence and harassment

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

Social media incidents

Data protection and data security

Appropriate filtering and monitoring

School website

Cloud platforms

Digital images and video

Social media

Leehurst Swan School’s Social Media presence

Staff, pupils’ and parents’ Social Media presence

Personal devices including wearable technology and bring your own device (BYOD)

Trips / events away from school

Searching and confiscation

Appendix A – Acceptable Use Policy

## Overview

### *Aims*

This policy aims to:

- Set out expectations for all Leehurst Swan 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 and respectful 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 all stakeholders to recognise that the breadth of issues classified within online safety is considerable and ever evolving, but can be categorised in four areas of risk 'the 4C's':
  - Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
  - Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
  - Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
  - Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).
- Help school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
  - for the protection and benefit of the children and young people in their care, and
  - for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice

- 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 the Behaviour, Discipline and Exclusions Policy or Anti-Bullying Policy)

### *Scope*

This policy applies to all members of the Leehurst Swan community (including staff, governors, volunteers, contractors, students/pupils, parents/carers, visitors and community users) 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**

This 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.

### *Headmaster – Mr Clive Marriott*

#### **Key responsibilities:**

- 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

Leehurst Swan School

Last Reviewed: 01/09/2024, Next Review: 01/09/2025 or as required by a change in regulatory legislation

- 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 all of which should be regularly reviewed
- Be responsible for ensuring all staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring – see KCSIE 2024 for further information) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- 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 – Mr Clive Marriott*

**Key responsibilities** (remember the DSL can delegate certain online-safety duties, e.g. to the online-safety coordinator, but not the overall responsibility)

- The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety and understand the filtering and monitoring systems and processes in place).
- 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 whole school and college approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- Liaise with the local authority and work with other agencies in line with Working together to safeguard children

- Take day to day responsibility for online safety issues and be aware of the potential for serious child protection concerns
- Work with the Headmaster, 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
- 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.
- Ensure that online safety education is embedded across the curriculum (e.g. by use of the UKCIS framework 'Education for a Connected World') and beyond, in wider school life
- Promote an awareness and commitment to online safety throughout the school community, with a strong focus on parents, who are often appreciative of school support in this area, but also including hard-to-reach parents
- Liaise with school technical, pastoral, and support staff as appropriate
- 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 works within the school.
- 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
- Ensure that staff adopt a zero-tolerance approach to this, as well as to bullying
- Facilitate training and advice for all staff:
  - all staff must read KCSIE Part 1 and all those working with children Annex B
  - cascade knowledge of risks and opportunities throughout the organisation



*Governing Body, led by Online Safety / Safeguarding Link Governor – Mr Mathew Round*

**Key responsibilities (quotes are taken from Keeping Children Safe in Education 2024 paras 134 - 151):**

- 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](#)
- Ensure an appropriate senior member of staff, from the school leadership team, in this case, the Headmaster, is appointed to the role of Designated Safeguarding Lead (DSL). The DSL should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). Governors should ensure that this is explicit in the DSL's job description."
- Support the Headmaster in encouraging parents and the wider community to become engaged in online safety activities
- Expect regular strategic reviews from the Headmaster in his role of online-safety co-ordinator / DSL and oversee that he incorporates online safety into standing discussions of safeguarding at governor meetings
- Regularly review to ensure that the Headmaster's various roles for safeguarding and online safety is not compromised
- Work Headmaster and the School's Data Manager 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 systems set up by the Headmaster to ensure that all school staff have read Part 1, Part 5 and Annex B of KCSIE; and routinely check with the Headmaster that paragraphs 134-151 on Online Safety reflect practice in the school
- Regularly review the School's Safeguarding INSET logs with the Headmaster to ensure that all staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring – see para 123 for further information) at induction. Check with the Headmaster that the training is regularly updated in line with advice from the local SVPP integrated, aligned and considered as part of the overarching safeguarding approach.
- Routinely review curriculum content with the Headmaster to ensure that children are taught about safeguarding, including online safety as part of providing a broad and balanced curriculum, and review the whole school approach to online safety with a clear policy on the use of mobile technology.

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### *All staff*

#### **Key responsibilities:**

- 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
- KCSIE 2024 para 22 states that: All staff should be aware that technology is a significant component in many safeguarding and well-being issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
- Know who the Designated Safeguarding Lead (DSL) and Online Safety Lead (OSL) is Mr Clive Marriott.
- Read Part 1, Part 5 and Annex B 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 these sections).
- 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 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 Staff Behaviour Policy available in the Staff 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, 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, encourage sensible use, monitor what pupils/students are doing and consider potential dangers and the age appropriateness of websites (ensure that appropriate filtering and monitoring policies are in place)

- To carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if

- relevant), 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
- Prepare and check all online source and resources before using within the classroom
  - Encourage pupils/ students to follow their acceptable use policy, remind them about it and enforce school sanctions
  - Notify the DSL/OSL of new trends and issues before they become a problem
  - Take a zero-tolerance approach to bullying and low-level sexual harassment (your DSL will disseminate relevant information from the 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
  - 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. More guidance on this point can be found in this [Online Reputation](#) guidance for schools.
  - Update online safety and cyber security training annually.

### ***PSHE / RSHE Lead/s – Ms Sam Collins***

#### **responsibilities:**

- 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.

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- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSHE.

### ***Computing Lead – Mr Robert Maddison (Prep and Senior)***

#### **Key responsibilities:**

- As listed in the 'all staff' section, plus:
- Oversee the delivery of the online safety element of the Computing curriculum.
- 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/ aspect leaders***

#### **Key responsibilities:**

- As listed in the 'all staff' section, plus:
- Look for opportunities to embed online safety in your subject or aspect, 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 – Mr Jawad Haq Key responsibilities:***

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

- 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 / LGfL nominated contact 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. The school currently uses Opendium UTM and Senso Cloud to monitor students use of the school network and Hexnode for Mobile Device Management solution.

- Regularly review the effectiveness of the school's filtering and monitoring systems
- 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
- Monitor the use of school technology, online platforms and social media and that any misuse/attempted misuse is identified and reported in line with school policy
- Work with the Headmaster to ensure the school website meets statutory DfE requirements

#### *Data Protection Officer (DPO) - Mr Clive Marriott*

##### **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

Leehurst Swan School

Last Reviewed: 01/09/2024, Next Review: 01/09/2025 or as required by a change in regulatory legislation

- 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. An example of an LA safeguarding record retention policy can be read at [safepolicies.lgfl.net](https://safepolicies.lgfl.net), but you should check the rules in your area.

- Work with the DSL, Headmaster 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, sign 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

### *Pupils*

#### **Key responsibilities:**

- Read, understand, sign and adhere to the student/pupil acceptable use policy and review this annually
- Understand the importance of reporting abuse, misuse or access to inappropriate materials
- Know what action to take if they or someone they know feels worried or vulnerable when using online technology
- 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
- 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, sign and promote the school's parental acceptable use policy (AUP) and read 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 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):

- PSHE
- Relationships education, relationships and sex education (RSE) and health
- Computing
- Careers
- Citizenship

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 (ask your DSL what appropriate filtering and monitoring policies are in place).

Equally, all staff should carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if relevant), 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. Annual reviews of curriculum plans / schemes of work (including for SEND pupils) are used as an opportunity to follow this framework more closely in its key areas of Self-image and Identity, Online relationships, Online reputation, Online bullying, Managing online information, Health, Wellbeing and lifestyle, Privacy and security, and Copyright and ownership.

Para 135 of KCSIE 2024 suggests that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content
- Contact: being subjected to harmful online interaction with other users
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

## **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, PSHE/RSHE and Citizenship).



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
- Anti-Bullying Policy
- Behaviour, Discipline and Exclusions Policy (including school sanctions)
- Acceptable Use Policies
- Data Protection Policy, agreements and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc)

This 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 on pupils when they come into 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).

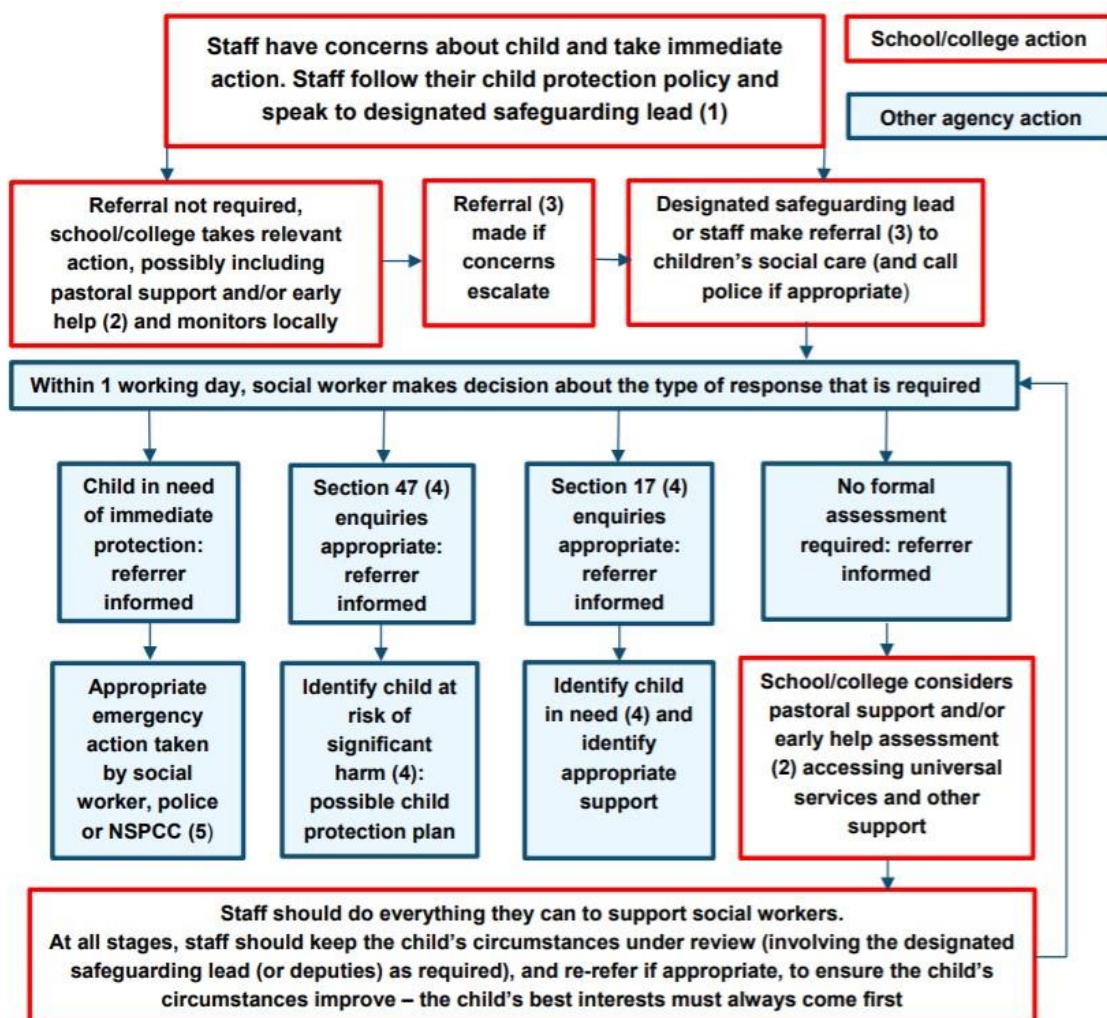
Any suspected online risk or infringement should be reported to the online safety lead / designated safeguarding lead on the same day – where clearly urgent, it will be made by the end of the lesson.

Any concern/allegation about staff misuse is always referred directly to the Headmaster, unless the concern is about the Headmaster in which case the complaint is referred to the Chair of Governors and the LADO (Local Authority 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, 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).

### **Actions where there are concerns about a child**

The following flow chart is published in KCSIE 2024 and can be used as a guide when there are concerns about online activity. As outlined previously, online safety concerns are no different to any other safeguarding concern. Please also refer to the Wiltshire specific flowchart available in our staff handbook and referred to in our Child Protection and Safeguarding Policy.



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

## Sexting

*All schools (regardless of phase) should refer to the UK Council for Internet Safety (UKCIS) guidance on sexting (also referred to as 'youth produced sexual imagery') in schools. NB - where one of the parties is over 18, this is no longer sexting but child sexual abuse.*

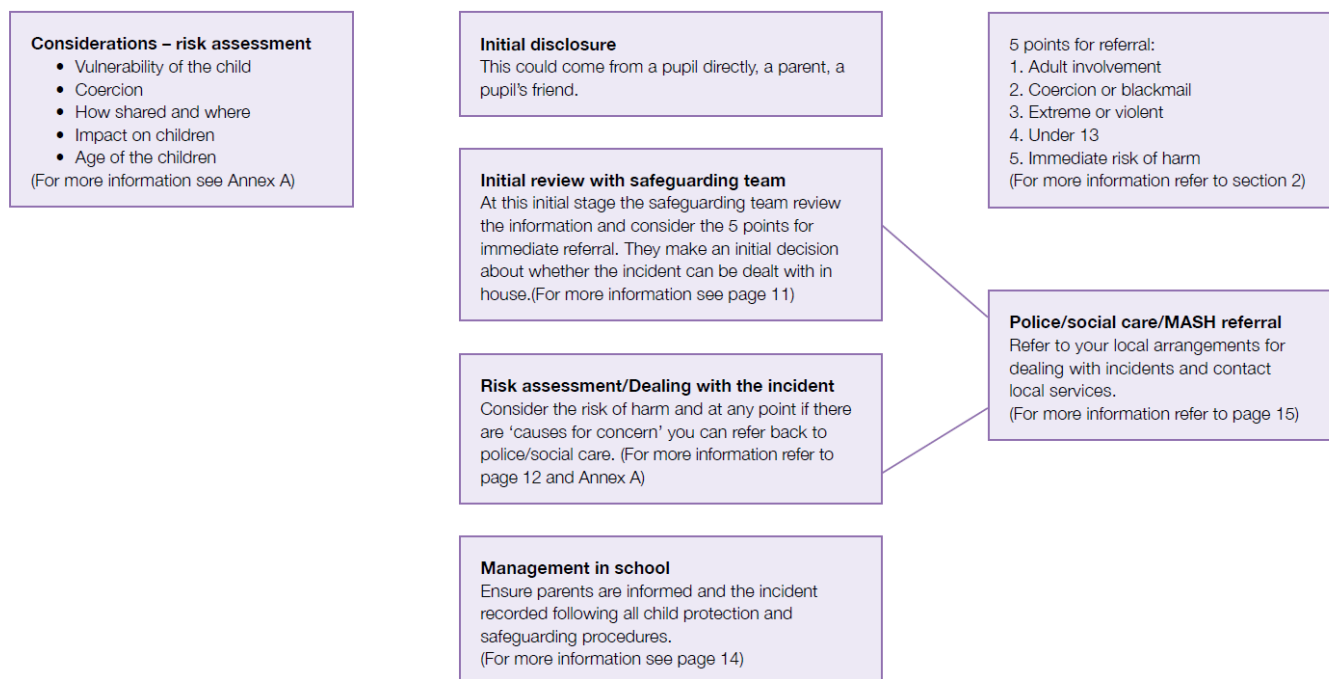
There is a one-page overview called [Sexting; how to respond to an incident](#) for all staff (not just classroom-based staff) to read, in recognition of the fact that it is mostly someone other than the designated safeguarding lead (DSL) or online safety lead to first become aware of an incident, and 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, [Sexting in Schools and Colleges](#) to decide next steps and whether other agencies need to be involved.

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.

# Annex G

## Flowchart for responding to incidents



### ***Upskirting***

It is important that everyone understands that upskirting (taking a photo of someone under their clothing) 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.

### ***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 by reading Part 5 which covers 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 should 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, as well as to BYOD (bring your own device) policy.

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.

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 Leehurst Swan community.

Breaches will be dealt with in line with the school behaviour, discipline and exclusions 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, Leehurst Swan School 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.

### **AI**

Generative AI refers to technology that can be used to create new content based on large volumes of data that models have been trained on. This can include audio, code, images, text, simulations, and videos.

### ***Key messages for the education sector***

- Although generative AI is not new, recent advances and public access to the technology mean that the general public can now use this technology to produce AI-generated content. This poses opportunities and challenges for the education sector.
- When used appropriately, technology (including generative AI), has the potential to reduce workload across the education sector, and free up teachers' time, allowing them to focus on delivering excellent teaching.
- Schools, colleges and universities, as well as awarding organisations need to continue to take reasonable steps where applicable to prevent malpractice, including malpractice involving use of generative AI and other emerging technologies.
- The education sector must continue to protect its data, resources, staff and pupils, in particular:
  - o Personal and sensitive data must be protected and therefore must not be entered into generative AI tools.
  - o Education institutions should review and strengthen their cyber security, particularly as generative AI could increase the sophistication and credibility of attacks.
  - o Education institutions must continue to protect their students from harmful content online, including that which might be produced by generative AI.

### ***For more detail please refer to:***

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1146540/Generative\\_artificial\\_intelligence\\_in\\_education\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1146540/Generative_artificial_intelligence_in_education_.pdf)

### **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

Leehurst Swan School



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 – note the red and purple highlights:

**“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, contractors and parents are bound by the school’s data protection policy and agreements.

The Headmaster, 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.

All staff with access to the school network and information systems will receive regular GDPR training. Staff should under no circumstances store sensitive information on nonencrypted USB devices.

### **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.” In other words, pupils should not be prevented from undertaking genuine research about keeping safe or related to coursework.

Filtering must be effective in any language used in the school.

At this school, the internet connection is provided by British Telecom and we put appropriate firewalls and filters in place to protect the students from accessing harmful or inappropriate material.

Leehurst Swan School will strive to ensure it has effective monitoring strategies to meet the safeguarding needs of the school. Monitoring should include physical monitoring (i.e.

staff presence), live software viewing, the monitoring of user logs and individual device monitoring where applicable.

Staff know that they must report any concerns regarding filtering and monitoring to the Headmaster, DSL or DDSLs.

Filtering and monitoring systems will be formally reviewed at least annually. The review will be recorded and shared as appropriate.

### **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 Headmaster and governors have delegated the day-to-day responsibility of updating the content of the website to Mrs Lindsay Chater, Mrs Genevieve Middleton and Mrs Rosie Orchard.

The DfE has determined information which must be available on a school website.

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

- School have the same duty as any person or organisation to respect and uphold copyright law – schools have been fined thousands of pounds for copyright breaches. Sources must always be credited, and material only used with permission. There are many open-access libraries of high-quality, public-domain images that can be used (e.g. pixabay.com for marketing materials – beware some adult content on this site).
- 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**

Many schools are recognising the benefits of cloud computing platforms, not just for cost savings but to enhance teaching and learning.

As more and more systems move to the cloud, it becomes easier to share and access data.

It is important to consider data protection before adopting a cloud platform or service.

For online safety, basic rules of good password hygiene ("Treat your password like your toothbrush – never share it with anyone!"), expert administration and training can help to keep staff and pupils safe, and to avoid incidents. The data protection officer and network manager analyse and document systems and procedures before they are implemented, and regularly review them. The following principles apply:

- Privacy statements inform parents and children (13+) 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

- Regular training ensures all staff understand sharing functionality and this is audited to ensure that pupil data is not shared by mistake. Open access or widely shared folders are clearly marked as such
- Pupils and staff are only given access and/or sharing rights when they can demonstrate an understanding of what data may be stored and how it can be seen
- 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, which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. Staff will not use personal mobile phones or cameras to take pictures of pupils.

Photos are stored on the school network in line with the retention schedule of the school Data Protection Policy.

## **Social media**

### ***Leehurst Swan School's Social Media presence***

Leehurst Swan School works on the principle that if we don't manage our social media reputation, someone else will.

Online Reputation Management (ORM) is about understanding and managing our digital footprint (everything that can be seen or read about the school online). Few parents will apply for a school place without first 'googling' the school, and the ISI pre-inspection check includes monitoring what is being said online (Mumsnet is a favourite).

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](mailto:helpline@saferinternet.org.uk)) involve schools' (and staff members') online reputation. Accordingly, we manage and monitor our social media footprint carefully to know what is



being said about the school and to respond to criticism and praise in a fair, responsible manner.

Mrs Genevieve Middleton and Mrs Rosie Orchard are responsible for managing our Twitter/Facebook/Google Plus accounts and checking our Wikipedia and Google reviews.

### *Staff, pupils' and parents' Social Media 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 should 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).

Many social media platforms have a minimum age of 13; we ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use. It is worth noting that following on from the government's Safer Internet Strategy, enforcement and age checking is likely to become more stringent over the coming years.

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 (as outlined on p.15) by talking to their children about the apps, sites and games they use (you don't need to know them – ask your child to explain it to you), 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).

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 there have been more than 200 Prohibition Orders issued to teachers in recent years related to the misuse of technology/social media.

All members of the school community are reminded that particularly in the context of social media, it is important to comply with the school policy on Digital Images and Video (see page 21) and permission is sought before uploading photographs, videos or any other information about other people.

### *Personal devices including wearable technology and bring your own device (BYOD)*

- **Pupils** are allowed to bring mobile phones into school, but they must be deposited in their allocated boxes at the start of the school day. Pupils are not permitted to keep their phones about their person during the school day.
- **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. If a staff member is expecting an important personal call when teaching or otherwise on duty, they may leave their phone with the school office to answer on their behalf or ask for the message to be left with the school office.
- **Volunteers, contractors, 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 Headmaster should be sought (the Headmaster 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. Parents are asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office.

### *Trips/ events away from school*

For school trips/events away from school, teachers will be issued a school trips phone and this number can be used for any authorised or emergency communications with pupils and parents. Any deviation from this policy (e.g. by mistake or because the school phone will not work) will be notified immediately to the Headmaster. 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.

### ***Searching and confiscation***

In line with the DfE guidance 'Searching, screening and confiscation: advice for schools', the Headmaster 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.

### ***Appendix A – Acceptable Use Policy (An adapted version is available for KS1 and KS2)***

Digital technologies have become integral to the lives of children and young people, both within Leehurst Swan and outside Leehurst Swan. These technologies are powerful tools, which open new opportunities for everyone. These technologies can stimulate discussion, promote creativity, and stimulate awareness of context to promote effective learning.

#### **This Acceptable Use Policy is intended to ensure:**

- that young people will be responsible users and stay safe while using the internet and other digital technologies for educational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.

Leehurst Swan will try to ensure that students will have good access to digital technologies to enhance their learning and will, in return, expect the students to agree to be responsible users.

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### **Acceptable Use Policy Agreement**

I understand that I must use school ICT systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the ICT systems and other users.

#### **For my own personal safety:**

- I understand that the school will monitor my use of the systems, devices and digital communications.
- I will keep my username and password safe and secure – I will not share it, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will be aware of "stranger danger", when I am communicating on-line.
- I will not disclose or share personal information about myself or others when on-line (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc)
- I will not I arrange to meet people off-line that I have communicated with on-line without parental knowledge.
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it on-line to a member of staff.

Leehurst Swan School

**I understand that everyone has equal rights to use technology as a resource and:**

- I understand that the school systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not use the school systems or devices for on-line gaming, on-line gambling, internet shopping, file sharing, or video broadcasting (e.g. YouTube), unless I have permission of a member of staff to do so.

**I will act as I expect others to act toward me:**

- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission. I recognise that the school has a responsibility to maintain the security and integrity of the technology it offers me and to ensure the smooth running of the school.
- I will only use my own personal devices (mobile phones / USB devices etc) in school if I have permission). I understand that, if I do use my own devices in the school, I will follow the rules set out in this agreement, in the same way as if I was using school equipment.
- I understand the risks and will not try to upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I try to use any programmes or software that might allow me to bypass the filtering / security systems in place to prevent access to such materials.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.
- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person / organisation who sent the email, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes) .
- I will not install or attempt to install or store programmes of any type on any school device, nor will I try to alter computer settings.

**When using the internet for research or recreation, I recognise that:**

- I should ensure that I have permission to use the original work of others in my own work.
- Where work is protected by copyright, I will not try to download copies (including music and videos)
- When I am using the internet to find information, I should take care to check that the information that I access is accurate, as I understand that the work of others may not be truthful and may be a deliberate attempt to mislead me.

**I understand that I am responsible for my actions, both in and out of school:**

- I understand that the school also has the right to act against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of school and where they involve my membership of the school community (examples would be cyberbullying, use of images or personal information).
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I will be subject to disciplinary action. This may include loss of access to the school network / internet, detentions, exclusions, contact with parents and in the event of illegal activities involvement of the police.

***Appendix B – Protocol for use of MS Teams***

**Note for staff: The video facility should only be used if it is of benefit to the lesson.**

**Protocol for the use of MS Teams including live video**

- Whilst using MS Teams for remote learning, we expect pupils to follow this protocol in addition to the rules around the acceptable use of IT, which still applies.
  - Pupils should have cameras turned off unless specifically requested otherwise. Pupils taking formal assessments and internal examinations on-line will need to turn their camera on.
  - Any 'live' video should always be scheduled in advance to take place during school hours and supervised by the teacher. The use of video should not be spontaneous and must be planned and communicated to pupils in advance.
  - There should be a minimum of two children present unless previously agreed with the DSL.
  - 'Live' video should be in a quiet, safe environment, free from distractions. Backgrounds must be blurred or chosen from the backgrounds available on Teams. In some cases, pupils (and teachers) may not be able to access or blur backgrounds. If this is the case do not use the video facility unless you can show a plain background.
  - Pupils should be dressed appropriately e.g. no pyjamas. Pupils should only show their head and shoulders.
  - All members of the household must be aware that the meeting is taking place and make sure they are also suitably dressed and use appropriate language and behaviour when nearby or in the background.
  - Pupils should always be respectful of the teacher and other pupils as they would in a class and conduct themselves according to the school behaviour, discipline and exclusions policy. Normal school rules and sanctions will still apply.
- Use of the chat function is for discussing the content of a lesson only, with the permission of a teacher. It should not be used inappropriately and/or in a distracting way. Pictures should not be posted in the chat function.
- All 'live' Teams are recorded by the school and use is monitored. Pupils must not photograph or record online interactions.

- Pupil mobile telephone should be switched off and, in another room, to avoid distraction during lesson time.

- Parents should notify in writing if they do not wish their child to use video function on Teams.

Any safeguarding concerns should be passed on to DSL (Mr Clive Marriott) or the Deputy DSL (Mrs Gross or Mrs Wright).