

Online Safety Policy 2022-24

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Written by	TCS Safeguarding Lead
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Introduction

Key people / dates

	Designated Safeguarding Lead (DSL) team	Annabel Gerrard Croxon, Sue Raven, Chris Lee-McCloud
	Online-safety lead (if different)	Annabel Gerrard Croxon
	Online-safety / safeguarding link governor	Judith Davies
	PSHE/RSHE lead	Martin Gerrard Croxon
	Network manager / other technical support	Giles Williams

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' 2021 (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 your school's statutory Safeguarding Policy. Any issues and concerns with online safety must follow the 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. We recommend you read the DfE '[Get help with remote education](#)' guidance at safepolicies.lgfl.net before reissuing your school policies for online safety, safeguarding and AUPs to see what needs changing in the light of potential closure, remote learning and alternative arrangements at school. Although many aspects will be informed by legislation and regulations, you should involve staff, governors, pupils and parents in writing and reviewing the policy (KCSIE stresses making use of teachers' day-to-day experience on the ground). This will help ensure all stakeholders understand the rules that are in place and why, and that the policy affects day-to-day practice. Pupils could help to design a version in language their peers understand or

help you to audit compliance. Acceptable Use Policies (see appendices) for different stakeholders help with this – ensure these are reviewed alongside this overarching policy. Any changes to this policy should be immediately disseminated to all the above stakeholders.

Who is in charge of online safety?

You may have a named online-safety lead at your school (see above); this person may or may not be the designated safeguarding lead (DSL), but **KCSIE makes clear that “the designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety).”**

What are the main online safety risks today?

Online-safety risks are traditionally categorised as one of the 3 Cs: Content, Contact or Conduct (identified by Professor Tanya Byron’s 2008 report “Safer children in a digital world”). These three 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 all three.

Many of these new risks are mentioned in KCSIE 2021, 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 your pupils may have missed opportunities to disclose such abuse during the lockdowns or periods of absence. The quick audit safeposters.lgfl.net or quiz at digitalsafedigest.lgfl.net may help to surface some of these issues.

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](#) and your school’s internal reporting channels. Ways we can help you stay up to date with the latest news, risks, opportunities, best-practice and trends include the LGfL DigiSafe [blog](#), [newsletter](#) and our [Twitter](#)/[Facebook](#) 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 on the internal staff network/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, c, governors and pupils
- AUPs issued to whole school community, on entry to the school, and reissued if updated after annual review
- AUPs are displayed in school
- Reviews of this Online-Safety Policy will include input from staff, pupils and other stakeholders, helping to ensure further engagement

Overview

Aims

This policy aims to:

- Set out expectations for all The Centre 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:
 - 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 Behaviour Policy or the Behaviour Management and 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 our Safeguarding Policy. The DSL will handle referrals to local authority multi-agency safeguarding hubs (MASH) and normally the Principal will handle referrals to the LA designated officer (LADO).

Beyond this, reporting.lgfl.net has a list of curated links to external support and helplines for both pupils and staff, including 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 which might be useful to share with parents, and anonymous support for children and young people.

Scope

This policy applies to all members of The Centre School community (including teaching and support staff, supply teachers, 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.

Principal – Sue Raven

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 – Annabel Gerrard Croxon

Key responsibilities (the DSL may 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 Principal and technical staff to review protections for **pupils in the home** and **remote-learning** procedures, rules and safeguards
- 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, or the named person with oversight for SEN in a college and Senior Mental Health Leads) 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 Principal, 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 Local Governance Committee.
- 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, but also including hard-to-reach parents
- 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.
- Oversee and clarify with staff and governors that 'appropriate filtering and monitoring' with governors is both physical and technical.
- 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:
 - all staff must read KCSIE Part 1 and all those working with children Annex B

Local Governance Committee, led by Online Safety / Safeguarding Link Governor – Judith Davies

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** (including when with online tutors) and **remote-learning** procedures, rules and safeguards
- “Ensure an appropriate **senior member** of staff, from the school or college **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 and the wider community 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
- Work with the DPO, DSL and Principal 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:

- In 2021/2022 pay particular 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 Annabel Gerrard Croxon
- Read Part 1, Annex B and Annex D of Keeping Children Safe in Education 2021
- Read and follow this policy in conjunction with the academy’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 adhere to the staff code of conduct.
- Notify the DSL 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 (find out what appropriate filtering and monitoring systems are in place)

- 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 and enforce school sanctions.
- Notify the DSL of new trends and issues before they become a problem
- Take a zero-tolerance approach to bullying and sexual harassment
- 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 and other communal areas outside the classroom – let the DSL know
- Receive regular updates from the DSL 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/s – Martin Gerrard Croxon

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

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
- Ensure subject specific action plans also have an online-safety element

Network Manager/technician – Giles Williams

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Support the Principal 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
- Meet the RSHE lead to see how the online-safety curriculum delivered through this new subject can complement the school IT system and vice versa, and ensure no conflicts between educational messages and practice.
- 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
- 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
- Work with the Principal to ensure the school website meets statutory DfE requirements

Data Protection Officer (DPO) – Melanie Basson

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)'. The Centre Schools information retention will be defined by the Information and Records Management Toolkit for Schools.
- Work with the DSL, Principal and Local Committee members to ensure frameworks are in place for the protection of data and of safeguarding information sharing as outlined above and in accordance with Astrea's Data Protection Policy and Privacy Notices.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited in accordance with responsibilities outlined by the Trust Safeguarding Team

Volunteers

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 at school and as part of remote teaching or any online communications
- Note that as per AUP agreement there will never be an attempt to arrange any meeting, **including tutoring session**, without the full prior knowledge and approval of the school, and will never do so directly with a pupil. The same applies to any private/direct communication with a pupil.

Pupils

Key responsibilities:

- Read, understand, sign 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 or tutors
- Understand the importance of reporting abuse, misuse or access to inappropriate materials, including any concerns about a member of school staff or supply teacher or online tutor
- 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, 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, 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, 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.
- If organising private online tuition, remain in the room if possible, ensure the child knows tutors should not arrange new sessions directly with the child or attempt to communicate privately.

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)
- 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.

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. [saferesources.lgfl.net](https://www.saferesources.lgfl.net) has regularly updated theme-based resources, materials and signposting for teachers and parents.

At The Centre School we recognise that online safety and broader digital resilience must be thread throughout the curriculum and that is why we are working to adopt the cross-curricular framework 'Education for a Connected World – 2020 edition' from UKCIS (the UK Council for Internet Safety).

Handling online-safety concerns and incidents

It is vital that all staff recognise that online-safety is a part of safeguarding.

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 Policy
- Behaviour Management and Anti-Bullying Policy
- Acceptable Use Policies
- Prevention of Radicalisation
- Data Protection Policy

The Centre 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.

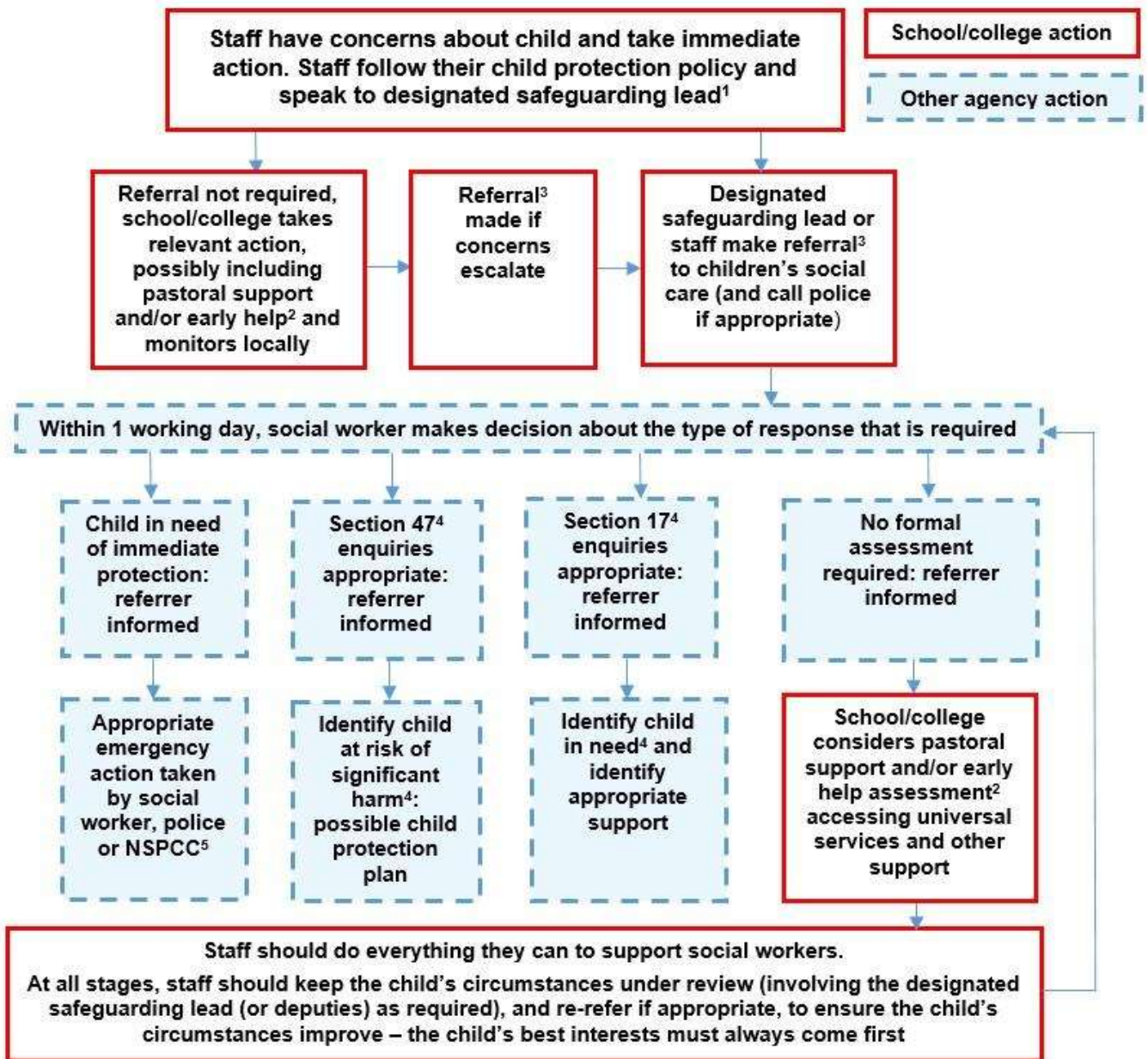
Any concern/allegation about staff misuse is always referred directly to the Principal, unless the concern is about the Principal in which case the complaint is referred to the Chair of The Centre School Local Governance Committee and the LADO (Local Authority's Designated Officer). Staff may also use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

The school will actively seek support from other agencies as needed (i.e. the local authority, LGfL, 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 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

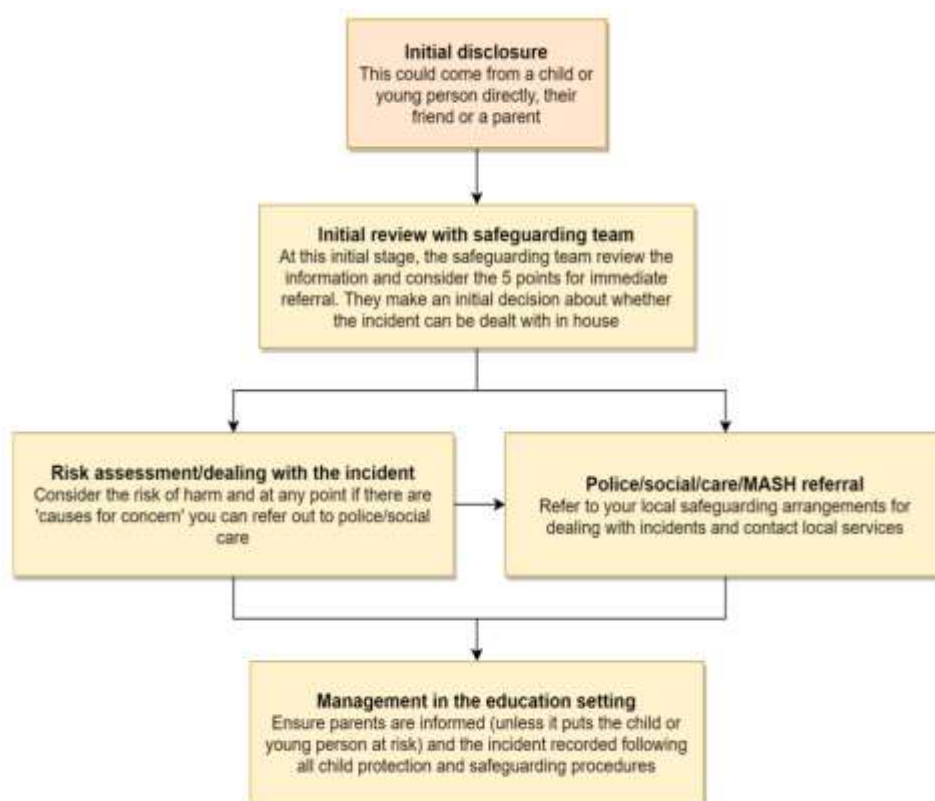


Sexting – sharing nudes and semi-nudes

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.



*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, including issues arising from banter

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 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.

Where pupils contravene these rules, the school behaviour policy will be applied; where staff contravene these rules, action will be taken by the Principal.

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 Centre School community. These are also governed by the academy's Acceptable Use Policy.

Breaches will be dealt with in line with the school behaviour policy (for pupils).

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community, The Centre 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, POSH, (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 – 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, and parents are bound by the school's Data Protection Policy and agreements.

Rigorous controls on the network, firewalls and filtering all support data protection. The following data security products are also used to protect the integrity of data, which in turn supports data protection Sophos Anti-Virus, Sophos Anti-Phish, Sophos InterceptX, Microsoft Endpoint Manager, Microsoft System Centre Endpoint Protection, SmoothWall & Cisco Umbrella

The Principal, data protection officer and LGC 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.

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 Cambridgeshire County Council (the ICT Service). 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 Smooth Wall, which is made specifically to protect children in schools.

At home, school devices are filtered and monitored when on home wifi connections.

When pupils log into any school system on a personal device, activity may also be monitored here.

Electronic communications

Please read this section alongside references to pupil-staff communications in the overall school Safeguarding Policy, and in conjunction with the Data Protection Policy. This section only covers electronic communications, but the same principles of transparency, appropriate conduct and audit trail apply.

Email

- Pupils at this school use Microsoft 365 for all school emails
- Staff at this school use the Microsoft 365 for all school emails

Both these systems are linked to the USO authentication system and are fully auditable, trackable and managed by Astrea Academy Trust. This is for the mutual protection and privacy of all staff, pupils and parents, as well as to support data protection.

General principles for email use are as follows:

- Microsoft 365 & BromCom the only means of electronic communication to be used between staff and pupils / staff and parents (in both directions). Use of a different platform must be approved in advance by the data-protection officer / Principal in advance. Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Principal (if by a staff member).
- Email may only be sent using the email systems above. There should be no circumstances where a private email is used; if this happens by mistake, the DSL/Principal/DPO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately
- Staff or pupil personal data should never be sent/shared/stored externally unless password protected.
 - Internally, staff should use the school network, including when working from home when remote access is available via Secure Remote Access.
- 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
- Pupils and staff are allowed to use the email system for reasonable (not excessive, not during lessons) personal use but should be aware that all use is monitored, their emails may be read and the same rules of appropriate behaviour apply at all times. Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination.

See also the social media section of this policy.

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 Principal/LGC have delegated the day-to-day responsibility of updating the content of the website to Martin Gerrard Croxon.

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:

- Schools 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.

- 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

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
- Two-factor authentication is used for access to staff or pupil data
- 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. Parents answer as follows:

- For displays around the school
- For the newsletter
- For the prospectus
- For the website
- For social media

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. At The Centre School no members of staff will ever use their personal phones to capture photos or videos of pupils. All staff are provided with a mobile phone by Astrea Academy Trust that they can use to capture photos or videos, these will be appropriate, linked to school activities, taken without secrecy and not in a one-to-one situation and moved to school storage.

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

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 the LGC, 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.

Social media

The Centre School's SM presence

The Centre 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 Ofsted 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) 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

Hanna Douglas and Chris Lee-McCloud are responsible for managing our Twitter/Facebook/Instagram accounts.

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 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 (note that WhatsApp is 16+). 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 Online Harms regulation is likely to require more stringent age verification measures 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 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).

The Centre School has a Facebook / Twitter / Instagram account and will respond to general enquiries about the school, but asks parents/carers not to use these channels to communicate about their children.

Email is the official electronic communication channel between parents and the school, and between staff and pupils.

Pupils/students are not allowed* to be 'friends' with or make a friend request** to any staff, governors, volunteers and contractors or otherwise communicate via social media.

Pupils/students are discouraged from 'following' staff, governor, volunteer or contractor 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.

* Exceptions may be made, e.g. for pre-existing family links, but these must be approved by the Principal, and should be declared upon entry of the pupil or staff member to the school).

** 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 Principal (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.

All members of the school community are reminded that particularly in the context of social media, it is important that permission is sought before uploading photographs, videos or any other information about other people.

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 including wearable technology

- **Students** are permitted to bring mobile phones in to school. During lessons, phones will not be used by students unless the teacher has given express permission as part of the lesson.
- **Staff who work directly with children** are permitted to use their own phone for work purposes during the school day. Child/staff data should never be downloaded onto a private phone. Staff will contact parents/carers using Teams, or their work mobile phone, not their personal phone number.
- **Volunteers, contractors, governors** are permitted to use their mobile phone. 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 Principal should be sought (the Principal 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 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.

Network / internet access on school devices

- **Pupils/students** are not allowed networked file access via personal devices.
- **Home devices** are issued to some students. These are restricted to the apps/software installed by the school and are to be used for learning and reasonable and appropriate personal use at home, but all usage may be tracked. The devices are filtered with Cisco Umbrella & monitored when on home wifi connections.
- **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. See also the Digital images and video section and Data protection and data security section. Child/staff data should never be downloaded onto a private phone.
- **Volunteers, contractors, governors** can access the guest wireless network by requesting a code from the IT dept, but have no access to networked files/drives, subject to the Acceptable Use Policy. All internet traffic is monitored.
- **Parents** have no access to the school network or wireless internet on personal devices.
- **Staff** are provided with a trust mobile phone to use for work purposes only, these are restricted by Microsoft Endpoint Manager. Personal mobile phones should not be used to access/store/send any work related information.

Trips / events away from school

- For school trips/events away from school, staff will contact parents/carers using Teams or their work mobile phone.

Searching and confiscation

In line with the DfE guidance '[Searching, screening and confiscation: advice for schools](#)', the Principal 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.

Appendices

1. Acceptable Use Policies (AUPs) for:
 - Pupils



Acceptable Use Policy (AUP) 2022

What is an AUP?

We ask all children, young people and adults involved in the life of The Centre School to agree to an Acceptable Use Policy (AUP), which is a document that outlines how we expect them to behave when they are online, and/or using school networks, connections, internet connectivity and devices, cloud platforms and social media (both when on school site and outside of school).

Why do we need an AUP?

These rules have been written to help keep everyone safe and happy when they are online or using technology. Sometimes things go wrong and people get upset, but these rules help us avoid it where we can.

School systems and users are protected and monitored by security and filtering services to provide safe access to digital technologies. This means anything you do on a school device or using school networks/platforms/internet (including from home when home learning) may be viewed by one of the staff members who are here to keep you safe.

But it's not about systems and devices – it's about behaviour. So the same rules apply when you are at school as when you are home learning or just having fun with friends.

All of the points in the list on the next page below can be summarised as follows:

“Treat yourself and others with respect at all times; treat people in the same way when you are online or on a device as you would face to face.”

Where can I find out more?

If your parents/carers want to find out more, they can read The Centre School's full Online Safety Policy on the school website www.astreacentreschool.org for more detail on our approach to online safety and links to other relevant policies (e.g. Safeguarding Policy, Behaviour Policy, etc).

If you have any questions about this AUP, please speak to Annabel Gerrard Croxon, Designated Safeguarding Lead.

What am I agreeing to?

1. I will treat myself and others with respect at all times; when I am online or using any device, I will treat everyone as if I were talking to them face to face. I shouldn't put myself or others at risk.
2. I consider my online reputation with everything that I post or share – I know anything I do can be shared and might stay online forever (even on Snapchat or if I delete it).
3. If I see, watch, read, hear or receive anything I am unhappy with or receive a message that makes me feel uncomfortable, eg bullying, sexual, extremist/hateful content, people hurting themselves or encouraging others, I will report it on the app, site or game and talk to a trusted adult about it.
4. I will only use the school's internet, systems, devices and logins for school-related activities for activities that are appropriate to what I am doing at that time (e.g. at school I don't play games unless I am allowed to, e.g. during lunch, and at home I don't access inappropriate sites or apps).
5. Whenever I use the internet or devices in school OR use school devices at home OR log in on home devices at home, I may be monitored or filtered; the same behaviour rules always apply.
6. I will keep logins, IDs and passwords secret and change my password regularly. If I think someone knows one of my passwords, I will change it; if I think they have used it, I will tell a teacher.
7. I will not try to bypass school security in any way or access any hacking files or tools.
8. I will only edit or delete my own files and not (even try to) view, change or delete other people's files or user areas without their permission.
9. I understand that any information I see online could be biased and misleading, so I should always check sources before sharing.
10. I understand that bullying online or using technology is just as unacceptable as any other type of bullying, and will not use technology to bully, impersonate, harass, threaten, make fun of or upset anyone, at school or outside. I will stand up for my friends and not be a bystander.
11. I will not post, look at, up/download or share material that could be offensive, harmful or illegal. If I come across any, I will report it immediately.
12. I know some sites, games and apps have age restrictions (most social media are 13+) and I should respect this. 18-rated games are not more difficult but inappropriate for young people.
13. I will not download copyright-protected material (text, music, video etc.).

14. I will not share my or others' personal information that can be used to identify me, my family or my friends on any online space, unless a trusted adult has given permission or reviewed the site.
15. When livestreaming I will check my privacy settings and know who can see what and when. If I livestream, my parents/carers know about it.
16. I know new online friends might not be who they say they are, so I am always very careful when someone wants to 'friend' me. I will never arrange to meet someone face to face who I have only previously met in an app, site or game without telling and taking a trusted adult with me.
17. When learning remotely, teachers and tutors will not behave any differently to when we are in school. If I get asked or told anything that I would find strange in school, I will tell another teacher.
18. I will only use my personal devices (mobiles, smartwatches etc) in school if I have been given permission, and I will never take secret photos, videos or recordings of teachers or students, including when learning remotely.
19. I will respect my body and other people's – I will not share or post photos or videos that show me or anyone else without all my/their clothes on.
20. Many apps can identify where I am or where I made a post or took a photo, so I know how to turn off location settings so everyone doesn't see where I am, where I live or go to school.
21. I can also report unwanted sexual harassment or abuse from the school community or elsewhere and get help at help@nspcc.org.uk or by calling 0800 136 663.
22. It is illegal to view any form of pornography if you are under 18 years old; I will not attempt to do so and will report anyone who tries to trick me into doing so.
23. I can always say no online, end a chat or block someone; if I do, it's best to talk to someone, too.