Gillotts School

Online Safety Policy

Contents

Introduction

This Online Safety Policy outlines our commitment to safeguard members of our school community online in accordance with statutory guidance and best practice.

This policy applies to all members of the school community (including staff, learners, volunteers, parents and carers, visitors) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

We will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents/carers of incidents of inappropriate online safety behaviour that take place out of school.

The school Online Safety Policy:

- sets expectations for the safe and responsible use of digital technologies for learning, administration, and communication
- allocates responsibilities for the delivery of the policy
- is regularly reviewed in a collaborative manner, taking account of online safety incidents and changes/trends in technology and related behaviours
- establishes guidance for staff in how they should use digital technologies responsibly, protecting themselves and the school and how they should use this understanding to help safeguard learners in the digital world
- describes how the school will help prepare learners to be safe and responsible users of online technologies

- establishes clear procedures to identify, report, respond to and record the misuse of digital technologies and online safety incidents, including external support mechanisms
- is supplemented by a series of related acceptable use agreements
- is made available to staff at induction and through the Home Page
- is published on the school website.

This policy was approved by the Local Governing Body meeting on 23 September 2025 and will be reviewed annually. The implementation of this policy will be monitored by the Deputy Headteacher and the IT Network Manager, who is the Online Safety Lead, supported by River Learning Trust IT Support.

Responsibilities

To ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviours, learning from each other and from good practice elsewhere, reporting inappropriate online behaviours, concerns, and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals and groups within the school.

Governors

- Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. The link Governor for Child Protection also acts as online safety governor.

Headteacher and senior leaders

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding, though the day-to-day responsibility for online safety is delegated to the Online Safety Lead, supported by River Learning Trust IT Support.
- The headteacher and (at least) another member of the senior leadership team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff.
- The headteacher/senior leaders are responsible for ensuring that the Online Safety Lead, technical staff, and other relevant staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.
- The headteacher/senior leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role.
- The headteacher/senior leaders will receive regular monitoring reports from the Online Safety Lead.
- The headteacher/senior leaders will work with the designated safeguarding lead (DSL), the Online Safety Lead and River Learning Trust IT Support on all aspects of filtering and monitoring.

Designated Safeguarding Lead (DSL)

As set out in Keeping Children Safe in Education, responsibility for online safety is held by the DSL and cannot be delegated. The Online Safety Lead works in support of the DSL in carrying out these responsibilities.

The DSL should be trained in online safety issues and be aware of the potential for serious safeguarding issues to arise from:

- sharing of personal data
- access to illegal/inappropriate materials

- inappropriate online contact with adults/strangers
- potential or actual incidents of grooming
- online bullying.

The DSL will receive reports of online safety incidents, record all incidents, and decide whether to make a referral.

The DSL will review filtering and monitoring logs and ensure that at least annual filtering and monitoring checks are carried out.

Online Safety Lead

The Online Safety Lead, supported by River Learning Trust IT Support, works in support of the DSL to enable them to carry out their responsibilities.

The Online Safety Lead will:

- work closely on a day-to-day basis with the Designated Safeguarding Lead (DSL)
- take day-to-day responsibility for online safety issues, being aware of the potential for serious child protection concerns
- promote an awareness of and commitment to online safety
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents
- provide (or identify sources of) training and advice for staff/governors/parents/carers/learners
- liaise with technical staff, pastoral staff and support staff (as relevant)
- receive regular updated training to allow them to understand how digital technologies are used and are developing.

Curriculum Leads (Deputy Headteacher and PSHE Subject Leader)

Curriculum Leads will develop a planned and coordinated online safety education programme.

This will be provided through:

- a discrete programme delivered through the pastoral curriculum
- the PSHE programme
- through relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week.

Teaching and support staff

School staff are responsible for ensuring that:

- they have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices
- they understand that online safety is a core part of safeguarding
- they have read, understood, and signed the staff acceptable use policy
- they follow all relevant guidance and legislation including, for example, Keeping Children Safe in Education and UK GDPR regulations
- all digital communications with learners, parents and carers and others should be on a professional level and only carried out using official school systems and devices (- where staff use AI, they should only use school-approved AI services for work purposes which have been evaluated to comply with organisational security and oversight requirements)
- they immediately report any suspected misuse or problem to the Online Safety Lead or DSL, as appropriate, for investigation/action, in line with the school safeguarding procedures
- all digital communications with learners and parents/carers should be on a professional level and only carried out using official school systems
- online safety issues are embedded in all aspects of the curriculum and other activities

- ensure learners understand and follow the Online Safety Policy and acceptable use agreements, have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they supervise and monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other school activities (where allowed) and implement current policies regarding these devices
- in lessons where internet use is pre-planned learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- where lessons take place using live-streaming or video-conferencing, staff must have full regard to national safeguarding guidance and local safeguarding policies
- they have a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc
- they model safe, responsible, and professional online behaviours in their own use of technology, including out of school and in their use of social media
- they adhere to the school's technical security policy, with regard to the use of devices, systems and passwords and have an understanding of basic cybersecurity
- they have a general understanding of how the learners in their care use digital technologies out of school, in order to be aware of online safety issues that may develop from the use of those technologies
- they are aware of the benefits and risks of the use of Artificial Intelligence (AI) services in school, being transparent in how they use these services, prioritising human oversight. AI should assist, not replace, human decision-making. Staff must ensure that final judgments, particularly those affecting people, are made by humans, fact-checked and critically evaluated.

Technical staff

Technical staff are responsible for ensuring that:

- they are aware of and follow the school Online Safety Policy to carry out their work effectively in line with school policy
- the school technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets (as a minimum) the recommended online safety technical requirements
- there is clear, safe, and managed control of user access to networks and devices
- they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- the use of technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported for investigation and action
- the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person
- monitoring software/systems are implemented and regularly updated as agreed, as identified by the DfE Meeting digital and technology standards in schools and colleges

Learners

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement and Online Safety Policy
- should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology

- should avoid plagiarism and uphold copyright regulations, taking care when using Artificial Intelligence (AI) services to protect the intellectual property of themselves and others and checking the accuracy of content accessed through AI services
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school, if related to their membership of the school.

Parents and carers

The school will take every opportunity to help parents and carers understand the issues with online services and devices through:

- publishing the school Online Safety Policy on the school website
- providing them with a copy of the learners' acceptable use agreement
- publish information about appropriate use of social media relating to posts concerning the school
- seeking their permissions concerning digital images, cloud services etc
- parents'/carers' evenings, newsletters, website, social media and information about national/local online safety campaigns and literature.

Parents and carers will be encouraged to support the school in:

- reinforcing the online safety messages provided to learners in school
- the use of their children's personal devices in the school (where this is allowed).

Professional standards

There is an expectation that professional standards will be applied to online safety as in other aspects of school life i.e.

- there is a consistent emphasis on the central importance of literacy, numeracy, digital competence and digital resilience. Learners will be supported in gaining skills across all areas of the curriculum and every opportunity will be taken to extend learners' skills and competence
- there is a willingness to develop and apply new techniques to suit the purposes of intended learning in a structured and considered approach and to learn from the experience, while taking care to avoid risks that may be attached to the adoption of developing technologies e.g. Artificial Intelligence (AI) tools.
- staff are able to reflect on their practice, individually and collectively, against agreed standards of effective practice and affirm and celebrate their successes
- policies and protocols are in place for the use of online communication technology between the staff and other members of the school and wider community, using officially sanctioned school mechanisms.
- where Generative AI is used to monitor staff communications, it will be balanced with respect for privacy and transparency about what is being monitored and why.

Acceptable use

The school has defined what it regards as acceptable/unacceptable use and this is shown in the tables below. The Online Safety Policy and acceptable use agreements define acceptable use at the school. The acceptable use agreements will be communicated/re-enforced through:

- online student planner
- staff induction and handbook
- communication with parents/carers
- built into education sessions
- school website

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not access online content (including apps, games, sites) to make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	**Any illegal activity for example:** ● Child sexual abuse imagery ● Child sexual abuse/exploitation/grooming ● Terrorism ● Encouraging or assisting suicide ● Offences relating to sexual images i.e., revenge and extreme pornography ● Incitement to and threats of violence ● Hate crime ● Public order offences - harassment and stalking ● Drug-related offences ● Weapons / firearms offences ● Fraud and financial crime including money laundering					X

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not undertake activities that might be classed as cyber-crime under the Computer Misuse Act (1990)	• Using another individual's username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised) • Gaining unauthorised access to school networks, data and files, through the use of computers/devices • Creating or propagating computer viruses or other harmful files • Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords) • Disable/Impair/Disrupt network functionality through the use of computers/devices • Using penetration testing equipment (without relevant permission)					X
Users shall not undertake activities that are not illegal but are classed as unacceptable in school policies:	Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs)			X	X	
	Promotion of any kind of discrimination				X	
	Using school systems to run a private business				X	
	Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school				X	
	Infringing copyright and intellectual property (including through use of AI services				X	
	Unfair usage (downloading/uploading large files that hinders others in their use of the internet)			X	X	

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
	Any other information which may be offensive to others or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Online gaming			X			
Online shopping/commerce			X			
File sharing			X			
Social media			X			
Messaging/chat			X			
Entertainment streaming e.g. Netflix, Disney+			X			
Use of video broadcasting, e.g. YouTube, Twitch, TikTok			X			
Use of personal email in school, or on school network/wi-fi			X			
Use of school email for personal emails			X			
Use of AI services that have not been approved by the school						

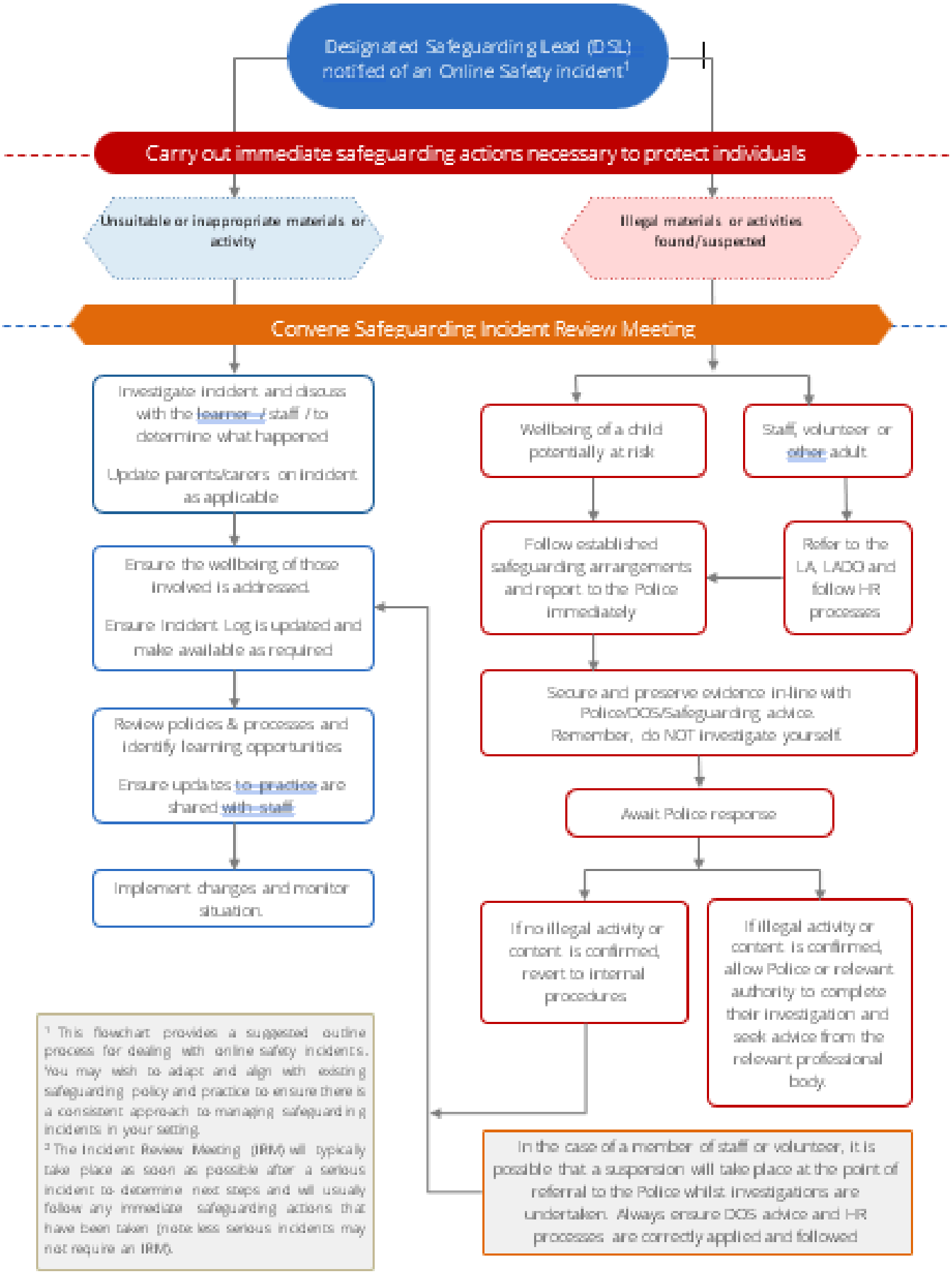
When using communication technologies, the school considers the following as good practice:

- when communicating in a professional capacity, staff should ensure that the technologies they use are officially sanctioned by the school
- any digital communication between staff and learners or parents/carers (e-mail, social media, learning platform, etc.) must be professional in tone and content. Personal email addresses, text messaging and social media must not be used for these communications.
- staff should be expected to follow good practice when using personal social media regarding their own professional reputation and that of the school and its community
- users should immediately report the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication
- relevant policies and permissions should be followed when posting information online e.g., school website and social media. Only school email addresses should be used to identify members of staff and learners.

Reporting and responding

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

- there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the school safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies
- all members of the school community will be made aware of the need to report online safety issues/incidents
- reports will be dealt with as soon as is practically possible once they are received
- the Designated Safeguarding Lead, Online Safety Lead and other responsible staff have appropriate skills and training to deal with online safety risks
- if there is any suspicion that the incident involves any illegal activity or the potential for serious harm the incident must be escalated through the agreed school safeguarding procedures
- any concern about staff misuse will be reported to the Headteacher, unless the concern involves the Headteacher, in which case the complaint is referred to the Chair of Governors
- where AI is used to support monitoring and incident reporting, human oversight is maintained to interpret nuances and context that AI might miss
- where there is no suspected illegal activity, devices may be checked using the following procedures:
    - one or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
    - conduct the procedure using a designated device that will not be used by learners and, if necessary, can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). Use the same device for the duration of the procedure.
    - ensure that the relevant staff have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
    - record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed, and attached to the record.
    - once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:
        - internal response or discipline procedures
        - police involvement and/or action
- it is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively
- there are support strategies in place e.g., peer support for those reporting or affected by an online safety incident
- incidents should be logged on SIMS or within child protection records
- relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority; police; Professionals Online Safety Helpline; Reporting Harmful Content; CEOP
- those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions
- learning from the incident (or pattern of incidents) will followed up as appropriate



[1] This flowchart provides a suggested outline process for dealing with online safety incidents. You may wish to adapt and align with existing safeguarding policy and practice to ensure there is a consistent approach to managing safeguarding incidents in your setting.
[2] The Incident Review Meeting (IRM) will typically take place as soon as possible after a serious incident to determine next steps and will usually follow any immediate safeguarding actions that have been taken (note less serious incidents may not require an IRM).

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with.

Responding to student misuse

Incidents of misuse will be dealt with in accordance with the Behaviour for Learning policy. If students deliberately access or try to access material that could be considered illegal, the matter will be referred to the police. As a consequence for serious misuse of the school's IT systems, access to the systems may be restricted/ withdrawn.

Incidents should be referred in the first instance to the Assistant Headteacher (Student Progress) or the Headteacher.

Examples of incidents:

- Deliberately accessing or trying to access material that could be considered illegal
- Attempting to access or accessing the school network, using another user's account (staff or learner) or allowing others to access school network by sharing username and passwords
- Corrupting or destroying the data of other users
- Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature
- Unauthorised downloading or uploading of files or use of file sharing
- Using proxy sites or other means to subvert the school's filtering system
- Accidentally accessing offensive or pornographic material and failing to report the incident
- Deliberately accessing or trying to access offensive or pornographic material
- Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act
- Unauthorised use of digital devices (including taking images)
- Unauthorised use of online services
- Actions which could bring the school into disrepute or breach the integrity or the ethos of the school
- Continued infringements of the above, following previous warnings or sanctions

Responding to staff misuse

Incidents of misuse by staff will be dealt with in accordance with the Disciplinary Procedure. If staff deliberately access or try to access material that could be considered illegal, the matter will be referred to the police. Where necessary, the LADO's advice will be sought.

Incidents should be referred in the first instance to the Headteacher.

Examples of incidents:

- Deliberately accessing or trying to access material that could be considered illegal
- Actions which breach data protection or network/ cyber security rules
- Deliberately accessing or trying to access offensive or pornographic material
- Corrupting or destroying the data of other users or causing deliberate damage to hardware or software
- Using proxy sites or other means to subvert the school's filtering system.
- Unauthorised downloading or uploading of files or file sharing

- Breaching copyright/ intellectual property or licensing regulations (including through the use of AI systems)
- Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account
- Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature
- Using personal email/social networking/messaging to carry out digital communications with learners and parents/carers
- Inappropriate personal use of the digital technologies e.g. social media/ personal email
- Careless use of personal data
- Actions which could compromise the staff member's professional standing
- Actions which could bring the school into disrepute or breach the integrity or the ethos of the school
- Failing to report incidents whether caused by deliberate or accidental actions
- Continued infringements of the above, following previous warnings or sanctions

The use of Artificial Intelligence (AI) systems in school

As Generative Artificial Intelligence (gen AI) continues to advance and influence the world we live in, its role in education is also evolving. There are currently three key dimensions of AI use in schools: learner support, teacher support and school operations; ensuring all use is safe, ethical and responsible is essential.

We realise that there are risks involved in the use of Gen AI services, but that these can be mitigated through our existing policies and procedures, amending these as necessary to address the risks.
We will educate staff and learners about safe and ethical use of AI, preparing them for a future in which these technologies are likely to play an increasing role.

The safeguarding of staff and learners will, as always, be at the forefront of our policy and practice.

- The school acknowledges the potential benefits of the use of AI in an educational context - including enhancing learning and teaching, improving outcomes, improving administrative processes, reducing workload and preparing staff and learners for a future in which AI technology will be an integral part. Staff are encouraged to use AI based tools to support their work where appropriate, within the frameworks provided below and are required to be professionally responsible and accountable for this area of their work.
- We will comply with all relevant legislation and guidance, with reference to guidance contained in Keeping Children Safe in Education and UK GDPR
- We will provide relevant training for staff and governors in the advantages, use of and potential risks of AI. We will support staff in identifying training and development needs to enable relevant opportunities.
- We will seek to embed learning about AI as appropriate in our curriculum offer, including supporting learners to understand how gen AI works, its potential benefits, risks, and ethical and social impacts. The school recognises the importance of equipping learners with the knowledge, skills and strategies to engage responsibly with AI tools..
- As set out in the staff acceptable use agreement, staff will be supported to use AI tools responsibly, ensuring the protection of both personal and sensitive data. Staff should only input anonymised data to avoid the exposure of personally identifiable or sensitive information.

- Staff will always ensure AI tools used comply with UK GDPR and other data protection regulations. They must verify that tools meet data security standards before using them for work related to the school.
- Only those AI technologies approved by the school may be used. Staff should always use school-provided AI accounts for work purposes. These accounts are configured to comply with organisational security and oversight requirements, reducing the risk of data breaches.
- We will protect sensitive information. Staff must not input sensitive information, such as internal documents or strategic plans, into third-party AI tools unless explicitly vetted for that purpose. They must always recognise and safeguard sensitive data.
- The school will ensure that when AI is used, it will not infringe copyright or intellectual property conventions – care will be taken to avoid intellectual property, including that of the learners, being used to train generative AI models without appropriate consent.
- AI incidents must be reported promptly. Staff must report any incidents involving AI misuse, data breaches, or inappropriate outputs immediately to the relevant internal teams. Quick reporting helps mitigate risks and facilitates a prompt response.
- The school will audit all AI systems in use and assess their potential impact on staff, learners and the school's systems and procedures, creating an AI inventory listing all tools in use, their purpose and potential risks.
- We are aware of the potential risk for discrimination and bias in the outputs from AI tools and have in place interventions and protocols to deal with any issues that may arise. When procuring and implementing AI systems, we will follow due care and diligence to prioritise fairness and safety.
- The school will support parents and carers in their understanding of the use of AI in the school
- AI tools may be used to assist teachers in the assessment of learners' work, identification of areas for improvement and the provision of feedback. Teachers may also support learners to gain feedback on their own work using AI
- Staff should ensure that documents, emails, presentations, and other outputs influenced by AI include clear labels or notes indicating AI assistance. Clearly marking AI-generated content helps build trust and ensures that others are informed when AI has been used in communications or document
- We will prioritise human oversight. AI should assist, not replace, human decision-making. Staff must ensure that final judgments, particularly those affecting people, are made by humans and critically evaluate AI-generated outputs. They must ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing. This is especially important for external communication to avoid spreading misinformation.
- Improper use of AI tools, including breaches of data protection standards, misuse of sensitive information, or failure to adhere to this agreement, will be subject to disciplinary action as defined in Staff Disciplinary Policy

Online Safety Education Programme

<u>Students</u>

Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:

- a planned online safety curriculum for all year groups matched against a nationally agreed framework and regularly taught in a variety of contexts
- lessons are matched to need, are age-related and build on prior learning
- lessons are context-relevant with agreed objectives leading to clear and evidenced outcomes

- learners' needs and progress are addressed through effective planning and assessment
- digital competency is planned and effectively threaded through the appropriate digital pillars in other curriculum areas, eg PSHE
- it incorporates/makes use of relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week
- the programme will be accessible to learners at different ages and abilities such as those with additional learning needs or those with English as an additional language
- learners should be taught in all lessons to be critically aware of the materials/content they access online and be guided to validate the accuracy of information (including where the information is gained from Artificial Intelligence services)
- learners should be taught to acknowledge the source of information used and to respect copyright / intellectual property when using material accessed on the internet and particularly through the use of Artificial Intelligence services
- vulnerability is actively addressed as part of a personalised online safety curriculum, eg for victims of abuse or students with SEND
- learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school
- staff should act as good role models in their use of digital technologies the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- where learners are allowed to freely search the internet, staff should be vigilant in supervising the learners and monitoring the content of the websites/tools (including AI systems) the learners visit
- it is accepted that from time to time, for good educational reasons, students may need to research topics, (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff should be able to request the temporary removal of those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need
- the online safety education programme should be relevant and up to date to ensure the quality of learning and outcomes.

Staff

All staff will receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- a planned programme of formal online safety and data protection training will be made available to all staff. This will be regularly updated and reinforced.
- the training will be an integral part of the school's annual safeguarding, data protection and cyber security training for all staff
- all new staff will receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements. It includes explicit reference to classroom management, professional conduct, online reputation and the need to model positive online behaviours
- the Online Safety Lead and Designated Safeguarding Lead (or other nominated person) will receive regular updates through attendance at external training events and by reviewing guidance documents released by relevant organisations

- this Online Safety Policy and its updates will be presented to and discussed by staff in staff/team meetings/INSET days
- the Online Safety Lead will provide advice/guidance/training to individuals as required.

Families

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

- regular communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes
- letters, newsletters, website
- high profile events/ campaigns e.g. Safer Internet Day
- reference to the relevant websites/publications

Governors

Governors should take part in online safety awareness sessions, with particular importance for those who are members of the Curriculum and Student Progress Committee. This may be offered in a number of ways:

- Attendance at training provided by the Local Authority, National Governors Association or other relevant organisation (eg SWGfL)
- Participation in school training sessions, eg for staff or parents

A higher level of training will be made available to (at least) the Online Safety Governor. This will include:

- Cyber-security training (at least at a basic level)
- Training to allow the governor to understand the school's filtering and monitoring provision, in order that they can participate in the required checks and reviews.

Technology

The school is responsible for ensuring that the school infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. The school should ensure that all staff are made aware of policies and procedures in place on a regular basis and explain that everyone is responsible for online safety and data protection.

Filtering

Day to day management of filtering systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The DSL will have lead responsibility for safeguarding and online safety and the Online Safety Lead and River Learning Trust IT Support will have technical responsibility.

- the school filtering provision is agreed by senior leaders and technical staff and is regularly reviewed (at least annually) and updated in response to changes in technology and patterns of online safety incidents/behaviours
- a member of the LT and a governor, are responsible for ensuring the standards are met. Roles and responsibilities of staff and third parties, for example, in-house or third-party IT support are clearly defined
- the school manages access to content across its systems for all users. The filtering provided meets the standards defined in the DfE Filtering standards for schools and colleges and the guidance provided by the UK Safer Internet Centre Appropriate filtering
- the school has provided enhanced/differentiated user-level filtering (allowing different filtering levels for different groups of users: staff/learners, etc.)
- illegal content (e.g., child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation URL list and the police assessed list of unlawful terrorist content, produced on behalf of the Home Office. Content lists are regularly updated
- there are established and effective routes for users to report inappropriate content, recognising that no system can be 100% effective. These are acted upon in a timely manner, within clearly established procedures
- there is a clear process in place to deal with, and log, requests/approvals for filtering changes
- filtering logs are regularly reviewed and alert the DSL to breaches of the filtering policy, which are then acted upon
- there are regular checks of the effectiveness of the filtering systems . Checks are undertaken across a range of devices at least termly and the results recorded and analysed to inform and improve provision. The DSL and Governor are involved in the process and aware of the findings
- devices that are provided by the school have school-based filtering applied irrespective of their location.

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

Monitoring

The school follows the UK Safer Internet Centre Appropriate Monitoring guidance.

The school has monitoring systems in place, agreed by senior ladders and technical staff, to protect the school, systems and users:

- The school monitors all network use across all its devices and services
- All users are aware that the network is monitored

- Concerns arising from monitoring reports are urgently picked up, acted upon, and outcomes are recorded by the DSL
- There are effective protocols in place to report abuse/misuse. There is a clear process for prioritising response to alerts that require rapid safeguarding intervention
- Management of serious safeguarding alerts is consistent with safeguarding policy and practice
- The monitoring provision is reviewed at least once every academic year and updated in response to changes in technology and patterns of online safety incidents and behaviours. The review should be conducted by members of the senior leadership team, the designated safeguarding lead, and technical staff. It will also involve the responsible governor. The results of the review will be recorded and reported as relevant.

The school follows the UK Safer Internet Centre Appropriate Monitoring guidance and protects users and school systems through the use of the appropriate blend of strategies informed by the school's risk assessment. These include:

- physical monitoring (adult supervision in the classroom)
- internet use is logged, regularly monitored and reviewed
- filtering logs are regularly analysed and breaches are reported to senior leaders
- pro-active alerts inform the school of breaches to the filtering policy, allowing effective intervention
- where possible, school technical staff regularly monitor and record the activity of users on the school technical systems
- use of a third-party assisted monitoring service to review monitoring logs and report issues to school monitoring lead(s)

Technical Security

The school technical systems will be managed in ways that ensure that the school meets recommended standards in the DfE Technical Standards for Schools and Colleges:

- responsibility for technical security resides with the Headteacher and Deputy Headteacher, who delegate day to day responsibility to River Learning Trust IT Support
- there will be regular reviews and audits of the safety and security of school technical systems
- a documented access control model is in place, clearly defining access rights to school systems and devices. This is reviewed annually. All users (staff and learners) have responsibility for the security of their username and password and must not allow other users to access the systems using their log on details. Users must immediately report any suspicion or evidence that there has been a breach of security
- password policy and procedures are implemented
- all users have responsibility for the security of their username and password and must not allow other users to access the systems using their log on details
- all school networks and systems are protected by secure passwords
- the administrator passwords for school systems are kept in the school safe
- there is a risk-based approach to the allocation of learner usernames and passwords
- servers, wireless systems and cabling are securely located and physical access restricted
- appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems and devices from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up-to-date endpoint software
- there are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud

- the Network Manager, supported by River Learning Trust IT Support, is responsible for ensuring that all software purchased by and used by the school is adequately licensed and that the latest software updates (patches) are applied
- an appropriate system is in place for users to report any actual/potential technical incident/security breach
- use of school devices out of school and by family members is regulated by an acceptable use statement that a user consents to when the device is allocated to them
- personal use of any device on the school network is regulated by acceptable use statements that a user consents to when using the network
- staff members are not permitted to install software on a school-owned devices without the consent of River Learning Trust IT Support
- removable media is not permitted
- systems are in place to control and protect personal data and data is encrypted at rest and in transit
- mobile device security and management procedures are in place ·
- guest users are provided with appropriate access to school systems based on an identified risk profile
- systems are in place that prevent the unauthorised sharing of personal/ sensitive data unless safely encrypted or otherwise secured. ·
- care will be taken when using Artificial Intelligence services to avoid the input of sensitive information, such as personal data, internal documents or strategic plans, into third-party AI systems unless explicitly vetted for that purpose. Staff must always recognise and safeguard sensitive data
- dual-factor authentication is used for sensitive data or access outside of a trusted network
- where AI services are used for technical security, their effectiveness is regularly reviewed, updated and monitored for vulnerabilities
- where AI services are used, the school will work with suppliers to understand how these services are trained and will regularly review flagged incidents to ensure equality for all users e.g. avoiding bias.

Mobile technologies

The school acceptable use agreements for staff, learners, parents, and carers outline the expectations around the use of mobile technologies.

The school allows staff and student owned personal devices filtered Wi-Fi access to the internet in school. Students may be loaned school owned devices (eg disadvantaged students) to ensure they have a large screen device to support their learning. Acceptable student use of personal devices is set out in the BYOD Code of Conduct. Misuse will be dealt with under the school's Behaviour for Learning Policy. Visitors also have filtered Wi-Fi access to the internet in school on their personal devices.

Social media

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to learners through:

- ensuring that personal information is not published
- education/training being provided including acceptable use, age restrictions, social media risks, digital and video images policy, checking of settings, data protection and reporting issues
- clear reporting guidance, including responsibilities, procedures and sanctions
- risk assessment, including legal risk
- guidance for learners, parents/carers

When official school social media accounts are established, there should be:

- a process for approval by senior leaders
- clear processes for the administration, moderation, and monitoring of these accounts
- a code of behaviour for users of the accounts
- systems for reporting and dealing with abuse and misuse
- understanding of how incidents may be dealt with under school disciplinary procedures.

School staff should ensure that, in their personal use of social media:

- no reference should be made in social media to learners, parents/carers or school staff
- they do not engage in online discussion on personal matters relating to members of the school community
- personal opinions should not be attributed to the school
- where a personal account is used which associates itself with, or impacts on, the school it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy
- security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information
- they act as positive role models in their use of social media
- the school permits reasonable and appropriate access to personal social media sites during school hours
- where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken
- personal communications which do not refer to or impact upon the school are outside the scope of this policy

Monitoring of public social media

- as part of active social media engagement, the school may pro-actively monitor the Internet for public postings about the school
- the school should effectively respond to social media comments made by others according to a defined policy or process
- when parents/carers express concerns about the school on social media we will urge them to make direct contact with the school, in private, to resolve the matter. Where this cannot be resolved, parents/carers should be informed of the school complaints procedure.

<u>Digital and video images</u>

The school will inform and educate users about the risks associated with publishing digital images on the internet and will implement policies to reduce the likelihood of the potential for harm:

- the school may use live-streaming or video-conferencing services in line with national and local safeguarding guidance/ policies
- when using digital images, staff will inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images
- staff/volunteers must be aware of those learners whose images must not be taken/published. Those images should only be taken on school devices. The personal devices of staff should not be used for such purposes
- in accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in

some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other learners in the digital/video images

- staff and volunteers are allowed to take digital/video images to support educational aims, but must follow school policies concerning the sharing, storage, distribution and publication of those images
- care should be taken when sharing digital/video images that learners are appropriately dressed
- learners must not take, use, share, publish or distribute images of others without their permission
- photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with Online Safety Policy
- learners' full names will not be used anywhere online in association with photographs
- written permission from parents or carers will be obtained before photographs of learners are taken for use for marketing purposes
- parents/carers will be informed of the purposes for the use of images, how they will be stored and for how long – in line with the school data protection policy
- images will be securely stored in line with the school retention policy
- learners' work can only be published with the permission of the learner and of parents.

Online Publishing

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

- Public-facing website
- Social media
- Online newsletters

The school website is externally hosted. The school ensures that online safety policy has been followed in the use of online publishing e.g., use of digital and video images, copyright, identification of young people, publication of school calendars and personal information – ensuring that there is least risk to members of the school community, through such publications.

Where learner work, images or videos are published, their identities are protected, and full names are not published.

The school website provides information about online safety e.g., publishing the schools Online Safety Policy and acceptable use agreements; advice and guidance.

Data Protection

Personal data will be recorded, processed, transferred and made available according to the current data protection legislation.

The school:

- has a Data Protection Policy
- implements the data protection principles and can demonstrate that it does so
- has paid the appropriate fee to the Information Commissioner's Office (ICO)
- has appointed an appropriate Data Protection Officer (DPO) who has effective understanding of data protection law and is free from any conflict of interest
- has a 'Record of Processing Activities' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it

- the Record of Processing Activities lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis is listed
- has an 'information asset register' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- information asset register lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis will have also been listed
- will hold the minimum personal data necessary to enable it to perform its function and will not hold it for longer than necessary for the purposes it was collected for. The school 'retention schedule' supports this
- data held is accurate and up to date and is held only for the purpose it was held for. Systems are in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- provides staff, parents, students and governors with information about how the school looks after their data and what their rights are in a clear Privacy Notice
- has procedures in place to deal with the individual rights of the data subject
- carries out Data Protection Impact Assessments (DPIA) where necessary e.g. to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier
- has undertaken appropriate due diligence and has data protection compliant contracts in place with any data processors
- understands how to share data lawfully and safely with other relevant data controllers
- has clear and understood policies and routines for the deletion and disposal of data
- reports any relevant breaches to the Information Commissioner within 72hrs of becoming aware of the breach as required by law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents
- has a Freedom of Information Policy which sets out how it will deal with FOI requests
- provides data protection training for all staff at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff
- ensures that where AI services are used, data privacy is prioritised

When personal data is stored on any mobile device or removable media the:

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

Staff must ensure that they:

- at all times take care to ensure the safekeeping of personal data, minimising the risk of its loss or misuse
- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- can help data subjects understand their rights and know how to handle a request whether verbal or written and know who to pass it to in the school
- should only use encrypted data storage for personal data
- when restricted or protected personal data is required outside the school's premises (e.g., from home), use the available secure remote access provided (eg Google Drive, remote access to SIMS)

- use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data
- transfer data using encryption/ a secure email account (where appropriate), and secure password protected devices.

Cyber security

The DfE Cyber security standards for schools and colleges explains:
"Cyber incidents and attacks have significant operational and financial impacts on schools and colleges. These incidents or attacks will often be an intentional and unauthorised attempt to access, change or damage data and digital technology. They could be made by a person, group, or organisation outside or inside the school or college and can lead to:

- safeguarding issues due to sensitive personal data being compromised
- impact on student outcomes
- a significant data breach
- significant and lasting disruption, including the risk of repeated future cyber incidents and attacks, including school or college closure
- financial loss
- reputational damage"

The school has reviewed the DfE Cyber security standards for schools and colleges and is working toward meeting these standards:

- the school will conduct a cyber risk assessment annually and review each term
- the school, working with RLT, has identified the most critical parts of the school's digital and technology services and sought assurance about their cyber security
- the school has an effective backup and restoration plan in place in the event of cyber attacks
- the school's governance and IT policies reflect the importance of good cyber security
- staff and Governors receive training on the common cyber security threats and incidents that schools experience
- the school's education programmes include cyber awareness for learners
- the school has a business continuity and incident management plan in place
- there are processes in place for the reporting of cyber incidents. All students and staff have a responsibility to report cyber risk or a potential incident or attack, understand how to do this feel safe and comfortable to do so.