



Tonacliffe Primary School

Online Safety Policy

September 2023

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1. Developing and Reviewing of this Policy

This Online Safety Policy has been developed by Ruth Noble

Date policy created: September 2022 (approved by governors in September 2022)

Policy reviewed and updated: September 2023

This Online Safety policy review was approved by the Curriculum Committee on: October 2023

The implementation of this Online Safety policy will be monitored by:

Joanne Heap (DSL)

Ruth Noble (Computing and Online Safety Lead and Deputy DSL)

Liz Mooney (Deputy DSL)

Amy Griffiths (Deputy DSL)

Iain German (Deputy DSL)

Charlotte Sutcliffe (Deputy DSL)

Lauren Sutcliffe (Deputy DSL)

Monitoring will take place at regular intervals: Termly

The Governing Body will receive a report on the implementation of the Online Safety Policy generated by the monitoring group Three times a year during the Online Safety Group

The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place. The next anticipated review date will be: September 2024

Should serious online safety incidents take place, the following external persons / agencies should be informed:

LCC Schools Safeguarding Officer:
Victoria Wallace

Local authority designated
officers: Tim Booth / Shane Penn
/ Donna Green

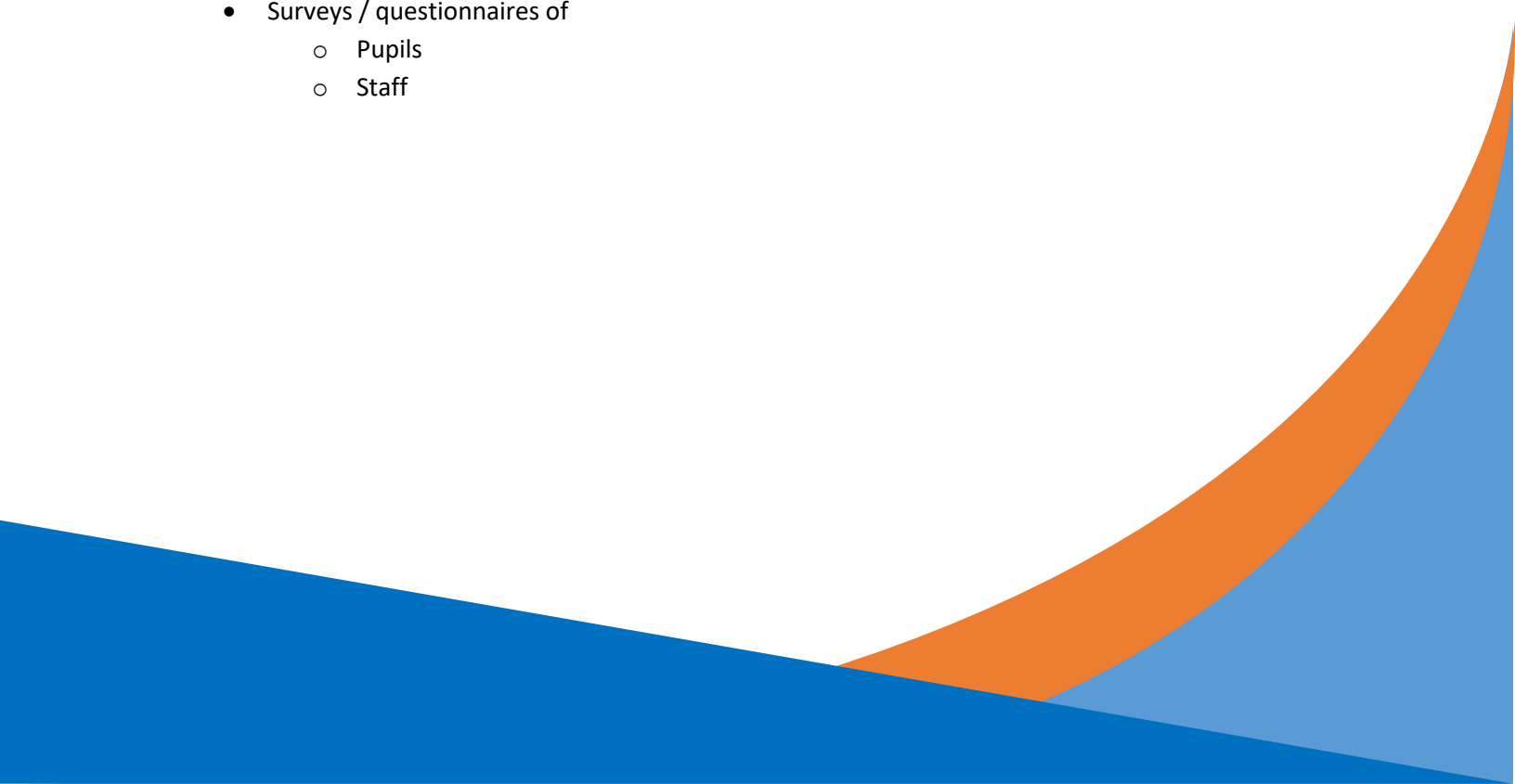
The police

This policy is linked to our:

- Child protection and safeguarding policy
- Behaviour policy
- Cyber security policy
- Data protection policy
- Complaints procedure
- Acceptable use policy for parents
- Acceptable use policy for staff, governors and volunteers
- Acceptable use policy for visitors and contractors
- Anti-bullying policy
- Staff code of conduct

The school will monitor the impact of the policy using:

- Logs of reported incidents
- Monitoring logs of internet activity
- Surveys / questionnaires of
 - Pupils
 - Staff



2. Aims of this Policy

This policy aims to promote a whole school approach to online safety by:

- Setting out expectations for all Tonacliffe Primary School community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline).
- Helping safeguarding and senior leadership teams to have a better understanding and awareness of all elements of online safeguarding through effective collaboration and communication with technical colleagues (e.g. for filtering and monitoring), curriculum leads (e.g. PSHE) and beyond.
- Helping 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, regardless of device or platform, and that the same standards of behaviour apply online and offline.
- Facilitating 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.
- Helping 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.
- Establishing clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as Behaviour Policy or Anti-Bullying Policy).

3. Scope of the Policy

This policy applies to all members of the school community (including staff, pupils, governors, volunteers and parents) who have access to and are users of the school digital technology systems, both in and out of the school.

The Education and Inspections Act 2006 empowers Headteachers to such an extent as is reasonable, to regulate the behaviour of pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of online-bullying or other Online Safety incidents covered by the policy, which may take place outside of the school, but is linked to membership of the school.

The school 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 has taken place out of school.

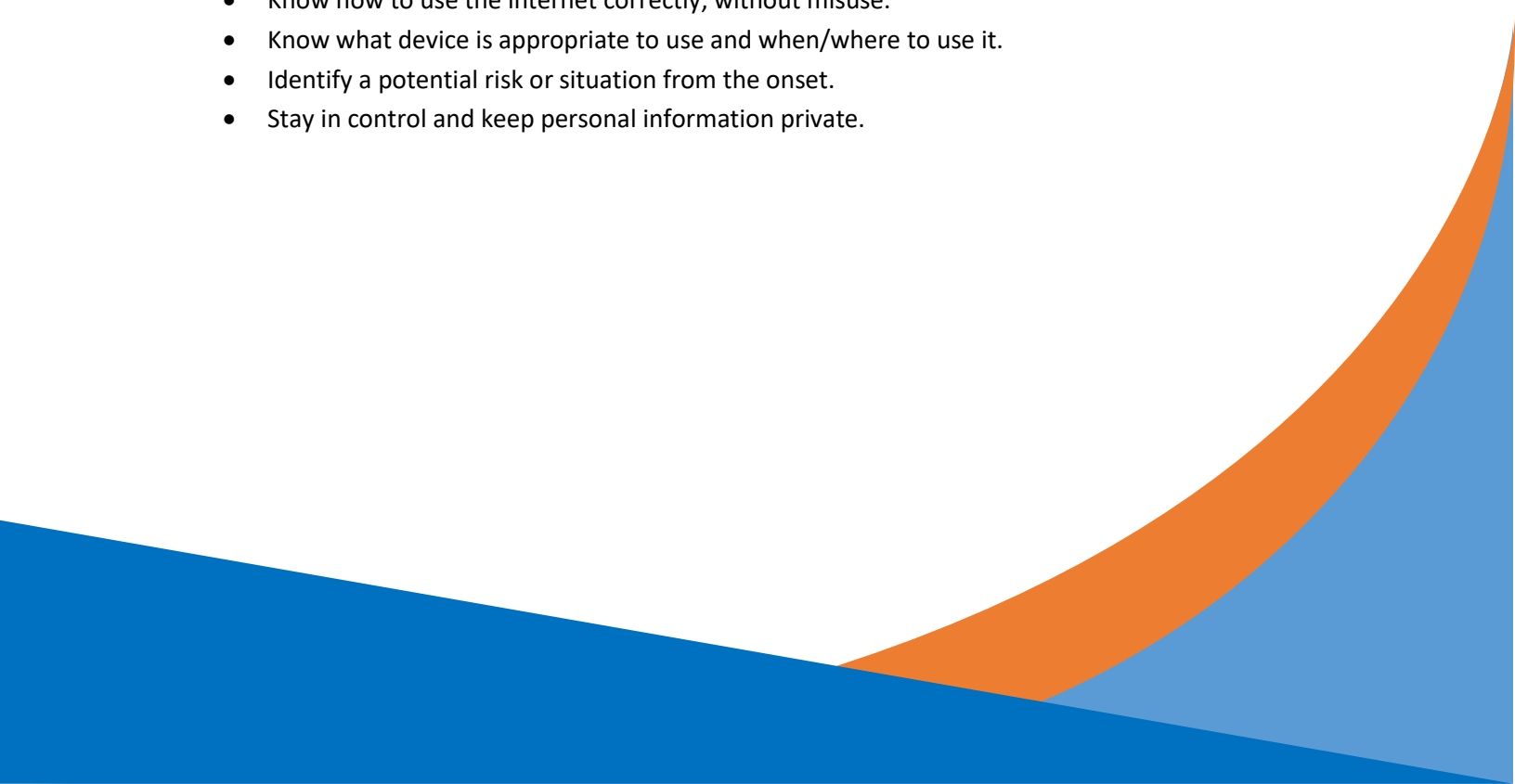
4. Our Aim:

We aim to deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology, including mobile and smart technology (which we refer to as mobile phones). We aim to have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors.

Our school provides a diverse, balanced and relevant approach to the use of technology where all children are encouraged to maximise the benefits and opportunities that the technology has to offer. Children will learn in an environment where security measures are balanced appropriately with the need to learn effectively.

Following the school's Online Safety curriculum, the children will be equipped with the skills and knowledge to use technology appropriately and responsibly. The school's Online Safety curriculum will teach children how to recognise the risks associated with technology and how to deal with them, both within and outside the school environment. Our PSHE curriculum also has links to online safety which have been mapped out clearly to make sure the children are having plenty of support and teaching with some of the key areas of online safety.

We aim to help every pupil and adult to:

- Feel safe and confident when using new technologies.
 - Know who to speak to when they feel unsafe.
 - Know how to report any abusive behaviour.
 - Know how to use the internet correctly, without misuse.
 - Know what device is appropriate to use and when/where to use it.
 - Identify a potential risk or situation from the onset.
 - Stay in control and keep personal information private.
- 

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact** – being subjected to harmful online interaction with other users, such as child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct** – personal online behavior that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scam.

5. Roles and Responsibilities

The following section outlines the online safety roles and responsibilities of individuals and groups within the school. Our Online Safety Coordinators are Joanne Heap (DSL), Ruth Noble (Deputy DSL and Computing and Online Safety Lead). Liz Mooney (Deputy DSL), Amy Griffiths (Deputy DSL), Iain German (Deputy DSL), Charlotte Clutterbuck (Deputy DSL) and Lauren Sutcliffe (Deputy DSL).

4.1 Governors

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of this policy. A member of the governors has taken on the role of Safeguarding, which covers Online Safety. The governor who oversees online safety is Gareth Snook. The governor who oversees our filtering and monitoring provision is Lee Mather.

All governors will:

- Ensure they have read and understood this policy.
- Approve this policy and strategy and subsequently review its effectiveness.
- Undergo safeguarding and child protection training.
- Ensure that all staff also receive appropriate safeguarding and child protection (including online safety) training at induction and each academic year.
- Ensure that, where necessary, teaching about safeguarding, including online safety is adapted for the vulnerable children, victims of abuse and some pupils with SEND because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may be more suitable.

- Appoint a filtering and monitoring governor to work with the DSL on the new filtering and monitoring standards.
- Have an overview of the filtering and monitoring provisions within our school.
- Have regular reviews with the online safety lead/DSL to discuss online safety.
- Support the school in encouraging parents and the wider community to become engaged in online safety activities.

The Governor for filtering and monitoring will:

- Have a clear overview of our filtering and monitoring provision.
- Be made aware of any updates or essential major changes to the provision.
- Review the monitoring/filtering check logs created by the online safety lead.

4.2 Headteacher

- The DSL should “take **lead responsibility** for safeguarding and child protection (**including online safety and understanding the filtering and monitoring** systems and processes in place). At Tonacliffe Primary School, the DSL/ Headteacher does this with the support of the Deputy DSL and Online Safety Lead. This ensures systems are robust.
- Fosters a culture of safeguarding where online safety is fully integrated into whole-school safeguarding.
- The Headteacher will ensure all staff undergo safeguarding and child protection training and updates (including online safety).
- The Headteacher and members 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.
- Liaises with the Local Authority/ relevant body.
- Receives reports of online safety incidents and creates a log of incidents to inform future online safety developments.
- Takes day to day responsibility for online safety issues.
- Ensures 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 remote systems are implemented according to child-safety first principles.
- Better understands, reviews and drives the rationale behind decisions in filtering and monitoring as per the new DfE standards – through regular liaison with the Online Safety Lead, technical colleagues and the DSL team – in particular understands what is blocked or allowed for who, when and how as per KCSIE.
- Works with the online safety lead to ensure that the filtering and monitoring provision is working, up to date and ensuring safety for our pupils.

4.2 Designated Safeguarding Leads

Details of the schools safeguarding lead and deputy leads are detailed within section 1 – developing and reviewing of the policy and within the school’s child protection policy.

The DSL’s take responsibility for online safety in school, in particular:

- Ensuring “an effective whole school approach to online safety” is fostered as per KCSIE.
- Supporting the Headteacher and Online Safety Lead in ensuring that staff understand this policy and that it is being implemented consistently throughout school.
- Working with the Headteacher, Online Safety Lead and other staff, as necessary, to address any online safety issues or incidents.
- Ensuring that online safety incidents are dealt with and are logged in line with school policy.
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school policy.
- Supporting the Headteacher and Online Safety Lead with the monitoring and filtering provision in school and have an oversight of how this is managed.
- Reminding 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.
- Receive regular updates in online-safety issues and legislation, be aware of local and school trends – see safeblog.lgfl.net for examples or sign up to the [LGfL safeguarding newsletter](#)

Designated safeguarding leads should be trained in Online Safety issues and be aware of the potential for serious child protection/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.

4.3 Online Safety and Computing Lead:

Ruth Noble, the Online Safety and Computing Lead is also a member of the school’s governing body and is a Deputy DSL in school and will follow the roles as described in those sections and has the following roles:

- Takes day to day responsibility for online safety and has a leading role in establishing and reviewing the school online safety policies/documents.

- Ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- Provides training and advice for staff.
- Collaborates with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use policies.
- Receives reports of online safety incidents and accesses this through CPOMs or Smoothwall and uses this to inform future online safety developments.
- Works with the headteacher and technical staff to ensure that the filtering and monitoring provision is working, up to date and ensuring safety for our pupils.
- Regularly uses the UKSIC test filtering tool to ensure the school's filtering is signed up to and blocking the relevant lists.
- Carries out tests and develop records of results, issues with or changes to the filtering and monitoring provision in school.
- Leads the Online Safety Group with governors to discuss current issues, reviews filtering and logs.
- Attends relevant meetings.
- Reports regularly to the Senior Leadership Team.
- Annually reviews the school's approach to online safety using the LGfL online safety audit.
- Oversees the delivery of the online safety curriculum.
- Works closely with the PSHE lead to monitor any over laps and ensures a complementary whole-school approach.

4.4 Technical Support:

The technical staff are responsible for ensuring:

- The school's technical infrastructure is secure and is not open to misuse or malicious attack.
- That the school meets required online safety technical requirements.
- That users may only access the networks and devices through a properly enforced password protection policy.
- Access to potentially dangerous sites and the downloading of potentially dangerous files is blocked.
- Collaborates with the Online Safety Lead/Headteacher to help them make strategic decisions around the safeguarding elements of technology.
- Supports the Headteacher and Online Safety Lead with the setting up of the filtering and monitoring provision in school and works with the companies to make any changes where necessary.

4.5 Teaching and Support Staff:

The teaching and support staff are responsible for ensuring that:

- They have an up to date awareness of online safety matters and of the current school Online Safety Policy and practices.
- They implement this policy consistently.
- They have read, understood and signed the Staff Acceptable Use Policy.
- They report any suspected misuse or problem to the Headteacher for investigation.
- They work with the Headteacher, Online Safety Lead and DSLs to ensure any online safety incidents are logged and dealt with appropriately in line with the school policy using CPOMs.
- They respond appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline and maintaining an attitude of 'it could happen here'.
- They ensure all incidents of cyber-bullying are dealt with in line with the school behaviour policy and logged appropriately using CPOMs.
- All digital communications with pupils/parents/carers should be on a professional level and only carried out using official school systems (e.g. school email accounts).
- Online safety issues are embedded in all aspects of the curriculum and other activities.
- Pupils understand and follow the acceptable use policies.
- Pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations.
- They monitor the use of digital technologies, mobile devices, cameras etc. in lessons and other school activities with regards to these devices.
- In lessons where the internet use is pre-planned, pupils should be guided to sites checked suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Report to the online safety lead and headteacher any incidents where the filtering or monitoring may have not worked as expected.

4.6 PSHE Lead

The PSHE curriculum lead's responsibilities are:

- As listed in the 'teaching and support staff' section, plus:
- To embed consent, mental wellbeing, healthy relationships and staying safe online as well as raising awareness of the risks and challenges from recent trends in self-generative artificial intelligence, financial extortion and sharing intimate pictures online into the PSHE / Relationships education, relationships and sex education (RSE) and health education curriculum. "This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age appropriate way that is relevant to their pupils' lives."

- To work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSE.
- To note that an PSHE/RSE policy should be included on the school website.
- To work closely with the Computing subject leader to monitor overlap and ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach

4.7 Pupils

- Are responsible for using the school digital technology systems in accordance with the Pupil Acceptable Use Agreement.
- Have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations.
- Need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so.
- 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 membership of the school.

4.8 Parents and Carers

Parents play a crucial role in ensuring that their children understand the need to use the internet and mobile devices in an appropriate way. The school will take every opportunity to help parents understand these issues through parent's evenings/newsletters/school website.

Parents must ensure their child has read, understood and agreed to the terms on the acceptable use of the school's ICT systems and internet.

Parents and carers will be encouraged to support the school in promoting good online safety practice and to follow guidelines on the appropriate use of:

- Digital and video images taken at school events.
- Access to the Online Safety section of the school's website.

This has been done by sending out a parent's acceptable use policy for them to read and sign.

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

- What are the issues? – [UK Safer Internet Centre](#)
- Hot topics – [Childnet International](#)
- Parent resource sheet – [Childnet International](#)
- Healthy relationships – [Disrespect Nobody](#)

6. Education and training

5.1 Education - Pupils

Whilst regulation and technical solutions are very important, their use must be balanced by educating pupils to take a responsible approach. The education of pupils in online safety / digital literacy is therefore an essential part of the school's online safety provision. Children and young people need the help and support of the school to recognise and avoid online safety risks and build their resilience.

In Key Stage 1, pupils will be taught to:

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

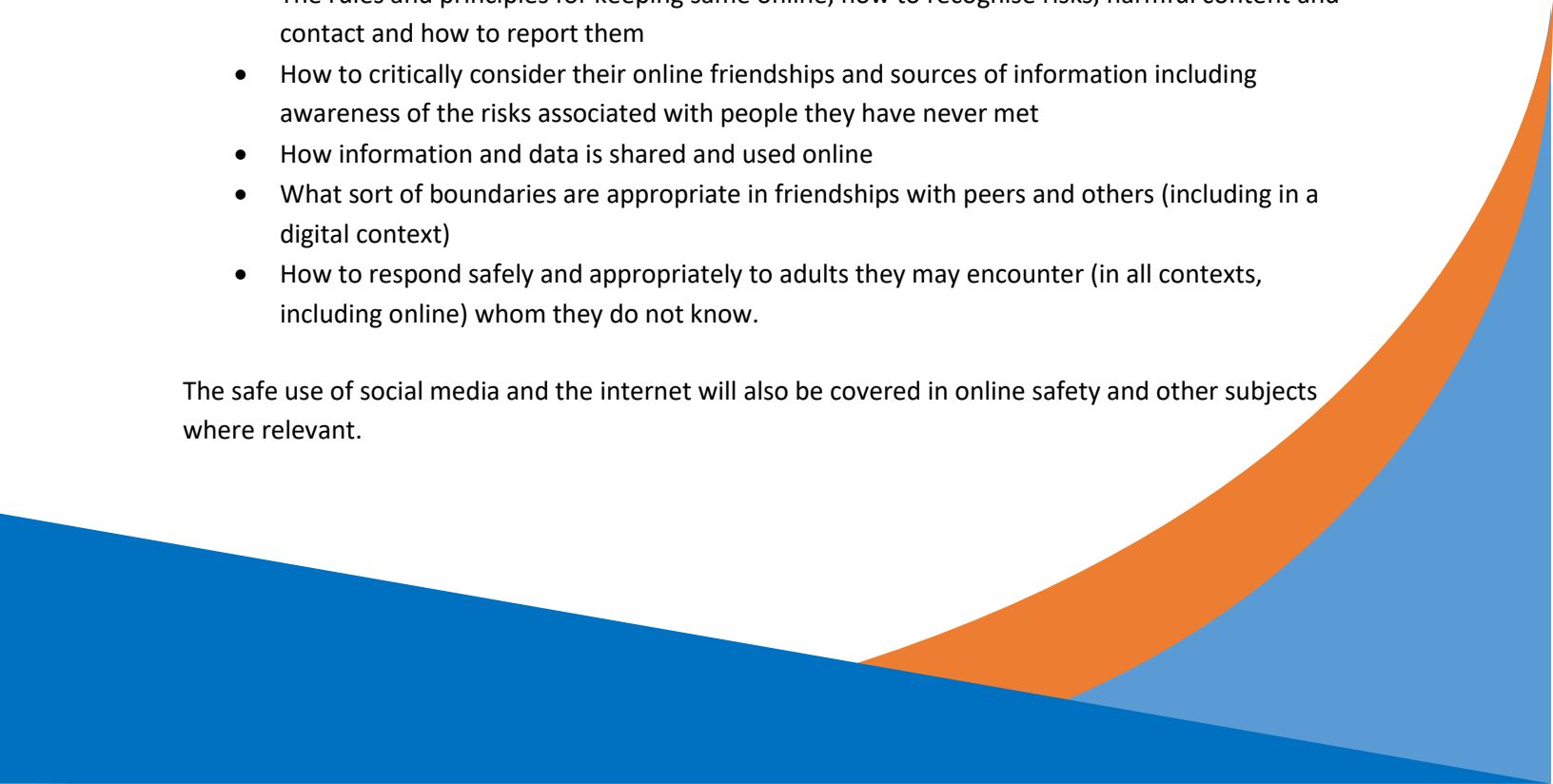
Pupils in Key Stage 2 will be taught to:

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

By the end of primary school, pupils will know:

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

The safe use of social media and the internet will also be covered in online safety and other subjects where relevant.



Online safety is a focus in all areas of the curriculum and staff make sure they reinforce online safety messages across the curriculum. The online safety curriculum is broad, relevant and provides progression, with opportunities for creative activities and is provided in the following ways:

- A planned online safety curriculum is provided as part of Computing and PSHE and other lessons and should be regularly revisited and reinforced.
- Pupils are taught in all lessons to be critically aware of the materials / content they access on-line and are guided to validate the accuracy of information.
- Pupils are taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils are supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- Pupils are helped to understand the need for the Pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school.
- Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.
- Staff 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 pupils are 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 pupils are allowed to freely search the internet, staff are vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, pupils may need to research topics (eg racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, is auditable, with clear reasons for the need.

5.2 Education - Parents and Carers

Many parents and carers have only a limited understanding of online safety risks and issues, yet they play an essential role in the education of their children and in the monitoring / regulation of the children's online behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

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

- Letters, newsletters, the school website
- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant web sites / publications e.g. [swgfl.org.uk](http://www.swgfl.org.uk) www.saferinternet.org.uk/
<http://www.childnet.com/parents-and-carers> (see appendix for further links / resources)
- Discussing online safety within parents evening, where necessary
- Providing the opportunity for parents and carers to complete courses, webinars or workshops with National Online Safety membership, YGAM or Smoothwall.

5.3 Education and Training – Staff/Volunteers

It is essential that all staff receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- An audit of the online safety training needs of all staff will be carried out regularly.
- All new staff 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 is expected that some staff will identify online safety as a training need within the performance management process.
- This Online Safety Policy and its updates will be presented to and discussed by staff in staff meetings / INSET days.
- The Online Safety Lead will provide advice / guidance / training to individuals as required.
- Staff have access to all training opportunities on National Online Safety.
- All staff will be made aware that:
 - Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse.
 - Children can abuse their peers online through:
 - Abusive, harassing and misogynistic messages
 - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
 - Sharing of abusive images and pornography, to those who don't want to receive such content.
 - Physical abuse, sexual violence and initiation can all contain an online element.

5.4 Education and Training – Governors

Governors should take part in online safety training / awareness sessions, with particular importance for those who are members of any subcommittee / group involved in technology / online safety / health and safety /safeguarding. This may be offered in a number of ways:

- Participation in school training/ information sessions for staff or parents (this may include attendance at assemblies / lessons/ staff training sessions).
- Having access to all training opportunities on National Online Safety.
- Attending the Online Safety Group.

7. Cyber-bullying

6.1 Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power (see also the school behaviour policy).

6.2 Preventing and addressing cyber-bullying

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

The school will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences may be.

Teachers are encouraged and supported to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, online safety lessons and other subjects where appropriate.

All staff, governors and volunteers (where appropriate) receive training on cyber-bullying, it's impact and ways to support pupils, as part of safeguarding training.

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

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

aware that they must not view or forward illegal images of children. The DSL will consider whether the incident should be reported to the police if it involves illegal material, and will work with external services if it is deemed necessary to do so.

6.3 Examining electronic devices

School staff have the specific power under the Education and Inspections Act 2006 (which has been increased by the Education Act 2011) to search for and, if necessary, delete inappropriate images or files on pupils' electronic devices, including mobile phones, iPads and other tablet devices, where they believe there is a 'good reason' to do so.

When deciding whether there is good reason to examine or erase data or files on an electronic device, staff must reasonably suspect that the data or file in question has been, or could be, used to:

- Cause harm, and/or
- Disrupt teaching, and/or
- Break any of the school rules

If inappropriate material is found on the device, it is up to the staff member, in conjunction with the DSL or other member of senior leadership team to decide whether they should:

- Delete that material, or
- Retain it as evidence (of a criminal offence or a breach of school discipline), and/or
- Report it to the police.

School staff may also confiscate devices for evidence to hand to the police, if a pupil discloses that they are being abused and that this abuse includes an online element.

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

- The DfE's guidance on screening, searching and confiscation.
- UKCIS guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people.

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

8. Use of Microsoft Teams

Microsoft Teams is used within school for many reasons:

- As a form of meetings with companies, staff and parents.
- To use the assignments tool for the setting of homework for children.

When using Microsoft Teams, all staff will follow the Online Safety Policy. Staff will:

- Make sure that no personal information or identification is shown in the background of the video call.
- Ensure private and confidential video calls are held in private rooms with no children present.
- Teach the children how to be safe when using Microsoft Teams.
- Provide clear rules and expectations to the children and parents in using Microsoft Teams for assignments and homework.

9. Technical

9.1 Filtering and Monitoring.

At Tonacliffe Primary School:

- web filtering is provided by Fortinet on the school site.
- changes can be made by Ruth Noble (Online Safety Lead and Deputy DSL), Joanne Heap, (Headteacher and DSL) and Tom Sharples, (school technician) or any other member of Convene IT Staff, when spoken to by Ruth Noble, Joanne Heap or Tom Sharples.
- overall responsibility is held by the DSL's Joanne Heap and Ruth Noble.
- technical support and advice, setup and configuration are from Tom Sharples/Convene IT.
- regular checks are made half termly by Ruth Noble to ensure filtering is still active and functioning everywhere. These are evidenced in the online safety audit.
- an annual review is carried out as part of the online safety audit.

The school uses Smoothwall monitoring solutions to monitor the use of computers and laptops owned by the school. Smoothwall monitor provides a real-time, digital monitoring solution that flags incidents as they happen. It monitors keystrokes and informs the Headteacher, Online Safety Lead and DSLs about incidents, providing detailed reports and screenshots when users try to view or type harmful content. The incidents are analysed for indication of risk to a student such as cyber-bullying, suicide, violence or inappropriate use of school resources. The Headteacher and Online Safety Lead and DSLs will be informed via the Smoothwall portal, weekly reports and through notification with the integration of Smoothwall and CPOMS.

9.2 Infrastructure/equipment, filtering and monitoring

The school will be 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.

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements.
- There will be regular reviews and audits of the safety and security of school technical systems.
- Servers, wireless systems and cabling is securely located and physical access restricted.
- All users have clearly defined access rights to school technical systems and devices.
- All users are provided with a username and secure password by Convene IT, who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and passwords.
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by Fortinet. Content lists are regularly updated and internet use is logged and monitored.
- Regular checks will be used to make sure our filtering is up to date and blocking the relevant lists using the UKSIC test filtering tool.
- Internet filtering / monitoring ensures that children are safe from terrorist and extremist material when accessing the internet.
- The school provides enhanced / differentiated user-level filtering.
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc. 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 virus software.
- An agreed policy is in place for the provision of temporary access of “guests” (e.g. trainee teachers, supply teachers, visitors) onto the school systems.
- An agreement is in place regarding the extent of personal use that users (staff / pupils) are allowed on school devices that may be used out of school.

The Headteacher, Online Safety lead, DSL and school staff log behaviour and safeguarding issues related to online safety. The Headteacher, Online Safety Lead and DSL will investigate and manage the issues related and log actions. These will be logged through the Child Protection Online Management System (CPOMS).

9.3 Mobile Technologies

Mobile technology devices are school owned. Pupils' personal mobile devices are not allowed to be used in school – see personal electronic devices policy. All users should understand that the primary purpose of the use of mobile devices in a school context is educational and that the school will not be held responsible for personal devices in school.

When on site, all staff must:

- Make sure their personal devices are kept in certain areas – unless leaving the school premises. The headteacher and office staff keep their phones within locked draws in their office. All other staff must keep their personal devices/mobile phones in the staffroom.
- If staff are waiting for important calls such as doctor appointments, mechanics and health calls, phones can be left within the school office.
- Not take their phone out of the given areas within the school day.
- Phones must be left on silent unless left in the office for important and urgent calls.
- Only use their mobile phones within dedicated breaks within working hours, unless on PPA or agreed situations with the Headteacher.

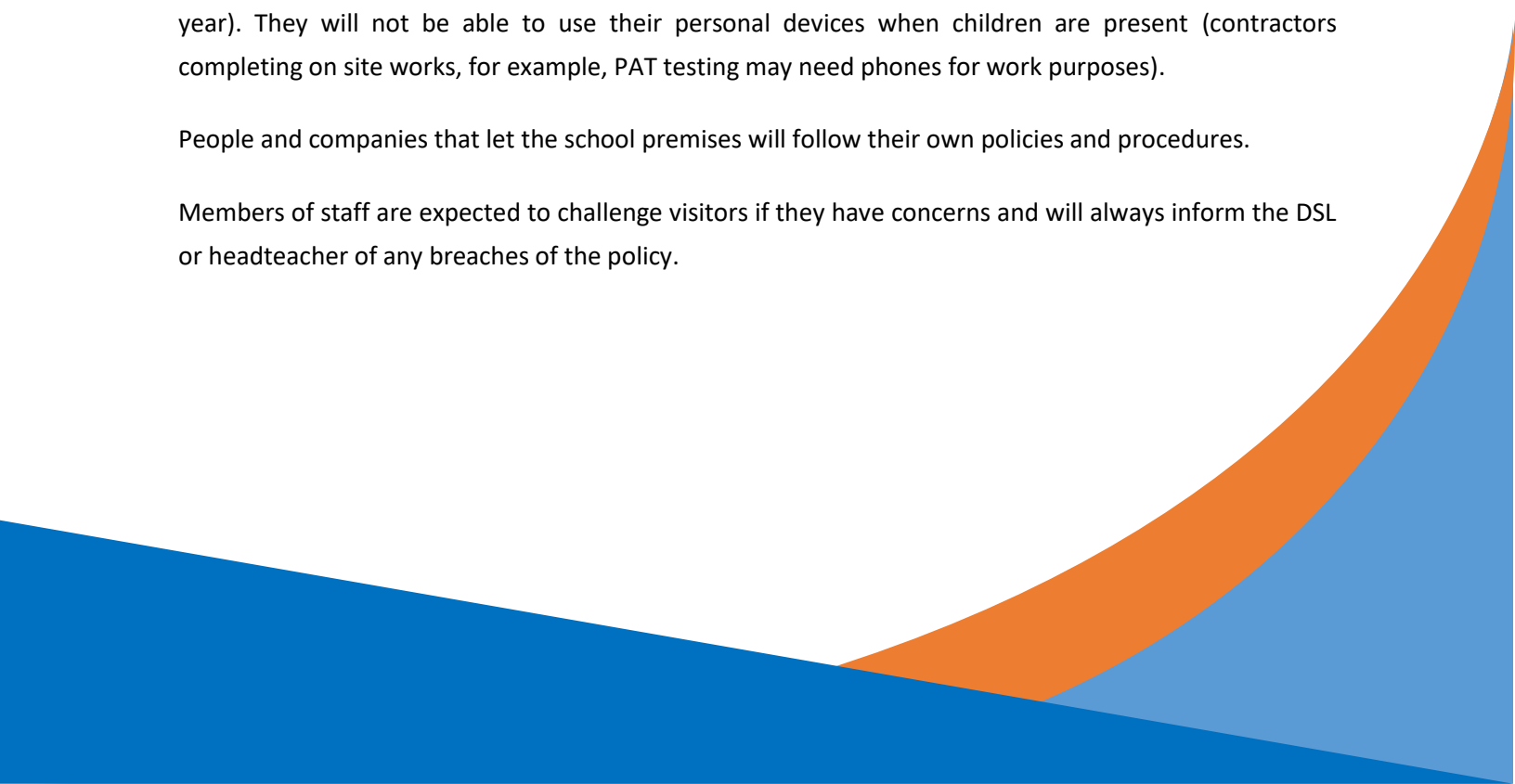
The school caretaker will have his work phone on his person throughout the day. This phone has no access to the internet or a camera.

Supply staff will be informed of the school rules in relation to personal mobile devices. If they bring their phone onto the premises, they must keep their phone in the staffroom or the school office.

Any visitors to school will be informed of the school rules in relation to personal mobile devices through the visitor's acceptable use policy which they are asked to sign when they visit school (once an academic year). They will not be able to use their personal devices when children are present (contractors completing on site works, for example, PAT testing may need phones for work purposes).

People and companies that let the school premises will follow their own policies and procedures.

Members of staff are expected to challenge visitors if they have concerns and will always inform the DSL or headteacher of any breaches of the policy.



10. Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet.

The Online Safety Lead will inform and educate users about risks involved with the use of digital and video images and will implement policies to reduce the likelihood of the potential for harm:

- When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognize the risks attached to publishing their own images on the internet e.g. on social networking sites.
- Permission from parents or carers will be obtained before photographs of pupils are published on the school website/local press.
- 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, parents are informed that these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other pupils in the digital / video images.
- Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those images are only to be taken on school equipment, the personal equipment of staff should not be used for such purposes.
- Care is taken when taking digital / video images that pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Pupils must not take, use, share, publish or distribute images of others without their permission.
- Photographs published on the website, or elsewhere that include pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.

11. Data Protection

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

For more information regarding data protection and GDPR, please refer to our school's GDPR policy.

Staff must ensure that they:

- At all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse.
- 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 and secure password protected devices.

When personal data is stored on any portable computer system, memory stick or any other removable media:

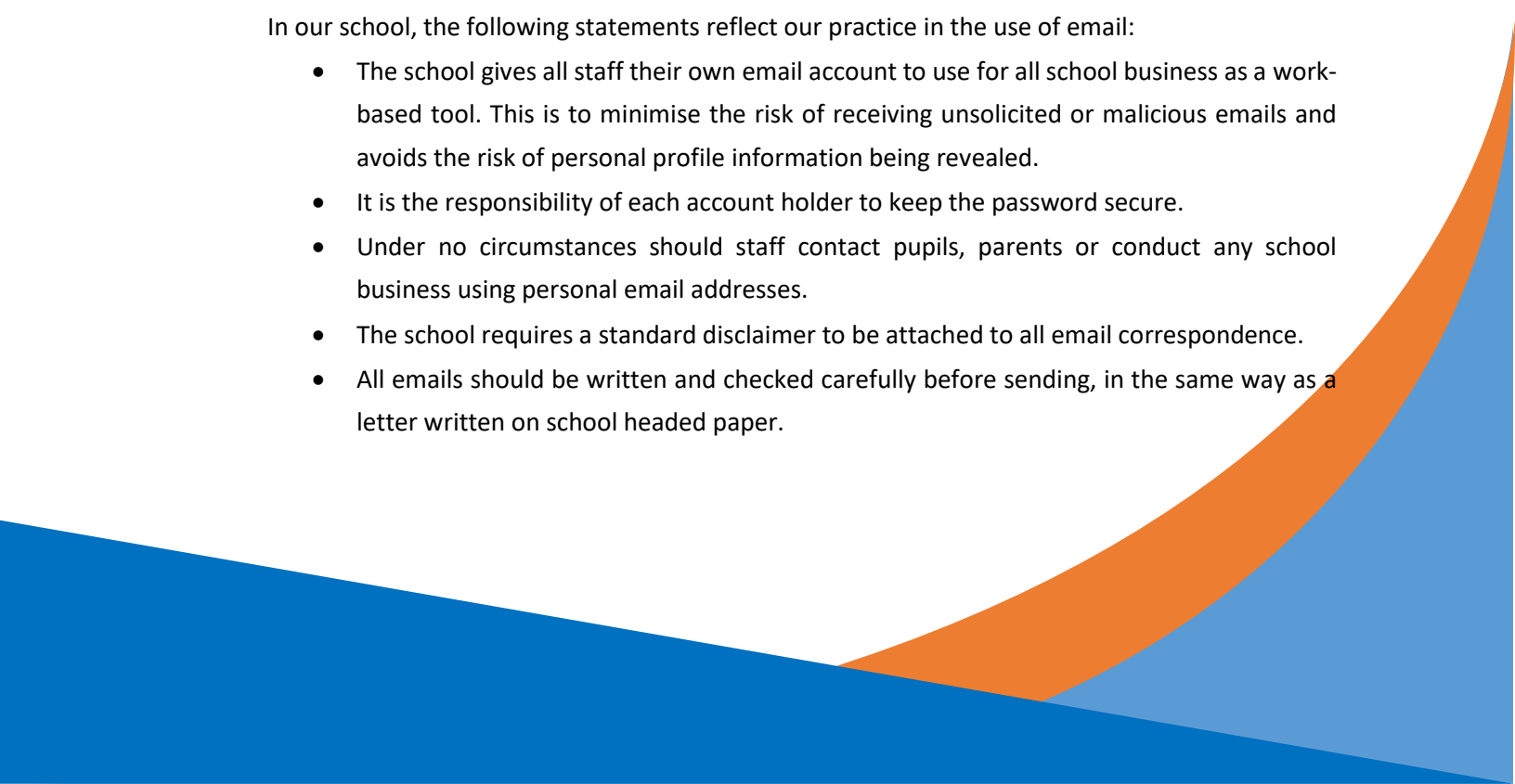
- The data must be encrypted and password protected.
- The device must be password protected.
- The device must offer approved virus and malware checking software.
- The data must be securely deleted from the device, in line with school policy once it has been transferred or its use is complete.

To help protect personal data within the school office, school children will not be allowed to enter the office.

12. Email

The use of email is an essential means of communication for staff. We recognise that pupils need to understand how to style an email in relation to their age and good network etiquette.

In our school, the following statements reflect our practice in the use of email:

- The school gives all staff their own email account to use for all school business as a work-based tool. This is to minimise the risk of receiving unsolicited or malicious emails and avoids the risk of personal profile information being revealed.
 - It is the responsibility of each account holder to keep the password secure.
 - Under no circumstances should staff contact pupils, parents or conduct any school business using personal email addresses.
 - The school requires a standard disclaimer to be attached to all email correspondence.
 - All emails should be written and checked carefully before sending, in the same way as a letter written on school headed paper.
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- When logging onto emails off the school premises and using personal devices, a two-factor verification has been set up.

Staff must:

- Inform the Online Safety Lead and the Headteacher if they receive an offensive email.
- Treat incoming email should be treated as suspicious and attachments not open unless the author is known.
- Not use staff email for personal advertising.
- Check emails regularly.
- Log into and out of their emails every time they have accessed them.

13. Social media

Social media (including 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.

11.1 Expectations

- The expectations regarding safe and responsible use of social media applies to all members of the Tonacliffe school community.
- The term social media include (but is not limited to): blogs; wikis; social networking sites; forums; bulletin boards; online gaming; apps; video/photo sharing sites; chatrooms and instant messenger.
- All members of the Tonacliffe school community are expected to engage in social media in a positive, safe and responsible manner.
 - All members of the Tonacliffe school community are advised not to publish specific and detailed private thoughts, concerns, pictures or messages on any social media services, especially content that may be considered threatening, hurtful or defamatory to others.

- Concerns regarding the online conduct of any member of the Tonacliffe school community on social media, should be reported to the DSL and will be managed in accordance with our anti-bullying, allegations against staff, behaviour and child protection policies.

11.2 Staff personal use of social media

- The safe and responsible use of social networking, social media and personal publishing sites will be discussed with all members of staff as part of the staff induction and will be revisited and communicated via regular staff training opportunities.
- Safe and professional behaviour will be outlined for all members of staff (including volunteers) as part of our code of conduct/behaviour policy and policy on social networking sites and other forms of social media as part of the acceptable use policy.
- They must not use their social media accounts for personal use during working hours.
- Staff must familiarise themselves with the site's 'privacy settings' in order to ensure that information is not automatically shared with a wider audience than intended.
- They do not conduct or portray themselves in a manner which may
 - Bring the school into disrepute;
 - Lead to valid parental complaints;
 - Be deemed as derogatory towards the school and/or its employees;
 - Be deemed as derogatory towards pupils and/or parents and carers;
 - Bring into question their appropriateness to work with children and young people.
- Staff must notify the Leadership Team immediately if they consider that any content shared on social media sites conflicts with their role.
- All members of staff are encouraged to carefully consider the information, including text and images, they share and post online to ensure that their social media is compatible with their professional role and is in accordance with our policies and the wider professional and legal framework.
- All members of staff are encouraged not to identify themselves as employees of Tonacliffe on their personal social networking accounts; this is to prevent information on these sites from being linked with the setting, and to safeguard the privacy of staff members.

Communicating with learners and parents and carers

- All members of the staff are advised not to communicate with or add as 'friends' any current or past learners via any personal social media sites, applications or profiles.

- Any pre-existing relationships or exceptions may compromise this, will be discussed with DSL or headteacher.
- Staff will not use personal social media accounts to contact learners or parents.
- Any communication from current or past learners received on personal social media accounts will be reported to the DSL or headteacher.

11.2 Pupils use of social media

Safe and appropriate use of social media will be taught to pupils as part of an embedded and progressive education approach, via age appropriate sites and resources.

- We are aware that many popular social media sites state that they are not for children under the age of 13, therefore we will not create accounts specifically for pupils.
- Pupils are advised not to place personal photos on any social networking site. They are taught to consider how public the information is and consider using private areas. Advice is given regarding the background detail in a photograph which could identify the pupil or his/her location.
- Pupils are advised on the security and encouraged to set passwords, deny access to unknown individuals and instructed how to block unwanted communications. Pupils are encouraged to invite known friends only and deny access to others by making profiles private.
- Pupils are advised not to publish specific and detailed private thoughts, especially those that may be considered threatening, hurtful or defamatory.
- Pupils are advised to use nicknames and avatars when using social networking sites.
- Pupils are taught about how to keep personal information safe when using online services.
- Pupils are taught to never give out personal details of any kind which might identify them and/or their location.

14. The school website

The school website will contain a page outlining the school's online safety messages so that the children and parents and carers can use this information when online and outside of the school environment.

- Staff are aware of the guidance associated with the use of digital media and personal information on the school website and this is included in the Acceptable Use Policy.
- Staff or pupil personal contact information will not be published. The contact details given online are that of the school office.

- Photographs that include pupils will be selected carefully so that individual pupils whose parents have not been given consent are not in photos online.
- Pupil's full names will not be used anywhere on a school website or other online space in association with photographs.
- Permission from parents or carers will be obtained when they start school before photographs are published on the school website.

15. Responding to Online Safety incidents and concerns

Illegal offences

Any suspected illegal material or activity will be brought to the immediate attention of the headteacher who will refer this to the external authorities, e.g. Police, CEOP etc.

Inappropriate use

The school will deal with incidents that involve inappropriate use. Incidents will be dealt with quickly and actions will be proportionate to the offence.

- All staff are aware of the different types of online safety incidents and how to respond appropriately.
- All incidents and concerns will be logged on CPOMS, our online safeguarding system.
- We require staff, parents, carers and learners to work in partnership to resolve online safety issues.
- After any investigations are completed, we will debrief, identify lessons learnt and implement any policy or curriculum changes as required.
- Parents, carers or external agencies will be involved when necessary.

16. Staff Misuse

- Any complaint about staff misuse will be referred to the headteacher in accordance with the allegations policy.
- Any allegations regarding a member of staff's online conduct will result in following the procedure outlined in our Child Protection Policy and the PANS Lancashire procedures and will be discussed with the *LADO (Local authority designated officer)*
- Appropriate action will be taken in accordance with our staff behaviour policy/code of conduct.

17. Procedures for responding to specific online incidents or concerns.

15.1 Cyberbullying

- Cyberbullying, along with all other forms of bullying, will not be tolerated at Tonacliffe.
- Full details of how we will respond to cyberbullying are set out in our anti-bullying policy.

15.2 Online hate

- Online hate content, directed towards or posted by, specific members of the community will not be tolerated at Tonacliffe and will be responded to in line with existing policies, including anti-bullying and behaviour.
- All members of the community will be advised to report online hate in accordance with relevant policies and procedures.
- The Police will be contacted if a criminal offence is suspected.
- If we are unclear on how to respond, or whether a criminal offence has been committed, the DSL will obtain advice through the Multi agency safeguarding hub or the Lancashire Police.

15.3 Online radicalisation and extremism

- We will take all reasonable precautions to ensure that learners and staff are safe from terrorist and extremist material when accessing the internet on site.
- If we are concerned that a child or parent/carer may be at risk of radicalization online, the DSL will be informed immediately, and action will be taken in line with our child protection policy.
- If we are concerned that a member of staff may be at risk of radicalization online, the headteacher will be informed immediately, and action will be taken in line with the child protection and allegations policies.

15.4 Indecent images of children (IIOC)

- Tonacliffe will ensure that all members of the community are made aware of the possible consequences of accessing indecent images of children.
- We will respond to concerns regarding IIOC on our equipment and/or personal equipment, even if access took place off site.
- We will seek to prevent accidental access of IIOC by using internet filtering, firewalls and anti-spam software.
- If we are unclear if a criminal offence has been committed the DSL will obtain advice immediately through Lancashire Police and/or LSCB.

- If made aware of IIOC, we will:
 - Act in accordance with our child protection policy and the relevant Lancashire Safeguarding Child Board procedures.
 - Store any devices involved securely.
 - Immediately inform appropriate organisations, such as the Internet Watch Foundation, Lancashire Police or the LADO.
- If made aware that a member of staff or a pupil has been inadvertently exposed to indecent images of children, we will:
 - Ensure the DSL is informed.
 - Ensure that the URLs which contain the suspect images are reported to the Internet Watch Foundation via www.iwf.org.uk
 - Ensure that any copies that exist of the image, for example in emails, are deleted.
 - Report concerns, as appropriate to parents and carers.
- If made aware that indecent images of children have been found on the setting provided devices, we will:
 - Ensure that the DSL is informed.
 - Ensure that the URLs which contain the suspect images are reported to the Internet Watch Foundation via www.iwf.org.uk
 - Ensure that any copies that exist of the image, for example in emails, are deleted.
 - Inform the police via 101 (999 if there is an immediate risk of and Children's Social Work Service (as appropriate).
 - Only store copies of images (securely, where no one else has access to them and delete all other copies) at the request of the police only.
 - Report concerns, as appropriate to parents and carers.
- If made aware that a member of staff is in possession of indecent images of children on setting provided devices, we will:
 - Ensure that the headteacher is informed in line with our managing allegations against staff policy.
 - Inform the Local Authority Designated Officer (LADO) and other relevant organisations in accordance with our managing allegations against staff policy.
 - Quarantine any devices until police advice has been sought.

15.5 Online sexual violence and sexual harassment between children (child-on-child abuse).

The school recognizes that child-on-child abuse can take place online.

Examples include the following:

- Non-consensual sharing of sexual images and videos

- Sexualised cyberbullying
- Online coercion and threats
- Unwanted sexual comments and messages on social media
- Online sexual exploitation

The school responds to all concerns regarding online child-on-child abuse, whether or not the incident took place on the school premises or using school owned equipment.

Concerns regarding online child-on-child abuse are reported to the DSL who will investigate the matter in line with the Child Protection and Safeguarding Policy.

15.6 Online child sexual abuse and exploitation

Through the online safety curriculum, pupils are taught about how to recognise online and abuse and where they can go for support if they experience it.

The schools responds to concerns regarding online abuse and exploitation, whether or not it took place on the school premises or using school-owned equipment.

All concerns relating to online abuse and exploitation, including child sexual abuse and exploitation and criminal exploitation, are reported to the DSL and dealt with in line with the Child Protection and Safeguarding Policy.

16 Useful link for Education Settings

Lancashire support and guidance for educational settings

LSCB:

<http://www.lancshiresafeguarding.org.uk/>

General Enquiries:

Telephone: 01772 536954

Email: children.cypsafeguarding@lancashire.gov.uk

Twitter: <https://twitter.com/LancsSguarding>

Concerns about a child should be reported on Lancashire 0300 123 6720 or out of hours 0300 123 6722 (8pm-8am); or Rochdale 0300 303 0440 or out of hours 0300 303 8875. (Monday 11am-11.30am Monday-Friday 5.30pm-8.30am. Anytime weekends and bank holidays.)

Lancashire Schools' ICT Centre can provide advice on dealing with social media issues (telephone: 01772 532626 or email: AskICT@btlancashire.co.uk). In addition, the Professionals Online Safety Helpline (POSH) is able to support colleagues with issues such as protecting their professional identity and online harassment by parents.

In the event of a serious incident, schools should contact the Schools Safeguarding Officer, Tammy Twang, 01772 531196, CYPsafeeduc@lancashire.gov.uk.

General advice and guidance on dealing with incidents can be obtained through the Schools' ICT Centre.

Lancashire Police

<https://www.lancashire.police.uk/> or <https://www.lancashire.police.uk/help-advice/online-safety>

In an emergency (a life is in danger or a crime in progress) dial 999. For other non-urgent enquiries contact Lancashire Police via 101.

National Links and Resources for Educational Settings

- CEOP:
 - www.thinkuknow.co.uk
 - www.ceop.police.uk
- Childnet: www.childnet.com
- Internet matters: www.internetmatters.org
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Lucy Faithfull Foundation: www.lucyfaithfull.org
- NSPCC: www.nspcc.org.uk/online-safety
- Childline: www.childline.org.uk
- Net Aware: www.net-aware.org.uk
- The Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- UK Safer Internet Centre: www.saferinternet.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/about/helpline
- 360 Safe Self-Review tool for schools: www.360safe.org.uk

National Links and Resources for Parents/carers

- Action Fraud: www.actionfraud.police.uk

- CEOP:
 - www.thinkuknow.co.uk
 - www.ceop.police.uk
 - Childnet: www.childnet.com
 - Get Safe Online: www.getsafeonline.org
 - Internet Matters: www.internetmatters.org
 - Internet Watch Foundation: www.iwf.org.uk
 - NSPCC: www.nspcc.org.uk/online-safety
 - Childline: www.childline.org.uk
 - Net Aware: www.net-aware.org.uk
 - The Marie Collins Foundation: www.mariecollinsfoundation.org.uk
 - UK Safer Internet Centre: www.saferinternet.org.uk
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