Online Safety Policy

Date of Issue / Adoption:	January 2015
Last Review / Amended Date:	January 2023 – Version 9.0
Review History:	January 2023 – Version 9.0 January 2022 – Version 8.0 January 2021 – Version 7.0 January 2020 – Version 6.0 January 2019 – Version 5.0 January 2018 – Version 4.0 July 2017 – Version 3.1 January 2017 – Version 3.0 January 2016 – Version 2.0 January 2015 – Version 1.0
Holder:	Executive Headteacher
Committee Responsible:	Teaching and Learning Committee
Next Review Date:	**January 2024**

Scope of the Policy

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

The Education and Inspections Act 2006 empowers Headteachers to such 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 cyber-bullying, or other online safety incidents covered by this policy, which may take place outside of the school, but is linked to membership of the school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data. In

the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.
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 take place out of school.

Contents Page

1. Roles and Responsibilities

The following section outlines the online safety roles and responsibilities of individuals and groups within the school:

1.1 Governors:

Governors are responsible for the approval of the online safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the Governors receiving regular information about online safety incidents and monitoring reports. A member of the Governing Body has taken on the role of Safeguarding Governor.
The role of the Safeguarding Governor will include:

- regular meetings with the Online Safety Co-ordinator
- regular monitoring of online safety incident logs
- regular monitoring of filtering logs
- reporting to relevant Governors meeting

1.2 Executive Headteacher and Senior Leaders:

- The Executive Headteacher has a duty of care for ensuring the safety of members of the school community (including online safety), though the day to day responsibility for online safety will be delegated to the Online Safety Co-ordinator.
- The Executive 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. (see flow chart on dealing with online safety incidents – included in a later section – "Responding to incidents of misuse" and relevant Local Authority HR / other relevant body disciplinary procedures).
- The Executive Headteacher / Senior Leaders are responsible for ensuring that the online safety Coordinator and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.
- The Executive 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. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive regular monitoring reports from the Online Safety Co-ordinator.

1.3 Online Safety Co-ordinator:

- Lee Cooper and Mark Cleave are the Online Safety Co-Ordinators as part of their Designated Safeguarding role.
- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies.
- 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
- liaises with the Local Authority / relevant body
- liaises with school technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments,
- meets regularly with Safeguarding Governor to discuss current issues, review incident logs and filtering / change control logs

- meets regularly with Safeguarding Governor to discuss current issues, review incident logs and filtering / change control logs
- attends relevant meeting of Governors
- reports regularly to Senior Leadership Team

1.4 Technical staff:

The Technical Staff / Co-ordinator for Computing (Tom Flisher – Structured Network Solutions) is responsible for ensuring:

- that 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 and any Local Authority Online Safety Policy / Guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
- the filtering policy is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person
- that 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
- that the use of the network / internet / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Executive Headteacher / Senior Leader; online safety Coordinator for investigation
- that monitoring systems are implemented and updated as agreed in school policies

1.5 Teaching and Support Staff:

Teaching and support staff should ensure:

- they have an up to date awareness of online safety matters and of the current school online safety policy and practices
- they have read, understood and signed the Staff Acceptable Use Policy (AUP)
- they report any suspected misuse or problem to the Executive Headteacher / Senior Leader; online safety Coordinator using MyConcern safeguarding software.
- all digital communications with pupils / 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
- pupils understand and follow the online safety and 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 (where allowed) and implement current policies with regard to these devices
- that in lessons where internet use is pre-planned pupils 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

1.6 Designated Safeguarding Lead:

The Designated Safeguarding Leads are: Mark Cleave, Renukah Atwell, Sharon Brooks, Lee Cooper, Jo Gould, Abi Rodreigo, Sarah Dobney, Maxine Hamilton & Charliiee Armstrong.

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 on-line contact with adults / strangers
- potential or actual incidents of grooming
- cyber-bullying

1.7 Pupils:

- are responsible for using the school digital technology systems in accordance with the Pupil Acceptable Use Policy
- 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
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking / use of images and on cyber-bullying.
- 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

1.8 Parents / Carers

Parents / Carers play a crucial role in ensuring that their children understand the need to use the internet / mobile devices in an appropriate way. The school will take every opportunity to help parents understand these issues. 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 parents' sections of the website / VLE and on-line student / pupil records
- their children's personal devices in the school

1.9 Community Users

Community Users who access school systems / website as part of the wider school provision will be expected to sign a Community User AUA before being provided with access to school systems.

2. Policy Statements

2.1 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 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.

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 should be provided as part of Computing / PHSE / other lessons and should be regularly revisited
- Key online safety messages should be reinforced as part of a planned programme of assemblies and pastoral activities
- Pupils should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information.
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils should be helped to understand the need for the Pupil 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 pupils 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 pupils are allowed to freely search the internet, staff should be 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 (e.g. extremism, racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the EiS (or other relevant designated person) can temporarily remove 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.

2.1 Education – parents / 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 of the children's on-line 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, website, VLE
- Parents / Carers evenings
- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant web sites / publications

2.3 Education & 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:

- All staff complete online safety training as a National Online Safety School, and specific training is also provided for parents.
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and Acceptable Use Agreements.

- The online safety Coordinator (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 Coordinator (or other nominated person) will provide guidance to individuals as required.

2.4 Training – Governors

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

- Attendance at training provided by the Local Authority / National Governors Association / or other relevant organisation
- Participation in school training / information sessions for staff or parents (this may include attendance at assemblies / lessons).

1. Technical – infrastructure / equipment, filtering and monitoring

The school will be responsible for ensuring that the school network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their online safety responsibilities:

- 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 must be securely located and physical access restricted
- All users will have clearly defined access rights to school technical systems and devices.
- All users will be provided with a username and secure password. Users are responsible for the security of their username and password and will be required to change their password every 8 weeks. (Specific pupils may be not follow the policy for nominal periods while they learn the required skills, but need to be aware of the associated risks – see appendix)
- The "master / administrator" passwords for the school ICT system, used by the Network Manager (or other person) must also be available to the Executive Headteacher or other nominated senior leader and kept in a secure place (e.g. The school safe)
- Technical Support, provided by SNS UK Ltd, is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored.
- The school has provided enhanced / differentiated user-level filtering
- School technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement.

- Pupils and staff know, from online safety training, which staff to speak to in order to report any actual / potential incident to the relevant person, as agreed).
- 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. That they agree to the staff AUP.
- An agreed policy is in place regarding the extent of personal use that users (staff / pupils / community users) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place regarding the use of removable media by users on school devices. This is in a process of transition with the use of removable media being replaced by home access to the curriculum server. Personal data should not be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

2. Bring Your Own Device (BYOD)

The educational opportunities offered by mobile technologies are being expanded as a wide range of devices, software and online services become available for teaching and learning, within and beyond the classroom. This has led to the exploration by schools of users bringing their own technologies in order to provide a greater freedom of choice and usability. However, there are a number of online safety considerations for BYOD that need to be reviewed prior to implementing such a policy. Use of BYOD should not introduce vulnerabilities into existing secure environments. Considerations will need to include; levels of secure access, filtering, data protection, storage and transfer of data, mobile device management systems, training, support, acceptable use, auditing and monitoring. This list is not exhaustive and a BYOD policy should be in place and reference made within all relevant policies.

- The rules that apply to all school ICT and internet use will apply to BYODs.
- The school has a set of clear expectations and responsibilities for all users
- The school adheres to the Data Protection Act principles
- All users are provided with and accept the Acceptable Use Agreement
- All network systems are secure and access for users is differentiated
- Where possible these devices will be covered by the school's normal filtering systems, while being used on the premises
- All users will use their username and password and keep this safe
- Mandatory training is undertaken for all staff
- Pupils receive training and guidance on the use of personal devices
- Monitoring of usage will take place to ensure compliance
- All BYOD are brought to school at the owner's risk and the school accepts no responsibility for loss, theft and damage to the device.
- School staff may confiscate a pupil's mobile phone or device if they believe it is being used to contravene the schools behaviour or bullying policy or could contain youth produced sexual imagery (sexting). The phone or device may be searched by a member of the Leadership team with the consent of the pupil or parent/carer and content may be deleted or requested to be deleted, if appropriate. Searches of mobile phone or personal devices will only be carried out in accordance with the schools policy.

3. 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. However, staff, parents / carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for cyberbullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. The school will inform and educate users about these risks 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 recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.
- 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 in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be 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 should only be taken on school equipment, the personal equipment of staff should not be used for such purposes.
- Care should be 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.
- Written permission from parents or carers will be obtained before photographs of pupils are published on the school website (This will be covered as part of the AUA signed by parents or carers).
- Pupil's work can only be published with the permission of the pupil and parents or carers (This will be covered as part of the AUA signed by parents or carers).

4. Data Protection

Personal data will be recorded, processed, transferred and made available according to the Data Protection Act 1998 which states that personal data must be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Kept no longer than is necessary
- Processed in accordance with the data subject's rights
- Secure
- Only transferred to others with adequate protection.

The school must ensure that:

- It will hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for.
- Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay.
- All personal data will be fairly obtained in accordance with the "Privacy Notice" and lawfully processed in accordance with the "Conditions for Processing".
- It has a Data Protection Policy
- It is registered as a Data Controller for the purposes of the Data Protection Act (DPA)
- Responsible persons are appointed / identified - Senior Information Risk Officer (SIRO) and Information Asset Owners (IAOs)
- Risk assessments are carried out
- It has clear and understood arrangements for the security, storage and transfer of personal data
- Data subjects have rights of access and there are clear procedures for this to be obtained
- There are clear and understood policies and routines for the deletion and disposal of data
- There is a policy for reporting, logging, managing and recovering from information risk incidents
- There are clear Data Protection clauses in all contracts where personal data may be passed to third parties
- There are clear policies about the use of cloud storage / cloud computing which ensure that such data storage meets the requirements laid down by the Information Commissioner's Office.

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/media 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 (below) once it has been transferred or its use is complete.

<u>5. Communications</u>

A wide range of rapidly developing communications technologies has the potential to enhance learning. The table on the following page shows how the school currently considers the benefit of using these technologies for education outweighs their risks / disadvantages:

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

- The official school email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored.
- Users must immediately report, to the nominated person – in accordance with the school policy, 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.

- Any digital communication between staff and pupils or parents / carers (email, chat, VLE etc) must be professional in tone and content. These communications may only take place on official (monitored) school systems. Personal email addresses, text messaging or social media must not be used for these communications.
- Pupils should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

6. Social Media - Protecting Professional Identity

All schools and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Schools and local authorities could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, cyberbully, discriminate on the grounds of sex, race or disability or who defame a third party may render the school or local authority liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to pupils, staff and the school through limiting access to personal information:

- Training to include: acceptable use; social media risks; checking of settings; data protection; reporting issues.
- Clear reporting guidance, including responsibilities, procedures and sanctions
- Risk assessment, including legal risk

School staff should ensure that:

- No reference should be made in social media to pupils, 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 or local authority
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.

The school's use of social media for professional purposes will be checked regularly by the E-Safety coordinator and Governors to ensure compliance with the Social Media, Data Protection, Communications, Digital Image and Video Policies.

	Staff & other adults				Pupils			
Communication Technologies	Allowed	Allowed at certain times	Allowed for selected staff	Not Allowed at anytime	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Mobile phones may be brought to school	X						X	
Use of school mobile phones in lessons		X					X	
Use of personal mobile phones in lessons				X			X	
Use of mobile phones in social time	X							X
Taking photos on school cameras/phones	X						X	
Taking photos on personal cameras/phones				X				X
Use of other mobile devices e.g. tablets, gaming devices		X				X		
Non-employee use of school devices outside of work				X				
Use of personal email addresses in school, or on school network		X					X	
Use of school email for personal emails				X	X			
Use of messaging apps			X					X
Use of social media			X					X
Use of blogs			X					X

9. Inappropriate activities

The school believes that the activities referred to in the following section would be inappropriate in a school context and that users, as defined below, should not engage in these activities in school or outside school when using school equipment or systems. The school policy restricts usage as follows:

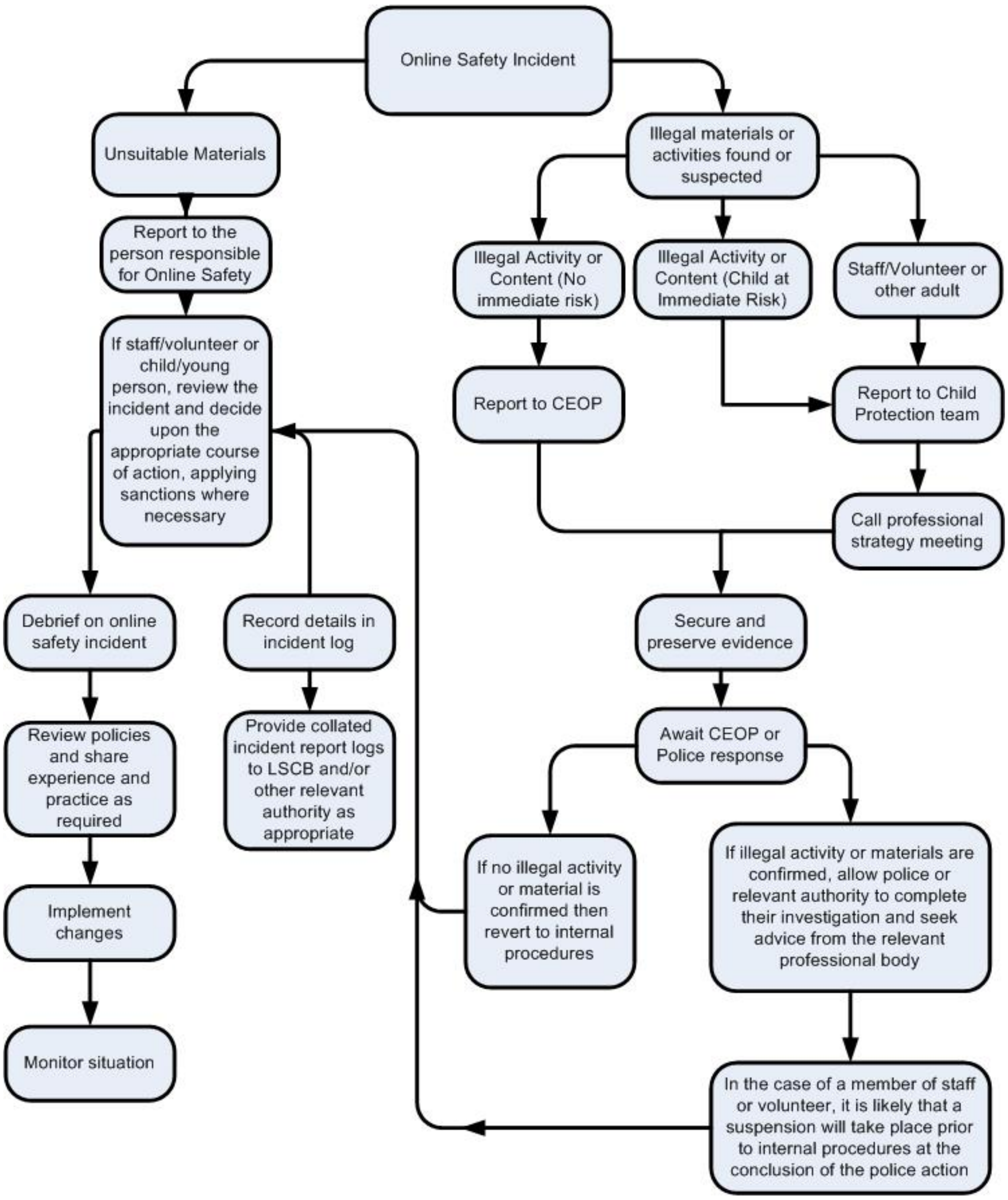
User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	Extremist / criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	pornography				X	
	promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				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					X	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)					X	
Creating or propagating computer viruses or other harmful files					X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)					X	
On-line gaming (educational)			X			
On-line gaming (non-educational)			X			
On-line gambling					X	
On-line shopping / commerce			X			
File sharing				X		
Use of social media				X		
Use of messaging apps				X		
Staff use of video broadcasting e.g. Youtube		X				

10. Responding to incidents of misuse

This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities (see "User Actions" above).

10.1 Illegal Incidents

If there is any suspicion that the web site(s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right hand side of the Flowchart (below and appendix) for responding to online safety incidents and report immediately to the police.


Online Safety Incident
Unsuitable Materials
Report to the person responsible for Online Safety
If staff/volunteer or child/young person, review the incident and decide upon the appropriate course of action, applying sanctions where necessary
Debrief on online safety incident
Review policies and share experience and practice as required
Implement changes
Monitor situation
Record details in incident log
Provide collated incident report logs to LSCB and/or other relevant authority as appropriate
Illegal materials or activities found or suspected
Illegal Activity or Content (No immediate risk)
Illegal Activity or Content (Child at Immediate Risk)
Staff/Volunteer or other adult
Report to CEOP
Report to Child Protection team
Call professional strategy meeting
Secure and preserve evidence
Await CEOP or Police response
If no illegal activity or material is confirmed then revert to internal procedures
If illegal activity or materials are confirmed, allow police or relevant authority to complete their investigation and seek advice from the relevant professional body
In the case of a member of staff or volunteer, it is likely that a suspension will take place prior to internal procedures at the conclusion of the police action

10.2 Responding to concerns regarding Youth Produced Sexual Imagery or "Sexting"

Grange Park School ensure that all members of the community are made aware of the potential social, psychological and criminal consequences of sharing, possessing and creating youth produced sexual imagery (known as "sexting").

- The school will implement preventative approaches via a range of age and ability appropriate educational approaches for pupils, staff and parents/carers.
- Grange Park School views "sexting" as a safeguarding issue and all concerns will be reported to and dealt with by the Designated Safeguarding Leads (Mark Cleave, Renukah Atwell, Sharon Brooks, Lee Cooper, Jo Gould, Abi Rodreigo, Sarah Dobney, Maxine Hamilton & Charliiee Armstrong)
- The school will follow the guidance as set out in the non-statutory UKCCIS advice 'Sexting in schools and colleges: responding to incidents and safeguarding young people' and KSCB "Responding to youth produced sexual imagery" guidance
- If the school are made aware of incident involving creating youth produced sexual imagery the school will:
- Act in accordance with the school's child protection and safeguarding policy and the relevant Kent Safeguarding Child Boards procedures.
- Immediately notify the designated safeguarding lead.
- Store the device securely.
- Carry out a risk assessment in relation to the children(s) involved.
- Consider the vulnerabilities of children(s) involved (including carrying out relevant checks with other agencies)
- Make a referral to children's social care and/or the police (as needed/appropriate).
- Put the necessary safeguards in place for children e.g. offer counselling support and immediate protection and offer appropriate pastoral support for those involved.
- Implement appropriate sanctions in accordance with the school's behaviour policy but taking care not to further traumatise victims where possible.
- Review the handling of any incidents to ensure that the school is implementing best practice and the leadership team will review and update any management procedures where necessary.
- Inform parents/carers about the incident and how it is being managed.
- The school will not view an images suspected of being youth produced sexual imagery unless there is no other possible option or there is a clear need or reason to do so (in these cases the image will only be viewed by the Designated Safeguarding Lead).
- The school will not send, share or save content suspected to be an indecent image of children and will not allow or request children to do so.
- If an indecent image has been taken or shared on the school/settings network or devices, then the school will take action to block access to all users and isolate the image.
- The school will take action regarding creating youth produced sexual imagery, regardless of the use of school/setting equipment or personal equipment, both on and off the premises.
- The school will ensure that all members of the community are aware of sources of support regarding youth produced sexual imagery.

10.3 Responding to concerns regarding Online Child Sexual Abuse and Exploitation

- Grange Park School will ensure that all members of the community are made aware of online child sexual abuse, including exploitation and grooming including the consequences, possible approaches which may be employed by offenders to target children and how to respond to concerns.
- The school will implement preventative approaches for online child sexual abuse via a range of age and ability appropriate educational approaches for pupils, staff and parents/carers.

- Grange Park School views online child sexual abuse as a safeguarding issue and all concerns will be reported to and dealt with by the Designated Safeguarding Lead (Mark Cleave, Renukah Atwell, Sharon Brooks, Lee Cooper, Jo Gould, ~~Emma Nuttall~~ and Abi Rodreigo)
- If the school is unclear if a criminal offence has been committed, then the Designated Safeguarding Lead will obtain advice immediately through the Education Safeguarding Team and/or Kent Police.
- If the school is made aware of intelligence or information which may relate to child sexual exploitation (on or offline) then it will be passed through to the CSET team by the DSL.
- If the school are made aware of incident involving online child sexual abuse of a child, then the school will:
    - Act in accordance with the school's child protection and safeguarding policy and the relevant Kent Safeguarding Child Boards procedures.
    - Immediately notify the designated safeguarding lead.
    - Store any devices involved securely.
    - Immediately inform Kent police via 101 (using 999 if a child is at immediate risk)
    - Where appropriate the school will involve and empower children to report concerns regarding online child sexual abuse e.g. using the Click CEOP report form: www.ceop.police.uk/safety-centre/
    - Carry out a risk assessment which considers any vulnerabilities of pupil(s) involved (including carrying out relevant checks with other agencies).
    - Make a referral to children's social care (if needed/appropriate).
    - Put the necessary safeguards in place for pupil(s) e.g. offer counselling support and immediate protection and offer appropriate pastoral support for those involved.
    - Inform parents/carers about the incident and how it is being managed.
    - Review the handling of any incidents to ensure that the school is implementing best practice and the school leadership team will review and update any management procedures where necessary.
- The school will take action regarding online child sexual abuse regardless of the use of school equipment or personal equipment, both on and off the school premises.
- The school will ensure that all members of the community are aware of sources of support regarding online child sexual abuse.
- If pupils at other schools are believed to have been targeted, then the school will seek support from the Education Safeguarding Team to enable other schools to take appropriate action to safeguarding their community.
- The school will ensure that the Click CEOP report button is visible and available to pupils and other members of the school community, for example including the CEOP report button the school website homepage and on intranet systems.

10.4 Responding to concerns regarding Indecent Images of Children (IIOC)

- Grange Park School will ensure that all members of the community are made aware of the criminal nature of Indecent Images of Children (IIOC) including the possible consequences.
- The school will take action regarding of Indecent Images of Children (IIOC) regardless of the use of school/setting equipment or personal equipment, both on and off the premises.

- The school will take action to prevent access accidental access to of Indecent Images of Children (IIOC) for example using an internet Service provider (ISP) which subscribes to the Internet Watch Foundation block list, implementing appropriate web filtering, implementing firewalls and anti-spam software.
- If the school is unclear if a criminal offence has been committed, then the Designated Safeguarding Lead will obtain advice immediately through the Education Safeguarding Team and/or Kent Police.
- If the school/setting is made aware of Indecent Images of Children (IIOC) then the school will:
- Act in accordance with the school's child protection and safeguarding policy and the relevant Kent Safeguarding Child Boards procedures.
- Immediately notify the school Designated Safeguard Lead.
- Store any devices involved securely.
- Immediately inform appropriate organisations e.g. the Internet Watch Foundation (IWF), Kent police via 101 (using 999 if a child is at immediate risk) and/or the LADO (if there is an allegation against a member of staff).
- If the school are made aware that a member of staff or a pupil has been inadvertently exposed to indecent images of children whilst using the internet, then the school will:
- Ensure that the Designated Safeguard Lead is informed.
- Ensure that the URLs (webpage addresses) 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.
- If the school are made aware that indecent images of children have been found on the school's electronic devices, then the school will:
- Ensure that the Designated Safeguard Lead is informed.
- Ensure that the URLs (webpage addresses) 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 harm) and children's social services (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.
- If the school are made aware that a member of staff is found in possession of indecent images of children on their electronic device provided by the school, then the school will:
- Ensure that the Designated Safeguard Lead is informed or another member of staff in accordance with the school whistleblowing procedure.
- Contact the police regarding the images and quarantine any devices involved until police advice has been sought.
- Inform the Local Authority Designated Officer (LADO) and other relevant organisations in accordance with the schools managing allegations policy.
- Follow the appropriate school policies regarding conduct.

10.5 Responding to concerns regarding radicalisation and extremism online

The school will take all reasonable precautions to ensure that children are safe from terrorist and extremist material when accessing the internet in schools and that suitable filtering is in place which takes into account the needs of pupils.

- When concerns are noted by staff that a child may be at risk of radicalisation online then the Designated Safeguarding Lead (DSL) will be informed immediately and action will be taken in line with the safeguarding policy.

- Online hate content directed towards or posted by specific members of the community will be responded to in line with existing school policies, including anti-bullying, behaviour etc. If the school is unclear if a criminal offence has been committed, then the Designated Safeguarding Lead will obtain advice immediately via the Education Safeguarding Team and/or Kent Police.

10.6 Responding to concerns regarding cyberbullying

Cyberbullying, along with all other forms of bullying, of any member of the Grange Park School community will not be tolerated. Full details are set out in the school policies regarding anti-bullying and behaviour.

- All incidents of online bullying reported will be recorded.
- There are clear procedures in place to investigate incidents or allegations and support anyone in the school community affected by online bullying.
- If the school is unclear if a criminal offence has been committed, then the Designated Safeguarding Lead will obtain advice immediately through the Education Safeguarding Team and/or Kent Police.
- Pupils, staff and parents/carers will be advised to keep a record of cyberbullying as evidence.
- The school will take steps to identify the bully where possible and appropriate. This may include examining school system logs, identifying and interviewing possible witnesses, and contacting the service provider and the police, if necessary.
- Pupils, staff and parents/carers will be required to work with the school to support the approach to cyberbullying and the schools e-Safety ethos.
- Sanctions for those involved in online or cyberbullying may include:
- Those involved will be asked to remove any material deemed to be inappropriate or offensive.
- A service provider may be contacted to remove content if those involved refuse to or are unable to delete content.
- Internet access may be suspended at school for the user for a period of time. Other sanctions for pupils and staff may also be used in accordance to the schools anti-bullying, behaviour policy or Acceptable Use Policy.
- Parent/carers of pupils involved in online bullying will be informed.
- The Police will be contacted if a criminal offence is suspected.

10.7 Responding to concerns regarding online hate

Online hate at Grange Park School will not be tolerated. Further details are set out in the school policies regarding behaviour.

- All incidents of online hate reported to the school will be recorded.
- All members of the community will be advised to report online hate in accordance with relevant school policies and procedures e.g. anti-bullying, behaviour etc.
- The Police will be contacted if a criminal offence is suspected. If the school is unclear if a criminal offence has been committed, then the Designated Safeguarding Lead will obtain advice immediately through the Education Safeguarding Team and/or Kent Police.

10.8 Other Incidents

It is hoped that all members of the school community will be responsible users of digital technologies, who understand and follow school policy. However, there may be times when infringements of the policy could take place, through careless or irresponsible or, very rarely, through deliberate misuse.

In the event of suspicion, all steps in this procedure should be followed:

- Have more than one senior member of staff / governor involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should 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 form (except in the case of images of child sexual abuse – see below)
- 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
  - Involvement by Local Authority or national / local organisation (as relevant).
  - Police involvement and/or action
- If content being reviewed includes images of Child abuse, then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:
  - incidents of 'grooming' behaviour
  - the sending of obscene materials to a child
  - adult material which potentially breaches the Obscene Publications Act
  - criminally racist / extremist material
  - other criminal conduct, activity or materials
- Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.

It is important that all of the above steps are taken as they will provide an evidence trail for the school and possibly the police and demonstrate that visits to these sites were carried out for child protection purposes. The completed form should be retained by the group for evidence and reference purposes.

10.9 School Actions & Sanctions

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. It is intended that incidents of misuse will be dealt with through normal behaviour procedures as follows:

Pupils Actions / Sanctions

Incidents:	Refer to class teacher/s	Refer to Head of Department / Head of Year / other	Refer to Executive Headteacher	Refer to Police	Refer to technical support staff for action re filtering / security etc	Inform parents / carers	Removal of device / network / internet access rights	Warning	Further sanction e.g. report / exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		X	X	X	X	X	X		
Unauthorised use of non-educational sites during lessons	X					X	X	X	X
Unauthorised use of mobile phone / digital camera / other mobile device	X					X	X	X	X
Unauthorised use of social media / messaging apps / personal email	X					X	X	X	
Unauthorised downloading or uploading of files					X		X	X	
Allowing others to access school network by sharing username and passwords							X	X	
Attempting to access or accessing the school network, using another student's / pupil's account	X						X	X	
Attempting to access or accessing the school network, using the account of a member of staff	X						X	X	
Corrupting or destroying the data of other users	X	X	X				X	X	X
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X	X					X	X	X
Continued infringements of the above, following previous warnings or sanctions			X			X	X		X
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school		X	X			X	X		X
Using proxy sites or other means to subvert the school's filtering system	X	X			X	X	X	X	
Accidentally accessing offensive or pornographic material and failing to report the incident	X					X		X	
Deliberately accessing or trying to access offensive or pornographic material	X	X	X		X	X	X		
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act			X			X	X	X	

Staff Actions / Sanctions

Incidents:	Refer to line manager	Refer to Executive Headteacher	Refer to Local Authority / HR	Refer to Police	Refer to Technical Support Staff for action re filtering etc.	Warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		X	X	X	X	X	X	X
Inappropriate personal use of the internet / social media / personal email	X	X				X		X
Unauthorised downloading or uploading of files					X	X		
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	X	X						X
Careless use of personal data e.g. holding or transferring data in an insecure manner	X	X				X		
Deliberate actions to breach data protection or network security rules		X	X		X			X
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software		X		X	X	X	X	X
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature		X	X	X				X
Using personal email / social networking / instant messaging / text messaging to carry out digital communications with students / pupils		X	X	X		X		X
Actions which could compromise the staff member's professional standing		X				X		X
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school		X				X		X
Using proxy sites or other means to subvert the school's filtering system		X			X	X		
Accidentally accessing offensive or pornographic material and failing to report the incident		X			X	X		
Deliberately accessing or trying to access offensive or pornographic material		X	X	X	X		X	X
Breaching copyright or licensing regulations	X	X			X	X		
Continued infringements of the above, following previous warnings or sanctions		X			X	X		X

EQUAL OPPORTUNITIES STATEMENT

Grange Park School is committed to the positive promotion of equal opportunities for all.

Acceptance Slip for e-safety Policy
Grange Park School

I confirm that I have read, accepted and will at all times conform to the school's policy on online safety.

Print full name: ___________________________________

Post/position: ___________________________________

Signature: ___________________________________

Date: ___________________________________