



**The White Hills Park Trust**  
*A Culture of Excellence*

# **E-Safety Policy**

## **White Hills Park Trust**

## **E-Safety Policy**

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|-----------------------------|---|
| Scope:                      | <b>Applicable to all Trust Schools</b>                                  |
| Review date:                | <b>Autumn Term 2025</b>   |
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| Author/Reviewer:            | <b>Trust IT Director and Trust Safeguarding Lead<br/>September 2024</b> |

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### 1. Aims

Working and learning online has become essential part of our work in schools. We recognise and celebrate the role of the Internet in enhancing our work and contributing to pupil outcomes. However, it is clear that there are dangers, and it is the duty of the Trust and its schools to do everything possible to eliminate or mitigate these dangers.

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

Our Headteachers are empowered, to such extent as is reasonable, to regulate the behaviour of pupils when they are off the school site and staff are empowered to impose disciplinary penalties for inappropriate behaviour.

This is pertinent to incidents of cyber-bullying, or other e-safety incidents covered by this policy, which may take place outside of our Trust and schools but is still linked to membership of the Trust. The Trust will deal with such incidents within this policy and associated behaviour and inappropriate e-safety behaviour that take place out of school. Parents/carers may be informed of concerns via telephone or letter.

Our schools aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Identify and support groups of pupils that are potentially at greater risk of harm online than others
- 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')
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

### **The 4 key categories of risk**

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, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour 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; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

## **2. Legislation and guidance**

This policy is based on the Department for Education's (DfE's) statutory safeguarding guidance, [Keeping Children Safe in Education](#), and its advice for schools on:

- [Teaching online safety in schools](#)
- [Preventing and tackling bullying](#) and [cyber-bullying: advice for headteachers and school staff](#)

- [\[Relationships and sex education\]](#)
- [\[Searching, screening and confiscation\]](#)

It also refers to the DfE's guidance on [protecting children from radicalisation](#).

It reflects existing legislation, including but not limited to the [Education Act 1996](#) (as amended), the [Education and Inspections Act 2006](#) and the [Equality Act 2010](#). In addition, it reflects the [Education Act 2011](#), which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on pupils' electronic devices where they believe there is a 'good reason' to do so.

The policy also takes into account the National Curriculum computing programmes of study.

: This policy complies with our funding agreement and articles of association.

### **3. Roles and responsibilities**

Trustees are responsible for the approval of the e-safety Policy and for reviewing the effectiveness of the policy.

#### **3.1 The governing board of each academy**

The governing board has overall responsibility for monitoring this policy and the individual academy's policy holding the headteacher to account for its implementation.

The governing board will make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.

The governing board will also make sure all staff receive regular online safety updates (via email, e-bulletins and staff meetings), as required and at least annually, to ensure they are continually provided with the relevant skills and knowledge to effectively safeguard children.

The governing board will co-ordinate regular meetings with appropriate staff to discuss online safety, requirements for training, and monitor online safety logs as provided by the designated safeguarding lead (DSL).

The governing board should ensure children are taught how to keep themselves and others safe, including keeping safe online.

The governing board must ensure the school has appropriate filtering and monitoring systems in place on school devices and school networks and will regularly review their effectiveness. The board will review the DfE filtering and monitoring standards, and discuss with IT staff and service providers what needs to be done to support the school in meeting the standards, which include:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems;
- Reviewing filtering and monitoring provisions at least annually;
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning;

- Having effective monitoring strategies in place that meet their safeguarding needs.

All governors will:

- Ensure they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet
- Ensure that online safety is a running and interrelated theme while devising and implementing their whole-school or college approach to safeguarding and related policies and/or procedures
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is 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 often be more suitable

### **3.2 The headteacher**

The headteacher is responsible for ensuring that staff understand this policy any individual school policy, and that it is being implemented consistently throughout the school.

#### **Headteachers and Senior Leaders**

- Headteachers are responsible for ensuring the safety (including e-safety) of members of their school communities.
- Headteachers and senior leaders are responsible for ensuring that relevant staff receive suitable training and development to enable them carry out their e-safety roles and to train other colleagues, as relevant.
- Headteachers and senior leaders will ensure that there is a system in place to
- Each school's senior leadership team (SLT) will receive information regarding any e- safety incidents which will be logged and reviewed by SLT.
- Headteachers and members of each School SLT should be aware of the procedures to be followed in the event of a serious e-safety allegation being made against a member of staff.

#### **Member of SLT with responsibility for e-safety**

- Take day to day responsibility for e-safety issues and oversee the sanctions for breaches of rules relating to e-safety.
- Ensure that all staff are aware of the procedures that need to be followed in the event of an e-safety incident taking place.
- Provide training and advice to staff.
- Liaise with the Local Authority Designated Officer (LADO) or Police as appropriate.
- Liaise with the Trust's ICT technical staff and Trust Safeguarding Lead about e-safety issues
- Receive reports of e-safety incidents as part of behaviour monitoring.
- Provide information to the Trust's Executive Team/Board as appropriate.

- Keep abreast of current issues and guidance through organisations such as CEOP (Child Exploitation and Online Protection), Childnet, UK Safer Internet Centre and Prevent Radicalisation.

### **Trust IT Services Manager/ICT Technical Staff and Trust Safeguarding Lead**

Ensure that all reasonable endeavours to ensure the Academy and Trust ICT infrastructure is secure and is not open to misuse or malicious attack and that all aspects of the Trust's ICT systems are secure, in line with the Trust's guidance and policies.

The Trust Safeguarding Lead will provide regular strategic and operational support to DSLs in school with all e-safety related curriculum and safeguarding issues and concerns

The Trust Safeguarding Lead and Trust Director of It will carry out with schools and annual e-safety review and audit

### **3.3 The designated safeguarding lead (DSL)**

Details of the school's designated safeguarding lead (DSL) [and deputy/deputies] are set out in our child protection and safeguarding policy, as well as relevant job descriptions.

The DSL takes lead responsibility for online safety in school, in particular:

- Supporting the headteacher in ensuring that staff understand this policy and any individual school policy and that it is being implemented consistently throughout the school
- Working with the headteacher and governing board to review school policies annually and ensure the procedures and implementation are updated and reviewed regularly
- Taking the lead on understanding the filtering and monitoring systems and processes in place on school devices and school networks
- Working with the ICT manager to make sure the appropriate systems and processes are in place
- Working with the headteacher, ICT manager and other staff, as necessary, to address any online safety issues or incidents
- Managing all online safety issues and incidents in line with the school's child protection policy
- Ensuring that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety (appendix 4 contains a self-audit for staff on online safety training needs)
- Liaising with other agencies, the Trust Safeguarding Lead and Trust IT support and/or external services if necessary

- Providing regular reports on online safety in school to the headteacher and/or governing board
- Undertaking annual risk assessments that consider and reflect the risks children face
- Providing regular safeguarding and child protection updates, including online safety, to all staff, at least annually, in order to continue to provide them with relevant skills and knowledge to safeguard effectively
- Should be trained in e-safety issues and be aware of the potential for serious child protection 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.

### **3.4 Trust IT Services Director Manager and Technical Staff**

The Trust team is responsible for:

- Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems on school devices and school networks, which are reviewed and updated at least annually to assess effectiveness and ensure pupils are kept safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
- Ensuring that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring the school's ICT systems on a [weekly/fortnightly/monthly] basis in conjunction with the school IT leads and DSLs
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are logged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy
- Ensure that all reasonable endeavours are undertaken to ensure the Academy and Trust ICT infrastructure is secure and is not open to misuse or malicious attack and that all aspects of the Trust's ICT systems are secure, in line with the Trust's guidance and policies.

### 3.5 All staff and volunteers

All staff, including contractors and agency staff, and volunteers are responsible for:

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet and ensuring that pupils follow the school's terms on acceptable use
- Knowing that the DSL is responsible for the filtering and monitoring systems and processes, and being aware of how to report any incidents of those systems or processes
- Following the correct procedures by [insert school specific action here] if they need to bypass the filtering and monitoring systems for educational purposes
- Working with the DSL to ensure that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy
- They have an up-to-date awareness of e-safety matters and of current Trust e-safety policy and practices.
- They have read and understood the appropriate ICT agreements.
- They report any suspected misuse or problem to a member of SLT.
- Digital communications with pupils are only on a professional level and carried out using official Trust systems.
- E-safety issues are embedded in all aspects of the curriculum and other school activities.
- Pupils understand and follow the Trust's e-safety and Acceptable Use Policy.
- Pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations.
- They monitor ICT activity in lessons, extra-curricular and extended Academy activities.
- They are aware of e-safety issues related to the use of mobile phones, cameras and handheld devices and that they monitor their use and implement current best practice with regard to these devices.
- In lessons where internet use is pre-planned, students should be guided to sites that are checked as suitable for their use.
- -safety issues are embedded in all aspects of the curriculum and other school activities.
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- They monitor ICT activity in lessons, extra-curricular and extended Academy activities.
- They are aware of e-safety issues related to the use of mobile phones, cameras and handheld devices and that they monitor their use and implement current best practice with regard to these devices.
- In lessons where internet use is pre-planned, students should be guided to sites that are checked as suitable for their use.
- Responding 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'

It is understood that social media may play an important part in communication between the school and pupils, parents/carers; however, there is also a need to ensure it is used in an appropriate and safe way. Before any member of staff sets up a resource such as a student blog space, they must seek permission from the Headteacher, and they should ensure that appropriate steps are taken to make such social media 'private' so that only people they approve can access it. The member of staff will then be responsible for the posts made on the site and for moderating the content from other users/contributors.

### **3.6 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. Research shows that many parents and carers do not fully understand the issues and are less experienced in the use of ICT than their children. The Trust will therefore take every opportunity to help parents understand these issues through school communications and their websites.

Parents and carers will be responsible for:

- Endorsing the Trust policy.
- Accessing the Academy website in accordance with the relevant Acceptable Use Policy
- Parents/carers are expected to:
- Notify a member of staff or the headteacher of any concerns or queries regarding this policy
- Ensure their child has read, understood and agreed to the terms on acceptable use of the school's ICT systems and internet

Parents/carers 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](#)
- Parent resource sheet – [Childnet](#)

### 3.7 Visitors and members of the community

Visitors and members of the community who use the school's ICT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use (appendix 3).

## 4. Educating pupils about online safety

Pupils will be taught about online safety as part of the curriculum. E-Safety education will be provided in the following ways:

- A planned e-safety programme will be provided as part of the ICT programme.
- Key e-safety messages will be reinforced as part of a planned programme of assemblies and within the PSHE curriculum. Pupils are taught about British Values and radicalisation.
- Pupils will be taught whenever an opportunity occurs to be critically aware of the material/content they access on-line and be guided to validate the accuracy of information.
- Pupils will be encouraged to adopt safe and responsible use of ICT, the internet, and mobile devices both within and outside school.
- Pupils will be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet.
- Staff will act as good role models in their use of ICT, the internet and mobile devices.

All schools have to teach:

➤ [Relationships education and health education](#) in primary schools

➤ [Relationships and sex education and health education](#) in secondary schools

### Primary provision

In **Key Stage (KS) 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 (KS) 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 by 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 sorts 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

### **Secondary provision**

In **KS3**, pupils will be taught to:

- Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
- Recognise inappropriate content, contact and conduct, and know how to report concerns

Pupils in **KS4** will be taught:

- To understand how changes in technology affect safety, including new ways to protect their online privacy and identity
- How to report a range of concerns

By the **end of secondary school**, pupils will know:

- Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- Not to provide material to others that they would not want shared further and not to share personal material that is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others, and negatively affect how they behave towards sexual partners
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence that carries severe penalties including jail
- How information and data is generated, collected, shared and used online
- How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours
- How people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)

## **All schools**

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

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.

## **5. Educating parents/carers about online safety**

The school will raise parents/carers' awareness of internet safety in letters or other communications home, and in information via our website. This policy will also be shared with parents/carers.

Online safety will also be covered during parents' evenings.

The school will let parents/carers know:

- What systems the school uses to filter and monitor online use
- What their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child will be interacting with online

If parents/carers have any queries or concerns in relation to online safety, these should be raised in the first instance with the headteacher and/or the DSL.

Concerns or queries about this policy can be raised with any member of staff or the headteacher.

## **6. 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 1 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.

Our schools will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Teachers will discuss cyber-bullying with their tutor groups.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.

All staff, governors and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training (see section 11 for more detail).

The school also sends information/leaflets on cyber-bullying to parents/carers or puts on the website information so 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 of 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.

The DSL will report the incident and provide the relevant material to the police as soon as is reasonably practicable, if they have reasonable grounds to suspect that possessing that material is illegal. They will also work with external services if it is deemed necessary to do so.

### **6.3 Examining electronic devices**

The headteacher, and any member of staff may be authorised to do so by some circumstances (as set out in the individual academy's behaviour policy to carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or pupils, and/or
- Is identified in the school rules as a banned item for which a search can be carried out, and/or
- Is evidence in relation to an offence

Before a search, if the authorised staff member is satisfied that they have reasonable grounds for suspecting any of the above, they will also:

- Make an assessment of how urgent the search is and consider the risk to other pupils and staff. If the search is not urgent, they will seek advice from [the headteacher / DSL / appropriate staff member]
- Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it
- Seek the pupil's co-operation
- Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so.

When deciding whether there is a 'good reason' to examine data or files on an electronic device, the staff member should reasonably suspect that the device has, or could be used to:

- Cause harm, and/or
- Undermine the safe environment of the school or disrupt teaching, and/or
- Commit an offence

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL / headteacher / other member of the senior leadership team] to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response.

When deciding if there is a good reason to erase data or files from a device, staff members will consider if the material may constitute evidence relating to a suspected offence. In these instances, they will not delete the material, and the device will be handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if:

1. They reasonably suspect that its continued existence is likely to cause harm to any person, and/or
2. The pupil and/or the parent/carers refuses to delete the material themselves

If a staff member **suspects** a device **may** contain an indecent image of a child (also known as a nude or semi-nude image), they will:

- **Not** view the image
- Confiscate the device and report the incident to the DSL (or equivalent) immediately, who will decide what to do next. The DSL will make the decision in line with the DfE's latest guidance on [screening, searching and confiscation](#) and the UK Council for Internet Safety (UKCIS) guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

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

- The DfE's latest guidance on [searching, screening and confiscation](#)
- UKCIS guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- The school behaviour policy / searches and confiscation policy
- Any complaints about searching for or deleting inappropriate images or files on pupils' electronic devices will be dealt with through the school complaints procedure.

## 6.4 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

White Hills Park Trust recognises that AI has many uses to help pupils learn but may also have the potential to be used to bully others. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real. This includes deepfake pornography: pornographic content created using AI to include someone's likeness.

White Hills Park Trust will treat any use of AI to bully pupils in line with our anti-bullying/behaviour] policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out a risk assessment where new AI tools are being used by our schools or the trust.

## **7. Acceptable use of the internet in school**

All pupils, parents/carers, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of the school's ICT systems and the internet. Visitors will be expected to read and agree to the school's terms on acceptable use if relevant.

Use of the school's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role.

We will monitor the websites visited by pupils, staff, volunteers, governors and visitors (where relevant) to ensure they comply with the above and restrict access through filtering systems where appropriate.

## **8. Pupils using mobile devices in school**

Any use of mobile devices in school by pupils must be in line with the individual academy's acceptable use agreement.

Any breach of the acceptable use agreement by a pupil may trigger disciplinary action in line with the school behaviour policy, which may result in the confiscation of their device.

## **9. Staff using work devices outside school**

All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- Keeping the device password-protected – strong passwords are at least 8 characters, with a combination of upper and lower-case letters, numbers and special characters (e.g. asterisk or currency symbol)
- Ensuring their hard drive is encrypted – this means if the device is lost or stolen, no one can access the files stored on the hard drive by attaching it to a new device
- Making sure the device locks if left inactive for a period of time
- Not sharing the device among family or friends
- Installing anti-virus and anti-spyware software
- Keeping operating systems up to date by always installing the latest updates
- Staff members must not use the device in any way that would violate the school's terms of acceptable use,
- Work devices must be used solely for work activities.
- If staff have any concerns over the security of their device, they must seek advice from the Trust IT team

## **10. How the school will respond to issues of misuse**

Where a pupil misuses the school's ICT systems or internet, we will follow the procedures set out in our policies of the code of conduct the action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the school's ICT systems or the internet or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in

accordance with the staff disciplinary procedures / staff code of conduct. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The school will consider whether incidents that involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

## 11. Training

All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues, including cyber-bullying and the risks of online radicalisation.

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

By way of this training, 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, threatening, 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/hazing type violence can all contain an online element

Training will also help staff:

- Develop better awareness to assist in spotting the signs and symptoms of online abuse
- Develop the ability to ensure pupils can recognise dangers and risks in online activity and can weigh up the risks
- Develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term

The DSL and deputies will undertake child protection and safeguarding training, which will include online safety, at least every 2 years. They will also update their knowledge and skills on the subject of online safety at regular intervals, and at least annually.

Governors will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

More information about safeguarding training is set out in our child protection and safeguarding policy.



## 12. Monitoring arrangements

The DSL logs behaviour and safeguarding issues related to online safety. An incident report log can be found in appendix 5. All safeguarding concerns will be logged on Cpoms (At Foxwood Academy this is done on the school vulnerability matrix and electronic safeguarding system)

This policy will be reviewed every year by the White Hills Park Trust IT Director and the White Hills Park Trust Safeguarding Lead. At every review, the policy will be shared with the Trustees. The review (such as the one available [here](#)) will be supported by an annual risk assessment that considers and reflects the risks pupils face online. This is important because technology, and the risks and harms related to it, evolve and change rapidly.

## 13. Use of digital and video images - Photographic, Video

- 13.1 The development of digital imaging technologies has created significant benefits to learning, allowing staff and students instant use of images that they have recorded themselves or downloaded from the internet. However, staff and students need to be aware of the risks associated with sharing images and with posting digital images on the internet. Those images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term.
- 13.2 The Trust / schools 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 students 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.
  - Staff are allowed to take digital / video images to support educational aims but must follow school and Trust policies concerning the sharing, distribution and publication of those images. Those images should only be taken on school/Trust equipment; the personal equipment of staff should not be used for such purposes. They should also only be stored on the Trust's network and not on any personal device.
  - Care should be taken when taking digital / video images that students are appropriately dressed and are not participating in activities that might bring the individuals or the Trust 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 students will be selected carefully and will comply with good practice guidance on the use of such images.

- Written or digital consent from parents or carers will be obtained before photographs of students are published on the school / Trust website.
- Be aware that downloading, copying, or printing images from the internet may breach copyright laws.

## **14 GDPR (General Data Protection Regulation) and Prevent**

Personal data (as defined by the GDPR) will be recorded, processed, transferred, and made available according to GDPR. Please see the relevant GDPR policy for further information.

### **Communications**

- 14.1 A wide range of rapidly developing communications technologies has the potential to enhance learning.
- Users need to be aware that email communications may be monitored.
  - Users must immediately report to a member of SLT, the receipt of any email that makes them feel uncomfortable, is offensive, threatening or bullying in nature and must not respond to any such email.
  - Any digital communication between staff and students or parents / carers (email, text, MCAS etc.) must be professional in tone and content. These communications may only take place on official (monitored) Trust systems. Personal email addresses, text messaging or public chat / social networking programmes must not be used for these communications.
  - Pupils should be taught about email safety issues, such as the risks attached to the use of personal details. They should also be taught strategies to deal with inappropriate emails and be reminded of the need to write emails clearly and correctly and not include any unsuitable or abusive material'.
  - Personal information should not be posted on school / Trust websites. Only names and official email addresses should be used to identify members of staff.

### **Unsuitable / inappropriate activities**

- 14.2 Some internet activity e.g. accessing child abuse images or distributing racist material is illegal and is obviously be banned from the Trust and all other ICT systems. Other activities e.g. Cyber-bullying, use of electronic communications to radicalise children or others, is banned and could lead to criminal prosecution. There are however a range of activities which may, generally, be legal but would be inappropriate in a school context, either because of the age of the users or the nature of those activities, please be mindful of these. If in doubt, please seek advice from your Headteacher, or the Trust IT Team.

## **The Prevent Duty**

- 14.3 The statutory guidance makes clear the need for schools to ensure that children are safe from radicalisation and extremist material when accessing the internet in schools. The Trust will ensure that suitable filtering is in place, however even the best filtering solutions do not prevent access to every risk. As with other online risks of harm, every member of staff needs to be aware of the risks posed by the online activity of extremist and radicalisation groups.

## **15. Responding to incidents of misuse**

It is hoped that all members of the Trust community will be responsible users of ICT understand and follow this policy. However, there may be times when infringements of the policy could take place, through careless or irresponsible or, very rarely, through deliberate misuse. Listed below are the responses that will be made to any apparent or actual incidents of misuse:

15.1 If any apparent or actual misuse appears to involve illegal activity i.e.

- Child sexual abuse images
- Adult material which potentially breaches the Obscene Publications Act
- Criminally racist material
- Other criminal conduct, activity or materials
- Radicalization of others

The Headteacher must be informed immediately and also the Trust Safeguarding Lead and Trust Director of IT. The Headteacher and any other relevant members of the SLT must inform the relevant authorities immediately of any concerns/ infringements. The steps taken must all be reported to the Trust Safeguarding Lead and Director of IT

## **16. Links with other policies**

This E-Safety policy is linked to our:

- Child protection and safeguarding policy
- Staff disciplinary procedures
- Data protection policy and privacy notices
- Complaints procedure
- ICT and internet acceptable use policy
- Individual academy policies for safeguarding and e-safety



## Appendix 4: online safety training needs – self-audit for staff

| ONLINE SAFETY TRAINING NEEDS AUDIT   |   |
|--|---|
| <b>Name of staff member/volunteer:</b>   | <b>Date:</b>                              |
| <b>Question</b>  | <b>Yes/No (add comments if necessary)</b> |
| Do you know the name of the person who has lead responsibility for online safety in school?                |   |
| Are you aware of the ways pupils can abuse their peers online?   |   |
| Do you know what you must do if a pupil approaches you with a concern or issue?                            |   |
| Are you familiar with the school's acceptable use agreement for staff, volunteers, governors and visitors? |   |
| Are you familiar with the school's acceptable use agreement for pupils and parents/carers?                 |   |
| Are you familiar with the filtering and monitoring systems on the school's devices and networks?           |   |
| Do you understand your role and responsibilities in relation to filtering and monitoring?                  |   |
| Do you regularly change your password for accessing the school's ICT systems?                              |   |
| Are you familiar with the school's approach to tackling cyber-bullying?                                    |   |
| Are there any areas of online safety in which you would like training/further training?                    |   |

## Appendix 5: online safety incident report log

| ONLINE SAFETY INCIDENT LOG |                               |                             |              |   |
|----------------------------|-------------------------------|-----------------------------|--------------|---|
| Date                       | Where the incident took place | Description of the incident | Action taken | Name and signature of staff member recording the incident |
|                            |                               |                             |              |   |
|                            |                               |                             |              |   |
|                            |                               |                             |              |   |
|                            |                               |                             |              |   |
|                            |                               |                             |              |   |