Knowledge-rich, skills-led learning for all
Christ at our heart
Serving everyone in our community
Partnership of love, ambition, joy and peace

Online safety policy

Model policy template			
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John 10:10 "…I came that they may have life and have it abundantly."

1. Aims

This policy aims to ensure that all schools in the Kent Catholic Schools' Partnership ("the Trust"):

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governance committee members
- 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, misinformation, disinformation (including fake news), conspiracy theories, 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 schoolshttps://www.gov.uk/government/publications/preventing-and-tackling-bullying
- 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. Catholic Values

As a Catholic school, our school values are derived from the Gospel and the teachings of Christ. These values permeate all aspects of life at our school for every member of the school community. The following values guide us in our thoughts and actions at Our Lady of Hartley:

Love, Honesty, Kindness, Fairness, Understanding, Respect, Faith, Trust, Forgiveness.

4. Roles and responsibilities

4.1 Trust Board

The Trust Board will:

- Review and approve this model policy annually
- Receive annual online safety reporting via the annual safeguarding report
- Seek assurance that appropriate filtering and monitoring systems are in place in all Trust schools

4.2 Trust executive

The Trust Executive will:

- Support headteachers in providing advice and guidance on online safety
- Ensure that appropriate filtering and monitoring systems are in place in all Trust schools
- Provide an annual online safety update via the annual safeguarding report to the Trust Board
- Provide regular bespoke online safety training to headteachers and DSLs.

4.3 Local governance committee

The local governance committee of the school will:

- Ensure they have read and understood this policy
- Monitor the effectiveness of this policy
- Monitor the annual online safety review
- Hold the headteacher to account for its consistent implementation

4.4 The headteacher

The headteacher has overall responsibility for this policy and will:

- Ensure 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
- Ensure 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
- 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)
- Ensure children are taught how to keep themselves and others safe, including keeping safe online
- 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
- Ensure the school has appropriate filtering and monitoring systems in place on school devices and school networks, and will regularly review their effectiveness.
- Review the DfE's filtering and monitoring standards and carry out an annual risk assessment. The headteacher will discuss with key stakeholders including IT staff, service providers, and the Area School Improvement Partner or the Trust Safeguarding & Wellbeing Manager where appropriate, 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 the school's safeguarding needs.

4.5 The designated safeguarding lead (DSL)

Details of the school's designated safeguarding lead (DSL) and deputy/deputies are set out in the Trust child protection and safeguarding policy.

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

- Supporting the headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school
- Working with the headteacher to review this policy 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
- Providing the local governance committee with assurance that filtering and monitoring systems are working effectively and reviewed regularly
- Working with the ICT manager to make sure the appropriate systems and processes are in place
- Working with the headteacher, Trust Safeguarding & Wellbeing Manager, 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, Appendix 1 provides a flow chart for responding to online safety incidents
- Responding to safeguarding concerns identified by filtering and monitoring
- 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 logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the headteacher, local governance committee and, annually to the Trust
- 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

This list is not intended to be exhaustive.

4.6 The ICT manager

The ICT manager 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 on an, at least, monthly basis
- 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

This list is not intended to be exhaustive.

4.7 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 Trust's acceptable use policy which is part of the Trust Staff Code of Conduct, and ensuring that pupils follow the school's terms on acceptable use (appendices 1 and 2)
- 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 failing by immediately informing the Headteacher and DSL.
- Following the correct procedures by referring to the Headteacher 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 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
- 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'
- Ensure that any use of Artificial Intelligence should be carried out in accordance with the Trust's AI usage policy

This list is not intended to be exhaustive.

4.8 Parents/carers

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 (appendices 1 and 2)

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
- Online safety topics for parents/carers – Childnet
- Parent resource sheet – Childnet

4.9 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 and expected to read and follow it. If appropriate, they will be expected to agree to staff and volunteer acceptable use statement which is part of the Trust staff code of conduct.

5. Educating pupils about online safety

Pupils will be taught about online safety as part of the curriculum:

All schools have to teach:

- Relationships education and health education in primary schools
- Relationships and sex education and health education in secondary schools

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
- Be discerning in evaluating digital content

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
- The benefits of rationing time spent online, the risks of excessive time spent on electronic devices and the impact of positive and negative content online on their own and others' mental and physical wellbeing
- How to consider the effect of their online actions on others and know how to recognise and display respectful behaviour online and the importance of keeping personal information private
- Where and how to report concerns and get support with issues online

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.

6. 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 or virtual learning environment (VLE). 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.

7. Cyber-bullying

7.1 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.)

7.2 Preventing and addressing cyber-bullying

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

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

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, governance committee members and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training (see section 12 for more detail).

The school also sends families information each month from Knowsley City Learning Trust 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.

7.3 Examining electronic devices

The headteacher, and any member of staff authorised to do so by the headteacher, can 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 or other 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 headteacher, or other staff member authorised by the headteacher, 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:

- They reasonably suspect that its continued existence is likely to cause harm to any person, and/or
- The pupil and/or the parent/carer 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
- Our school behaviour policy

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

7.4 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 Gemini.

The 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.

The Trust will treat any use of AI to bully pupils very seriously, in line with our behavior and anti-bullying polocies.

Any use of Artificial Intelligence should be carried out in accordance with the Trust's AI usage policy.

8. Acceptable use of the internet in school

All pupils, parents/carers, staff, volunteers and governance committee members 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, governance committee members and visitors (where relevant) to ensure they comply with the above and restrict access through filtering systems where appropriate.

9. Pupils using mobile devices in school

Please refer to the school's mobile phone policy which can be found on the school website.

The use of mobile devices by pupils on the school site is not permitted. Pupils bringing a mobile device to school must hand it in to the school office for safe keeping until the end of the school day.

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.

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 on behavior and IT acceptable use. 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 discipline & conduct policy and procedures. 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

11.1 Staff, governance committee members and volunteers

All staff

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

All staff members will receive training on cyber security.

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

Headteacher and DSLs

The Headteacher, DSL and deputy DSLs 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.

Governance committee members

Governance committee members will receive training on online safeguarding issues and cyber security as part of their safeguarding training.

Volunteers

Volunteers will receive appropriate training and updates, if applicable.

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

11.2 Pupils

All pupils will receive age-appropriate training on safe internet use, including:

- Methods that hackers use to trick people into disclosing personal information
- Password security
- Social engineering
- The risks of removable storage devices (e.g. USBs)
- Multi-factor authentication
- How to report a cyber incident or attack
- How to report a personal data breach

Pupils will also receive age-appropriate training on safeguarding issues such as cyberbullying and the risks of online radicalisation.

12. Monitoring arrangements

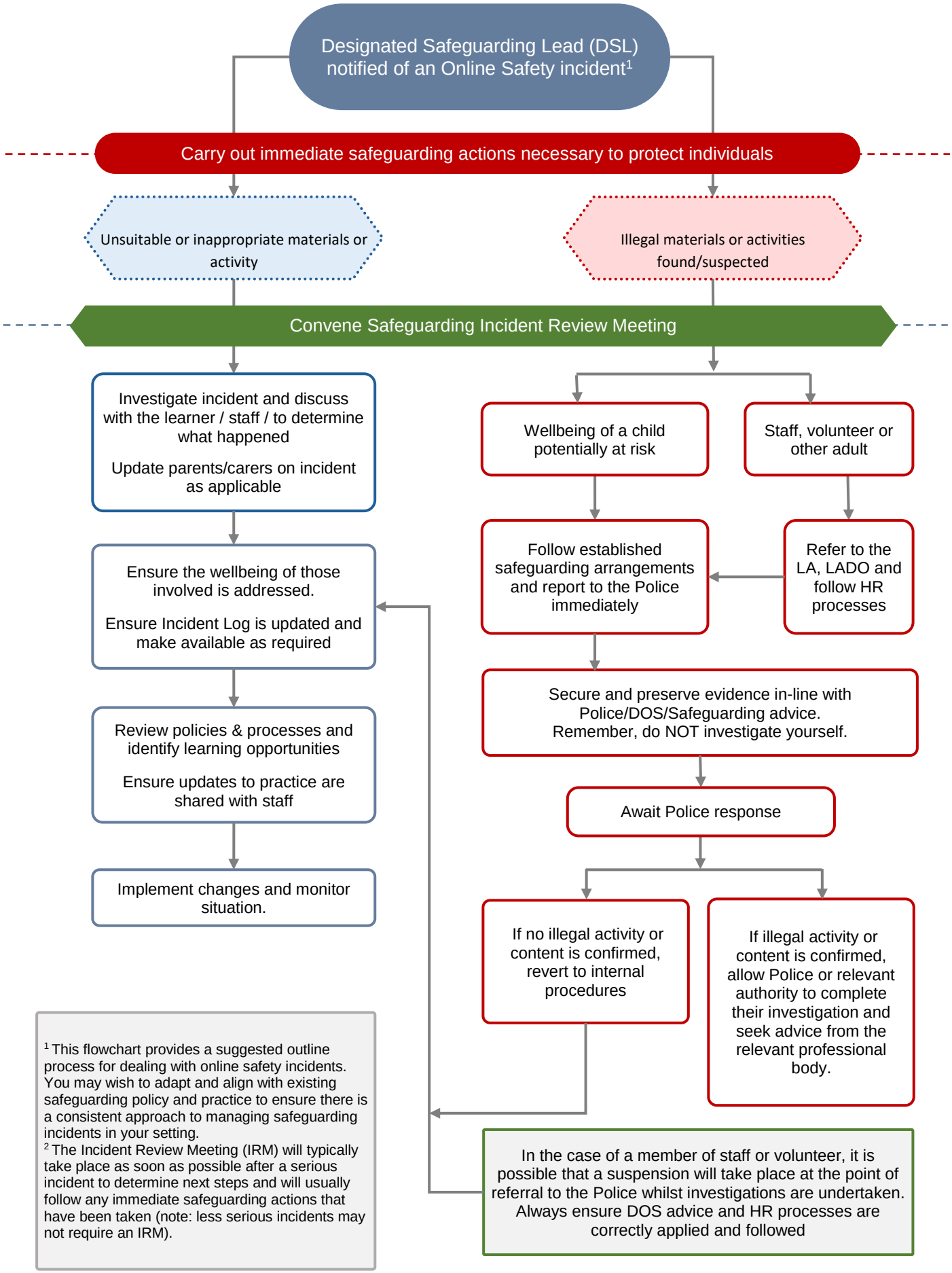
This policy template will be reviewed annually by the Education Standards Committee.

The headteacher and lead DSL will carry out an annual online safety review using a recommended tool provided by the Trust, monitored by the local governance committee and Area School Improvement Partner. The review 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. Links with other policies

This policy should be read in conjunction with other relevant Trust and school policies.

Appendix 1 – Online safety incident flow chart



[1] This flowchart provides a suggested outline process for dealing with online safety incidents. You may wish to adapt and align with existing safeguarding policy and practice to ensure there is a consistent approach to managing safeguarding incidents in your setting.

[2] The Incident Review Meeting (IRM) will typically take place as soon as possible after a serious incident to determine next steps and will usually follow any immediate safeguarding actions that have been taken (note: less serious incidents may not require an IRM).