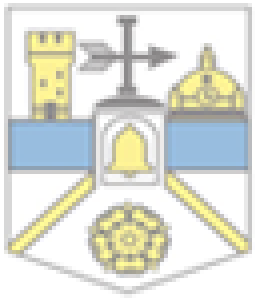


Glusburn Community Primary and Nursery School Online Safety Policy

SWGfL
Safe, Secure, Online

Contents

Introduction Error! Bookmark not defined.

Online Safety Policy

Scope of the Online Safety Policy
Policy development, monitoring and review
Schedule for development, monitoring and review
Process for monitoring the impact of the Online Safety Policy

Policy and leadership

Responsibilities
Online Safety Group
Professional Standards

Policy

Online Safety Policy
Acceptable use
User actions
Reporting and responding
Responding to Learner Actions
Responding to Staff Actions
The use of Artificial Intelligence (AI) systems in School (new January 2025) 28
Online Safety Education Programme
Contribution of Learners
Staff/volunteers
Governors
Families
Adults and Agencies

Technology

Filtering & Monitoring
Filtering
Monitoring
Technical Security
Mobile technologies
Social media
Digital and video images
Online Publishing
Data Protection
Cyber Security (new January 2025) 46

Outcomes

Introduction

This portfolio of school Online Safety Policy templates is intended to help leaders produce a suitable Online Safety Policy which will consider all current and relevant issues, in a whole school context, linking with other relevant policies such as a school's Safeguarding Policy, Behaviour Policy and Anti-Bullying Policy.

The requirement that learners can use digital technologies appropriately and safely is addressed as part of the wider duty of care to which all who work in schools are bound. Schools must, through their Online Safety Policy, meet their statutory obligations to ensure that learners are safe and are protected from potential harm, both on and off-site. It will also form part of the school's protection from legal challenge, relating to the use of digital technologies.

These policy templates suggest policy statements which, in the view of SWGfL, would be essential in any school Online Safety Policy, based on good practice. In addition, there are a range of alternative statements that schools should consider, in their particular circumstances.

An effective Online Safety Policy must be tailored to the needs of each school and an important part of the process will be the discussion and consultation which takes place during the writing or review of the policy. It is best practice that the school reviews their Online Safety Policy at least annually and, if necessary, more frequently in response to any significant new technological developments or trends in technology related behaviours.

The DfE Keeping Children Safe in Education statutory guidance requires Local Authorities, Multi Academy Trusts, and schools in England to ensure learners are safe from harm:

> *"It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate"*
>
> *"Governing bodies and proprietors should ensure online safety is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement"*

The DfE Keeping Children Safe in Education guidance also recommends:

> *Reviewing online safety ... Technology, and risks and harms related to it, evolve, and change rapidly. Schools and colleges should consider carrying out an annual review of their approach to online*

safety, supported by an annual risk assessment that considers and reflects the risks their children face. A free online safety self-review tool for schools can be found via the 360 safe self-review tool.

The DfE Keeping Children Safe in Education guidance suggests that:

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

contact: being subjected to harmful online interaction with other users; for example: 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: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual 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.

Schools in England are subject to an increased level of scrutiny of their online safety practices by Ofsted Inspectors during inspections, while the Counter Terrorism and Securities Act 2015 requires schools to ensure that children and young people are safe from terrorist and extremist material on the internet.

With its optional statements and guidance notes, this portfolio of templates is longer than the resulting policy document is likely to be. It is intended that, while covering this complex and ever-changing issue, the resulting policy document should be concise and easily understood if it is to be effective and adopted by all. The templates are based on current best practice policies and procedures and schools can amend them to suit their requirements.

Guidance notes

- Within the templates, sections which include information or guidance are shown in BLUE. It is anticipated that schools would amend or remove these sections from their completed policy document, though this will be a decision for the school group that produces the policy.
- It is strongly advised that sections formatted in **BOLD** are retained, as they should form an essential part of a school's Online Safety Policy.

- Where sections in the template are formatted in *ITALICS*, it is anticipated that schools would wish to carefully consider whether to include that section or statement in their completed policy.
- The first part of this document provides a template for an overall Online Safety Policy for the school. The appendices contain acceptable use agreement templates and more detailed, specific policy templates. It will be for schools to decide which of these documents they choose to amend and adopt.
- The document will use the term school to encompass schools and academies. The term learner is used generically to cover pupils, students, and children. The term Headteacher is intended to cover Headteachers and Principals.

Glusburn Community Primary and Nursery School

Online Safety Policy

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

Date created: 20/08/2024

REVIEWED ON: AUG 2025

Scope of the Online Safety Policy

This Online Safety Policy outlines the commitment of Glusburn Community Primary and Nursery School to safeguard members of our school community online in accordance with statutory guidance and best practice. *Schools should be aware of the legislative framework under which this Online Safety Policy template and guidance has been produced as outlined in the attached 'Legislation' Appendix.*

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

Glusburn Community Primary and Nursery 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.

Policy development, monitoring and review

This Online Safety Policy has been developed by the school community.

- *headteacher/senior leaders*
- *Designated safeguarding lead (DSL)*
- *Online Safety Lead (OSL)*
- *staff – including teachers/support staff/technical staff*
- *governors*
- *parents and carers*

Consultation with the whole school community has taken place.

Schedule for development, monitoring and review

This Online Safety Policy was approved by the *school governing body on:*	*October 2024*
The implementation of this Online Safety Policy will be monitored by:	*The senior leadership team*
Monitoring will take place at regular intervals:	*At least termly*
The *governing body* will receive a report on the implementation of the Online Safety Policy generated by the monitoring group (which will include anonymous details of online safety incidents) at regular intervals:	*Via Headteacher report to governors*
The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new technological developments, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	*SEPT 2026*
Should serious online safety incidents take place, the following external persons/agencies should be informed:	*LA safeguarding officer* *Police (if required)*

Process for monitoring the impact of the Online Safety Policy

The school will monitor the impact of the policy using:

- *logs of reported incidents*
- *Filtering and monitoring logs*
- *internal monitoring data for network activity*
- *Feedback from:*
    - *learners*
    - *parents and carers*
    - *staff.*

Policy and leadership

Responsibilities

To ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviours, learning from each other and from good practice elsewhere, reporting inappropriate online behaviours, concerns, and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals[1] and groups within the school.

Headteacher and senior leaders

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding, though the day-to-day responsibility for online safety is held by the Designated Safeguarding Lead, as defined in Keeping Children Safe in Education.
- The headteacher and (at least) another member of the senior leadership team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff[2].
- The headteacher/senior leaders are responsible for ensuring that the Designated Safeguarding Lead / Online Safety Lead, IT provider/technical staff, and other relevant staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.
- The headteacher/senior leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role.
- The headteacher/senior leaders will receive regular monitoring reports from the Designated Safeguarding Lead / Online Safety Lead.
- The headteacher/senior leaders will work with the **responsible Governor, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring.**

[1] In a small school some of the roles described may be combined, though it is important to ensure that there is sufficient 'separation of responsibility' should this be the case.

[2] See flow chart on dealing with online safety incidents in 'Responding to incidents of misuse' and relevant local authority/MAT/ HR/other relevant body disciplinary procedures.

Governors

The DfE guidance "Keeping Children Safe in Education" states:

> "Governing bodies and proprietors should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare …. this includes … online safety"
>
> "Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)"

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy e.g. by asking the questions posed in the UKCIS document "Online Safety in Schools and Colleges – questions from the Governing Body".

This review will be carried out by the safeguarding governor/pupil & families committee who will receive regular information about online safety incidents and monitoring reports. A member of the governing body will take on the role of Online Safety Governor to include:

- regular meetings with the Designated Safeguarding Lead / Online Safety Lead
- regularly receiving (collated and anonymised) reports of online safety incidents
- checking that provision outlined in the Online Safety Policy (e.g. online safety education provision and staff training is taking place as intended)
- Ensuring that the filtering and monitoring provision is reviewed and recorded, at least annually. (The review will be conducted by members of the SLT, the DSL, and the IT service provider and involve the responsible governor) - in-line with the DfE Filtering and Monitoring Standards
- reporting to relevant governors group/meeting
- Receiving (at least) basic cyber-security training to enable the governors to check that the school meets the DfE Cyber-Security Standards

The governing body will also support the school in encouraging parents/carers and the wider community to become engaged in online safety activities.

Designated Safety Lead (DSL)

Keeping Children Safe in Education states that:

> *"The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description."*

They (the DSL) "are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college"

*They (the DSL) "*can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online"

While the responsibility for online safety is held by the DSL and cannot be delegated, the school may choose to appoint an Online Safety Lead or other relevant persons to work in support of the DSL in carrying out these responsibilities. It is recommended that the school reviews the sections below for the DSL and OSL and allocate roles depending on the structure it has chosen

The DSL will:

- hold the lead responsibility for online safety, within their safeguarding role.
- Receive relevant and regularly updated training in online safety to enable them to understand the risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online
- meet regularly with the online safety governor to discuss current issues, review (anonymised) incidents and filtering and monitoring logs and ensuring that annual (at least) filtering and monitoring checks are carried out
- attend relevant governing body meetings/groups
- report regularly to headteacher/senior leadership team
- be responsible for receiving reports of online safety incidents and handling them, and deciding whether to make a referral by liaising with relevant agencies, ensuring that all incidents are recorded.
- liaise with staff and IT providers on matters of safety and safeguarding and welfare (including online and digital safety)

Online Safety Lead

- The Online Safety Lead will:
- lead the Online Safety Group
- work closely on a day-to-day basis with the Designated Safeguarding Lead (DSL), (where these roles are not combined)
- receive reports of online safety issues, being aware of the potential for serious child protection concerns and ensure that these are logged to inform future online safety developments
- have a leading role in establishing and reviewing the school online safety policies/documents
- promote an awareness of and commitment to online safety education / awareness raising across the school and beyond

- liaise with curriculum leaders to ensure that the online safety curriculum is planned, mapped, embedded and evaluated
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents
- provide (or identify sources of) training and advice for staff/governors/parents/carers/learners
- liaise with (school/local authority/external provider) technical staff, pastoral staff and support staff (as relevant)
- receive regularly updated training to allow them to understand how digital technologies are used and are developing (particularly by learners) with regard to the areas defined In Keeping Children Safe in Education:
    - content
    - contact
    - conduct
    - commerce

Curriculum Leads

Curriculum Leads will work with the DSL/OSL to develop a planned and coordinated online safety education programme.

This will be provided through:

- a discrete programme
- PHSE and SRE programmes
- A mapped cross-curricular programme
- assemblies and pastoral programmes
- through relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week.

Teaching and support staff

School staff are responsible for ensuring that:

- they have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices
- they understand that online safety is a core part of safeguarding
- they have read, understood, and signed the staff acceptable use agreement (AUA)
- they follow all relevant guidance and legislation including, for example, Keeping Children Safe in Education and UK GDPR regulations
- all digital communications with learners, parents and carers and others should be on a professional level *and only carried out using official school systems and devices (where staff use AI, they should only use school-approved AI services for work purposes which have been evaluated to comply with organisational security and oversight requirements*

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

IT Provider

The DfE Filtering and Monitoring Standards says:

> *"Senior leaders should work closely with governors or proprietors, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring. Your IT service provider may be a staff technician or an external service provider."*

"Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The DSL should work closely together with IT service providers to meet the needs of your setting. You may need to ask filtering or monitoring providers for system specific training and support."

"The IT service provider should have technical responsibility for:

- *maintaining filtering and monitoring systems*
- *providing filtering and monitoring reports*
- *completing actions following concerns or checks to systems"*

"The IT service provider should work with the senior leadership team and DSL to:

- *procure systems*
- *identify risk*
- *carry out reviews*
- *carry out checks"*

"We are aware that there may not be full-time staff for each of these roles and responsibility may lie as part of a wider role within the school, college, or trust. However, it must be clear who is responsible, and it must be possible to make prompt changes to your provision."

Glusburn Community Primary and Nursery School use Smoothwall provided by North Yorkshire Council.

They are responsible for ensuring that:

- they are aware of and follow the school Online Safety Policy and Technical Security Policy to carry out their work effectively in line with school policy
- the school technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets (as a minimum) the required online safety technical requirements as identified by the DfE Meeting Digital and Technology Standards in Schools & Colleges and guidance from local authority / MAT or other relevant body
- there is clear, safe, and managed control of user access to networks and devices
- they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- the use of technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported to the Headteacher for investigation and action
- the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person
- monitoring systems are implemented and regularly updated as agreed in school policies

Learners

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement and Online Safety Policy
- should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology.
- should avoid plagiarism and uphold copyright regulations, taking care when using Artificial Intelligence (AI) services to protect the intellectual property of themselves and others and checking the accuracy of content accessed through AI services.
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school, if related to their membership of the school.

Parents and carers

Parents and carers play a crucial role in ensuring that their children understand the need to use the online services and devices in an appropriate way.

The school will take every opportunity to help parents and carers understand these issues through:

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

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

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

Community users

Community users who access school systems/website/learning platform as part of the wider school provision will be expected to sign a community user AUA before being provided with access to school systems.

The school encourages the engagement of agencies/members of the community who can provide valuable contributions to the online safety provision and actively seeks to share its knowledge and good practice with other schools and the community.

Professional Standards

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

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

Policy

Online Safety Policy

The DfE guidance "Keeping Children Safe in Education" states:

> "Online safety and the school or college's approach to it should be reflected in the child protection policy"

The school Online Safety Policy:

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

- is supplemented by a series of related acceptable use agreements
- is made available to staff at induction and through normal communication channels (to be described)
- *is published on the school website.*

Acceptable use

The school has defined what it regards as acceptable/unacceptable use and this is shown in the tables below.

Acceptable use agreements

An Acceptable Use Agreement is a document that outlines a school's expectations on the responsible use of technology by its users. In most schools they are signed or acknowledged by their staff as part of their conditions of employment.

The Online Safety Policy and acceptable use agreements define acceptable use at the school. The acceptable use agreements will be communicated/re-enforced through:

- staff induction
- posters/notices around where technology is used
- communication with parents/carers
- built into education sessions
- school website
- peer support.

Schools should discuss and agree which activities are acceptable/unacceptable. This will vary with the size/structure of the school and the ages of the learners. It is recommended that the school discuss and agree on these activities and to complete the following tables as guidance for members of the school community:

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not access online content (including apps, games, sites) to make, post, download, upload, data transfer, communicate or	**Any illegal activity for example:** • Child sexual abuse imagery* • Child sexual abuse/exploitation/grooming • Terrorism • Encouraging or assisting suicide • Offences relating to sexual images i.e., revenge and extreme pornography					X

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
pass on, material, remarks, proposals or comments that contain or relate to:	• Incitement to and threats of violence • Hate crime • Public order offences - harassment and stalking • Drug-related offences • Weapons / firearms offences • Fraud and financial crime including money laundering N.B. Schools should refer to guidance about dealing with self-generated images/sexting – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges					
Users shall not undertake activities that might be classed as cyber-crime under the Computer Misuse Act (1990)	• Using another individual's username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised) • Gaining unauthorised access to school networks, data and files, through the use of computers/devices • Creating or propagating computer viruses or other harmful files • Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords) • Disable/Impair/Disrupt network functionality through the use of computers/devices • Using penetration testing equipment (without relevant permission) N.B. Schools will need to decide whether these should be dealt with internally or by the police. Serious or repeat offences should be reported to the police. The National Crime Agency has a remit to prevent learners becoming involved in cyber-crime and harness their activity in positive ways– further information here					x

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not undertake activities that are not illegal but are classed as unacceptable in school policies:	Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs)			X	X	
	Promotion of any kind of discrimination				X	
	Using school systems to run a private business				X	
	Using systems, applications, websites or other mechanisms that bypass the filtering/monitoring or other safeguards employed by the school				X	
	Infringing copyright				X	
	Unfair usage (downloading/uploading large files that hinders others in their use of the internet)			X	X	
	Any other information which may be offensive to others or breaches the integrity of the ethos of the school or brings the school into disrepute				X	

The school may also wish to add some of the following policy statements about the use of communications technologies, in place of, or in addition to the above table.

	Staff and other adults				**Learners**			
	Not allowed	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission/awareness
Online gaming	X							X
Online shopping/commerce			X		X			
File sharing		X			X			
Social media			X		X			
Messaging/chat			X		X			
Entertainment streaming e.g. Netflix, Disney+			X		X			
Use of video broadcasting, e.g. YouTube, Twitch, TikTok			X		X			
Mobile phones may be brought to school		X					X	
Use of mobile phones for learning at school	X				X			
Use of mobile phones in social time at school			X		X			
Taking photos on mobile phones/cameras	X				X			
Use of other personal devices, e.g. tablets, gaming devices			X		X			
Use of personal e-mail in school, or on school network/wi-fi			X		X			
Use of AI services that have not been approved by the school			X		X			

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

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

Reporting and responding

The 2021 Ofsted "Review of Sexual Abuse in Schools and Colleges" highlighted the need for schools to understand that reporting systems do not always respond to the needs of learners. While the report looks specifically at harmful sexual behaviours, schools may wish to address these issues more generally in reviewing their reporting systems. The Ofsted review suggested:

> *"School and college leaders should create a culture where sexual harassment and online sexual abuse are not tolerated, and where they identify issues and intervene early to better protect children and young people. ..In order to do this, they should assume that sexual harassment and online sexual abuse are happening in their setting, even when there are no specific reports, and put in place a whole-school approach to address them. This should include:*
>
> - *routine record-keeping and analysis of sexual harassment and sexual violence, including online, to identify patterns and intervene early to prevent abuse"*

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

- there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the school safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies.
- all members of the school community will be made aware of the need to report online safety issues/incidents
- reports will be dealt with as soon as is practically possible once they are received
- the Designated Safeguarding Lead, Online Safety Lead and other responsible staff have appropriate skills and training to deal with online safety risks.

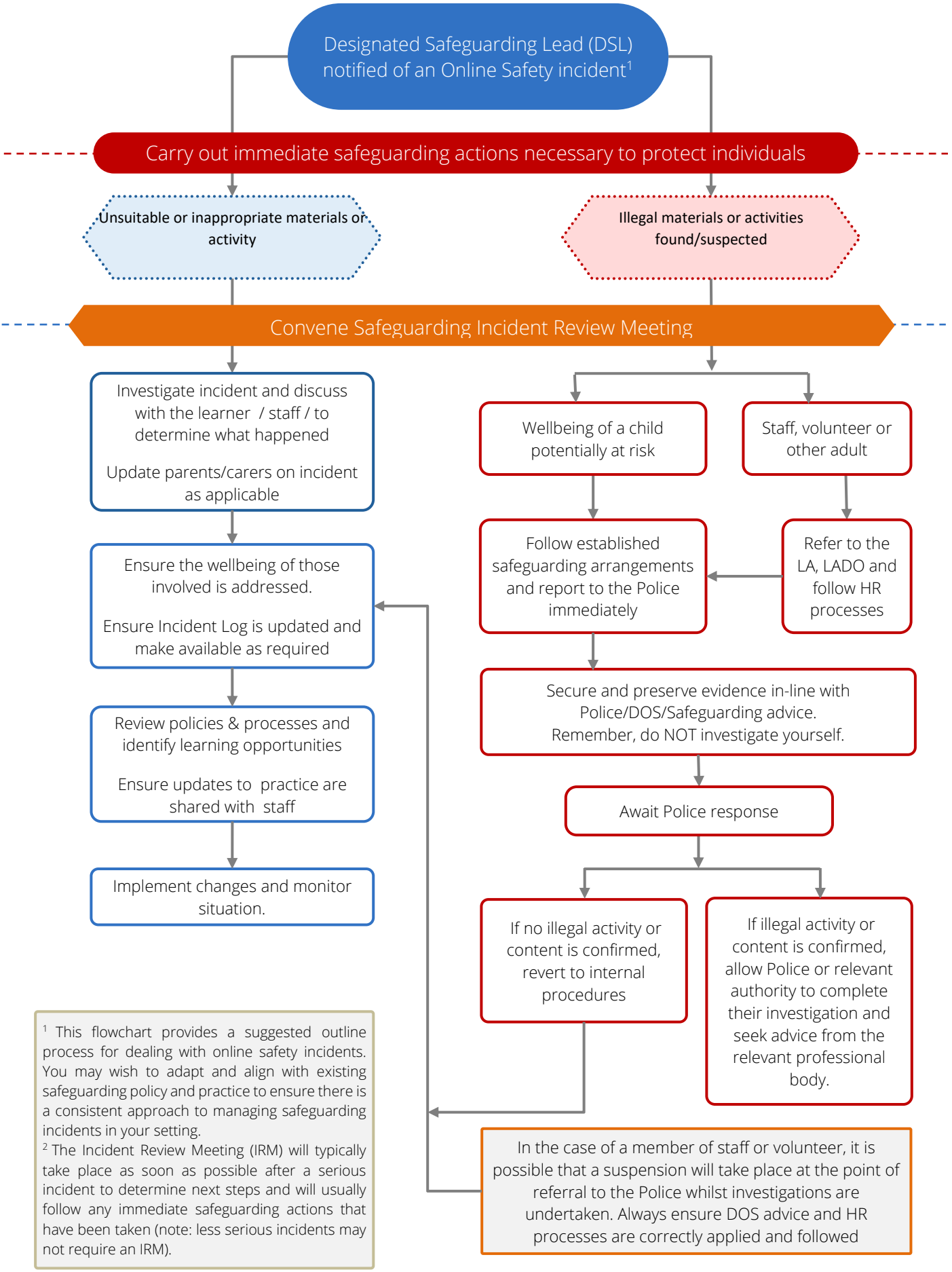
- if there is any suspicion that the incident involves any illegal activity or the potential for serious harm (see flowchart and user actions chart in the appendix), the incident must be escalated through the agreed school safeguarding procedures, this may include
    - Non-consensual images
    - Self-generated images
    - Terrorism/extremism
    - Hate crime/ Abuse
    - Fraud and extortion
    - Harassment/stalking
    - Child Sexual Abuse Material (CSAM)
    - Child Sexual Exploitation Grooming
    - Extreme Pornography
    - Sale of illegal materials/substances
    - Cyber or hacking offences under the Computer Misuse Act
    - Copyright theft or piracy

- any concern about staff misuse will be reported to the Headteacher, unless the concern involves the Headteacher, in which case the complaint is referred to the Chair of Governors and the local authority.
- where AI is used to support monitoring and incident reporting, human oversight is maintained to interpret nuances and context that AI might miss
- where there is no suspected illegal activity, devices may be checked using the following procedures:
    - one or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
    - conduct the procedure using a designated device that will not be used by learners and, if necessary, can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). Use the same device for the duration of the procedure.
    - ensure that the relevant staff have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
    - record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed, and attached to the form
    - 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
        - police involvement and/or action

- it is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively
- there are support strategies in place e.g., peer support for those reporting or affected by an online safety incident
- incidents should be logged via CPOMs or the management system (for staff incidents)
- relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority; police; Professionals Online Safety Helpline; Reporting Harmful Content; CEOP.
- those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions
- learning from the incident (or pattern of incidents) will be provided (as relevant and anonymously) to:
    - the Online Safety Group for consideration of updates to policies or education programmes and to review how effectively the report was dealt with
    - staff, through regular briefings
    - learners, through assemblies/lessons
    - parents/carers, through newsletters, school social media, website
    - governors, through regular safeguarding updates
    - local authority/external agencies, as relevant (The Ofsted Review into Sexual Abuse in Schools and Colleges suggested "working closely with Local Safeguarding Partnerships in the area where the school or college is located so they are aware of the range of support available to children and young people who are victims or who perpetrate harmful sexual behaviour"

The school will make the flowchart below available to staff to support the decision-making process for dealing with online safety incidents.

The flowchart below is new in January 2025. There is little change to the content, but the flowchart has been re-designed to make it easier for schools to edit. Schools are recommended to replace previous versions with this.



[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).

School actions

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/disciplinary procedures as follows:

Responding to Learner Actions

Incidents	Refer to class teacher/tutor	Refer to Head of Department / Principal Teacher / Deputy Head	Refer to Headteacher	Refer to Police/Social Work	Refer to local authority technical support for advice/action	Inform parents/carers	Remove device/ network/internet access	Issue a warning	Further sanction, in line with behaviour policy
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on User Actions on unsuitable/inappropriate activities).		X	X	X					
Attempting to access or accessing the school network, using another user's account (staff or learner) or allowing others to access school network by sharing username and passwords		x			x		x	x	
Corrupting or destroying the data of other users.			x			x	x		x
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature			x			x	x		x
Unauthorised downloading or uploading of files or use of file sharing.		x			x	x		x	
Using proxy sites or other means to subvert the school's filtering system.			x		x	x			x

Incidents	Refer to class teacher/tutor	Refer to Head of Department / Principal Teacher / Deputy Head	Refer to Headteacher	Refer to Police/Social Work	Refer to local authority technical support for advice/action	Inform parents/carers	Remove device/ network/internet	Issue a warning	Further sanction, in line with behaviour policy
Accidentally accessing offensive or pornographic material and failing to report the incident.		x			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	
Unauthorised use of digital devices (including taking images)		x					x	x	x
Unauthorised use of online services		x					x	x	x
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.			x			x	x		x
Continued infringements of the above, following previous warnings or sanctions.			x			x			x

Responding to Staff Actions

Incidents	Refer to line manager	Refer to Headteacher/ Principal	Refer to local authority/MAT/HR	Refer to Police	Refer to LA / Technical Support Staff for action re filtering, etc.	Issue a 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				
Actions which breach data protection or network / cyber-security rules.		X				X		
Deliberate actions to breach data protection or network security rules.		X	X		X			X
Deliberately accessing or trying to access offensive or pornographic material		X	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
Using proxy sites or other means to subvert the school's filtering system.		X	X		X		X	X
Unauthorised downloading or uploading of files or file sharing		X	X		X	X		X
Breaching copyright/ intellectual property or licensing regulations (including through the use of AI systems)		X			X	X		
Allowing others to access school network by sharing username and passwords or attempting to access or		X			X	X		

accessing the school network, using another person's account.								
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature		x	x		x			x
Incidents	Refer to line manager	Refer to Headteacher/ Principal	Refer to local authority/HR	Refer to Police	Refer to LA / Technical Support Staff for action re filtering, etc.	Issue a warning	Suspension	Disciplinary action
Using personal e-mail/social networking/messaging to carry out digital communications with learners and parents/carers	x					x		
Inappropriate personal use of the digital technologies e.g. social media / personal e-mail	x					x		
Careless use of personal data, e.g. displaying, holding or transferring data in an insecure manner	x					x		
Actions which could compromise the staff member's professional standing	x					x		
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.		x				x		x
Failing to report incidents whether caused by deliberate or accidental actions		x			x	x		x
Continued infringements of the above, following previous warnings or sanctions.								x

The use of Artificial Intelligence (AI) systems in School

A more detailed policy template (C6) can be found in the appendices, including a risk assessment matrix for the use of AI and an AI specific Staff Acceptable Use Agreement

As Generative Artificial Intelligence (gen AI) continues to advance and influence the world we live in , its role in education is also evolving. There are currently 3 key dimensions of AI use in schools: learner support, teacher support and school operations; ensuring all use is safe, ethical and responsible is essential.

We realise that there are risks involved in the use of Gen AI services, but that these can be mitigated through our existing policies and procedures, amending these as necessary to address the risks.

We will educate staff and learners about safe and ethical use of AI, preparing them for a future in which these technologies are likely to play an increasing role.

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

Policy Statements

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

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

Online Safety Education Programme

While regulation and technical solutions are particularly important, their use must be balanced by educating learners to take a responsible approach. The education of learners in online safety is

therefore an essential part of the school's online safety provision. Learners need the help and support of the school to recognise and avoid online safety risks and develop their resilience.

The 2021 Ofsted "Review of Sexual Abuse in Schools and Colleges" highlighted the need for:

> *"a carefully sequenced RSHE curriculum, based on the Department for Education's (DfE's) statutory guidance, that specifically includes sexual harassment and sexual violence, including online. This should include time for open discussion of topics that children and young people tell us they find particularly difficult, such as consent and the sending of 'nudes'.."*

Keeping Children Safe in Education states:

> "*Governing bodies and proprietors should ensure online safety is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum ...*"

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

A planned online safety curriculum for all year groups matched against a nationally agreed framework and regularly taught in a variety of contexts.

- Lessons are matched to need; are age-related and build on prior learning
- Lessons are context-relevant with agreed objectives leading to clear and evidenced outcomes
- Learner need and progress are addressed through effective planning and assessment
- Digital competency is planned and effectively threaded through the appropriate digital pillars in other curriculum areas e.g. PHSE; SRE; Literacy etc
- it incorporates/makes use of relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week
- the programme will be accessible to learners at different ages and abilities such as those with additional learning needs or those with English as an additional language.
- learners should be taught in all lessons to be critically aware of the materials/content they access online and be guided to validate the accuracy of information (including where the information is gained from Artificial Intelligence services)
- learners should be taught to acknowledge the source of information used and to respect copyright / intellectual property when using material accessed on the internet and particularly through the use of Artificial Intelligence services
- vulnerability is actively addressed as part of a personalised online safety curriculum e.g., for victims of abuse and SEND.

- learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school. Acceptable use is reinforced across the curriculum, with opportunities to discuss how to act within moral and legal boundaries online, with reference to the Computer Misuse Act 1990. Lessons and further resources are available on the CyberChoices site.
- staff should act as good role models in their use of digital technologies the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- where learners are allowed to freely search the internet, staff should be vigilant in supervising the learners and monitoring the content of the websites / tools (including AI systems) the learners visit
- where learners are allowed to freely search the internet, staff should be vigilant in supervising the learners and monitoring the content of the websites the young people visit
- it is accepted that from time to time, for good educational reasons, students may need to research topics, (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff should be able to request the temporary removal of those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need
- the online safety education programme should be relevant and up to date to ensure the quality of learning and outcomes.

Contribution of Learners

The school acknowledges, learns from, and uses the skills and knowledge of learners in the use of digital technologies. We recognise the potential for this to shape the online safety strategy for the school community and how this contributes positively to the personal development of young people. Their contribution is recognised through:

- mechanisms to canvass learner feedback and opinion.
- learners contribute to the online safety education programme e.g. peer education, digital leaders leading lessons for younger learners, online safety campaigns

Staff/volunteers

The DfE guidance "Keeping Children Safe in Education" states:

> "All staff should receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, all staff

should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively."

"Governing bodies and proprietors should ensure… that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning."

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

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

Governors

Governors should take part in online safety training/awareness sessions, with particular importance for those who are members of any sub-committee/group involved in technology/online safety/health and safety/safeguarding. This may be offered in several ways such as:

- attendance at training provided by the local authority or other relevant organisation
- participation in school training / information sessions for staff or parents (this may include attendance at assemblies/lessons).

A higher level of training will be made available to Safeguarding Governor. This will include:

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

Families

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

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

- regular communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes
- regular opportunities for engagement with parents/carers on online safety issues through awareness workshops / parent/carer evenings etc
- the learners – who are encouraged to pass on to parents the online safety messages they have learned in lessons and by learners leading sessions at parent/carer evenings.
- letters, newsletters, website, learning platform,
- high profile events / campaigns e.g. Safer Internet Day
- reference to the relevant web sites/publications, e.g. SWGfL; www.saferinternet.org.uk/; www.childnet.com/parents-and-carers (see Appendix for further links/resources).
- Sharing good practice with other schools in clusters

Adults and Agencies

The school will provide opportunities for local community groups and members of the wider community to gain from the school's online safety knowledge and experience. This may be offered through the following:

- online safety messages targeted towards families and relatives.
- providing family learning courses in use of digital technologies and online safety
- providing online safety information via their website and social media for the wider community
- supporting community groups, e.g. early years settings, childminders, youth/sports/voluntary groups to enhance their online safety provision

Technology

The DfE Filtering and Monitoring Standards states that "**Your IT service provider may be a staff technician or an external service provider".** If the school has an external technology provider, it is the responsibility of the school to ensure that the provider carries out all the online safety and security measures that would otherwise be the responsibility of the school. It is also important that the technology provider is fully aware of the school Online Safety Policy/acceptable use agreements

and the school has a Data Processing Agreement in place with them. The school should also check their local authority/other relevant body policies on these technical and data protection issues if the service is not provided by the authority and will need to ensure that they have completed a Data Protection Impact Assessment (DPIA) for this contract.

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

Filtering & Monitoring

The DfE guidance (for England) on filtering and monitoring in "Keeping Children Safe in Education" states:

> "It is essential that governing bodies and proprietors ensure that appropriate filtering and monitoring systems are in place …governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the … risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified…
>
> The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty. To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards…"

The school filtering and monitoring provision is agreed by senior leaders, governors and the IT Service Provider and is regularly reviewed (at least annually) and updated in response to changes in technology and patterns of online safety incidents/behaviours

Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The DSL will have lead responsibility for safeguarding and online safety and the IT service provider will have technical responsibility

The filtering and monitoring provision is reviewed (at least annually) by senior leaders, the Designated Safeguarding Lead and a governor with the involvement of the IT Service Provider.

- checks on the filtering and monitoring system are carried out by the IT Service Provider with the involvement of a senior leader, the Designated Safeguarding Lead and a governor, in

particular when a safeguarding risk is identified, there is a change in working practice, e.g. remote access or BYOD or new technology is introduced e.g. using SWGfL Test Filtering

Filtering

The DfE Technical Standards for Schools and Colleges states:

"Schools and colleges have a statutory responsibility to keep children and young people safe online as well as offline. Governing bodies and proprietors should make sure their school or college has appropriate filtering and monitoring systems in place, as detailed in the statutory guidance, Keeping children safe in education.

Filtering is preventative. It refers to solutions that protect users from accessing illegal, inappropriate and potentially harmful content online. It does this by identifying and blocking specific web links and web content in the form of text, images, audio and video

These standards help school and college leaders, designated safeguarding leads and IT support understand how to work together to make sure they can effectively safeguard their students and staff."

- a member of the SLT and a governor, are responsible for ensuring these standards are met. Roles and responsibilities of staff and third parties, for example, in-house or third-party IT support are clearly defined
- the school manages access to content across its systems for all users and on all devices using the schools internet provision. The filtering provided meets the standards defined in the DfE Filtering standards for schools and colleges and the guidance provided in the UK Safer Internet Centre Appropriate filtering.
- illegal content (e.g., child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation URL list and the police assessed list of unlawful terrorist content, produced on behalf of the Home Office. Content lists are regularly updated
- there are established and effective routes for users to report inappropriate content, recognising that no system can be 100% effective. These are acted upon in a timely manner, within clearly established procedures
- there is a clear process in place to deal with, and log, requests/approvals for filtering changes (see Appendix for more details).
- filtering logs are regularly reviewed and alert the Designated Safeguarding Lead to breaches of the filtering policy, which are then acted upon.
- There are regular checks of the effectiveness of the filtering systems . Checks are undertaken across a range of devices at least termly and the results recorded and analysed to inform and improve provision. The DSL and Governor are involved in the process and aware of the

findings. (Schools may wish to use e.g. using SWGfL Testfiltering.com to carry out these checks)

- Devices that are provided by the school have school-based filtering applied irrespective of their location.
- younger learners will use child friendly/age-appropriate search engines e.g. SWGfL Swiggle
- the school has a mobile phone policy and where personal mobile devices have internet access through the school network, content is managed in ways that are consistent with school policy and practice.
- access to content through non-browser services (e.g. apps and other mobile technologies) is managed in ways that are consistent with school policy and practice.

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

Monitoring

The DfE Technical Standards for Schools and Colleges states:

"Monitoring is reactive. It refers to solutions that monitor what users are doing on devices and, in some cases, records this activity. Monitoring can be manual, for example, teachers viewing screens as they walk around a classroom. Technical monitoring solutions rely on software applied to a device that views a user's activity. Reports or alerts are generated based on illegal, inappropriate, or potentially harmful activities, including bullying. Monitoring solutions do not block users from seeing or doing anything."

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

The school has monitoring systems in place, agreed by senior leaders and technical staff, to protect the school, systems and users: (Schools may wish to provide more specific details of their monitoring systems)

The school has monitoring systems in place to protect the school, systems and users:

- The school monitors all network use across all its devices and services.
- monitoring reports are urgently picked up, acted on and outcomes are recorded by the Designated Safeguarding Lead, all users are aware that the network (and devices) are monitored.
- There are effective protocols in place to report abuse/misuse. There is a clear process for prioritising response to alerts that require rapid safeguarding intervention.
- Management of serious safeguarding alerts is consistent with safeguarding policy and practice.

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

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

Technical Security

The school technical systems will be managed in ways that ensure that the school meets recommended technical requirements

- responsibility for technical security resides with SLT who may delegate activities to identified roles.
- all users have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the IT service provider and will be reviewed, at least annually, by the SLT/Online Safety Group
- password policy and procedures are implemented. (consistent with guidance from the National Cyber Security Centre)
- the security of their username and password and must not allow other users to access the systems using their log on details.
- A documented access control model is in place, clearly defining access rights to school systems and devices. This is reviewed annually. All users (staff and learners) have responsibility for the security of their username and password and must not allow other users to access the systems using their log on details. Users must immediately report any suspicion or evidence that there has been a breach of security
- all school networks and system will be protected by secure passwords. Passwords must not be shared with anyone. (see section on passwords in 'Technical security policy template' in the Appendix C1)
- the administrator passwords for school systems are kept in a secure place, e.g. school safe.
- there is a risk-based approach to the allocation of learner usernames and passwords. (see 'Technical security policy template' in the Appendix C1 for more information)
- there will be regular reviews and audits of the safety and security of school technical systems
- servers, wireless systems and cabling are securely located and physical access restricted

- appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems and devices from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up-to-date endpoint software.
- there are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud,
- The senior leadership team is responsible for ensuring that all software purchased by and used by the school is adequately licenced and that the latest software updates (patches) are applied.
- an appropriate system is in place for users to report any actual/potential technical incident/security breach to the relevant person, as agreed)
- use of school devices out of school and by family members is regulated by an acceptable use statement that a user consents to when the device is allocated to them
- personal use of any device on the school network is regulated by acceptable use statements that a user consents to when using the network
- staff members are not permitted to install software on a school-owned devices without the consent of the SLT/IT service provider
- removable media is not permitted unless approved by the SLT/IT service provider
- systems are in place to control and protect personal data and data is encrypted at rest and in transit. (See school personal data policy template in the appendix for further detail)
- mobile device security and management procedures are in place (where mobile devices are allowed access to school systems). (Schools may wish to add details of the mobile device security procedures that are in use).
- guest users are provided with appropriate access to school systems based on an identified risk profile.
- systems are in place that prevent the unauthorised sharing of personal / sensitive data unless safely encrypted or otherwise secured. (See school personal data policy template in the appendix for further detail).
- Care will be taken when using Artificial Intelligence services to avoid the input of sensitive information, such as personal data, internal documents or strategic plans, into third-party AI systems unless explicitly vetted for that purpose. Staff must always recognise and safeguard sensitive data.
- dual-factor authentication is used for sensitive data or access outside of a trusted network
- where AI services are used for technical security, their effectiveness is regularly reviewed, updated and monitored for vulnerabilities.
- Where AI services are used, the school will work with suppliers to understand how these services are trained and will regularly review flagged incidents to ensure equality for all users e.g. avoiding bias

Mobile technologies

The DfE guidance "Keeping Children Safe in Education" states:

> *"The school or college should have a clear policy on the use of mobile and smart technology. Amongst other things this will reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. Schools and colleges should carefully consider how this is managed on their premises and reflect this in their mobile and smart technology policy and their child protection policy.*

Mobile technology devices may be school owned/provided or personally owned and might include smartphone, tablet, wearable devices, notebook/laptop or other technology that usually has the capability of utilising the school's wireless network. The device then has access to the wider internet which may include the school learning platform and other cloud-based services such as e-mail and data storage.

All users should understand that the primary purpose of the use of mobile/personal devices in a school context is educational. The mobile technologies policy should be consistent with and inter-related to other relevant school polices including but not limited to those for safeguarding, behaviour, anti-bullying, acceptable use, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school's online safety education programme.

In preparing a mobile technologies policy the school should consider possible issues and risks. These may include:

- security risks in allowing connections to your school network
- filtering of personal devices
- breakages and insurance
- access to devices for all learners
- avoiding potential classroom distraction
- network connection speeds, types of devices
- charging facilities
- total cost of ownership.

A range of mobile technology strategies is possible. However, these need to be thoroughly researched, risk assessed and aligned with existing policy prior to implementation. A more detailed mobile technologies policy template can be found in the Appendix.

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

The school allows:

	School devices			**Personal devices**		
	School owned for individual use	School owned for multiple users	Authorised device[3]	Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	No (except Y6)	Yes	Yes
Full network access	Yes	Yes	Yes	No	No	No
Internet only					Yes	Yes (temporarily in some instances)

Aspects that the school may wish to consider and include in their Online Safety Policy, mobile technologies policy or acceptable use agreements may include the following:

School owned/provided devices:

- all school devices are managed though the use of Mobile Device Management software
- there is an asset log that clearly states whom a device has been allocated to. There is clear guidance on where, when and how use is allowed
- any designated mobile-free zone is clearly signposted
- personal use (e.g. online banking, shopping, images etc.) is clearly defined and expectations are well-communicated.
- the use of devices on trips/events away from school is clearly defined and expectation are well-communicated.
- liability for damage aligns with current school policy for the replacement of equipment.
- education is in place to support responsible use.

[3] Authorised device – purchased by the learner/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school.

Personal devices:

- there is a clear policy covering the use of personal mobile devices on school premises for all users
- where devices are used to support learning, staff have been trained in their planning, use and implementation, ensuring that all learners can access a required resource.
- where personal devices are brought to school, but their use is not permitted, appropriate, safe and secure storage should be made available. (this needs to be shaped according to current mobile phone school policy)
- use of personal devices for school business is defined in the acceptable use policy and staff handbook. Personal devices commissioned onto the school network are segregated effectively from school-owned systems
- the expectations for taking/storing/using images/video aligns with the school's acceptable use policy and use of images/video policy. The non-consensual taking/using of images of others is not permitted.
- liability for loss/damage or malfunction of personal devices is clearly defined
- there is clear advice and guidance at the point of entry for visitors to acknowledge school requirements
- education about the safe and responsible use of mobile devices is included in the school online safety education programmes

Social media

With widespread use of social media for professional and personal purposes a policy that sets out clear guidance for staff to manage risk and behaviour online is essential. Core messages should include the protection of learners, the school and the individual when publishing any material online.

Expectations for teachers' professional conduct are set out in the DfE Teachers Standards but all adults working with children and young people must understand that the nature and responsibilities of their work place them in a position of trust and that their conduct should reflect this.

All schools and local authorities have a duty of care to provide a safe learning environment for learners and staff. Schools could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, bully online, discriminate on the grounds of sex, race, or disability or who defame a third party may render the school 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 learners through:

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

- risk assessment, including legal risk.
- guidance for learners, parents/carers

School staff should ensure that:

- No reference should be made in social media to learners, parents/carers or school staff.
- they do not engage in online discussion on personal matters relating to members of the school community.
- personal opinions should not be attributed to the school.
- security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.
- they act as positive role models in their use of social media

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

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

Personal use

- personal communications are those made via personal social media accounts. In all cases, where a personal account is used which associates itself with, or impacts on, the school it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy
- personal communications which do not refer to or impact upon the school are outside the scope of this policy
- where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken
- the school permits reasonable and appropriate access to personal social media sites during breaks or before/after school.

Monitoring of public social media

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

School use of social media for professional purposes will be checked regularly by a senior leader and the Online Safety Lead to ensure compliance with the social media, data protection, communications, digital image and video policies. In the event of any social media issues that the school is unable to resolve support may be sought from the Professionals Online Safety Helpline.

The social media policy template in Appendix C4 provides more detailed guidance on the school's responsibilities and on good practice.

Digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and learners instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and learners need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for online bullying 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

- the school may use live-streaming or video-conferencing services in line with national and local safeguarding guidance / policies. Guidance can be found on the SWGfL Safer Remote Learning web pages and in the DfE Safeguarding and remote education
- when using digital images, staff will inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images.
- staff/volunteers must be aware of those learners whose images must not be taken/published. Those images should only be taken on school devices. The personal devices of staff should not be used for such purposes
- in accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other *learners* in the digital/video images
- *staff and volunteers are allowed to take digital/video images to support educational aims, but must follow school policies concerning the sharing, storage, distribution and publication of those images*
- *care should be taken when sharing digital/video images that learners are appropriately dressed*
- *learners must not take, use, share, publish or distribute images of others without their permission*
- *photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with Online Safety Policy*

- learners' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- written permission from parents or carers will be obtained before photographs of learners are taken for use in school or published on the school website/social media. (see parents and carers acceptable use agreement in the Appendix). Permission is not required for images taken solely for internal purposes
- parents/carers will be informed of the purposes for the use of images, how they will be stored and for how long – in line with the school data protection policy
- images will be securely stored in line with the school retention policy

Online Publishing

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

- Public-facing website
- Social media
- Newsletters

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

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

The school public online publishing provides information about online safety e.g., publishing the schools Online Safety Policy and acceptable use agreements; curating latest advice and guidance; news articles etc, creating an online safety page on the school website.

The website includes an online reporting process for parents and the wider community to register issues and concerns to complement the internal reporting process.

Data Protection

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

The school:

- has a Data Protection Policy. (See appendix for template policy)
- implements the data protection principles and can demonstrate that it does so

- has paid the appropriate fee to the Information Commissioner's Office (ICO)
- has appointed an appropriate Data Protection Officer (DPO) who has effective understanding of data protection law and is free from any conflict of interest. The school may also wish to appoint a Data Manager and Systems Controllers to support the DPO
- has a 'Record of Processing Activities' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- the Record of Processing Activities lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis is listed
- has an 'information asset register' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- information asset register lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis will have also been listed
- will hold the minimum personal data necessary to enable it to perform its function and will not hold it for longer than necessary for the purposes it was collected for. The school 'retention schedule" supports this
- data held is accurate and up to date and is held only for the purpose it was held for. Systems are in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- provides staff, parents, volunteers, teenagers, and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice (see Privacy Notice section in the appendix)
- has procedures in place to deal with the individual rights of the data subject, e.g. one of the dozen rights applicable is that of Subject Access which enables an individual to see/have a copy of the personal data held about them
- carries out Data Protection Impact Assessments (DPIA) where necessary e.g. to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier
- has undertaken appropriate due diligence and has data protection compliant contracts in place with any data processors
- understands how to share data lawfully and safely with other relevant data controllers.
- has clear and understood policies and routines for the deletion and disposal of data
- reports any relevant breaches to the Information Commissioner within 72hrs of becoming aware of the breach as required by law. It also reports relevant breaches to the individuals

affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents

- has a Freedom of Information Policy which sets out how it will deal with FOI requests
- provides data protection training for all staff at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff
- ensures that where AI services are used, data privacy is prioritised

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

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

Staff must ensure that they:

- at all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse
- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- can help data subjects understand their rights and know how to handle a request whether verbal or written and know who to pass it to in the school
- only use encrypted data storage for personal data
- will not transfer any school personal data to personal devices. Procedures should be in place to enable staff to work from home (i.e. a work laptop provided).
- use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data
- transfer data using encryption, a secure email account (where appropriate), and secure password protected devices.

The Personal Data Advice and Guidance in the appendix (B2) provides more detailed information on the school's responsibilities and on good practice.

Cyber Security (new January 2025)

The DfE Cyber security standards for schools and colleges explains:

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

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

The 'Cyber-security in schools: questions for governing bodies and Trustees' guidance produced by the National Cyber Security Centre (NCSC) aims to support governing bodies' and management committees' understanding of their education settings' cyber security risks. The guidance includes eight questions to facilitate the cyber security conversation between the governing body and school leaders, with the governing body taking the lead.

The school may wish to consider the following statements, amending them in the light of their current cybersecurity policy, processes and procedures:

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

Outcomes

The impact of the Online Safety Policy and practice is regularly evaluated through the review/audit of online safety incident logs; behaviour/bullying reports; surveys of staff, learners; parents/carers and is reported to relevant groups:

- there is balanced professional debate about the evidence taken from the reviews/audits and the impact of preventative work e.g., online safety education, awareness, and training
- there are well-established routes to regularly report patterns of online safety incidents and outcomes to school leadership and Governors
- parents/carers are informed of patterns of online safety incidents as part of the school's online safety awareness raising
- online safety (and related) policies and procedures are regularly updated in response to the evidence gathered from these reviews/audits/professional debate
- the evidence of impact is shared with other schools, agencies and LAs to help ensure the development of a consistent and effective local online safety strategy.

Appendix

Copies of the more detailed template policies and agreements, contained in the appendix, can be found in the links and resources section of the relevant aspects in the 360safe self-review tool and online on the SWGfL website. The appendices are as follows:

A2 - Learner Acceptable Use Agreement Template – KS2
A3 - Learner Acceptable Use Agreement Template – for younger learners (Foundation/KS1)
A4 - Parent/Carer Acceptable Use Agreement Template
A5 - Staff (and Volunteer) Acceptable Use Policy Agreement Template
A6 - Community Users Acceptable Use Agreement Template
A7 – Online Safety Group Terms of Reference Template
A8 - Harmful Sexual Behaviour Policy Template (new template added September 2022)
A9 - Computer Misuse and Cyber Choices Policy Template
A10 - Responding to incidents of misuse – flow chart
A11 - Record of reviewing devices/internet sites (responding to incidents of misuse)
A12 - Reporting Log
B1 - Training Needs Audit Log
C1 - Technical Security Policy Template (including filtering and passwords)
C2 - Personal Data Advice and Guidance
C3 - School Online Safety Policy Template: Electronic Devices - Searching Screening and Confiscation (new DfE guidance from September 2022)

C4 - Mobile Technologies Policy Template (inc. BYOD/BYOT)
C5 - Social Media Policy Template
C6 The use of Artificial Intelligence (AI) in Schools Policy Template

Legislation
Links to other organisations and resources
Glossary of Terms

School Online Safety Policy Template Appendices

Appendices

A2 - Learner Acceptable Use Agreement Template – KS2
A3 - Learner Acceptable Use Agreement Template – for younger learners (Foundation/KS1)
A4 - Parent/Carer Acceptable Use Agreement Template
A5 - Staff (and Volunteer) Acceptable Use Policy Agreement Template
A6 - Community Users Acceptable Use Agreement Template
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A11 - Record of reviewing devices/internet sites (responding to incidents of misuse)
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A2 Learner Acceptable Use Agreement Template – for KS2

Introduction

Digital technologies have become integral to the lives of children and young people, both within and outside schools. These technologies are powerful tools, which open-up new opportunities for everyone. They can stimulate discussion, encourage creativity, and stimulate awareness of context to promote effective learning. Learners should have an entitlement to safe access to these digital technologies.

This acceptable use agreement is intended:

- to ensure that learners will have good access to devices and online content, be responsible users and stay safe while using digital technologies for educational, personal and recreational use
- to help learners understand good online behaviours that they can use in school, but also outside school
- to protect school devices and networks from accidental or deliberate misuse that could put the security of the systems and users at risk.

Acceptable Use Agreement

I agree to use the school's digital systems safely and responsibly to protect me, other learners and the school.

Keeping Safe Online

- The school will check how I use devices and the internet to keep everyone safe.
- I will keep my usernames and passwords private and tell a trusted adult if someone else knows them.
- I will be careful when talking to people online and will only talk to people I know and trust.
- I will not share personal information like my name, address, or photos without asking a trusted adult.
- I will only take or share images of myself, or others, when fully dressed.
- If I see or hear something online that worries or upsets me, I will tell a trusted adult straight away.
- I will only meet people I have spoken to online if a trusted adult is with me.

Using Computers and the Internet Sensibly

- I will only use devices, apps and sites that I am allowed to, and will check if I am unsure.

- I will always ask permission and check with a trusted adult before using someone else's work or pictures.
- I will make sure the information I find online is true by checking carefully.
- I will only use apps or tools, like AI, that my teacher has said are OK, and I will ask for help if I'm unsure.
- I will not copy or use music, videos, or games unless I have permission.
- I will tell a trusted adult about any damage to devices or if anything else goes wrong.
- I will check with trusted adults before clicking on any unexpected messages or links (even if these look as though they are from people that I already know).

Being Respectful and Responsible

- I will treat others kindly online, just as I do in real life.
- I will make good choices about what I share online to protect myself and others.
- I will spend a healthy amount of time using devices and make time for other activities too.
- I will always think about how my behaviour online could affect me, my friends, and my school.

What Happens If I Break These Rules

- If I don't follow these rules, my teacher may stop me from using computers or devices, speak to my parents, or take other actions to help me make better choices in the future.

By following these rules, I can enjoy using technology safely and responsibly.

I have read and understand the above and agree to follow these guidelines when:

- I use the school systems and devices (both in and out of school)
- I use my own devices in the school (when allowed) e.g. mobile phones, gaming devices USB devices, cameras etc.
- I am out of school and involved in any online behaviour that might affect the school or other members of the school.

A3 Learner Acceptable Use Agreement Template – for younger learners (Foundation/KS1)

This is how we stay safe when we use computers:

Our Technology Rules

I will follow these rules to use computers, tablets and the internet safely at school.

Staying Safe

- My teacher will watch what I do on computers, tablets and the internet to keep me safe.
- I will keep my passwords secret and tell my teacher if I need help.
- I understand that people online are not always who they say they are. I will only talk to people online if my teacher or a trusted adult says it's OK.
- I will not share my name, address, or pictures without asking my teacher or a trusted adult first.
- If I see something that makes me feel worried or upset, I will tell my teacher or a trusted adult straight away.
- I will only use apps, games or websites my teacher says are safe.

Using Technology Kindly

- I will be kind when using technology, just like I am in real life.
- I will take care of the computers and tablets I use.
- I will only look at things my teacher says are OK.

Making Good Choices

- I will ask my teacher before I use someone else's pictures or work.
- I will take breaks from screens and do other fun things too.
- I know that I can say no / please stop to anyone online who makes me feel sad, uncomfortable, embarrassed or upset.
- I will ask for help from a trusted adult if I am not sure what to do or if I think I may have done something wrong.

What Happens If I Forget the Rules

- If I forget the rules, my teacher will help me learn to make better choices next time.

These rules help us all stay safe and have fun using computers and tablets at school!

A4 Parent/Carer Acceptable Use Agreement Template

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies provide powerful tools, which open new opportunities for everyone. They can stimulate discussion, promote creativity, and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This acceptable use policy is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that parents and carers are aware of the importance of online safety and are involved in the education and guidance of young people with regard to their on-line behaviour.

The school will try to ensure that learners have good access to digital technologies to enhance their learning and will, in return, expect the learners to agree to be responsible users.

I understand that the school will take every reasonable precaution, including monitoring and filtering systems, to ensure that young people will be safe when they use the internet and systems. I also understand that the school cannot ultimately be held responsible for the nature and content of materials accessed on the internet and using mobile technologies.

I understand that my son's/daughter's activity on the systems will be monitored and that the school will contact me if they have concerns about any possible breaches of the acceptable use agreement.

I will encourage my child to adopt safe use of the internet and digital technologies at home and will inform the school if I have concerns over my child's online safety.

Use of Digital/Video Images

The use of digital/video images plays an important part in learning activities. Learners and members of staff may use digital cameras to record evidence of activities in lessons and out of school. These images may then be used in presentations in subsequent lessons.

Images may also be used to celebrate success through their publication in newsletters, on the school website and occasionally in the public media. Where an image is publicly shared by any means, only your child's first name will be used.

The school will comply with the Data Protection Act and request parent's/carer's permission before taking images of members of the school. We will also ensure that when images are published that the young people cannot be identified by the use of their names.

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 published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other learners in the digital/video images.

A5 Staff (and Volunteer) Acceptable Use Policy Agreement Template

School Policy

Digital technologies have become integral to the lives of everyone, including children and young people , both within schools and in their lives outside school. The internet and digital technologies are powerful tools, which can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. They also bring opportunities for staff to be more creative and productive in their work. The school has the right to protect itself and its systems and all users should have an entitlement to safe access to the internet and digital technologies at all times.

This acceptable use policy is intended to ensure:

- that staff and volunteers will be responsible users and stay safe while online and using digital technologies for educational, personal and recreational use
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk
- that staff are protected from potential risk in their use of technology in their everyday work.

The school will try to ensure that staff and volunteers will have good access to digital technology to enhance their work, to enhance learning opportunities and will, in return, expect staff and volunteers to agree to be responsible users.

Acceptable Use Policy Agreement

I understand that I must use school systems in a responsible way, to minimise the risk to the safety, privacy or security of the school community and its systems. I acknowledge the potential of digital technologies for enhancing learning and will endeavour to integrate them in a way that aligns with the school's policy, ethos and values.

For my professional and personal safety:

I understand that the school will monitor my use of school devices and digital technology systems

- I understand that the rules set out in this agreement also apply to use of these devices and technologies out of school, and to the transfer of personal / sensitive data (digital or paper based) out of the school
- I understand that the school devices and digital technology systems are primarily intended for educational use and that I will only use them for personal or recreational use within relevant school policies. .
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password.
- I will store my passwords securely and in line with the school's relevant security policy.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.

I will be professional in my communications and actions when using digital technologies and systems:

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner. I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and/or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital/video images, and taking account of parental permissions. I will not use my personal equipment to record these images, unless I have permission to do so. Where these images are published (e.g. on the school website) it will not be possible to identify by name, or other personal information, those who are featured.
- I will only use social networking sites in the school in accordance with school policies.
- I will only communicate with learners and parents/carers using official school systems. Any such communication will be professional in tone and manner.
- I will not engage in any online activity that may compromise my professional responsibilities.

The school has the responsibility to provide safe and secure access to technologies and ensure the smooth running of the school:

I will abide by all relevant guidance and legislation (e.g., Keeping Children Safe in Education / UK GDPR)

- I will ensure that I am aware of cyber-security risks and that I will not respond to any communications that might put my / school data or systems at risk from attack
- When using AI systems in my professional role I will use these responsibly and:
  - will only use AI technologies approved by the school
  - will be aware of the risks of bias and discrimination, critically evaluating the outputs of AI systems for such risks
  - to protect personal and sensitive data, I will ensure that I have explicit authorisation when uploading sensitive school-related information into AI systems
  - will take care not to infringe copyright or intellectual property conventions – care will be taken to avoid intellectual property, including that of the learners, being used to train generative AI models without appropriate consent.
  - ensure that documents, emails, presentations, and other outputs influenced by AI include clear labels or notes indicating AI assistance
  - critically evaluate AI-generated outputs to ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing
  - will use generative AI tools responsibly to create authentic and beneficial content, ensuring respect for individuals' identity and well-being

- *When I use my personal mobile devices in school, I will follow the rules set out by the school, in the same way as if I was using school equipment. I will ensure that any such devices are protected by up to date anti-virus / anti-malware software and are free from viruses.*
- *When communicating in a professional capacity, I will only use technology and systems sanctioned by the school.*
- *I will not use personal accounts on school systems.*
- I will exercise informed safe and secure practice when accessing links to content from outside of my organisation to reduce the risk of cyber security threats.
- I will ensure that my data is regularly backed up, in accordance with relevant school policies.
- I will not access illegal, inappropriate or harmful content on school systems.
- I will not bypass any filtering or security systems that are used to prevent access to such content.
- I will not install or attempt to install unauthorised programmes of any type on a school device , nor will I try to alter device settings, unless this is allowed in school policies
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in the school Data Security Policy (or other relevant policy). Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper based documents containing personal data must be held in lockable storage.
- I understand that the data protection policy requires that any staff or learner data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by school policy to disclose such information to an appropriate authority.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.

When using the internet in my professional capacity or for school sanctioned personal use:

- I will ensure that I have appropriate permissions to use the original work of others in my own work and will reflect this with appropriate acknowledgements, particularly where AI has been used to generate content
- Where content is protected by copyright, I will not download or distribute copies (including music and videos).

I understand that I am responsible for my actions in and out of the school:

- I understand that this acceptable use agreement applies to my use of digital technologies related to my professional responsibilities , within or outside of the school.
- I will ensure my use of technologies and platforms is in line with the school's agreed codes of conduct.

- I understand that if I fail to comply with this acceptable use agreement, I could be subject to disciplinary action. This could include a warning, a suspension, referral to Governors and/or the Local Authority / Trust in the event of illegal activities, the involvement of the Police.

I have read and understand the above and agree to use the school digital technology systems (both in and out of the school) and my own devices (in the school and when carrying out communications related to the school) within these guidelines.

A6 Acceptable Use Agreement for Community Users Template

This acceptable use agreement is intended to ensure:

- that community users of school digital technologies will be responsible users and stay safe while using these systems and devices
- that school systems, devices and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that users are protected from potential harm in their use of these systems and devices

Acceptable Use Agreement

I understand that I must use school systems and devices in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems, devices and other users. This agreement will also apply to any personal devices that I bring into the school:

- I understand that my use of school systems and devices will be monitored
- I will not use a personal device that I have brought into school for any activity that would be inappropriate in a school setting.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, terrorist and extremist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.
- I will not access, copy, remove or otherwise alter any other user's files, without permission.
- I will ensure that if I take and/or publish images of others I will only do so with their permission. I will not use my personal equipment to record these images, without permission. If images are published it will not be possible to identify by name, or other personal information, those who are featured.
- I will not publish or share any information I have obtained whilst in the school on any personal website, social networking site or through any other means, unless I have permission from the school.
- I will not, without permission, make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a school device, nor will I try to alter computer settings, unless I have permission to do so.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will immediately report any damage or faults involving equipment or software, whatever the cause.
- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).

- I understand that if I fail to comply with this acceptable use agreement, the school has the right to remove my access to school systems/devices

I have read and understand the above and agree to use the school systems (both in and out of school) and my own devices (in school and when carrying out communications related to the school) within these guidelines.

As the school is collecting personal data by issuing this form, it should inform community users about:

Who will have access to this form.	How this form will be destroyed.
Where this form will be stored.	How long this form will be stored for.

Name: ..... Signed: ..... Date: .....

A8 School Online Safety Policy Template – Harmful Sexual Behaviour

Background context and legislation.

Introduction

The South West Grid for Learning Trust (SWGfL) is a charity that has been at the forefront of supporting schools with online safety and security for 20 years and was recognised as a world leader in online safety innovation in a DCMS report.

The Harmful Sexual Behaviour Support Service (HSBSS) for England was created at the start of 2022. HSBSS is a unique project, funded by the UK Home Office in response to the Everyone's Invited revelations and the subsequent reviews by Ofsted. Drawing upon our existing expertise in supporting victims of online harm we fast-tracked the creation of the service within 14 working days of the request. We work in partnership with the Marie Collins Foundation. We have a current and up-to-date understanding about how online sexual harassment manifests in schools. Overwhelmingly we speak with safeguarding leads about often complex cases involving children and young people in their school.

Legislative background and context

Key Documents:

- Department for Education: Keeping Children Safe in Education
- Department for Education: Sexual violence and sexual harassment between children in schools and colleges
- Everyone's Invited
- Department for Education: Sharing Nudes and Semi-Nudes: Advice for Education Settings working with Young People
- Ofsted: Review of sexual abuse in schools and colleges
- Department for Education: Teaching Online Safety in Schools
- Department for Education: Working together to safeguard children
- Report Harmful Content: Laws about harmful behaviours

In March 2021 it was discovered that the Everyone's Invited website was holding "testimonials" about incidents that occurred in over 3000 schools in the UK. This highlighted a wide range of abuse scenarios involving children abusing other children. As a result, the Education Secretary requested a rapid review into sexual abuse in schools and colleges in England. Ofsted published their findings in June 2021. This led to a series of recommendations for schools, multi-agency partners and government.

Ofsted's School Inspection Handbook states that:

"leaders ensure that their school's culture addresses harmful sexual behaviour. **Inspectors will expect schools to assume that sexual harassment, online sexual abuse and sexual violence are happening in the community, and potentially in the school, even when there are no specific reports, and put in place a whole-school approach to address them."**

"Schools should have appropriate and well-communicated school-wide policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) are unacceptable."

Ofsted will:

- Request that college leaders supply records and analysis of sexual harassment and sexual violence, including online, to inspectors. The Independent Schools Inspectorate will also specifically request schools to provide the same records upon notification of inspection, in addition to its current practice.
- Speak with groups of pupils, where this helps them to better understand a school or college's approach to tackling sexual harassment and violence, including online.
- Feed this part of the inspection into a judgement of safeguarding and leadership and management. If a school's processes are not adequate, Ofsted is likely to judge both their safeguarding practices and leadership and management as inadequate.

Your behaviour and safeguarding/child protection policies will likely be checked to see whether they set out clear and effective procedures to prevent and respond to incidents. It will be expected that you have a zero-tolerance approach to all harmful sexual behaviour.

This document has been created as a template for school leaders to assist them in creating their own Harmful Sexual Behaviour Policy.

Within this template, sections which include information or guidance are shown in BLUE. It is anticipated that schools/academies would remove these sections from their completed policy document, though this will be a decision for the group that produces the policy.

Where sections in the template are written in ITALICS it is anticipated that schools would wish to consider whether or not to include that section or statement in their completed policy.

Where sections are highlighted in BOLD, it is suggested that these should be an essential part of a school policy.

Online:

Schools and colleges should recognise that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across social media platforms that leads to repeat victimisation. Online concerns can be especially complicated and support is available from a range of organisations – see the links section. For

this reason, schools should ensure they have a robust, up-to-date and comprehensive online safety policy which links to other relevant safeguarding policies.

Policy for Harmful Sexual Behaviour

Statement of intent

Our school has a zero-tolerance approach to any harmful sexual behaviour involving children and acknowledge that it could be occurring at *(insert name of school)* and in our school community. The school is proactive in its approach to assessing prevalence, responding to incidents and challenging and changing behaviour. This policy applies to all governors, staff and learners.

Schools and colleges have a statutory duty to safeguarding the children in their setting. We work together to foster an environment that creates healthy relationships for children and young people.

Our whole-school approach encourages healthy relationships and works to prevent harmful sexual behaviour. We provide high quality education within the curriculum to reduce the likelihood of the situations occurring.

We recognise that HSB is harmful to both the child/children affected by the behaviours and the child/children who displayed the behaviour and provide ongoing support for all involved.

Our approach is to treat everything as safeguarding incident in the first instance - we distinguish between behaviours that are exploratory and part of healthy age and ability appropriate development and those that may be harmful.

As a school we provide regular opportunities for school staff to understand what harmful sexual behaviours might look like and what they should do in the event of a report.

Related policies

This policy should be read in conjunction with:

- Child protection and safeguarding policy
- Whistleblowing
- Behaviour policy
- Anti-bullying policy
- Online safety
- Acceptable Use Agreements
- *Curriculum Policies*
- *Use of outside agencies*

Definitions

As stated in the Sexual Offences Act 2003, the term Harmful Sexual Behaviour (HSB) covers a wide range of behaviours, often these may be considered problematic, abusive, or violent and may also be developmentally inappropriate. HSB can occur online, offline or in a blend of both environments. The term HSB is widely acknowledged in child protection and should be treated in this context.

Whilst peer on peer harassment has become a widely recognised term, this is already moving towards child on child in recognition that age and development is a factor in making decisions about behaviour. A significant age difference between the children involved in an incident may lead to a decision about the behaviour being harmful or not. For example, this could be an older child's behaviour towards a pre-pubescent child, or a younger child's behaviour towards an older child with learning difficulties. It is important that Designated Safeguarding Leads (DSL) know what is and is not HSB. DSLs should be involved in planning the curriculum for HSB, planning preventative actions and ensuring a whole-schools culture that condones HSB, alongside all other forms of abuse and harassment. This template policy provides a basis for an effective approach to managing sexual violence and harassment.

What is sexual violence?

The following are sexual offences under the Sexual Offences Act 2003:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is sexual harassment?

Keeping Children Safe in Education Guidance and the Sexual Violence and sexual harassment between children in schools and colleges state:

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence.
    - sharing of unwanted explicit content
    - up skirting (this is a criminal offence)
    - sexualised online bullying.
    - unwanted sexual comments and messages, including, on social media.
    - sexual exploitation; coercion and threats.

It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Responsibilities

Leaders and DSLs

Our leaders and DSLs have ultimate responsibility in dealing with all incidents of harmful sexual behaviour, including online. It is the expectation that all incidents of harmful sexual behaviour/sexual violence and harassment are reported in line with school safeguarding and child protection procedures.

We ensure that our designated safeguarding lead/s (DSL) and their deputies are confident in school safeguarding processes and when it is necessary to escalate. Our DSLs know what local and national specialist support is available to support all children involved in harmful sexual behaviour and are confident as to how to access this support when required.

Designated safeguarding lead/s and their deputies have an in-depth working knowledge of key documentation, particularly KCSIE 2022 and Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE 2021). We ensure that they receive appropriate specialist training, commensurate with their role and that ongoing training is provided for all school staff.

It is the role of school leaders and designated safeguarding leads to ensure that all staff and Governors receive training specific to harmful sexual behaviour, and that it is included as part of induction.

Staff

It is the responsibility of all staff to have read and understood this policy and associated policies. All staff must report any incidents or suspected incidents of harmful sexual behaviour to DSLs in line with school policy and ensure they are informed of the outcome. All staff will challenge any harmful sexual language or inappropriate behaviour. Staff have a duty to ensure that the school environment is one which is safe and which supports learners to understand safe and healthy relationships and appropriate behaviour through delivery of our curriculum.

Governors

We ensure that our governing body have a good understanding of what harmful sexual behaviour is, when it can pose a risk to children and how to keep children safe. Our trustees/governors receive regular training and updates, both in terms of what sexualised behaviour is, but also how to effectively support establishments and their stakeholders whilst holding provision to account.

As part of the headteacher's report, the governing body has the opportunity to monitor and evaluate the approach to harmful sexual behaviour to ensure it is adequate and effective. This includes evaluation of the curriculum, pupil voice activity and evaluation of parent/carer engagement. Governors ensure that risks relating to these issues are identified, that a number of reporting routes are available, and that risks are effectively mitigated.

Learners

All learners have the right to learn in a safe, healthy and respectful school environment. Our learners benefit from a broad and balanced curriculum and are taught about healthy relationships and know how and when to report and that a range of different reporting routes is available to them. Our learners are encouraged to report any harmful sexual behaviour, even if they are not directly involved. All learners will be believed if they make a disclosure and will be treated sensitively - whilst we cannot guarantee confidentiality, their thoughts and wishes will be taken into account when supporting them.

Parents/carers

We work hard to engage parents and carers by:

- discussion/meetings
- sharing newsletters
- sharing information online e.g., website, social media
- providing curriculum information

Our parents and carers are made aware of how and when to report any concerns to the school, that all incidents will be handled with care and sensitivity, and that it may sometimes be necessary to involve other agencies.

Vulnerable groups

We recognise that, nationally, vulnerable learners are three times more likely to be at risk from Harmful Sexual Behaviour. These include:

- A child with additional needs and disabilities.
- A child living with domestic abuse.
- A child who is at risk of/suffering significant harm.
- A child who is at risk of/or has been exploited or at risk of exploited (CRE, CSE),
- A care experienced child.
- A child who goes missing or is missing education.
- Children who identify as, or are perceived as, LGBTQI+ and/or any of the other protected characteristics.

Children displaying HSB have often experienced their own abuse and trauma. We ensure that any vulnerable learner is offered appropriate support, both within and outside school, sometimes via specialist agencies.

Reporting

Our systems are well promoted, easily understood and easily accessible for children and young people to confidently report abuse, knowing their concerns will be treated seriously. All reports will be dealt with swiftly and sensitively and outcomes shared where appropriate. We also respond to anonymous reports, or reports made by third parties.

Responding to an incident or disclosure

In this policy we recognise the importance of distinguishing between healthy, problematic and sexually harmful behaviour (HSB)

Our response is always based on sound safeguarding principles and follows school safeguarding processes. It is calm, considered and appropriate and puts the learner at the centre of all decisions made.

The school will always adopt a multi-agency approach and seek external support and guidance, in line with school policy, if deemed necessary. This may include:

MAST, Early Help, CAMHS, Police etc

Risk assessment

The school may deem it necessary to complete a harmful sexual behaviour risk assessment as part of the response to any reported incidents. The purpose of the risk assessment is the protect and support all those involved by identifying potential risk, both in and out of school (e.g., including public transport, after school clubs etc) and by clearly describing the strategies put in place to mitigate such risk.

The risk assessment will be completed following a meeting with all professionals working with the learner, as well as parents or carers. Where appropriate, the learners involved will also be asked to contribute.

The risk assessment will be shared will all staff who work with the learner, as well as parents and carers. It will be dynamic and will respond to any changes in behaviour and will be regularly evaluated to assess impact.

Education

Our school's educational approach seeks to develop knowledge and understanding of healthy, problematic, and sexually harmful behaviours, and empowers young people to make healthy,

informed decisions. Our school's approach is delivered predominantly through PSHE and RSE and additional opportunities are provided through:

- Cross curricular programmes
- Computing
- assemblies, discrete lessons, visits from outside agencies etc

Our approach is given the time it deserves and is authentic i.e., based on current issues nationally, locally and within our setting. It is shaped and evaluated by learners and other members of the school community to ensure that it is dynamic, evolving and based on need.

Training

It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of HSB. This could form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding.

- Brook traffic light tool
- NSPCC training
- Whole staff training
- Online training

A clear training strategy which supports staff to respond effectively to different types of harassment and sexual misconduct incidents. This should involve an assessment of the training needs of all staff. This strategy should be reviewed and evaluated on a regular basis to ensure it is fit for purpose.

Training should be made available on an ongoing basis for all staff and students to raise awareness of harassment and sexual misconduct with the purpose of preventing incidents and encouraging reporting where they do occur.

Links

Child Exploitation and Online Protection command: CEOP is a law enforcement agency which aims to keep children and young people safe from sexual exploitation and abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors

The NSPCC provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk. The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies)

Support from specialist sexual violence sector organisations such as Rape Crisis or The Survivors Trust

The Anti-Bullying Alliance has developed guidance for schools about Sexual and sexist bullying.

The UK Safer Internet Centre provides an online safety helpline for professionals at 0344 381 4772 and helpline@saferinternet.org.uk. The helpline provides expert advice and support for school and college staff with regard to online safety issues

Internet Watch Foundation: If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF)

Childline/IWF Report Remove is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online

UKCIS Sharing nudes and semi-nudes advice: Advice for education settings working with children and young people on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery).

Thinkuknow from NCA-CEOP provides support for the children's workforce, parents and carers on staying safe online

Lucy Faithful Foundation

Marie Collins Foundation

NSPCC National Clinical and Assessment Service (NCATS)

Project deSHAME from Childnet provides useful research, advice and resources regarding online sexual harassment.

A9 Computer Misuse and Cyber Choices Policy Template

All key stakeholders, including the school IT service provider, have responsibility for the safeguarding of young people from computer misuse and are aware of the Cyber Choices programme led by the National Crime Agency (NCA) and managed locally by Regional Organised Crime Units (part of the national policing network). The risks to young people of crossing the line into committing cybercrimes is a safeguarding issue. This often happens without the individual even realising, young people need support in making the right #CyberChoices in their use of technology. Young people with an interest in technology, a high IQ, and an appetite to engage in risky behaviours are considered to be at a higher risk of committing a cyber offence, but many first-time offenders are also unaware of what the law governing cyber offences actually is. The average age of first-time cyber offenders in the UK has fallen significantly in recent years. The Cyber Choices programme works with individuals committing, or at risk of committing, cybercrimes which can only be carried out with technology, where devices are both the tool for committing the crime, and the target of the crime.

All staff are made aware of the safeguarding risks of computer misuse.

All staff are familiar with the NCA Hacking it Legal Leaflet*, which explains Cyber Choices and the Computer Misuse Act 1990, and lists recommended resources for teachers to use.

Staff are aware of the role of their local Regional Organised Crime Unit as their point of contact for Cyber Choices referrals.

Learners agree to the Acceptable Use Policy (AUP) which outlines acceptable online behaviours and explains that some online activity is illegal. Acceptable computer use is reinforced across the curriculum, with opportunities to discuss how to act within moral and legal boundaries online, with reference to the Computer Misuse Act 1990. Lessons and further resources are available on the NCA Cyber Choices site.

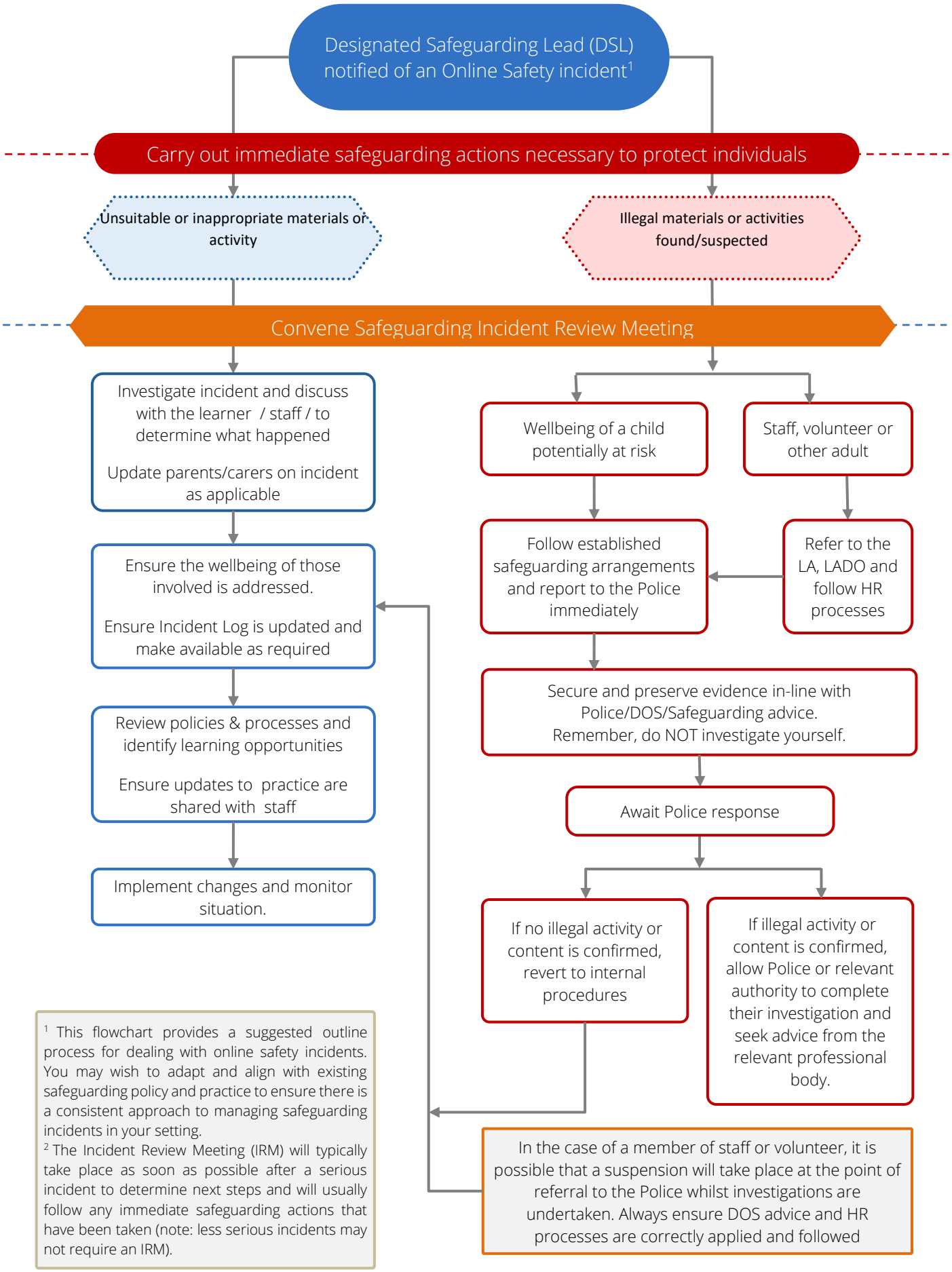
Any breach of the AUP or activity by a learner that may constitute a cybercrime, in school or at home, will be referred to the Designated Safeguarding Lead for consideration as a safeguarding risk.

Where the DSL believes that the learner may be at risk of committing cybercrimes, or to already be committing cybercrimes, a referral to the local Cyber Choices programme will be made (contact details for all Regional Organised Crime Units are available in the "what to do if you're concerned" section at the bottom of the NCA Cyber Choices page). Where the DSL is unsure if a learner meets the referral criteria, advice should be sought from the local Cyber Choices team.

Parents also have the opportunity report potential cybercrime directly to the local Cyber Choices team but are recommended to make school-based concerns through the DSL.

The IT service provider is aware of the safeguarding requirement to refer concerns about computer misuse to the Designated Safeguarding Lead and has a clear process to follow in order to do so.

A10 Responding to incidents of misuse – 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).

360safe.org.uk
360safe@swgfl.org.uk

C1 School Technical Security Policy Template (including filtering, monitoring and passwords)

Suggestions for use

Where sections are highlighted in BOLD text, it is the view of the SWGfL Online Safety Group that these would be an essential part of a school online safety policy.

Introduction

Effective technical security depends not only on technical measures, but also on appropriate policies and procedures and on good user education and training. This is informed by the Department for Education (DfE) guidance, Keeping Children Safe in Education, and the Digital and Technology Standards and therefore applicable for schools and colleges in England. For schools and colleges outside England, this would be considered good practice, the school should also ensure that they remain compliant with national, local authority or MAT guidance, as relevant. The school is responsible for ensuring that the *school infrastructure/network* is as safe and secure as is reasonably possible and that:

- users can only access data to which they have right of access
- access to personal data is securely controlled in line with the school's personal data policy
- system logs are maintained and reviewed to monitor user activity
- there is effective guidance and training for users
- there are regular reviews and audits of the safety and security of school computer systems, including filtering and monitoring provision

This template is not designed to reproduce the entirety of the DfE's standards, but is designed to support governors and senior leaders in the production of a technical security policy. Governors and senior leaders remain responsible for the school's technical security. If the school has an external IT service provider, it is the school's responsibility to ensure that the provider complies with expectations in the Digital and Technology Standards. It is also important that the IT service provider works in partnership with the Designated Safeguarding Lead (DSL) to support the school safeguarding requirements. The school should also check their Local Authority/MAT/other relevant body policies/guidance on these technical issues.

Responsibilities

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. The management of technical security is the responsibility of Governors and Senior Leaders, supported in this by the Designated Safeguarding Lead, Online Safety Lead and IT Service Provider.

Policy statements

The school is responsible for ensuring that their infrastructure/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 receive guidance and training and will be effective in carrying out their responsibilities:

- school technical systems will be managed in ways that ensure that the school meets recommended technical requirements (if not managed by the Local Authority, these may be outlined in Local Authority/other relevant body technical guidance)
- cyber security is included in the school risk register.
- 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.
- there are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud,
- appropriate security measures (including updates) are in place to protect the servers, firewalls, switches, routers, wireless systems, workstations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data, including operating systems.
- the school's infrastructure and individual workstations are protected by up-to-date software to protect against malicious threats from viruses, worms, trojans etc.
- responsibilities for the management of technical security are clearly assigned to appropriate and well-trained staff (this may be at school, local authority or managed provider level)
- all users will have clearly defined access rights to school technical systems and accounts are deleted when the user leaves. *Details of the access rights available to groups of users will be recorded by the network manager/technical staff/other person and will be reviewed, at least annually, by the online safety group.*
- users will be made responsible for the security of their username and password, must not allow other users to access the systems using their log on details and must

immediately report any suspicion or evidence that there has been a breach of security

- The IT Service Provider, in partnership with Governors/SLT/DSL, regularly monitors and records the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement.
- mobile device security and management procedures are in place
- an appropriate system is in place for users to report any actual/potential technical incident to the SLT/DSL/Online Safety Lead (OSL)/ (or other relevant person, as agreed)
- The senior leadership/administrative team 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
- remote management tools are used by staff to control workstations and view users' activity.
- guest users are provided with appropriate access to school systems based on an identified risk profile.
- by default, users do not have administrator access to any school-owned device.
- an agreed policy is in place regarding the extent of personal use that users (staff/learners/community users) and their family members are allowed on school devices that may be used out of school.
- an agreed policy is in place (to be described) regarding the use of removable media by users on school devices (see school personal data policy template in the appendix for further detail)
- personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured. (see school personal data policy template in the appendix for further detail)

Password Security

A safe and secure username/password system is essential if the above is to be established and will apply to all school technical systems, including networks, devices, email and learning platform). You can find out more about passwords from the National Cyber Security Centre and SWGfL "Why password security is important". You may wish to share this with staff members to help explain the significance of passwords as this is helpful in explaining why they are necessary and important. Where sensitive data is in use – particularly when accessed on mobile devices – schools may wish to use more secure forms of authentication e.g. multi-factor authentication.

Policy Statements:

- The password policy and procedures reflect NCSC and DfE advice/guidance.
- The use of passwords is reduced wherever possible, for example, using Multi-Factor Authentication (MFA) or (Single Sign On) SSO.
- Security measures are in place to reduce brute-force attacks and common passwords are blocked.
- School networks and system will be protected by secure passwords.
- Passwords are encrypted by the system to prevent theft.
- Passwords do not expire and the use of password managers is encouraged.
- Complexity requirements (e.g. capital letter, lower case, number, special character) are not used.
- Users are able to reset their password themselves.
- All passwords are at least 12 characters long and users are encouraged to use 3 random words.
- Passwords are immediately changed in the event of a suspected or confirmed compromise.
- No default passwords are in use. All passwords provided "out of the box" are changed to a unique password by the IT Service Provider.
- All accounts with access to sensitive or personal data are protected by Multi-Factor Authentication methods.
- A copy of administrator passwords is kept in a secure location.
- All users (adults and learners) have responsibility for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.
- Passwords must not be shared with anyone.

Learner passwords:

Schools need to take a risk-based approach to the allocation of learner usernames and passwords. Schools should be able to identify individuals accessing their systems and an individual logon is the recommended approach. For younger children and those with special educational needs, the DfE guidance states that schools could:

- consider using authentication methods other than passwords.
- consider using a separate account accessed by the teacher rather than the student.
- segment the network so such accounts cannot reach sensitive data.
- consider if the data or service being accessed requires authentication.

Policy Statements

- For younger children and those with special educational needs, learner usernames and passwords can be kept in an electronic or paper-based form, but they must be securely kept when not required by the user. *Password complexity for these users could be reduced (for example 6-character maximum) and should not include special characters. Where external systems have different password requirements the use of random words or sentences should be encouraged.*
- Learners are encouraged to set passwords with an increasing level of complexity. Passwords using 3 three random words and with a length of over 12 characters are considered good practice.
- Users will be required to change their password if it is compromised. (Note: passwords should not be regularly changed but should be secure and unique to each account.)
- Learners will be taught the importance of password security, this should include how passwords are compromised, and why these password rules are important. The ProjectEVOLVE Privacy and Security strand should help you with this.

Filtering and Monitoring

Introduction to Filtering

The filtering of internet content provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context. The filtering system cannot, however, provide a 100% guarantee that it will do so, as online content changes dynamically and new technologies are constantly being developed. It is important, therefore, to understand that filtering is only one element in a larger strategy for online safety and acceptable use. It is important that the school has a filtering policy to manage the associated risks and to provide preventative measures which are relevant to the situation in this school. Many users are not aware of the flexibility provided by many filtering services at a local level for schools. Where available, schools should use this flexibility to meet their learning needs and reduce some of the frustrations occasionally felt by users who wish to maximise the use of the new technologies. Provide training and awareness raising to help users understand the process that is available to them.

DfE Keeping Children Safe in Education requires schools to have “appropriate filtering”. DfE published Filtering and monitoring standards for schools and colleges in March 2023. Schools are recommended to use the UK Safer Internet Centre Definitions to help them determine if their filtering system is appropriate.

Schools may wish to test their filtering for protection against illegal materials at: SWGfL Test Filtering

Your filtering system should be operational, up to date and applied to all:

- users, including guest accounts.
- school owned devices
- devices using the school broadband connection.

Your filtering system should:

- filter all internet feeds, including any backup connections.
- be age and ability appropriate for the users and be suitable for educational settings.
- handle multilingual web content, images, common misspellings and abbreviations.
- identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them.
- provide alerts when any web content has been blocked.

Mobile and app content is often presented in a different way to web browser content. If your users access content in this way, you should get confirmation from your provider as to whether they can provide filtering on mobile or app technologies. A technical monitoring system should be applied to devices using mobile or app content to reduce the risk of harm.

Introduction to Monitoring

Monitoring user activity on school and college devices is an important part of providing a safe environment for children and staff. Unlike filtering, it does not stop users from accessing material through internet searches or software. Monitoring allows you to review user activity on school and college devices. For monitoring to be effective it must pick up incidents urgently, usually through alerts or observations, allowing you to take prompt action and record the outcome.

Your monitoring strategy should be informed by the filtering and monitoring review. A variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users
- live supervision by staff on a console with device management software

- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services

DfE Keeping Children Safe in Education requires schools to have "appropriate monitoring". DfE published Filtering and monitoring standards for schools and colleges in March 2023. Schools are recommended to use the UK Safer Internet Centre Definitions to help them determine if their monitoring system is appropriate

Filtering and Monitoring Responsibilities

DfE Filtering Standards require that schools and colleges identify and assign roles and responsibilities to manage your filtering and monitoring systems, and include

Role	Responsibility	Name / Position
Responsible Governor	Strategic responsibility for filtering and monitoring and need assurance that the standards are being met.	Pauline Brown – Safeguarding Governor
Senior Leadership	Team Member Responsible for ensuring these standards are met and: • procuring filtering and monitoring systems • documenting decisions on what is blocked or allowed and why • reviewing the effectiveness of your provision • overseeing reports Ensure that all staff: • understand their role • are appropriately trained • follow policies, processes and procedures • act on reports and concerns	Katie Smith - Headteacher
Designated Safeguarding Lead	Lead responsibility for safeguarding and online safety, which could include overseeing and acting on: • filtering and monitoring reports • safeguarding concerns	Neil Bithell

	• checks to filtering and monitoring systems	
IT Service Provider	Technical responsibility for: • maintaining filtering and monitoring systems • providing filtering and monitoring reports • completing actions following concerns or checks to systems	North Yorkshire Council
All staff need to be aware of reporting mechanisms for safeguarding and technical concerns. They should report if:	• they witness or suspect unsuitable material has been accessed • they can access unsuitable material • they are teaching topics which could create unusual activity on the filtering logs • there is failure in the software or abuse of the system • there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks • they notice abbreviations or misspellings that allow access to restricted material	

Policy Statements

Internet access is filtered for all users. Differentiated internet access is available for staff and customised filtering changes are managed by the school. Illegal content is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation URL list and other illegal content lists. Filter content lists are regularly updated and internet use is logged and frequently monitored. The monitoring process alerts the school to breaches of the filtering policy, which are then acted upon. There is a clear route for reporting and managing changes to the filtering system. Where personal mobile devices are allowed internet access through the school network, filtering will be applied that is consistent with school practice.

- There is a filtering and monitoring system in place that safeguards staff and learners by blocking harmful, illegal and inappropriate content.

- There is a monitoring system that enables the prompt investigation of a potential safeguarding incident and outcomes are logged.
- Roles and responsibilities for the management of filtering and monitoring systems have been defined and allocated.
- The filtering and monitoring provision is reviewed at least annually and checked regularly.
- There is a defined and agreed process for making changes to the filtering or monitoring system that involves a senior leader in the agreement of the change.
- Mobile devices that access the school's internet connection (whether school or personal devices) will be subject to the same filtering standards as other devices on the school systems.

Changes to Filtering and Monitoring Systems

There should be a clear process for requests to change the filtering and monitoring systems and who makes the decision to alter the filtering system.

In this section the school should provide a detailed explanation of:

- how, and to whom, users may request changes to the filtering and monitoring systems
- the grounds on which changes may be permitted or denied
- how a second responsible person will agrees to the change before it is made
- any audit/reporting system

Filtering and Monitoring Review and Checks

To understand and evaluate the changing needs and potential risks of the school, the filtering and monitoring provision will be reviewed at least annually. The review will be conducted by members of the senior leadership team, the designated safeguarding lead (DSL), and the IT service provider. Additional checks to filtering and monitoring will be informed by the review process so that governors have assurance that systems are working effectively and meeting safeguarding obligations.

Reviewing the filtering and monitoring provision

A review of filtering and monitoring will be carried out to identify the current provision, any gaps, and the specific needs of learners and staff.

The review will take account of:

- the risk profile of learners, including their age range, pupils with special educational needs and disability (SEND), pupils with English as an additional language (EAL)
- what the filtering system currently blocks or allows and why
- any outside safeguarding influences, such as county lines
- any relevant safeguarding reports
- the digital resilience of learners
- teaching requirements, for example, the RHSE and PSHE curriculum
- the specific use of chosen technologies, including Bring Your Own Device (BYOD)
- what related safeguarding or technology policies are in place
- what checks are currently taking place and how resulting actions are handled

To make the filtering and monitoring provision effective, the review will inform:

- related safeguarding or technology policies and procedures
- roles and responsibilities
- training of staff
- curriculum and learning opportunities
- procurement decisions
- how often and what is checked
- monitoring strategies

The review will be carried out as a minimum annually, or when:

- a safeguarding risk is identified
- there is a change in working practice, e.g. remote access or BYOD
- new technology is introduced

Checking the filtering and monitoring systems

Checks to filtering and monitoring systems are completed and recorded as part of the filtering and monitoring review process. How often the checks take place will be based on the context, the risks highlighted in the filtering and monitoring review, and any other risk assessments. Checks will be undertaken from both a safeguarding and IT perspective.

When filtering and monitoring systems are checked this should include further checks to verify that the system setup has not changed or been deactivated. Checks are performed on a range of:

- school owned devices and services, including those used off site
- geographical areas across the site
- user groups, for example, teachers, pupils and guests

Logs of checks are kept so they can be reviewed. These record:

- when the checks took place
- who did the check
- what was tested or checked
- resulting actions

The SWGfL Filtering Standards checklist may be helpful.

Training/Awareness:

It is a statutory requirement in England that staff receive training, at least annually, about safeguarding, child protection, online safety and filtering and monitoring. Furthermore, in order to protect personal and sensitive data, governors, senior leaders, staff and learners should receive training about information security and data protection, at least annually.

Governors, Senior Leaders and staff are made aware of the expectations of them:

- at induction
- at whole-staff/governor training
- through the awareness of policy requirements
- through the acceptable use agreements
- in regular updates throughout the year

Those with specific responsibilities for filtering and monitoring (Responsible Governor, DSL, OSL or other relevant persons) will receive enhanced training to help them understand filtering and monitoring systems and their implementation and review.

Learners are made aware of the expectations of them:

- in lessons (the schools should describe how this will take place)
- through the acceptable use agreements

Parents will be informed of the school's filtering policy through the acceptable use agreement and through online safety awareness sessions/newsletter etc. (amend as relevant)

Audit/Monitoring/Reporting/Review:

Governors/SLT/DSL/OSL will ensure that full records are kept of:

- Training provided
- User Ids and requests for password changes
- User logons
- Security incidents related to this policy
- Annual online safety reviews including filtering and monitoring
- Changes to the filtering system
- Checks on the filtering and monitoring systems

Further Guidance

Schools may wish to seek further guidance. The following is recommended:

Schools in England (and Wales) are required "***to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering***". Furthermore, the Department for Education's statutory guidance 'Keeping Children Safe in Education' obliges schools and colleges in England to "*ensure appropriate filters and appropriate monitoring systems are in place and regularly review their effectiveness" and they "should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system*" however, schools will need to "*be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding*." Ofsted concluded as far back as 2010 that "Pupils in the schools that had 'managed' systems had better knowledge and understanding of how to stay safe than those in schools with 'locked down' systems. Pupils were more vulnerable overall when schools used locked down systems because they were not given enough opportunities to learn how to assess and manage risk for themselves."

To further support schools and colleges in England, the Department for Education published Digital and Technology standards.

The UK Safer Internet Centre has produced guidance on "Appropriate Filtering and Monitoring"

SWGfL, on behalf of UK Safer Internet Centre and DfE, developed further Filtering and Monitoring | SWGfL information for schools and colleges, including a checklist alongside further support for Governors

SWGfL provides a site for schools to test their filtering to ensure that illegal materials cannot be accessed: SWGfL Test Filtering

C2 School Personal Data Advice and Guidance

Suggestions for use

This document is for advice and guidance purposes only. It is anticipated that schools will use this advice alongside their own data protection policy. This document is not intended to provide legal advice and the school/college is encouraged to seek their own legal counsel when considering their management of personal data.

The template uses the terms learners to refer to the children or young people at the institution.

Data Protection Law – A Legislative Context

With effect from 25th May 2018, the data protection arrangements for the UK changed following the implementation of the European Union General Data Protection Regulation (GDPR). This represented a significant shift in legislation and in conjunction with the Data Protection Act 2018 replaced the Data Protection Act 1998.

GDPR - As a European Regulation, the GDPR has direct effect in UK law and automatically applies in the UK until we leave the EU (or until the end of any agreed transition period, if we leave with a deal). After this date, it will form part of UK law under the European Union (Withdrawal) Act 2018, with some technical changes to make it work effectively in a UK context.

Data Protection Act 2018 – this Act sits alongside the GDPR, and tailors how the GDPR applies in the UK and provides the UK-specific details such as; how to handle education and safeguarding information.

No Deal Brexit -The Information Commissioner advises that in the event of a no- deal Brexit it is anticipated that the Government of the day will pass legislation to incorporate GDPR into UK law alongside the DPA 2018. Unless your school receives personal data from contacts in the EU there will be little change save to update references to the effective legislation in privacy notices etc.

In this document the term "Data Protection Law" refers to the legislation applicable to data protection and privacy as applicable in the UK from time to time.

Does the Data Protection Law apply to schools?

In short, yes. Any natural or legal person, public authority, agency or other body which processes personal data is considered a 'data controller'.

A school is, for the purposes of the Data Protection Law, a "public body" and further processes the **personal data** of numerous **data subjects** on a daily basis.

Personal data is information that relates to an identified or identifiable living individual (a data subject).

Guidance for schools is available on the Information Commissioner's Office (ICO) website including information about the Data Protection Law.

The ICO's powers are wide ranging in the event of non-compliance and schools must be aware of the huge impact that a fine or investigation will have on finances and also in the wider community for example in terms of trust.

The Data Protection Law sets out that a data controller must ensure that personal data shall be:

a) processed lawfully, fairly and in a transparent manner in relation to data subjects;
b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Data Protection Law in order to safeguard the rights and freedoms of data subjects; and
f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

These principles of the Data Protection Law drive the need for the schools to put in place appropriate privacy notices (to give a data subject information about the personal data processing activities, legal basis of processing and data subject rights) and policies (such as for reporting a breach, managing a data subject access request, training, retention etc.) to demonstrate compliance.

Data Mapping to identify personal data, data subjects and processing activities

The school and its employees will collect and/ or process a wide range of information concerning numerous data subjects and some of this information will include personal data. Further, the schools may need to share some personal data with third parties. To be able to demonstrate and plan compliance and it is important that the school has a data map of these activities; it can then make sure that the correct privacy notices are provided, put in place security measures to keep the personal data secure and other steps to avoid breach and also put in place data processing agreements with the third parties.

The data map should identify what personal data held in digital format or on paper records in a school, where it is stored, why it is processed and how long it is retained.

In a typical data map for a school the data subjects and personal data will include, but is not limited to:

- Parents, legal guardians, governors – and personal data of names, addresses, contact details
- Learners - curricular / academic data e.g. class lists, learner progress records, reports, references, contact details, health and SEN reports
- Staff and contractors - professional records e.g. employment history, taxation and national insurance records, appraisal records and references, health records

Some types of personal data are designated as 'special category' being personal data;
"revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation"

This should be identified separately and to lawfully process special category data, you must identify both a lawful basis and a separate condition for processing special category data. You should decide and document this before you start processing the data.

The school will need to identify appropriate lawful process criteria for each type of personal data and if this is not possible such activities should be discontinued. The lawful processing criteria can be summarised as:

(a) Consent:	the data subject has given clear consent for you to process their personal data for a specific purpose (see below for further guidance)
(b) Contract:	the processing is necessary for a contract you have with the data subject
(c) Legal obligation:	the processing is necessary for you to comply with the law (not including contractual obligations).
(d) Vital interests:	the processing is necessary to protect someone's life.
(e) Public task:	the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
(f) Legitimate interests:	the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks) Please also be aware that these criteria must be supported by a written legitimate interest assessment.

No single basis is 'better' or more important than the others – which basis is most appropriate to use will depend on your purpose and relationship with the data subject.

Several of the lawful purpose criteria may relate to a particular specified purpose – a legal obligation, a contract with the individual, protecting someone's vital interests, or performing your public tasks. If you are processing for these purposes then the appropriate lawful basis may well be obvious, so it is helpful to consider these first.

As a public authority, and if you can demonstrate that the processing is to perform your tasks as set down in UK law, then you are able to use the public task basis. If not, you may still be able to consider consent or legitimate interests in some cases, depending on the nature of the processing and your relationship with the data subject. There is no absolute ban on public authorities using consent or legitimate interests as their lawful basis, but the Data Protection law does restrict public authorities' use of these two criteria.

The majority of processing of personal data conducted by public authorities will fall within Article 6(1)(e) GDPR, that *"processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"* however careful consideration must be given to any processing, especially in more novel areas. As you can see, consent is just one of several possible lawful processing criteria.

Consent has changed as a result of the GDPR and is now defined as: "in relation to the processing of personal data relating to an individual, means a freely given, specific, informed and unambiguous indication of the individual's wishes by which the individual, by a statement or by a clear affirmative action, signifies agreement to the processing of the personal data"

This means that where a school is relying on consent as the basis for processing personal data that consent has to be clear, meaning that pre-ticked boxes, opt-out or implied consent are no longer suitable. The GDPR does not specify an age of consent for general processing but schools should consider the capacity of learners to freely give their informed consent.

The Information Commissioner's Office (ICO) gives clear advice on when it's appropriate to use consent as a lawful base. It states:

"Consent is appropriate if you can offer people real choice and control over how you use their data and want to build their trust and engagement. But if you cannot offer a genuine choice, consent is not appropriate. If you would still process the personal data without consent, asking for consent is misleading and inherently unfair."

You should only use consent if none of the other lawful bases is appropriate. If you do so, you must be able to cope with people saying no (and/or changing their minds), so it's important that you only use consent for optional extras, rather than for core information the school requires in order to function. Examples;

- consent would be appropriate for considering whether a child's photo could be published in any way.

- if your school requires learner details to be stored in an MIS, it would not be appropriate to rely on consent if the learner cannot opt out of this. In this case, you could apply the public task lawful base.

Content of Privacy Notices

Privacy Notices are a key compliance requirement as they ensure that each data subject is aware of the following points when data is collected/ processed by a data controller:

- Who the controller of the personal data is
- What personal data is being processed and the lawful purpose of this processing
- where and how the personal data was sourced
- to whom the personal data may be disclosed
- how long the personal data may be retained
- data subject's rights and how to exercise them or make a complaint

In order to comply with the fair processing requirements in data protection law, the school will inform parents/carers of all learners of the data they collect, process and hold on the learners, the purposes for which the data is held and the third parties (e.g. LA etc.) to whom it may be passed. This privacy notice will be passed to parents/carers for example in the prospectus, newsletters, reports or a specific letter / communication or you could publish it on your website and keep it updated there. Parents/carers of young people who are new to the school will be provided with the privacy notice through an appropriate mechanism.

In some circumstances you may also require privacy notices for children / learners as data subjects as children have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased. The policies that explain this should be clear and age appropriate.

Data subject's right of access

Data subjects have a number of rights in connection with their personal data. They have the right:

- to be informed – Privacy Notices
- of access – Subject Access Requests
- to rectification – correcting errors
- to erasure – deletion of data when there is no compelling reason to keep it
- to restrict processing – blocking or suppression of processing
- to portability – unlikely to be used in a school context
- to object – objection based on grounds pertaining to their situation
- related to automated decision making, including profiling

Several of these could impact schools, such as the right of access. You need to put procedures in place to deal with Subject Access Requests. These are written or verbal requests to see all or a part of the personal data held by the Controller in connection with

the data subject. Controllers normally have 1 calendar month to provide the information, unless the case is unusually complex in which case an extension can be obtained.

A school must not disclose personal data even if requested in a Subject Access Request;

- if doing so would cause serious harm to the individual
- child abuse data
- adoption records
- statements of special educational needs

Your school must provide the information free of charge. However, if the request is clearly unfounded or excessive – and especially if this is a repeat request – you may charge a reasonable fee.

Breaches and how to manage a breach

Recent publicity about data breaches suffered by organisations and individuals continues to make the area of personal data protection a current and high profile issue for schools and other organisations. It is important that the school has a clear and well understood personal data handling policy in order to minimise the risk of personal data breaches.

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

A breach may arise from a theft, a deliberate attack on your systems, the unauthorised or malicious use of personal data by a member of staff, accidental loss, or equipment failure. In addition:

- no school or individual would want to be the cause of a data breach, particularly as the impact of data loss on individuals can be severe, put individuals at risk and affect personal, professional or organisational reputation
- schools are "data rich" and the introduction of electronic storage and transmission of data has created additional potential for the loss of data

- the school will want to avoid the criticism and negative publicity that could be generated by any-personal data breach

Schools have always held personal data on the learners in their care, and increasingly this data is held digitally and accessible not just in schools but also from remote locations. It is important to stress that the Data Protection Laws apply to all forms of personal data, regardless of whether it is held on paper or in electronic format. However, as it is part of an overall online safety policy template, this document will place particular emphasis on data which is held or transferred digitally.

Schools will need to carefully review their policy, in the light of pertinent Local Authority regulations and guidance and changes in legislation.

All significant data protection incidents must be reported through the DPO to the Information Commissioner's Office based upon the local incident handling policy and communication plan. The new laws require that this notification should take place within 72 hours of the breach being detected, where feasible.

If you experience a personal data breach you need to consider whether this poses a risk to people. You need to consider the likelihood and severity of any risk to people's rights and freedoms, following the breach. When you've made this assessment, if it's likely there will be a risk then you must notify the ICO; if it's unlikely then you don't have to report it. You do not need to report every breach to the ICO.

The school should have a policy for reporting, logging, managing and recovering from information risk incidents, which establishes a:

- "responsible person" for each incident
- communications plan, including escalation procedure
- plan of action for rapid resolution
- plan of action of non-recurrence and further awareness raising

Privacy by Design and Data Protection Impact Assessments (DPIA)

Data Protection Impact Assessments (DPIA) identify and address privacy risks early on in any project so that you can mitigate them before the project goes live.

DPIAs should be carried out by Data Managers (where relevant) under the support and guidance of the DPO. Ideally you should conduct a DPIA before processing activity starts. However, some may need to be retrospective in the early stages of compliance activity.

The risk assessment will involve:

- recognising the risks that are present
- judging the level of the risks (both the likelihood and consequences)
- prioritising the risks.

According to the ICO a DPIA should contain:

- a description of the processing operations and the purpose
- an assessment of the necessity and proportionality of the processing in relation to the purpose
- an assessment of the risks to individuals
- the measures in place to address risk, including security and to demonstrate that you comply.

Or more simply and fully:

- who did you talk to about this?
- what is going to happen with the data and how – collection, storage, usage, disposal
- how much personal data will be handled (number of subjects)
- why you need use personal data in this way
- what personal data (including if it's in a 'special category') are you using
- at what points could the data become vulnerable to a breach (loss, stolen, malicious)
- what the risks are to the rights of the individuals if the data was breached
- what are you going to do in order to reduce the risks of data loss and prove you are compliant with the law.

DPIA is an ongoing process and should be re-visited at least annually to verify that nothing has changed since the processing activity started.

Secure storage of and access to data

The school should ensure that systems are set up so that the existence of protected files is hidden from unauthorised users and that users will be assigned a clearance that will

determine which files are accessible to them. Access to protected data will be controlled according to the role of the user. Members of staff will not, as a matter of course, be granted access to the whole management information system.

Good practice suggests that all users will use strong passwords made up from a combination of simpler words. User passwords must never be shared.

Personal data may only be accessed on machines that are securely protected. Any device that can be used to access personal data must be locked if left (even for very short periods) and set to auto lock if not used for five minutes.

All storage media must be stored in an appropriately secure and safe environment that avoids physical risk, loss or electronic degradation.

Personal data should only be stored on school equipment. Private equipment (i.e. owned by the users) must not be used for the storage of school personal data.

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

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

The school will need to set its own policy as to whether data storage on removal media is allowed, even if encrypted. Some organisations do not allow storage of personal data on removable devices.

The school should have a clear policy and procedures for the automatic backing up, accessing and restoring of all data held on school systems, including off-site backups.

The school should have clear policy and procedures for the use of "Cloud Based Storage Systems" (for example Dropbox, Microsoft 365, Google Drive) and is aware that data held in remote and cloud storage is still required to be protected in line with the Data Protection Act. The school will ensure that it is satisfied with controls put in place by remote / cloud based data services providers to protect the data.

As a Data Controller, the school is responsible for the security of any data passed to a "third party". Specific data processing clauses must be included in all contracts where personal data is likely to be passed to a third party.

All paper based personal data must be held in lockable storage, whether on or off site.

Secure transfer of data and access out of school

The school recognises that personal data may be accessed by users out of school or transferred to the local authority or other agencies. In these circumstances:

- Users may not remove or copy sensitive or restricted or protected personal data from the school or authorised premises without permission and unless the media is encrypted and password protected and is transported securely for storage in a secure location
- Users must take particular care that computers or removable devices which contain personal data must not be accessed by other users (e.g. family members) when out of school
- When restricted or protected personal data is required by an authorised user from outside the organisation's premises (for example, by a member of staff to work from their home), they should preferably have secure remote access to the management information system or learning platform
- If secure remote access is not possible, users must only remove or copy personal or sensitive data from the organisation or authorised premises if the storage media, portable or mobile device is encrypted and is transported securely for storage in a secure location
- Users must protect all portable and mobile devices, including media, used to store and transmit personal information using approved encryption software
- Particular care should be taken if data is taken or transferred to another country, particularly outside Europe, and advice should be taken from the local authority (if relevant) in this event.

Disposal of personal data

The school should implement a document retention schedule that defines the length of time personal data is held before secure destruction. The Information and Records Management Society Toolkit for schools provides support for this process. The school must ensure the safe destruction of personal data when it is no longer required.

The disposal of personal data, in either paper or electronic form, must be conducted in a way that makes reconstruction highly unlikely. Electronic files must be securely disposed of, and other media must be shredded, incinerated or otherwise disintegrated.

A Destruction Log should be kept of all data that is disposed of. The log should include the document ID, classification, date of destruction, method and authorisation.

Demonstrating Compliance - Audit Logging / Reporting / Incident Handling

Organisations are required to keep records of processing activity. The data map referred to above will assist here. Records must include:

- the name and contact details of the data controller
- where applicable, the name and contact details of the joint controller and data protection officer
- the purpose of the processing
- to whom the data has been/will be disclosed
- description of data subject and personal data
- where relevant the countries it has been transferred to
- under which condition for processing the personal data has been collected
- under what lawful basis processing is being carried out
- where necessary, how it is retained and destroyed
- a general description of the technical and organisational security measures.

Clearly, in order to maintain these records good auditing processes must be followed, both at the start of the exercise and on-going throughout the lifetime of the requirement. Therefore, audit logs will need to be kept to:

- provide evidence of the processing activity and the DPIA
- record where, why, how and to whom personal data has been shared
- log the disposal and destruction of the personal data
- enable the school to target training at the most at-risk data
- record any breaches that impact on the personal data

Fee

The school should pay the relevant annual fee to the Information Commissioner's Office (ICO). Failure to renew may render the school to a penalty in additional to other fines possible under the Data Protection Law.

Responsibilities

Every maintained school is required to appoint a Data Protection Officer as a core function of 'the business'

The Data Protection Officer (DPO) can be internally or externally appointed.

They must have:

- expert knowledge
- timely and proper involvement in all issues relating to data protection
- the necessary resources to fulfil the role
- access to the necessary personal data processing operations
- a direct reporting route to the highest management level

The data controller must:

- not give the DPO instructions regarding the performance of tasks
- ensure that the DPO does not perform a duty or role that would lead to a conflict of interests
- not dismiss or penalise the DPO for performing the tasks required of them

As a minimum a Data Protection Officer must:

- inform, as necessary, the controller, a processor or an employee of their obligations under the data protection laws
- provide advice on a data protection impact assessment
- co-operate with the Information Commissioner
- act as the contact point for the Information Commissioner
- monitor compliance with policies of the controller in relation to the protection of personal data
- monitor compliance by the controller with Data Protection Law

The school may also wish to appoint a Data Manager. Schools are encouraged to separate this role from that of Data Protection Officer, where possible. This person will keep up to date with current legislation and guidance and will:

- determine and take responsibility for the school's information risk policy and risk assessment
- oversee the System Controllers

The school may also wish to appoint System Controllers for the various types of data being held (e.g. learner information / staff information / assessment data etc.). System Controllers will manage and address risks to the information and will understand:

- what information is held, for how long and for what purpose
- how information has been amended or added to over time, and
- who has access to the data and why.

Everyone in the school has the responsibility of handling protected or sensitive data in a safe and secure manner.

Governors are required to comply fully with this policy in the event that they have access to personal data, when engaged in their role as a Governor (either in the schools or elsewhere if on school business).

Training & awareness

All staff must receive data handling awareness / data protection training and will be made aware of their responsibilities. This should be undertaken regularly. You can do this through:

- Induction training for new staff
- Staff meetings / briefings / INSET
- Day to day support and guidance from System Controllers

Freedom of Information Act

All schools must have a Freedom of Information Policy which sets out how it will deal with FOI requests. FOI aims to increase transparency and accountability in public sector organisations as part of a healthy democratic process. Whilst FOI requests are submitted by an individual, the issue is for the school to consider whether the requested information

should be released into the public domain. FOI links to Data Protection Law whenever a request includes personal data. Good advice would encourage the school to:

- delegate to the Headteacher day-to-day responsibility for FOI policy and the provision of advice, guidance, publicity and interpretation of the school's policy
- consider designating an individual with responsibility for FOI, to provide a single point of reference, coordinate FOI and related policies and procedures, take a view on possibly sensitive areas and consider what information and training staff may need
- consider arrangements for overseeing access to information and delegation to the appropriate governing body
- proactively publish information with details of how it can be accessed through a Publication Scheme (see Model Publication Scheme below) and review this annually
- ensure that a well-managed records management and information system exists in order to comply with requests
- ensure a record of refusals and reasons for refusals is kept, allowing the schools to review its access policy on an annual basis

Model Publication Scheme

The Information Commissioner's Office provides schools and organisations with a model publication scheme which they should complete. The school's publication scheme should be reviewed annually.

The ICO produce guidance on the model publication scheme for schools. This is designed to support schools complete the Guide to Information for Schools.

Parental permission for use of cloud hosted services

Schools that use cloud hosting services are advised to seek appropriate consent to set up an account for learners.

Use of Biometric Information

Biometric information is special category data. The Protection of Freedoms Act 2012, included measures that affect schools that use biometric recognition systems, such as fingerprint identification and facial scanning:

- For all learners in schools under 18, they must obtain the written consent of a parent before they take and process their child's biometric data

- They must treat the data with appropriate care and must comply with data protection principles as set out in the Data Protection Law
- They must provide alternative means for accessing services where a parent or learner has refused consent

New advice to schools makes it clear that they are not able to use learners' biometric data without parental consent. Schools may wish to incorporate the parental permission procedures into revised consent processes. (see Appendix Parent / Carer Acceptable Use Agreement). *Our school does not use biometric data*

Privacy and Electronic Communications

Schools should be aware that they are subject to the Privacy and Electronic Communications Regulations in the operation of their websites.

C3 School Online Safety Policy Template: Electronic Devices - Searching Screening and Confiscation (updated with new DfE guidance – September 2022)

The DfE guidance – Searching, Screening and Confiscation was updated in July 2022.

Please note this guidance pertains only to schools in England.

The Education Act 2012, the basis of this template, sets out what the law is presumed to be, based on prior legal and educational knowledge, and common sense. Rights and responsibilities regarding physical contact and personal data are still evolving rapidly. So too are social, entertainment and educational technologies and the skills necessary to use them safely and prudently. This is particularly so where those who are under 18 are involved.

No existing law or policy can fully insulate anyone from the risk involved in searching for, access to or deletion of the personal data of others. Anyone refraining from any such search, access or deletion when hindsight shows circumstances merit such actions may however be at significant risk and may put seriously at risk the wellbeing of children entrusted to their care. This template cannot therefore be relied on as justification for any act or lack of action by anyone – there is no substitute for the proper and well documented exercise of adequately informed professional judgement.

It is for each school's Headteacher and Governors to set, apply and monitor application of their own policies as guided by their head teacher, local authority and official guidance, especially if the school is local authority maintained. This template is intended as an aide to this. South West Grid for Learning Trust does not and cannot accept and does not have responsibility for any school's policy on this or any other matter.

Within this template, sections which include information or guidance are shown in BLUE. It is anticipated that schools will remove these sections from their completed policy documents, though this will be for the school's relevant policy advisory group to recommend and for the head teacher and other governors to decide upon.

Where sections are highlighted in BOLD text, it is the view of the SWGfL Online Safety Group that these ought to be an essential part of a school online safety policy.

The template uses the term learners to refer to the children/young people attending the learning institution and the term Headteacher to refer to Headteachers or Principals, as relevant.

Introduction

The changing face of information technologies and ever-increasing learner use of these technologies has meant that the Education Acts were updated to keep pace. Part 2 of the Education Act 2011 (Discipline) introduced changes to the powers afforded to schools by statute to search learners in order to maintain discipline and ensure safety. Schools are required to ensure they have updated policies which take these changes into account. No such policy can on its own guarantee that the school will not face legal challenge but having a robust policy which takes account of the Act and applying it in practice will however help to provide the school with justification for what it does.

The particular changes we deal with here are the added power to screen, confiscate and search for items 'banned under the school rules' and the power to 'delete data' stored on confiscated electronic devices.

Items banned under the school rules are determined and publicised by the Headteacher (section 89 Education and Inspections Act 1996).

An item banned by the school rules may only be searched for under these new powers if it has been identified in the school rules as an item that can be searched for. It is therefore important that there is a school policy which sets out clearly and unambiguously the items which:

- are banned under the school rules; and
- are banned AND can be searched for by authorised school staff

The act allows authorised persons to examine data on electronic devices if they think there is a good reason to do so. In determining a 'good reason' to examine or erase the data or files the authorised staff member must reasonably suspect that the data or file on the device in question relates to an offence and/or may be used to cause harm, to disrupt teaching or could break the school rules.

Following an examination, if the person has decided to return the device to the owner, or to retain or dispose of it, they may erase any data or files, if they think there is a good reason to do so

The Headteacher must publicise the school behaviour policy, in writing, to staff, parents/carers and learners at least once a year. (There should therefore be clear links between the search etc. policy and the behaviour policy).

DfE advice on these sections of the Education Act 2011 can be found in the document: "Screening, searching and confiscation – Advice for schools" (updated July 2022)

It is recommended that Headteachers (and, at the least, one other senior leader) should be familiar with this guidance.

The DfE Guidance – "Behaviour in Schools" was updated in July 2022 and refers to behaviour online:

> "The way in which pupils relate to one another online can have a significant impact on the culture at school. Negative interactions online can damage the school's culture and can lead to school feeling like an unsafe place. Behaviour issues online can be very difficult to manage given issues of anonymity, and online incidents occur both on and off the school premises. Schools should be clear that even though the online space differs in many ways, the same standards of behaviour are expected online as apply offline, and that everyone should be treated with kindness, respect and dignity.
>
> Inappropriate online behaviour including bullying, the use of inappropriate language, the soliciting and sharing of nude or semi-nude images and videos and sexual harassment should be addressed in accordance with the same principles as offline behaviour, including following the child protection policy and speaking to the designated safeguarding lead (or deputy) when an incident raises a safeguarding concern.
>
> Many online behaviour incidents amongst young people occur outside the school day and off the school premises. Parents are responsible for this behaviour. However, often incidents that occur online will affect the school culture. Schools should have the confidence to sanction pupils when their behaviour online poses a threat or causes harm to another pupil, and/or could have repercussions for the orderly running of the school, when the pupil is identifiable as a member of the school or if the behaviour could adversely affect the reputation of the school.
>
> Headteachers should decide if mobile phones can be used during the school day. Many pupils, especially as they get older, will have one of their own. Allowing access

to mobiles in school introduces complexity and risks, including distraction, disruption, bullying and abuse, and can be a detriment to learning. Headteachers should consider restricting or prohibiting mobile phones to reduce these risks.

If headteachers decide not to impose any restrictions on mobile phones, they should have a clear plan to mitigate the risks of allowing access to phones. This plan, as part of the school's behaviour policy, should outline the approach to mobile phones and be reiterated to all pupils, staff and parents throughout the school year. Headteachers should ensure it is consistently and fairly applied."

Schools should be aware of guidance concerning Harmful Sexual Behaviour in the Keeping Children Safe in Education guidance document (see policy template in these appendices):

"Following any report of child-on-child sexual violence or sexual harassment offline or online, schools should follow the general safeguarding principles set out in Keeping children safe in education (KCSIE) - especially Part 5. The designated safeguarding lead (or deputy) is the most appropriate person to advise on the school's initial response. Each incident should be considered on a case-by-case basis.

Schools should be clear in every aspect of their culture that sexual violence and sexual harassment are never acceptable, will not be tolerated and that pupils whose behaviour falls below expectations will be sanctioned. Schools should make clear to all staff the importance of challenging all inappropriate language and behaviour between pupils. Schools should refer to the Respectful School Communities toolkit for advice on creating a culture in which sexual harassment of all kinds is treated as unacceptable."

Relevant legislation:

- Education Act 1996
- Education and Inspections Act 2006
- Education Act 2011 Part 2 (Discipline)
- The School Behaviour (Determination and Publicising of Measures in Academies) Regulations 2012
- Health and Safety at Work etc. Act 1974
- Obscene Publications Act 1959
- Children Act 1989
- Human Rights Act 1998
- Computer Misuse Act 1990

This is not a full list of Acts involved in the formation of this advice. Further information about relevant legislation can be found via the above link to the DfE advice document.

Responsibilities

The Headteacher is responsible for ensuring that the school policies reflect the requirements contained within the relevant legislation. The formulation of these policies may be delegated to other individuals or groups. The policies will normally be taken to Governors for approval. The Headteacher will need to authorise those staff who are allowed to carry out searches.

The Headteacher has authorised the following members of staff to carry out searches for and of electronic devices and the deletion of data/files on those devices: the senior leadership team.

The Headteacher may authorise other staff members in writing in advance of any search they may undertake, subject to appropriate training.

Training/Awareness

It is essential that all staff should be made aware of and should implement the school's policy.

Members of staff should be made aware of the school's policy on "Electronic devices – searching, confiscation and deletion":

- at induction
- at regular updating sessions on the school's online safety policy

Members of staff authorised by the Headteacher to carry out searches for and of electronic devices and to access and delete data/files from those devices should receive training that is specific and relevant to this role.

Specific training is required for those staff who may need to judge whether material that is accessed is inappropriate or illegal.

Policy Statements

Search:

The school Behaviour Policy refers to the policy regarding searches with and without consent for the wide range of items covered within the Education Act 2011 and lists those items. This policy refers only to the searching for and of electronic devices and the deletion of data/files on those devices.

Learners are not allowed to bring mobile phones or other personal electronic devices to school or use them in the school.

If learners breach these roles:

The sanctions for breaking these rules will be:

A warning

A short-term confiscation

Meeting with parents

Electronic devices

The DfE guidance – Searching, Screening and Confiscation received significant updates in July 2022 and now states:

- Electronic devices, including mobile phones, can contain files or data which relate to an offence, or which may cause harm to another person. This includes, but is not limited to, indecent images of children, pornography, abusive messages, images or videos, or evidence relating to suspected criminal behaviour.
- As with all prohibited items, staff should first consider the appropriate safeguarding response if they find images, data or files on an electronic device that they reasonably suspect are likely to put a person at risk
- Staff may examine any data or files on an electronic device they have confiscated as a result of a search .. if there is good reason to do so (defined earlier in the guidance as)
    - poses a risk to staff or pupils;
    - is prohibited, or identified in the school rules for which a search can be made or
    - is evidence in relation to an offence.
- If the member of staff conducting the search suspects they may find an indecent image of a child (sometimes known as nude or semi-nude images), the member of staff should never intentionally view the image, and must never copy, print, share, store or save such images. When an incident might involve an indecent image of a child and/or video, the member of staff should confiscate the device, avoid looking at the device and refer the incident to the designated safeguarding lead (or deputy) as the most appropriate person to advise on the school's response. Handling such reports or concerns can be especially complicated and schools should follow the principles as set out in Keeping children safe in education. The UK Council for Internet

Safety also provides the following guidance to support school staff and designated safeguarding leads: Sharing nudes and semi-nudes: advice for education settings working with children and young people.

- If a member of staff finds any image, data or file that they suspect might constitute a specified offence, then they must be delivered to the police as soon as is reasonably practicable.
- In exceptional circumstances members of staff may dispose of the image or data if there is a good reason to do so. In determining a 'good reason' to examine or erase the data or files, the member of staff must have regard to the following guidance issued by the Secretary of State
    - In determining whether there is a 'good reason' to examine the data or files, the member of staff should reasonably suspect that the data or file on the device has been, or could be used, to cause harm, undermine the safe environment of the school and disrupt teaching, or be used to commit an offence.
    - In determining whether there is a 'good reason' to erase any data or files from the device, the member of staff should consider whether the material found may constitute evidence relating to a suspected offence. In those instances, the data or files should not be deleted, and the device must be handed to the police as soon as it is reasonably practicable. If the data or files are not suspected to be evidence in relation to an offence, a member of staff may delete the data or files if the continued existence of the data or file is likely to continue to cause harm to any person and the pupil and/or the parent refuses to delete the data or files themselves

The examination of the data/files on the device should go only as far as is reasonably necessary to establish the facts of the incident. Any further intrusive examination of personal data may leave the school open to legal challenge. It is important that authorised staff should have training and sufficient knowledge of electronic devices and data storage.

Members of staff may require support in judging whether the material is inappropriate or illegal. One or more Senior Leaders should receive additional training to assist with these decisions. Care should be taken not to delete material that might be required in a potential criminal investigation.

The school should also consider their duty of care responsibility in relation to those staff who may access disturbing images or other inappropriate material whilst undertaking a search.

Seeing such material can be most upsetting. There should be arrangements in place to support such staff. The school may wish to add further detail about these arrangements.

Further guidance on reporting the incident to the police and the preservation of evidence can be found in the SWGfL flow chart in the main School Template Policies document. Local authorities/local safeguarding partnerships may also have further guidance, specific to their area.

A record should be kept of the reasons for the deletion of data/files. (DfE guidance states and other legal advice recommends that there is no legal reason to do this, best practice suggests that the school can refer to relevant documentation created at the time of any search or data deletion in the event of a learner, parental or other interested party complaint or legal challenge. Records will also help the school to review online safety incidents, learn from what has happened and adapt and report on application of policies as necessary).

Care of Confiscated Devices

School staff are reminded of the need to ensure the safe keeping of confiscated devices, to avoid the risk of compensation claims for damage/loss of such devices (particularly given the possible high value of some of these devices).

The school may wish to add a disclaimer to the relevant section of the Behaviour Policy which may assist in covering the school against damage/loss claims.

C4 Mobile Technologies Policy Template (inc. BYOD/BYOT)

Mobile technology devices may be a school owned/provided or privately owned smartphone, tablet, notebook/laptop or other technology that usually has the capability of utilising the school's wireless network. The device then has access to the wider internet which may include the school's learning platform and other cloud based services such as email and data storage.

The absolute key to considering the use of mobile technologies is that the learners, staff and wider school community understand that the primary purpose of having their personal device at school is educational and that this is irrespective of whether the device is school owned/provided or personally owned. The mobile technologies policy should sit alongside a range of polices including but not limited to the safeguarding policy, anti-bullying policy, acceptable use policy, policies around theft or malicious damage and the behaviour policy. Teaching about the safe and appropriate use of mobile technologies should be included in the online safety education programme.

Potential Benefits of Mobile Technologies

Research has highlighted the widespread uptake of mobile technologies amongst adults and children of all ages. Web-based tools and resources have changed the landscape of learning. Learners now have at their fingertips unlimited access to digital content, resources, experts, databases and communities of interest. By effectively maximizing the use of such resources, schools not only have the opportunity to deepen learning, but they can also develop digital literacy, fluency and citizenship in learners that will prepare them for the high tech world in which they will live, learn and work.

Considerations

There are a number of issues and risks to consider when implementing mobile technologies, these include; security risks in allowing connections to your school network, filtering of personal devices, breakages and insurance, access to devices for all learners, avoiding potential classroom distraction, network connection speeds, types of devices, charging facilities, total cost of ownership

Schools may consider implementing the use of mobile technologies as a means of reducing expenditure on school provided devices. However, it is important to remember that the increased network management costs and overheads involved in implementing this properly are likely to counterbalance or outweigh any savings.

The use of mobile technologies brings both real benefits and challenges for the whole school community – including teachers - and the only effective way for a school to implement these successfully is to involve the whole school community from the outset. Before the school embarks on this path, the risks and benefits must be clearly identified and shared with all stakeholders.

A range of mobile technology implementations is possible. The school should consider the following statements and remove those that do not apply to their planned implementation approach.

- The school acceptable use agreements for staff, learners and parents/carers will give consideration to the use of mobile technologies
- The school allows:

	School devices			**Personal devices**		
	School owned for individual use	School owned for multiple users	Authorised device[4]	Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	No (except Y6)	Yes	Yes
Full network access	Yes	Yes	Yes	No	No	No
Internet only					Yes	Yes (temporarily in some instances)

[4] Authorised device – purchased by the learner/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school.

The school has provided technical solutions for the safe use of mobile technologies in school (delete/amend as appropriate):

- All school devices are managed though the use of Mobile Device Management software
- Appropriate access control is applied to all mobile devices according to the requirements of the user (e.g Internet only access, network access allowed, shared folder network access)
- The school has addressed broadband performance and capacity to ensure that core educational and administrative activities are not negatively affected by the increase in the number of connected devices
- For all mobile technologies on the school network, filtering will be applied to the internet connection and attempts to bypass this are not permitted
- Appropriate exit processes are implemented for devices no longer used at a school location or by an authorised user. These may include; revoking the link between MDM software and the device, removing proxy settings, ensuring no sensitive data is removed from the network, uninstalling school-licenced software etc.
- All mobile devices on the school network are monitored
- The software/apps originally installed by the school must remain on the school owned device in usable condition and be easily accessible at all times. From time to time the school may add software applications for use in a particular lesson. Periodic checks of devices will be made to ensure that users have not removed required apps
- The school will ensure that devices contain the necessary apps for school work. Apps added by the school will remain the property of the school and will not be accessible to learners on authorised devices once they leave the school roll. Any apps bought by the user on their own account will remain theirs.
- Where a school device has been provided to support learning. It is expected that learners will bring devices to the school as required.
- The changing of settings that would stop the device working as it was originally set up and intended to work is not permitted

When personal devices are permitted:

- *Personal devices commissioned onto the school network are segregated effectively from school-owned systems Personal devices are brought into the school entirely at the risk of the owner and the decision to bring the device in to the school lies with the user (and their parents/carers) as does the liability for any loss or damage resulting from the use of the device in school*
- *The school accepts no responsibility or liability in respect of lost, stolen or damaged devices while at school or on activities organised or undertaken by the school (the school recommends insurance is purchased to cover that device whilst out of the home)*
- *The school accepts no responsibility for any malfunction of a device due to changes made to the device while on the school network or whilst resolving any connectivity issues*

- *The school recommends that the devices are made easily identifiable and have a protective case to help secure them as the devices are moved around the school. Pass-codes or PINs should be set on personal devices to aid security*
- *The school is not responsible for the day to day maintenance or upkeep of the users personal device such as the charging of any device, the installation of software updates or the resolution of hardware issues*

Users are expected to act responsibly, safely and respectfully in line with current acceptable use agreements, in addition:

- Devices are not permitted in tests or exams
- there is clear advice and guidance at the point of entry for visitors to acknowledge school requirements
  - Users are responsible for keeping their device up to date through software, security and app updates.
  - Users are responsible for charging their own devices and for protecting and looking after their devices while in the school
  - Confiscation and searching (England) - the school has the right to take, examine and search any device that is suspected of unauthorised use, either technical or inappropriate.
  - Users should be mindful of the age limits for app purchases and use and should ensure they read the terms and conditions before use.
- The expectations for taking/storing/using images/video aligns with the school's acceptable use policy and use of images/video policy. The non-consensual taking/using of images of others is not permitted.

Insurance

Schools that have implemented an authorised device approach (1:1 deployment) may wish to consider how they will insure these devices and should include details of the claims process in this policy.

C5 Social Media Policy Template

Social media (e.g. Facebook, Twitter, LinkedIn) is a broad term for any kind of online platform which enables people to directly interact with each other. However, some games, for example

Minecraft or World of Warcraft and video sharing platforms such as You Tube have social media elements to them.

The school recognises the numerous benefits and opportunities which a social media presence offers. Staff, parents/carers and learners are actively encouraged to find creative ways to use social media. However, there are some risks associated with social media use, especially around the issues of safeguarding, bullying and personal reputation. This policy aims to encourage the safe use of social media by the school, its staff, parents, carers and children.

Scope

This policy is subject to the school's codes of conduct and acceptable use agreements.

This policy:

- Applies to all staff and to all online communications which directly or indirectly, represent the school.
- Applies to such online communications posted at any time and from anywhere.
- Encourages the safe and responsible use of social media through training and education

The school respects privacy and understands that staff and learners may use social media forums in their private lives. However, personal communications likely to have a negative impact on professional standards and/or the school's reputation are within the scope of this policy.

Professional communications are those made through official channels, posted on a school account or using the school name. All professional communications are within the scope of this policy.

Personal communications are those made via a personal social media accounts. In all cases, where a personal account is used which associates itself with, or impacts on, the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.

Personal communications which do not refer to or impact upon the school are outside the scope of this policy.

Digital communications with learners are also considered.

Organisational control

Roles & Responsibilities

- SLT
    - Facilitating training and guidance on Social Media use.
    - Developing and implementing the Social Media policy
    - Taking a lead role in investigating any reported incidents.
    - Making an initial assessment when an incident is reported and involving appropriate staff and external agencies as required.
    - Receive completed applications for Social Media accounts
    - Approve account creation
- Administrator/Moderator
    - Create the account following SLT approval
    - Store account details, including passwords securely
    - Be involved in monitoring and contributing to the account
    - Control the process for managing an account after the lead staff member has left the organisation (closing or transferring)
- Staff
    - Know the contents of and ensure that any use of social media is carried out in line with this and other relevant policies
    - Attending appropriate training
    - Regularly monitoring, updating and managing content he/she has posted via school accounts
    - Adding an appropriate disclaimer to personal accounts when naming the school

Process for creating new accounts

The school community is encouraged to consider if a social media account will help them in their work, e.g. a history department Twitter account, or a "Friends of the school" Facebook page. Anyone wishing to create such an account must present a business case to the Leadership Team which covers the following points:-

- The aim of the account
- The intended audience
- How the account will be promoted
- Who will run the account (at least two staff members should be named)
- Will the account be open or private/closed

Following consideration by the SLT an application will be approved or rejected. In all cases, the SLT must be satisfied that anyone running a social media account on behalf of the school

has read and understood this policy and received appropriate training. This also applies to anyone who is not directly employed by the school, including volunteers or parents.

Monitoring

School accounts must be monitored regularly and frequently Any comments, queries or complaints made through those accounts must be responded to on the next working day where possible - even if the response is only to acknowledge receipt. Regular monitoring and intervention is essential in case a situation arises where bullying or any other inappropriate behaviour arises on a school social media account.

Behaviour

- The school requires that all users using social media adhere to the standard of behaviour as set out in this policy and other relevant policies.
- Digital communications by staff must be professional and respectful at all times and in accordance with this policy. Staff will not use social media to infringe on the rights and privacy of others or make ill-considered comments or judgments about staff. School social media accounts must not be used for personal gain. Staff must ensure that confidentiality is maintained on social media even after they leave the employment of the school.
- Users must declare who they are in social media posts or accounts. Anonymous posts are discouraged in relation to school activity.
- If a journalist makes contact about posts made using social media staff must follow the school media policy before responding.
- Unacceptable conduct, (e.g. defamatory, discriminatory, offensive, harassing content or a breach of data protection, confidentiality, copyright) will be considered extremely seriously by the school and will be reported as soon as possible to a relevant senior member of staff, and escalated where appropriate.
- The use of social media by staff while at work may be monitored, in line with school policies. *The school permits reasonable and appropriate access to private social media sites. However, where excessive use is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken*
- The school will take appropriate action in the event of breaches of the social media policy. Where conduct is found to be unacceptable, the school will deal with the matter internally. Where conduct is considered illegal, the school will report the matter to the police and other relevant external agencies, and may take action according to the disciplinary policy.

Legal considerations

- Users of social media should consider the copyright of the content they are sharing and, where necessary, should seek permission from the copyright holder before sharing.
- Users must ensure that their use of social media does not infringe upon relevant data protection laws, or breach confidentiality.

Handling abuse

- When acting on behalf of the school, respond to harmful and / or offensive comments swiftly and with sensitivity.
- If a conversation turns and becomes offensive or unacceptable, school users should block, report or delete other users or their comments/posts and should inform the audience exactly why the action was taken
- If you feel that you or someone else is subject to abuse by colleagues through use of online communications, then this action must be reported using the agreed school protocols.

Tone

The tone of content published on social media should be appropriate to the audience, whilst retaining appropriate levels of professional standards. Key words to consider when composing online content are:

- Engaging
- Conversational
- Informative
- Professional

Use of images

School use of images can be assumed to be acceptable, providing the following guidelines are strictly adhered to.

- Permission to use any photos or video recordings should be sought in line with the school's digital and video images policy. If anyone, for any reason, asks not to be filmed or photographed then their wishes should be respected.
- Under no circumstances should staff share or upload learner pictures online other than via official school channels.
- Staff should exercise their professional judgement about whether an image is appropriate to share on school social media accounts. Learners should be appropriately dressed, not be subject to ridicule and must not be on any school list of children whose images must not be published.

- If a member of staff inadvertently takes a compromising picture which could be misconstrued or misused, they must delete it immediately.

Personal use

- Staff
    - Personal communications are those made via a personal online accounts. In all cases, where a personal account is used which associates itself with the school or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.
    - Personal communications which do not refer to or impact upon the school are outside the scope of this policy.
    - Where excessive or inappropriate personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken

- Learners
    - Staff are not permitted to follow or engage with current or prior learners of the school (who are under 18) on any personal social media account.
    - The school's education programme should enable the learners to be safe and responsible users of social media.
    - Learners are encouraged to comment or post appropriately about the school. Any offensive or inappropriate comments will be resolved by the use of the school's behaviour policy
- Parents/Carers
    - If parents/carers have access to a school learning platform where posting or commenting is enabled, parents/carers will be informed about acceptable use.
    - Parents/Carers are encouraged to comment or post appropriately about the school. In the event of any offensive or inappropriate comments being made, the school will ask the parent/carer to remove the post and invite them to discuss the issues in person. If necessary, refer parents to the school's complaints procedures.

Monitoring posts about the school

- As part of active social media engagement, it is considered good practice to pro-actively monitor the Internet for public postings about the school.
- The school should effectively respond to social media comments made by others according to a defined policy or process.

Appendix

Managing your personal use of Social Media:

- "Nothing" on social media is truly private
- Social media can blur the lines between your professional and private life. Don't use the school logo and/or branding on personal accounts
- Check your settings regularly and test your privacy
- Keep an eye on your digital footprint
- Keep your personal information private
- Regularly review your connections – keep them to those you want to be connected to
- When posting online consider; Scale, Audience and Permanency of what you post
- If you want to criticise, do it politely.
- Take control of your images – do you want to be tagged in an image? What would children or parents say about you if they could see your images?
- Know how to report a problem

Managing school social media accounts

The Do's

- Check with a senior leader before publishing content that may have controversial implications for the school
- Use a disclaimer when expressing personal views
- Make it clear who is posting content
- Use an appropriate and professional tone
- Be respectful to all parties
- Ensure you have permission to 'share' other peoples' materials and acknowledge the author
- Express opinions but do so in a balanced and measured manner
- Think before responding to comments and, when in doubt, get a second opinion
- Seek advice and report any mistakes using the school's reporting process
- Consider turning off tagging people in images where possible
- Ensure the account is set up securely and the account can be transferred to another approved staff member in the event of the account holder leaving the school.

The Don'ts

- Don't make comments, post content or link to materials that will bring the school into disrepute
- Don't publish confidential or commercially sensitive material
- Don't breach copyright, data protection or other relevant legislation

- Don't link to, embed or add potentially inappropriate content. Consider the appropriateness of content for any audience of school accounts.
- Don't post derogatory, defamatory, offensive, harassing or discriminatory content
- Don't use social media to air internal grievances

Appendix C6 School Online Safety Policy Template – Artificial Intelligence in Schools

This is a new policy template, first published in January 2025

Introduction

The South West Grid for Learning Trust (SWGfL) is a charity that has been at the forefront of supporting schools with online safety and security for 20 years and is recognised as a world leader in online safety innovation

The integration of Artificial Intelligence (AI) in UK schools has evolved significantly over recent years, reflecting both technological advances and the educational community's response to the opportunities and challenges it presents.

A consensus is emerging about the benefits of AI to enhance personalised learning and streamline administrative tasks, while also raising concerns around data privacy, ethical use, and the preparedness of teachers to effectively integrate AI tools into classrooms.

This ongoing dialogue reflects the recognition of AI's transformative potential in education, balanced with a need for careful implementation to protect learner welfare and promote equitable outcomes. These considerations are shaping a pathway for embedding AI in schools, focusing on teacher training, ethical guidelines, and fostering digital competency among students.

Legislative Background and Key Documents

The UK Online Safety Act 2023 is designed to make the internet safer, particularly for children and vulnerable users, by regulating online content and holding tech companies accountable for harmful material. It is still yet to be fully understood where there may be gaps in regulation to protect children and young people from possible harm caused by AI. Ofcom is the online safety regulator in the UK and is responsible for publishing codes of practice and guidance on how companies can comply with their duties.

There is currently little in the way of specific legislation regarding the use of AI in schools, but guidance has been developed and is being regularly updated as the technology evolves. Schools may wish to consult the following:

- AI Roadmap - GOV.UK
- National AI Strategy - GOV.UK

- Ofcom's 2024 Online Nation Report
- EU Artificial Intelligence Act 2024 - Useful high-level 4-point summary of considerations
- UNESCO AI Competency Framework for Students (Guidance)
- UNESCO AI Competency Framework for Staff (Guidance)
- Responsible AI Toolkit - GOV.UK
- Data protection in schools - Artificial intelligence (AI) and data protection in schools - Guidance - GOV.UK
- Understanding AI for school – Tips for School Leaders - ASCL, NAHT, CST, and others
- SWGfL – Artificial Intelligence and Online Safety
- Welsh Government - Generative AI – Hwb guidance - Resources, guidance and information for education practitioners, learners, and families on generative AI.
- Welsh Government - Generative AI: keeping learners safe online

Context

AI represents a transformative leap in technology, enabling machines to create text, images, audio, and video with remarkable accuracy and creativity. Emerging from advancements in machine learning, particularly deep learning, generative models such as GPT (Generative Pre-trained Transformer) and DALL·E leverage vast datasets to understand and produce content that mimics human expression. Initially text-focused, these models have evolved to become multi-modal, integrating and processing various types of input, such as text and images, to generate cohesive outputs.

Since the debut of early systems like OpenAI's GPT-2 in 2019, the field has rapidly advanced, unlocking opportunities in education while raising critical considerations around ethics, data privacy, and equitable access.

According to Ofcom's 2024 Online Nation Report more than half of children have used generative AI tools in the past year. Teenagers aged 13-15 are more likely to use AI (66%) than those aged 8-12 (46%) and combining both age groups, over half (53%) have made use of AI to support with homework tasks. There is a broad range of purposes for children using AI including finding information, creating images/videos, seeking advice and summarising text, with the most popular tool among 8-15s being ChatGPT (37%) followed by Snapchat My AI (30%).

Schools must now navigate this landscape thoughtfully, crafting policies that harness the benefits of AI while prioritising staff and learners' safety, security and well-being. .

Policy on the use of Artificial Intelligence in Schools

Statement of intent

Artificial Intelligence (AI) technology is already widely used in commercial environments and is gaining greater use in education. We recognise that the technology has many benefits and the potential to enhance outcomes and educational experiences, with the opportunity to support staff in reducing workload.

We also realise that there are risks involved in the use of AI systems, but that these can be mitigated through our existing policies and procedures, amending these as necessary to address AI risks.

We will educate staff and learners about safe and ethical use of AI, preparing them for a future in which AI technologies are likely to play an increasing role.

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

Related policies

This policy should be read in conjunction with other school policies:

- Data Protection Policy
- Staff Discipline policies and codes of conduct
- Behaviour policy
- Anti-bullying policy
- Online safety policy
- Acceptable Use Agreements
- *Curriculum Policies*

Policy Statements

- The school acknowledges the benefits of the use of AI in an educational context - including enhancing teaching and learning and outcomes, improving administrative processes, reducing workload and preparing staff and learners for a future in which AI technology will be an integral part. Staff are encouraged to use AI based tools to support their work where appropriate, within the frameworks provided below and are required to be professionally responsible and accountable for this area of their work.
- We will comply with all relevant legislation and guidance, with reference to guidance contained in Keeping Learners Safe
- We will provide relevant training for staff and governors in the advantages, use of and potential risks of AI. We will support staff in identifying training and development needs to enable relevant opportunities.
- We will ensure that, within our education programmes, learners understand the ethics and use of AI and the potential benefits and risks of its use. The school recognises the importance of equipping learners with the knowledge, skills and strategies to engage responsibly with AI tools.
- As set out in acceptable use agreements, the school will use AI responsibly and with awareness of data sensitivity. Where used, staff should use AI tools responsibly, ensuring the protection of both personal and sensitive data. Staff should only input anonymized data to avoid the exposure of personally identifiable or sensitive information.
- Staff should always ensure AI tools used comply with UK GDPR and other data protection regulations. They must verify that tools meet data security standards before using them for work related to the school.
- Only those AI technologies approved by the school may be used. Staff should always use school-provided AI accounts for work purposes. These accounts are configured to comply with organisational security and oversight requirements, reducing the risk of data breaches.
- We will protect sensitive information. Staff must not input sensitive information, such as internal documents or strategic plans, into third-party AI tools unless explicitly vetted for that purpose. They must always recognize and safeguard sensitive data.
- The school will ensure that when AI is used, it will not infringe copyright or intellectual property conventions – care will be taken to avoid intellectual property, including that of the learners, being used to train generative AI models without appropriate consent.
- AI incidents must be reported promptly. Staff must report any incidents involving AI misuse, data breaches, or inappropriate outputs immediately to the relevant internal teams. Quick reporting helps mitigate risks and facilitates a prompt response.

- The school will audit all AI systems in use and assess their potential impact on staff, learners and the school's systems and procedures, creating an AI inventory listing all tools in use, their purpose and potential risks. (Risk assessment matrices are attached as an appendix)
- We are aware of the potential risk for discrimination and bias in the outputs from AI tools and have in place interventions and protocols to deal with any issues that may arise. When procuring and implementing AI systems, we will follow due care and diligence to prioritise fairness and safety.
- *The school will support parents and carers in their understanding of the use of AI in the school*
- *AI tools may be used to assist teachers in the assessment of learner's work and identify areas for improvement. Teachers may also support learners to gain feedback on their own work using AI. Use of these tools should be purposeful, considered and with a clear focus on ensuring impact and understanding and mitigating risk*
- *Maintain Transparency in AI-Generated Content. Staff should ensure that documents, emails, presentations, and other outputs influenced by AI include clear labels or notes indicating AI assistance. Clearly marking AI-generated content helps build trust and ensures that others are informed when AI has been used in communications or documents.*
- *We will prioritise human oversight. AI should assist, not replace, human decision-making. Staff must ensure that final judgments, particularly those affecting people, are made by humans and critically evaluate AI-generated outputs. They must ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing. This is especially important for external communication to avoid spreading misinformation.*
- Recourse for improper use and disciplinary procedures. Improper use of AI tools, including breaches of data protection standards, misuse of sensitive information, or failure to adhere to this agreement, will be subject to disciplinary action as defined in Staff Disciplinary Policy.

Responsibilities

Headteacher and Senior Leaders

Are responsible for the strategic planning of how AI will be used in the school, establishing AI policies and procedures and ensuring that all staff receive relevant training and have a clear understanding of these.

Designated Safeguarding Person (DSP) / Online Safety Lead

Our Designated Safeguarding Person / Online Safety Lead has responsibility for online safety in the school. They are expected to have knowledge of AI and its safeguarding implications and an in-depth working knowledge of key guidance. We ensure that they receive appropriate specialist training, commensurate with their role and that ongoing training is provided for all school staff.

Data Protection Officer

The DPO will be responsible for providing advice and guidance about data protection obligations in relation to the use of AI, including related Data Protection Impact Assessments (DPIAs).

Technical Staff

Technical staff / IT Leads will be responsible for technical support and guidance, with particular regard to cyber-security and the effectiveness of filtering and monitoring systems.

Staff

It is the responsibility of all staff to have read and understood this policy and associated Acceptable Use Agreements. All staff must report any incidents or suspected incidents concerning the use of AI in line with school policy. All staff will challenge any inappropriate behaviour. Staff have a duty to ensure that:

- the school environment is safe
- sensitive and confidential data / information is secure
- that their actions do not put the reputation of the school at risk and that
- learners understand their responsibilities

Governors/Trustees

We ensure that our Trust Board / governing body has a good understanding of how AI is used in a school context and potential benefits and risks of its use. They receive regular training and updates, enabling them to support the school and challenge where necessary. This may include evaluation of the use of AI in the curriculum, administration and communications, ensuring that risks relating to these issues are identified, that reporting routes are available, and that risks are effectively mitigated.

Parents/carers

We work hard to engage parents and carers by:

- *regular in school sessions*
- *sharing newsletters*
- *sharing information online e.g., website, social media*
- *providing curriculum information*

Our parents and carers are made aware of how AI is used in school and receive guidance on both good practice in its use and the risks of misuse that may affect their childrens' learning or safety. They are encouraged to report any concerns to the school and are made aware that all incidents will be handled with care and sensitivity.

Vulnerable groups

We recognise that vulnerable learners are more likely to be at risk from the misuse of AI (both in their own use or through the actions of others). We ensure that vulnerable learners are offered appropriate support to allow them to gain full benefit of the use of AI, while being aware of the potential risks.

Children are considered to be vulnerable data subjects and therefore any process involving their personal data is likely to be "high risk". If an AI/ automated process is used to make significant decisions about people, this is likely to trigger the need for a Data Protection Impact Assessment (DPIA).

Reporting

Our reporting systems are well promoted, easily understood and easily accessible for staff, learners and parents/carers to confidently report issues and concerns, knowing these will be treated seriously. All reports will be dealt with swiftly and sensitively and outcomes shared

where appropriate. We also respond to anonymous reports, or reports made by third parties. This can be done via: (amend as necessary)

- nominated member of staff
- established school reporting mechanisms
- online/offline reporting tool
- anonymous/confidential reporting routes
- links to national or local organisations
- *list any other systems here*

Responding to an incident or disclosure

Our response is always based on sound safeguarding principles and follows school safeguarding and disciplinary processes. It is calm, considered and appropriate and puts the learner at the centre of all decisions made.

- All AI incidents (including data breaches and/or inappropriate outputs) must be reported promptly to the relevant internal teams. Effective reporting helps mitigate risks and facilitates a prompt response.
- Where relevant / required incidents will be reported to external agencies e.g., Police, LADO, DPO, ICO.
- All AI related incidents will be recorded through the school's normal recording systems

In the case of misuse of AI by staff, the normal staff disciplinary processes will be followed.

Risk assessment

It is key that our approach to managing risk aligns with, and complements, our broader safeguarding approach.

The school understands that despite many positive benefits in the use of AI, there are some risks that will need to be identified and managed, including:

- Legal, commercial, security and ethical risks
- Data Protection
- Cyber Security
- Fraud
- Safeguarding and well-being

- Duty of care

The example matrix included at the end of this policy template may be used to evaluate risk within the school and may be edited and adapted accordingly through the normal school procedures

Education

Our school's educational approach seeks to develop knowledge and understanding of emerging digital technologies, including AI.

This policy outlines our commitment to integrating Artificial Intelligence (AI) responsibly and effectively within our school environment. We will use AI responsibly, safely and purposefully to support these aims:

- Enhance academic outcomes: Improve educational experiences and performance for pupils.
- Support teachers: Assist in managing workloads more efficiently and effectively.
- Educate on AI use: Promote safe, responsible, and ethical AI practices among staff and learners.
- Develop AI literacy: Incorporate AI as a teaching tool to build AI skills and understanding.
- Prepare for the future: Equip staff and pupils for a future where AI is integral.
- Promote educational equity: Use AI to address learning gaps and provide personalised support.

Our school's approach is to deliver this knowledge and understanding wherever it is relevant within the curriculum. This will include: (schools will need to amend as relevant)

- Computing
- PHSE
- Cross curricular programmes
- Discrete subjects (to be defined)
- Schools should list other opportunities to deliver teaching and learning around AI here e.g., assemblies, pastoral/form time, discrete lessons, visits from outside agencies etc

Our approach is given the time it deserves and is authentic i.e., based on current issues nationally, locally and within our sschool's risk profile. It is shaped and evaluated by learners

and other members of the school community to ensure that it is dynamic, evolving and based on need. We do this through:

- *Learner assessment*
- *Critical evaluation of emerging trends and research findings*
- *Surveys*
- *Focus groups*
- *Parental engagement*
- *Staff consultation*
- *Engaging with learners*
- *Staff training*

The following resources are used:

- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (including updated AI reference)
- ProjectEVOLVE - https://projectevolve.co.uk
- UKCIS DSIT "Education for a Connected World"
- Welsh Government - Generative AI – Hwb guidance - Resources, guidance and information for education practitioners, learners, and families on generative AI.
- *List other resources which are used to support the curriculum here*

In line with good practice, we have created child-friendly versions of key safeguarding policies, produced and regularly evaluated in consultation with young people. List those that are available below.

Training

As AI becomes an integral part of modern education, it is essential for staff to be trained in its effective use. Training equips educators with the knowledge and skills to integrate AI tools responsibly into teaching, learning, and administrative processes. It ensures that AI is used to enhance educational outcomes, streamline workloads, and promote equity while safeguarding ethical practices and data privacy. By fostering AI literacy, staff can confidently prepare pupils for a future where AI is a key driver of innovation and opportunity.

- We will provide comprehensive training to all staff on the effective, responsible, and ethical use of AI technologies in education, ensuring these tools enhance teaching, learning, and administrative processes.

- We will integrate AI-related risks and safeguards into annual safeguarding training, aligning with statutory guidance, including "Keeping Learners Safe."
- We will ensure all staff are equipped with the knowledge and skills to confidently integrate AI into their professional practice and to prepare pupils for a future shaped by AI-driven innovation and opportunities.
- We will train staff to identify, assess, and mitigate risks associated with AI technologies, including issues such as biased algorithms, privacy breaches, and harmful content.
- We will train staff on robust data protection practices, ensuring compliance with UK GDPR and other relevant regulations while using AI systems.
- We will promote ethical practices in the use of AI, ensuring that these technologies contribute to equity, fairness, and inclusivity in education.
- We will empower educators to teach learners about the safe and ethical use of AI, cultivating a culture of awareness, resilience, and informed decision-making in the digital age.
- We will train staff to use AI responsibly as a tool to monitor and address online risks, reinforcing our commitment to a safe learning environment.

Appendix C6a - Risk Assessment Matrix for Schools Implementing AI

Introduction

The following risk assessment matrix is intended to help schools identify, evaluate, and mitigate risks associated with implementing Artificial Intelligence (AI) in educational processes.

The matrix considers potential risks across various domains, including data protection, ethical considerations, and operational integrity. There is a particular focus on safeguarding and wellbeing issues, highlighting potential risks to student welfare and offers strategies to mitigate these risks effectively. Schools should amend the content of the matrix as necessary and consider the risk profile that is relevant to their own circumstances.

Risk Assessment Matrix

Risk Area	Risk Description	Likelihood (Low/Med/High)	Impact (Low/Med/High)	Risk Level (Low/Med/High)	Mitigation Measures
Data Protection and Privacy Breaches	Unauthorised access to sensitive data or personal information, leading to safeguarding concerns and commercial risk.	Med	High	Med	Implement strong encryption, regular audits, and GDPR-compliant data management policies and conduct regular privacy audits.
Cyberbullying	Increased potential for bullying through AI-mediated communication tools.	Low	Low	Low	Monitor AI communication tools, implement clear reporting mechanisms, and provide student support.
Over-reliance on AI	Over-reliance on AI tools reducing interpersonal interactions among students. Reduction in teacher autonomy and critical decision-making by overusing AI tools.	Med	Med	Med	Encourage collaborative learning activities and balance AI use with social engagement. Define clear boundaries for AI use and regularly review its

					impact on pedagogy.
Emotional Manipulation	AI systems unintentionally affecting student mental health through curated content.	Low	Low	Low	Monitor AI-generated content, involve mental health professionals, and promote media literacy.
Inappropriate Content or Conduct	AI exposing learners to harmful or unsuitable materials / behaviour	Med	Med	Med	Conduct rigorous testing of AI tools, apply effective filtering and monitoring and ensure human oversight.
Mental Health Impacts	Overuse of AI tools causing stress, anxiety, or dependency in learners.	Low	Low	Low	Monitor usage patterns, provide mental health resources, and set expectations on use of AI systems.
Bias and Discrimination	AI systems propagating	Low	Low	Low	Regularly audit AI algorithms

	biases that impact student wellbeing or inclusion. AI models producing discriminatory or biased outcomes.				for bias and provide inclusive media literacy education and training.
Misuse of AI	Learners using AI tools for harmful, unethical or illegal purposes (e.g. nudification).	Low	Low	Low	Educate learners on responsible and appropriate AI use and establish clear usage policies.
Misinformation	Creation or spread of harmful or misleading AI-generated content.	Med	Med	Med	Educate staff and learners to verify AI outputs and establish clear policies for verifying content authenticity.
Digital Divide	Inequitable access to AI tools among learners from diverse demographic groups.	Med	Med	Med	Provide equitable access to AI resources and ensure alternative solutions are available.

AI Ethics Awareness	Lack of awareness among staff and learners about ethical implications of AI.	Med	Med	Med	Provide training and education on AI ethics and its responsible usage. Establish an 'Ethics in AI' group.
Data Accuracy	AI systems generating inaccurate or misleading recommendations.	Med	Med	Med	Regularly validate AI outputs and involve human oversight in decision-making.
Legal Compliance	Non-compliance with laws regarding AI usage and learner data.	Med	Med	Med	Understand legal requirements. Conduct legal reviews and consult experts on AI-related regulations.
Cyber-Security	Increased use of AI tools in cyberattacks targeting school systems and data.	Med	Med	Med	Strengthen cybersecurity protocols and educate staff and learners on safe online practices.

Likelihood and Impact Definitions

- Likelihood: The likelihood that the identified risk will occur.
    - Low: Unlikely to occur under normal circumstances.
    - Medium: Possible occurrence based on past trends or vulnerabilities.
    - High: Likely to occur without intervention.
- Impact: The severity of impact should the risk materialise.
    - Low: Minimal disruption with limited consequences.
    - Medium: Moderate disruption affecting key processes.
    - High: Significant disruption with severe consequences.

Action Plan

Schools may wish to create an action plan based on the findings of the risk assessment matrix. Your plan should consider a before and after approach to demonstrate the intended impact of your proposed actions. These actions might include (amend as relevant).

1. *Appoint a safeguarding lead to oversee AI implementation and its impact on student welfare.*
2. *Deliver regular training for staff on online safety, AI ethics, and responsible use.*
3. *Audit the curriculum to identify where these AI related issues might be incorporated into existing or new curricular programmes.*
4. *Establish transparent reporting mechanisms for any safeguarding or wellbeing concerns linked to AI.*
5. *Collaborate with parents and carers to raise awareness about AI risks and best practices.*
6. *Conduct annual reviews of AI tools and their impact on student wellbeing, updating the risk matrix as needed.*

Review and Update

The school will review and update this matrix annually or whenever new AI technologies or safeguarding challenges arise.

Appendix C6b – Staff Use of AI Acceptable Use Agreement

School Policy

Emerging technologies, including Artificial Intelligence (AI), are increasingly integrated into educational settings and the lives of staff and learners. These technologies have immense potential to enhance creativity, promote personalized learning, and improve operational efficiency. However, their use also presents risks that require clear policies and practices to ensure safety, security, and ethical application.

This acceptable use policy aims to ensure:

- Staff and volunteers are responsible users of AI and emerging technologies, prioritising safety and ethical considerations.
- School systems and users are protected from misuse or harm resulting from the use of AI.
- Staff have a clear understanding of their responsibilities when engaging with AI and emerging technologies in professional and personal contexts.

Acceptable Use Policy Agreement

I understand that I must use AI and emerging technologies responsibly to minimise the risk to the safety, privacy, or security of the school community and its systems. I acknowledge the potential of these technologies for enhancing learning and will endeavour to integrate them in a way that aligns with the school's policy, ethos and values.

For my professional and personal safety:

- I understand that the school will monitor my use of AI tools and technologies.
- I will only use AI tools and technologies for purposes authorized by the school and will ensure compliance with data protection laws (e.g. UK GDPR) when handling personal data.
- I will ensure that any sensitive or personally identifiable information about staff, students, or parents/carers is only entered into AI systems that have explicit approval and robust security measures in place.
- I will report any AI-related incidents or anomalies that could indicate misuse, bias, or harm to the appropriate person immediately.

In my communications and actions:

- I will respect copyright, intellectual property, and ethical standards when uploading content to prompt AI output.
- I will critically evaluate the outputs of AI systems to avoid spreading misinformation or biased content and will ensure that all AI-assisted decisions are made with appropriate human oversight.
- I will communicate professionally and responsibly when using AI systems.
- I will ensure transparency through appropriate attribution where AI has been used.

When engaging with learners:

- I will support learners on the safe, ethical, appropriate and effective use of AI.
- I will use AI tools to engage with learners in ways that uphold and enhance their privacy, wellbeing, and trust.

When using the school's systems and resources:

- I will use AI systems in compliance with established security measures and access protocols.
- I will ensure that any AI applications used in teaching or administration are vetted and comply with the school's policies.
- I will ensure generative AI tools are not used to impersonate others or create deceptive or harmful content.

When handling data:

- I will ensure compliance with the school's data protection policies when using AI for data analysis or reporting.
- I will ensure I have explicit authorisation when uploading sensitive school-related information into generative AI systems.

Responsibility and Accountability:

- I will use generative AI tools responsibly to create authentic and beneficial content, ensuring respect for individuals' identities and well-being.
- I understand that misuse of AI or emerging technologies could lead to disciplinary actions, including warnings, suspension, or referral to the appropriate authorities.
- I acknowledge that this agreement applies to all AI-related activities within and outside of school premises that are connected to my professional responsibilities.

-

Legislation

Schools should be aware of the legislative framework under which this online safety policy template and guidance has been produced. It is important to note that in general terms an action that is illegal if committed offline is also illegal if committed online.

It is recommended that legal advice is sought in the advent of an online safety issue or situation.

A useful summary of relevant legislation can be found at: Report Harmful Content: Laws about harmful behaviours

Computer Misuse Act 1990

This Act makes it an offence to:

- Erase or amend data or programs without authority;
- Obtain unauthorised access to a computer;
- "Eavesdrop" on a computer;
- Make unauthorised use of computer time or facilities;
- Maliciously corrupt or erase data or programs;
- Deny access to authorised users.

Schools may wish to view the National Crime Agency website which includes information about "Cyber crime – preventing young people from getting involved". Each region in England (& Wales) has a Regional Organised Crime Unit (ROCU) Cyber-Prevent team that works with schools to encourage young people to make positive use of their cyber skills. There is a useful summary of the Act on the NCA site.

Data Protection Act 1998

This protects the rights and privacy of individual's data. To comply with the law, information about individuals must be collected and used fairly, stored safely and securely and not disclosed to any third party unlawfully. The Act states that person data must be:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate.
- Not kept longer than necessary.
- Processed in accordance with the data subject's rights.

- Secure.
- Not transferred to other countries without adequate protection.

The Data Protection Act 2018:

Updates the 1998 Act, incorporates the General Data Protection Regulations (GDPR) and aims to:

- Facilitate the secure transfer of information within the European Union.
- Prevent people or organisations from holding and using inaccurate information on individuals. This applies to information regarding both private lives or business.
- Give the public confidence about how businesses can use their personal information.
- Provide data subjects with the legal right to check the information businesses hold about them. They can also request for the data controller to destroy it.
- Give data subjects greater control over how data controllers handle their data.
- Place emphasis on accountability. This requires businesses to have processes in place that demonstrate how they're securely handling data.
- Require firms to keep people's personal data safe and secure. Data controllers must ensure that it is not misused.
- Require the data user or holder to register with the Information Commissioner.

All data subjects have the right to:

- Receive clear information about what you will use their data for.
- Access their own personal information.
- Request for their data to be revised if out of date or erased. These are known as the right to rectification and the right to erasure
- Request information about the reasoning behind any automated decisions, such as if computer software denies them access to a loan.
- Prevent or query about the automated processing of their personal data.

Freedom of Information Act 2000

The Freedom of Information Act gives individuals the right to request information held by public authorities. All public authorities and companies wholly owned by public authorities have obligations under the Freedom of Information Act. When responding to requests, they have to follow a number of set procedures.

Communications Act 2003

Sending by means of the Internet a message or other matter that is grossly offensive or of an indecent, obscene or menacing character; or sending a false message by means of or persistently making use of the Internet for the purpose of causing annoyance, inconvenience or needless anxiety is guilty of an offence liable, on conviction, to imprisonment. This wording

is important because an offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

Malicious Communications Act 1988

It is an offence to send an indecent, offensive, or threatening letter, electronic communication or other article to another person.

Regulation of Investigatory Powers Act 2000

It is an offence for any person to intentionally and without lawful authority intercept any communication. Monitoring or keeping a record of any form of electronic communications is permitted, in order to:

- Establish the facts;
- Ascertain compliance with regulatory or self-regulatory practices or procedures;
- Demonstrate standards, which are or ought to be achieved by persons using the system;
- Investigate or detect unauthorised use of the communications system;
- Prevent or detect crime or in the interests of national security;
- Ensure the effective operation of the system.
- Monitoring but not recording is also permissible in order to:
- Ascertain whether the communication is business or personal;
- Protect or support help line staff.
- The school reserves the right to monitor its systems and communications in line with its rights under this act.

Trade Marks Act 1994

This provides protection for Registered Trade Marks, which can be any symbol (words, shapes or images) that are associated with a particular set of goods or services. Registered Trade Marks must not be used without permission. This can also arise from using a Mark that is confusingly similar to an existing Mark.

Copyright, Designs and Patents Act 1988

It is an offence to copy all, or a substantial part of a copyright work. There are, however, certain limited user permissions, such as fair dealing, which means under certain circumstances permission is not needed to copy small amounts for non-commercial research or private study. The Act also provides for Moral Rights, whereby authors can sue if their name is not included in a work they wrote, or if the work has been amended in such a way as to impugn their reputation. Copyright covers materials in print and electronic form,

and includes words, images, and sounds, moving images, TV broadcasts and other media (e.g. YouTube).

Telecommunications Act 1984

It is an offence to send a message or other matter that is grossly offensive or of an indecent, obscene or menacing character. It is also an offence to send a message that is intended to cause annoyance, inconvenience or needless anxiety to another that the sender knows to be false.

Criminal Justice & Public Order Act 1994

This defines a criminal offence of intentional harassment, which covers all forms of harassment, including sexual. A person is guilty of an offence if, with intent to cause a person harassment, alarm or distress, they:

- Use threatening, abusive or insulting words or behaviour, or disorderly behaviour; or
- Display any writing, sign or other visible representation, which is threatening, abusive or insulting, thereby causing that or another person harassment, alarm or distress.

Racial and Religious Hatred Act 2006

This Act makes it a criminal offence to threaten people because of their faith, or to stir up religious hatred by displaying, publishing or distributing written material which is threatening. Other laws already protect people from threats based on their race, nationality or ethnic background.

Protection from Harassment Act 1997

A person must not pursue a course of conduct, which amounts to harassment of another, and which he knows or ought to know amounts to harassment of the other. A person whose course of conduct causes another to fear, on at least two occasions, that violence will be used against him is guilty of an offence if he knows or ought to know that his course of conduct will cause the other so to fear on each of those occasions.

Protection of Children Act 1978

It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is anyone under the age of 18. Viewing an indecent image of a child on your computer means that you have made a digital image. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence may face up to 10 years in prison

Sexual Offences Act 2003

A grooming offence is committed if you are over 18 and have communicated with a child under 16 at least twice (including by phone or using the Internet) it is an offence to meet them or travel to meet them anywhere in the world with the intention of committing a sexual offence. Causing a child under 16 to watch a sexual act is illegal, including looking at images such as videos, photos or webcams, for your own gratification. It is also an offence for a person in a position of trust to engage in sexual activity with any person under 18, with whom they are in a position of trust. (Typically, teachers, social workers, health professionals, connexions staff fall in this category of trust). Any sexual intercourse with a child under the age of 13 commits the offence of rape.

Public Order Act 1986

This Act makes it a criminal offence to stir up racial hatred by displaying, publishing or distributing written material which is threatening. Like the Racial and Religious Hatred Act 2006 it also makes the possession of inflammatory material with a view of releasing it a criminal offence. Children, Families and Education Directorate page 38 April 2007.

Obscene Publications Act 1959 and 1964

Publishing an "obscene" article is a criminal offence. Publishing includes electronic transmission.

Human Rights Act 1998

This does not deal with any particular issue specifically or any discrete subject area within the law. It is a type of "higher law", affecting all other laws. In the school context, human rights to be aware of include:

- The right to a fair trial
- The right to respect for private and family life, home and correspondence
- Freedom of thought, conscience and religion
- Freedom of expression
- Freedom of assembly
- Prohibition of discrimination
- The right to education

These rights are not absolute. The school is obliged to respect these rights and freedoms, balancing them against those rights, duties and obligations, which arise from other relevant legislation.

The Education and Inspections Act 2006

Empowers Headteachers, to such extent as is reasonable, to regulate the behaviour of learners when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour.

The Education and Inspections Act 2011

Extended the powers included in the 2006 Act and gave permission for Headteachers (and nominated staff) to search for electronic devices. It also provides powers to search for data on those devices and to delete data.

(see template policy in these appendices and for DfE guidance - http://www.education.gov.uk/schools/learnersupport/behaviour/behaviourpolicies/f0076897/screening-searching-and-confiscation)

The Protection of Freedoms Act 2012

Requires schools to seek permission from a parent/carer to use Biometric systems

The School Information Regulations 2012

Requires schools to publish certain information on its website:

https://www.gov.uk/guidance/what-maintained-schools-must-publish-online

Serious Crime Act 2015

Introduced new offence of sexual communication with a child. Also created new offences and orders around gang crime (including CSE)

Criminal Justice and Courts Act 2015

Revenge porn – as it is now commonly known – involves the distribution of private and personal explicit images or video footage of an individual without their consent, with the intention of causing them embarrassment and distress. Often revenge porn is used maliciously to shame ex-partners. Revenge porn was made a specific offence in the Criminal Justice and Courts Act 2015. The Act specifies that if you are accused of revenge porn and found guilty of the criminal offence, you could be prosecuted and face a sentence of up to two years in prison.

For further guidance or support please contact the Revenge Porn Helpline

Links to other organisations or documents

The following links may help those who are developing or reviewing a school online safety policy and creating their online safety provision:

UK Safer Internet Centre

Safer Internet Centre – https://www.saferinternet.org.uk/
South West Grid for Learning - https://swgfl.org.uk/products-services/online-safety/
Childnet – http://www.childnet-int.org/
Professionals Online Safety Helpline - http://www.saferinternet.org.uk/about/helpline
Revenge Porn Helpline - https://revengepornhelpline.org.uk/
Internet Watch Foundation - https://www.iwf.org.uk/
Report Harmful Content - https://reportharmfulcontent.com/
Harmful Sexual Support Service

CEOP

CEOP - http://ceop.police.uk/
ThinkUKnow - https://www.thinkuknow.co.uk/

Others

LGfL – Online Safety Resources
Kent – Online Safety Resources page
INSAFE/Better Internet for Kids - https://www.betterinternetforkids.eu/
UK Council for Internet Safety (UKCIS) - https://www.gov.uk/government/organisations/uk-council-for-internet-safety

Tools for Schools / other organisations

Online Safety BOOST – https://boost.swgfl.org.uk/
360 Degree Safe – Online Safety self-review tool – https://360safe.org.uk/
360Data – online data protection self-review tool: www.360data.org.uk
SWGfL Test filtering - http://testfiltering.com/
UKCIS Digital Resilience Framework - https://www.gov.uk/government/publications/digital-resilience-framework
SWGfL 360 Groups – online safety self review tool for organisations working with children
SWGfL 360 Early Years - online safety self review tool for early years organisations

Bullying/Online-bullying/Sexting/Sexual Harassment

Enable – European Anti Bullying programme and resources (UK coordination/participation through SWGfL & Diana Awards) - http://enable.eun.org/

SELMA – Hacking Hate - https://selma.swgfl.co.uk

Scottish Anti-Bullying Service, Respectme - http://www.respectme.org.uk/

Scottish Government - Better relationships, better learning, better behaviour - http://www.scotland.gov.uk/Publications/2013/03/7388

DfE - Cyberbullying guidance - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf

Childnet – Cyberbullying guidance and practical PSHE toolkit: http://www.childnet.com/our-projects/cyberbullying-guidance-and-practical-toolkit

Childnet – Project deSHAME – Online Sexual Harrassment

UKSIC – Sexting Resources

Anti-Bullying Network – http://www.antibullying.net/cyberbullying1.htm

Ditch the Label – Online Bullying Charity

Diana Award – Anti-Bullying Campaign

Social Networking

Digizen – Social Networking

UKSIC - Safety Features on Social Networks

Children's Commissioner, TES and Schillings – Young peoples' rights on social media

Curriculum

SWGfL Evolve - https://projectevolve.co.uk

UKCCIS – Education for a connected world framework

Department for Education: Teaching Online Safety in Schools

Teach Today – www.teachtoday.eu/

Insafe - Education Resources

Data Protection

360data - free questionnaire and data protection self review tool

ICO Guides for Organisations

IRMS - Records Management Toolkit for Schools

ICO Guidance on taking photos in schools

Professional Standards/Staff Training

DfE – Keeping Children Safe in Education

DfE - Safer Working Practice for Adults who Work with Children and Young People

Childnet – School Pack for Online Safety Awareness

UK Safer Internet Centre Professionals Online Safety Helpline

Infrastructure/Technical Support/Cyber-security

UKSIC – Appropriate Filtering and Monitoring

SWGfL Safety & Security Resources

Somerset - Questions for Technical Support

SWGfL - Cyber Security in Schools.

NCA – Guide to the Computer Misuse Act

NEN – Advice and Guidance Notes

Working with parents and carers

SWGfL – Online Safety Guidance for Parents & Carers

Vodafone Digital Parents Magazine

Childnet Webpages for Parents & Carers

Get Safe Online - resources for parents

Teach Today - resources for parents workshops/education

Internet Matters

Prevent

Prevent Duty Guidance

Prevent for schools – teaching resources

Childnet – Trust Me

Research

Ofcom –Media Literacy Research

Ofsted: Review of sexual abuse in schools and colleges

Further links can be found at the end of the UKCIS Education for a Connected World Framework

Glossary of Terms

AUP/AUA	Acceptable Use Policy/Agreement – see templates earlier in this document
CEOP	Child Exploitation and Online Protection Centre (part of National Crime Agency, UK Police, dedicated to protecting children from sexual abuse, providers of the Think U Know programmes.
CPD	Continuous Professional Development
FOSI	Family Online Safety Institute
ICO	Information Commissioners Office
ICT	Information and Communications Technology
INSET	In Service Education and Training
IP address	The label that identifies each computer to other computers using the IP (internet protocol)
ISP	Internet Service Provider
ISPA	Internet Service Providers' Association
IWF	Internet Watch Foundation
LA	Local Authority
LAN	Local Area Network
MAT	Multi Academy Trust
MIS	Management Information System
NEN	National Education Network – works with the Regional Broadband Consortia (e.g. SWGfL) to provide the safe broadband provision to schools across Britain.
Ofcom	Office of Communications (Independent communications sector regulator)
SWGfL	South West Grid for Learning Trust – the Regional Broadband Consortium of SW Local Authorities – is the provider of broadband and other services for schools and other organisations in the SW
TUK	Think U Know – educational online safety programmes for schools, young people and parents.

UKSIC	UK Safer Internet Centre – EU funded centre. Main partners are SWGfL, Childnet and Internet Watch Foundation.
UKCIS	UK Council for Internet Safety
VLE	Virtual Learning Environment (a software system designed to support teaching and learning in an educational setting,
WAP	Wireless Application Protocol

A more comprehensive glossary can be found at the end of the UKCIS Education for a Connected World Framework

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