



# Westgate Primary School

## Online Safety Policy

**Date created – Jan 2024**

This policy applies to all members of the schoolcommunity (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).

## Scope of the Online Safety Policy

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).

## Policy development, monitoring and review

This Online Safety Policy has been developed by the *Online Safety Group* made up of:

- *Tom Clarke – Acting Deputy Headteacher and Online Safety Lead*
- *Vicky Hodgson – SENCO / DSL*
- *Simon Tait – Computing Lead / Year 1 Class Teacher*
- *Natalie Hay – Computing Lead / Year 5 Class Teacher*
- *Governor – Emma Townley*
- *John Bodley – ICT Technician*

Consultation with the whole school community has taken place through a range of formal and informal meetings.

## Schedule for development, monitoring and review

This Online Safety Policy was approved by the <i>Westgate Primary Governing Body</i> on:	<i>TBC @ Full Governors Meeting 13<sup>th</sup> March 2024</i>
The implementation of this Online Safety Policy will be monitored by:	<i>Online Safety Group</i>
Monitoring will take place at regular intervals:	<i>Yearly in September</i>
The <i>governing body</i> 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:	<i>Yearly at Full Governors Meeting</i>
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:	<i>Yearly in September</i>
Should serious online safety incidents take place, the following external persons/agencies should be informed:	<i>See response in document.</i>

## Process for monitoring the impact of the Online Safety Policy

The school will monitor the impact of the policy using:

- *logs of reported incidents recorded on CPOMs*
- *Filtering and monitoring logs*
- *internal monitoring data for network activity*

## Policy and leadership

### Responsibilities

#### 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.
- 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.

## Governors

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy

A member of the governing body (Emma Townley) 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 where appropriate.
- 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 in-line with the DfE Filtering and Monitoring Standards
- reporting to relevant *governors group/meeting where appropriate.*
- Receiving (at least) basic cyber-security training to enable the governors to check that the school meets the DfE Cyber-Security Standards.
- *membership of the school Online Safety Group.*

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)

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 as part of the Online Safety Group 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)
- 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/MAT/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 Project Evolve.

This will be provided through:

- a discrete programme (currently Purple Mash e-safety lessons. This intended to be replaced by Project Evolve following piloting by Sept 24.)
- 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 immediately report any suspected misuse or problem to DSL or Online Safety Lead 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.

## IT Provider/ICT Technician -

If the school has a technology service provided by an outside contractor, it is the responsibility of the school to ensure that the provider carries out all the online safety measures that the school's obligations and responsibilities require. It is also important that the provider follows and implements school Online Safety Policy and procedures.

The IT Provider is 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 DSL or [Online Safety Lead](#) 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 ([see appendix 'Technical Security Policy template' for good practice](#)).
- *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 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

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.

## 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.

## Online Safety Group

The Online Safety Group has the following members ([amend as appropriate](#)):

- *Tom Clarke – Acting Deputy Headteacher and Online Safety Lead*
- *Vicky Hodgson – SENCO / DSL*
- *Simon Tait – Computing Lead / Year 1 Class Teacher*
- *Natalie Hay – Computing Lead / Year 5 Class Teacher*
- *Governor – Emma Townley*
- *John Bodley – ICT Technician*
- community representatives

Members of the Online Safety Group will assist the DSL/OSL with:

- the production/review/monitoring of the school Online Safety Policy/documents
- the production/review/monitoring of the school filtering policy and requests for filtering changes

- mapping and reviewing the online safety education provision – ensuring relevance, breadth and progression and coverage
- reviewing network/filtering/monitoring/incident logs, where possible
- encouraging the contribution of learners to staff awareness, emerging trends and the school online safety provision
- consulting stakeholders – including staff/parents/carers about the online safety provision
- monitoring improvement actions identified through use of the 360-degree safe self-review tool.

## **Policy**

### **Acceptable use**

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

#### **Acceptable use agreements**

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 and handbook
- communication with parents/carers/community users where appropriate.
- Lessons/activities in the classroom outlining acceptable use.

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
<p>Users shall not access online content (including apps, games, sites) to make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:</p>	<p><b>Any illegal activity for example:</b></p> <ul style="list-style-type: none"> <li>• Child sexual abuse imagery*</li> <li>• Child sexual abuse/exploitation/grooming</li> <li>• Terrorism</li> <li>• Encouraging or assisting suicide</li> <li>• Offences relating to sexual images i.e., revenge and extreme pornography</li> <li>• Incitement to and threats of violence</li> <li>• Hate crime</li> <li>• Public order offences - harassment and stalking</li> <li>• Drug-related offences</li> <li>• Weapons / firearms offences</li> <li>• Fraud and financial crime including money laundering</li> </ul> <p>N.B. Schools should refer to guidance about dealing with self-generated images/sexting – <a href="#">UKSIC Responding to and managing sexting incidents</a> and <a href="#">UKCIS – Sexting in schools and colleges</a></p>					X
<p>Users shall not undertake</p>	<ul style="list-style-type: none"> <li>• Using another individual's username or ID and password to access data, a program, or</li> </ul>					X

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
activities that might be classed as cyber-crime under the Computer Misuse Act (1990)	<p>parts of a system that the user is not authorised to access (even if the initial access is authorised)</p> <ul style="list-style-type: none"> <li>• Gaining unauthorised access to school networks, data and files, through the use of computers/devices</li> <li>• Creating or propagating computer viruses or other harmful files</li> <li>• Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords)</li> <li>• Disable/Impair/Disrupt network functionality through the use of computers/devices</li> <li>• Using penetration testing equipment (without relevant permission)</li> </ul> <p>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 <a href="#">here</a></p>					

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	
	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		
	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	

Consideration should be given for the following activities when undertaken for non-educational purposes:  Schools may wish to add further activities to this list.	Staff and other adults				Learners			
	Not allowed	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	staff permission/awareness
Online gaming								
Online shopping/commerce								
File sharing								
Social media								
Messaging/chat								
Entertainment streaming e.g. Netflix, Disney+								
Use of video broadcasting, e.g. YouTube, Twitch, TikTok								
Mobile phones may be brought to school								
Use of mobile phones for learning at school								

Use of mobile phones in social time at school (children not present)								
Taking photos on mobile phones/cameras								
Use of other personal devices, e.g. tablets, gaming devices								
Use of personal e-mail in school, or on school network/wi-fi								
Use of school e-mail for personal e-mails								

- 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 parents/carers (e-mail, social media, learning platform, etc.) must be professional in tone and content using school email addresses.
- 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.

## Reporting and responding

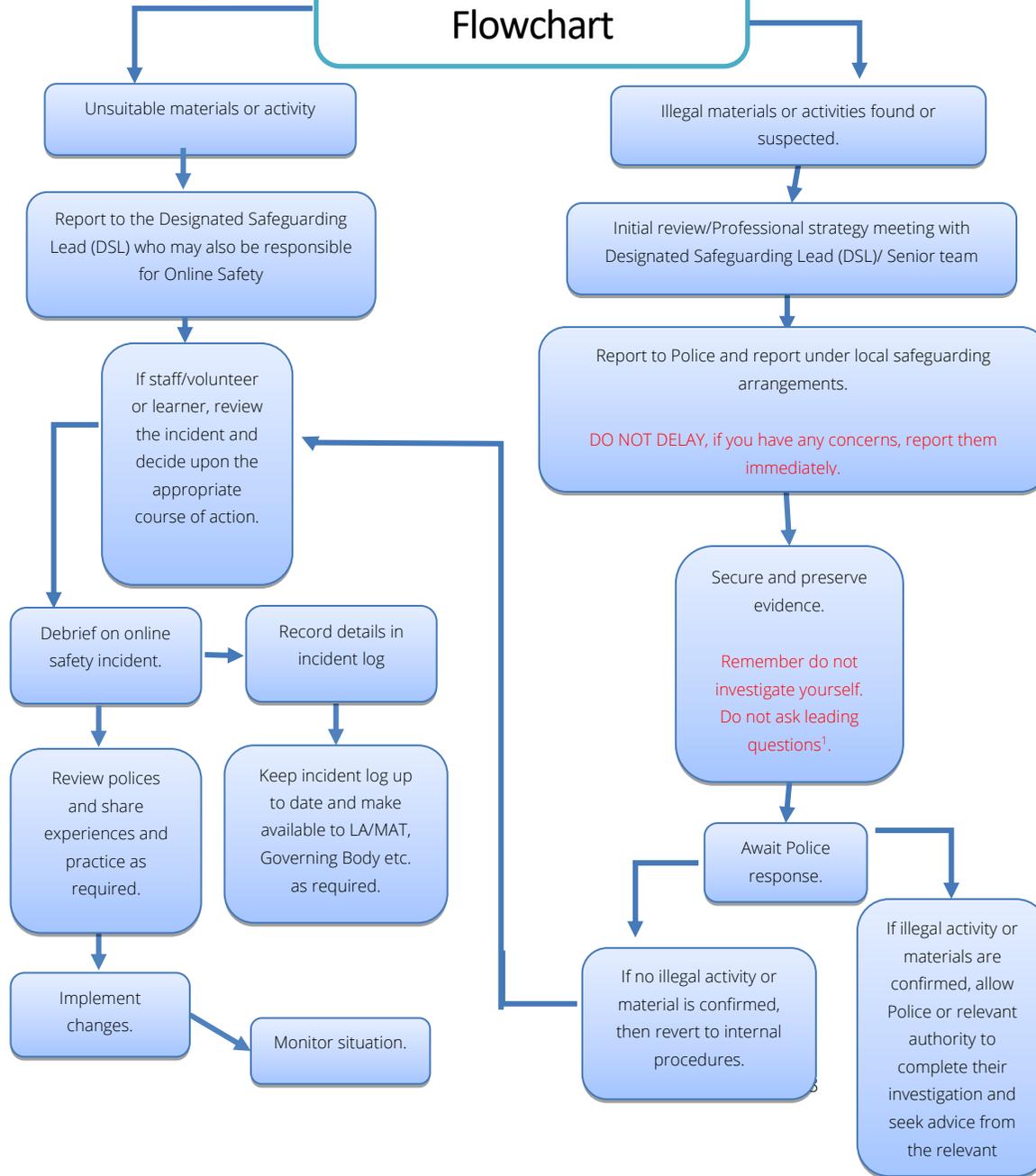
- there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the school safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies.
- all members of the school community will be made aware 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
- 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 / MAT
- 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 / MAT (as relevant)
    - 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 using CPOMS logging system.
- 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 ([as relevant](#))
- learning from the incident (or pattern of incidents) will be provided 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 school will make the flowchart below available to staff to support the decision-making process for dealing with online safety incidents.

# Online Safety Incident Flowchart



## 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	network/internet access rights	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 <a href="#">earlier section on User Actions</a> on unsuitable/inappropriate activities).		X	X	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
Corrupting or destroying the data of other users.	x	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	x		x

Unauthorised downloading or uploading of files or use of file sharing.		x	x						x
Using proxy sites or other means to subvert the school's filtering system.		x	x			x	x		x
Accidentally accessing offensive or pornographic material and failing to report the incident.		x	x			x			
Deliberately accessing or trying to access offensive or pornographic material.		x	x			x	x		x
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act.		x	x			x	x		x
Unauthorised use of digital devices (including taking images)	x	x				x	x		x
Unauthorised use of online services	x	x	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	x		x

Continued infringements of the above, following previous warnings or sanctions.	x	x	x			x	x		x
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## 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
<b>Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities)</b>	x	x	x	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			x
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	x	x			x			x

Using proxy sites or other means to subvert the school's filtering system.	x	x			x			x
Unauthorised downloading or uploading of files or file sharing	x	x			x			x
Breaching copyright or licensing regulations.	x	x			x			x
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account.	x	x			x			x
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature	x	x						
Using personal e-mail/social networking/messaging to carry out digital communications with learners and parents/carers	x	x				x		x
Inappropriate personal use of the digital technologies e.g. social media / personal e-mail	x	x				x		x
Careless use of personal data, e.g. displaying, holding or transferring	x	x				x		x

data in an insecure manner								
Actions which could compromise the staff member's professional standing	x	x				x		
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.	x	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	x				x		x

## Online Safety Education Programme –

- A planned online safety curriculum is available for all year groups matched against a nationally agreed framework e.g. Education for a Connected Work Framework by UKCIS/DCMS and the SWGfL Project Evolve 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.
- 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.
- 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 the young people visit
- 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 designing/updating/evaluating acceptable use agreements*
- *contributing to online safety events with the wider school community e.g. parents' evenings, family learning programmes etc.*

## Staff/volunteers

All staff will receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as part of annual safeguarding training at the beginning of each year.

- 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 and data protection 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 / MAT / 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/MAT or other relevant organisation (e.g.,SWGfL)
- 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 (at least) the Online Safety Governor. This will include:

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

## Families

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/](http://www.saferinternet.org.uk/); [www.childnet.com/parents-and-carers](http://www.childnet.com/parents-and-carers) (see Appendix for further links/resources).
- Sharing good practice with other schools in clusters and or the local authority/MAT

## 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 using Knowsley Online Safety Newsletters.
- *Providing online safety information via their website and social media for the wider community*

## Technology

### Filtering & Monitoring -

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 yearly 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 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
- there is a clear process in place to deal with, and log, requests/approvals for filtering changes
- filtering logs are regularly reviewed and alert the Designated Safeguarding Lead to breaches of the filtering policy, which are then acted upon.

## Monitoring

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 by the ICT technician who reports to the Online Safety Lead.
- filtering logs are regularly analysed and breaches are reported to senior leaders

## Technical Security

- responsibility for technical security resides with SLT who may delegate activities to the ICT Technician.
- 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.
- the security of their username and password and must not allow other users to access the systems using their log on details.
- all users 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.
- all school networks and system will be protected by secure passwords. Passwords must not be shared with anyone.
- 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.
- 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,
- [John Bodley \(ICT Technician\)](#) 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.
- guest users are provided with appropriate access to school systems based on an identified risk profile.

## Mobile technologies

	School devices			Personal devices		
	School owned for individual use	School owned for multiple users	Authorised device <sup>1</sup>	Student owned	Staff owned	Visitor owned
Allowed in school	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	Yes*	Yes	Yes
Full network access	Yes	Yes	Yes	No	No	Yes**

\*Only Year 5/6 children walking home from school. Stored securely by class teacher and not allowed use in school.

\*\*With permission of the ICT Technician/Online Safety Lead having signed visitor AUA.

## Social media

See related Social Media Policy for details.

## Digital and video images

- the school may use live-streaming or video-conferencing services in line with national and local safeguarding guidance / policies.
- 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
- parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, 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. This will be shared with parents at events where photos may be taken.
- 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
- 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.
- 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 school website – [www.westgatesch.com](http://www.westgatesch.com)
- Social media - Facebook

- Online newsletters – shared to Facebook and school website.

The school website is managed/hosted by [John Bodley \(ICT technician\)](#) and [Tom Clarke \(Online Safety Lead\)](#).

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

## 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.
- 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.
- has a 'Privacy Notices' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it. See Privacy Notices for staff and children.
- the 'Privacy Notices' lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis is listed.
- The Privacy Notices' list exactly [what personal data is held](#), where, why and which members of staff have responsibility for managing it
- 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. Guidance is drawn and followed from the IRMS Data Toolkit for schools.
- 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 and parents with information about how the school looks after their data and what their rights are in a clear Privacy Notice

- has procedures in place to deal with the individual rights of the data subject – see Privacy Notices
- 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 (See data breach log)
- has a Freedom of Information Policy which sets out how it will deal with FOI requests (see Privacy Notices)
- 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. This is incorporated in annual school Safeguarding training.

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
- 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.

- 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.
- Staff know to consult with school Data Protection Officer regarding any guidance or advice.

Date agreed: January 2023

Review Date: September 2024

## 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](http://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](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/](http://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](#)