ESafety Policy

April 2023

ESAFETY POLICY
QUEENSGATE FOUNDATION PRIMARY SCHOOL

Policy Review

This policy was adopted from The School Bus and will be reviewed by the Governing Board on an annual basis.

The policy was last reviewed and agreed by the Governing Board on 25th April 2023.

It will be reviewed again by April 2024.

Approved

Signature: …….. Head Teacher Date: 25th April 2023

Signature: …….. Chair of the Governing Board Date: 25th April 2023

Policy control

Date	Amendments / additions	Reason
14/05/2021	Update to legal framework, new role for governors to coincide with new section (12), section 3.5 2 new bullet points, 5.3 added, new point for social media to reflect where staff member has an already establish friendship with a parent, New section 12 online hoaxes & challenges, 12.10 added, Youth Produced Sexual Imagery (Sexting) renamed to Sexting and sharing of indecent imagery of pupils, new guidelines added to reflect new title, Remote learning (section 15) added, previous section 15 now section 16.	New advice and laws
April 2022	Addition of Smart Technology section 17	Policy update

Contents:

Statement of intent

The Online Safety Policy is part of the ICT Policy and School Development Plan, and relates to other policies including those for Behaviour, PSHE.

Queensgate Foundation Primary School understands that using online services is an important aspect of raising educational standards, promoting pupil achievement and enhancing teaching and learning.

The use of online services is embedded throughout the school; therefore, there are a number of controls in place to ensure the safety of pupils and staff.

The breadth of issues classified within online safety is considerable, but they can be categorised into three areas of risk:

- **Content**: Being exposed to illegal, inappropriate or harmful material, e.g. pornography, fake news, and racist or radical and extremist views
- **Contact**: Being subjected to harmful online interaction with other users, e.g. commercial advertising and adults posing as children or young adults
- **Conduct**: Personal online behaviour that increases the likelihood of, or causes, harm, e.g. sending and receiving explicit messages, and cyberbullying
- **Commerce**: Risks such as online gambling, inappropriate advertising, phishing and/or financial scams

The measures implemented to protect pupils and staff revolve around these areas of risk. Our school has created this policy with the aim of ensuring appropriate and safe use of the internet and other digital technology devices by all pupils and staff.

1. Legal framework

1.1. **This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:**

- Voyeurism (Offences) Act 2019
- The UK General Data Protection Regulation (UK GDPR)
- DfE (2022) 'Keeping children safe in education 2022'
- DfE (2023) 'Teaching online safety in school'
- DfE (2022) 'Searching, screening and confiscation'
- National Cyber Security Centre (2018) 'Cyber Security: Small Business Guide'
- UK Council for Child Internet Safety 'Education for a Connected World' 2020 edition
- DfE (2021) 'Harmful online challenges and online hoaxes'
- Department for Digital, Culture, Media and Sport and UK Council for Internet Safety (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

1.2. **This policy operates in conjunction with the following school policies:**

- Allegations of Abuse Against Staff Policy
- Anti-Bullying Policy
- Child Protection and Safeguarding Policy
- Data Breach Policy
- Data Protection Policy
- Disciplinary Procedures
- Internet and Email Acceptable Use Policy
- Photographic and Images Policy
- PSHE Policy
- Relationships and Sex Education Policy
- Staff Code of Conduct
- Pupil Behaviour and Discipline Policy
- Photography Policy

2. Roles and responsibilities

2.1. **The governing board is responsible for:**

- Ensuring that this policy is effective and complies with relevant laws and statutory guidance
- Ensuring the DSL's remit covers online safety
- Reviewing this policy on an annual basis
- Ensuring their own knowledge of online safety issues is up-to-date
- Ensuring all staff undergo safeguarding and child protection training (including online safety) at induction
- Ensuring that there are appropriate filtering and monitoring systems in place
- Ensuring that all relevant school policies have an effective approach to planning for, and responding to, online challenges and hoaxes embedded within them.

2.2. The headteacher is r**esponsible for:**

- Supporting the DSL and any deputies by ensuring they have enough time and resources to carry out their responsibilities in relation to online safety
- Ensuring staff receive regular, up-to-date and appropriate online safety training and information as part of their induction and safeguarding training
- Ensuring online safety practices are audited and evaluated
- Supporting staff to ensure that online safety is embedded throughout the curriculum so that all pupils can develop an appropriate understanding of online safety
- Organising engagement with parents to keep them up-to-date with current online safety issues and how the school is keeping pupils safe
- Working with the DSL and ICT technicians to conduct half-termly light-touch reviews of this policy
- Working with the DSL and governing board to update this policy on an annual basis

2.3. **The DSL is responsible for:**

- Taking the lead responsibility for online safety in the school
- Acting as the named point of contact within the school on all online safeguarding issues
- Undertaking training so they understand the risks associated with online safety and can recognise additional risks that pupils with SEND face online
- Liaising with relevant members of staff on online safety matters, e.g. the SENCO and ICT technicians
- Ensuring online safety is recognised as part of the school's safeguarding responsibilities and that a coordinated approach is implemented
- Ensuring appropriate referrals are made to external agencies, as required
- Staying up-to-date with current research, legislation and online trends
- Coordinating the school's participation in local and national online safety events, e.g. Safer Internet Day
- Establishing a procedure for reporting online safety incidents and inappropriate internet use, both by pupils and staff
- Ensuring all members of the school community understand the reporting procedure
- Maintaining records of reported online safety concerns as well as the actions taken in response to concerns
- Monitoring online safety incidents to identify trends and any gaps in the school's provision, and using this data to update the school's procedures
- Working with the headteacher and ICT technicians to conduct half-termly light-touch reviews of this policy
- Working with the headteacher and governing board to update this policy on an annual basis

2.4. ICT technicians **are responsible for:**

- Providing technical support in the development and implementation of the school's online safety policies and procedures
- Implementing appropriate security measures as directed by the headteacher
- Ensuring that the school's filtering and monitoring systems are updated as appropriate

- Working with the DSL and headteacher to conduct half-termly light-touch reviews of this policy

2.5. **All staff members are responsible for:**

- Taking responsibility for the security of ICT systems and electronic data they use or have access to
- Modelling good online behaviours
- Maintaining a professional level of conduct in their personal use of technology
- Having an awareness of online safety issues
- Reporting concerns in line with the school's reporting procedure
- Where relevant to their role, ensuring online safety is embedded in their teaching of the curriculum
- Ensuring they are familiar with, and understand, the indicators that pupils may be unsafe online

2.6. **Pupils are responsible for:**

- Seeking help from school staff if they are concerned about something they or a peer has experienced online
- Reporting online safety incidents and concerns in line with the procedures within this policy

3. The curriculum

3.1. Online safety is embedded throughout the curriculum; however, it is particularly addressed in the following subjects:

- Relationships. Sex and Health Education
- PSHE
- Citizenship
- Computing

3.2. The curriculum and the school's approach to online safety is developed in line with the UK Council for Child Internet Safety's 'Education for a Connected World' framework and the DfE's 'Teaching online safety in school' guidance.

3.3. Pupils are taught the underpinning knowledge and behaviours that can help them to navigate the online world safely and confidently regardless of the device, platform or app they are using.

3.4. Online safety teaching is always appropriate to pupils' ages and developmental stages.

3.5. The underpinning knowledge and behaviours pupils learn through the curriculum include the following:

- How to evaluate what they see online
- How to recognise techniques used for persuasion
- Acceptable and unacceptable online behaviour
- How to identify online risks
- How and when to seek support
- How to identify when something is deliberately deceitful or harmful

- How to recognise when something they are being asked to do puts them at risk or is age-inappropriate

3.6. The online risks pupils may face online are always considered when developing the curriculum. The risks that are considered and how they are covered in the curriculum can be found in Appendix 1 of this policy.

3.7. The DSL is involved with the development of the school's online safety curriculum.

3.8. The school recognises that, while any pupil can be vulnerable online, there are some pupils who may be more susceptible to online harm or have less support from family and friends in staying safe online, e.g. pupils with SEND and LAC. Relevant members of staff, e.g. the SENCO and designated teacher for LAC, work together to ensure the curriculum is tailored so these pupils receive the information and support they need.

3.9. Class teachers review external resources prior to using them for the online safety curriculum, to ensure they are appropriate for the cohort of pupils. When reviewing these resources, the following questions are asked:

- Where does this organisation get their information from?
- What is their evidence base?
- Have they been externally quality assured?
- What is their background?
- Are they age appropriate for pupils?
- Are they appropriate for pupils' developmental stage?

3.10. External visitors may be invited into school to help with the delivery of certain aspects of the online safety curriculum. The headteacher and DSL decide when it is appropriate to invite external groups into school and ensure the visitors selected are appropriate.

3.11. Before conducting a lesson or activity on online safety, the class teacher and DSL consider the topic that is being covered and the potential that pupils in the class have suffered or may be suffering from online abuse or harm in this way. The DSL advises the staff member on how to best support any pupil who may be especially impacted by a lesson or activity.

3.12. Lessons and activities are planned carefully so they do not draw attention to a pupil who is being or has been abused or harmed online, to avoid publicising the abuse.

3.13. During an online safety lesson or activity, the class teacher ensures a safe environment is maintained in which pupils feel comfortable to say what they feel and are not worried about getting into trouble or being judged.

3.14. If a staff member is concerned about anything pupils raise during online safety lessons and activities, they will make a report in line with section 14 and 15 of this policy.

3.15. If a pupil makes a disclosure to a member of staff regarding online abuse following a lesson or activity, the staff member will follow the reporting procedure outlined in sections 14 and 15 of this policy.

4. Staff training

4.1. All staff receive safeguarding and child protection training, which includes online safety training.

4.2. Online safety training for staff is updated annually and is delivered in line with advice from Hampshire Inspection Advisory Service and IOW Safeguarding Children's Partnership

4.3. In addition to this training, staff also receive regular online safety updates as required and at least annually.

4.4. The DSL and any deputies undergo training to provide them with the knowledge and skills they need to carry out their role, this includes online safety training. This training is updated at least every two years.

4.5. In addition to this formal training, the DSL and any deputies receive regular online safety updates to allow them to keep up with any developments relevant to their role. In relation to online safety, these updates allow the DSL and their deputies to:

- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and capability required to keep pupils safe while they are online at school
- Recognise the additional risks that pupils with SEND face online and offer them support to stay safe online

4.6. All staff receive a copy of this policy upon their induction and are informed of any changes to the policy.

4.7. Staff are required to adhere to the Staff Code of Conduct at all times, which includes provisions for the acceptable use of technologies and the use of social media.

4.8. All staff are informed about how to report online safety concerns, in line with sections 15 and 16 of this policy.

4.9. The DSL acts as the first point of contact for staff requiring advice about online safety.

5. Educating parents

5.1. The school works in partnership with parents to ensure pupils stay safe online at school and at home.

5.2. Parents are provided with information about the school's approach to online safety and their role in protecting their children. Parental awareness is raised in the following ways:

- Parents' evenings
- School website
- Newsletters

5.3. Parents will be informed of the ways in which they can prevent their child from accessing harmful content at home, e.g. by implementing parental controls to block age-inappropriate content.

6. Classroom use

6.1. **A wide range of technology is used during lessons, including the following:**

- Computers
- Laptops
- Tablets in some year groups
- Cameras

6.2. Prior to using any websites, tools, apps or other online platforms in the classroom, or recommending that pupils use these platforms at home, the class teacher always reviews and evaluates the resource.

6.3. Class teachers ensure that any internet-derived materials are used in line with copyright law.

6.4. Pupils are supervised when using online materials during lesson time – this supervision is suitable to their age and ability.

7. Filtering and monitoring online activity

7.1. The governing board ensures the school's ICT network has appropriate filters and monitoring systems in place.

7.2. The headteacher and ICT technicians undertake a risk assessment to determine what filtering and monitoring systems are required.

7.3. The filtering and monitoring systems the school implements are appropriate to pupils' ages, the number of pupils using the network, how often pupils access the network, and the proportionality of costs compared to the risks.

7.4. The governing board ensures 'over blocking' does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding.

7.5. Requests regarding making changes to the filtering system are directed to the ICT Technicians.

7.6. Prior to making any changes to the filtering system, ICT technicians and the DSL conduct a risk assessment and consult with the headteacher.

7.7. Any changes made to the system are recorded by ICT technicians.

7.8. Reports of inappropriate websites or materials are made to an ICT technician immediately, who investigates the matter and makes any necessary changes.

7.9. Deliberate breaches of the filtering system are reported to the DSL and ICT technicians, who will escalate the matter appropriately.

7.10. If a pupil has deliberately breached the filtering system, they will be disciplined in line with the Pupil Behaviour and Discipline Policy.

7.11. If a member of staff has deliberately breached the filtering system, they will be disciplined in line with the Disciplinary Policy and Procedure.

7.12. If material that is believed to be illegal is accessed, inadvertently or deliberately, this material will be reported to the appropriate agency immediately, e.g. the Internet Watch Foundation (IWF), CEOP and/or the police.

7.13. The school's network and school-owned devices are appropriately monitored.

7.14. All users of the network and school-owned devices are informed about how and why they are monitored.

7.15. Concerns identified through monitoring are reported to the DSL who manages the situation in line with sections 15 and 16 of this policy.

8. Network security

8.1. Technical security features, such as anti-virus software, are kept up-to-date and managed by the ICT technician.

8.2. Staff and pupils are advised not to download unapproved software or open unfamiliar email attachments.

8.3. Staff members and pupils report all malware and virus attacks to the ICT technician.

8.4. All members of staff have their own unique usernames and private passwords to access the school's systems.

8.5. Staff members and pupils are responsible for keeping their passwords private.

8.6. Users are not permitted to share their login details with others and are not allowed to log in as another user at any time.

8.7. Users are required to lock access to devices and systems when they are not in use.

9. Generative artificial intelligence (AI)

9.1. The school will take steps to prepare pupils for changing and emerging technologies, e.g. generative AI and how to use them safely and appropriately with consideration given to pupils' age.

9.2. The school will ensure its IT system includes appropriate filtering and monitoring systems to limit pupil's ability to access or create harmful or inappropriate content through generative AI.

9.3. The school will ensure that pupils are not accessing or creating harmful or inappropriate content, including through generative AI.

9.4. The school will take steps to ensure that personal and sensitive data is not entered into generative AI tools and that it is not identifiable.

9.5. The school will make use of any guidance and support that enables it to have a safe, secure and reliable foundation in place before using more powerful technology such as generative AI.

10. Social networking

Personal use

10.1. Access to social networking sites is filtered as appropriate.

10.2. Staff and pupils are not permitted to use social media for personal use during lesson time.

10.3. Staff and pupils can use personal social media during break and lunchtimes via their own devices; however, inappropriate or excessive use of personal social media during school hours may result in the further action.

10.4. Staff members are advised that their conduct on social media can have an impact on their role and reputation within the school.

10.5. Staff receive annual training on how to use social media safely and responsibly.

10.6. Staff are not permitted to communicate with pupils or parents over social networking sites and are reminded to alter their privacy settings to ensure pupils and parents are not able to contact them on social media.

10.7. Pupils are taught how to use social media safely and responsibly through the online safety curriculum.

10.8. Concerns regarding the online conduct of any member of the school community on social media are reported to the DSL and managed in accordance with the relevant policy, e.g. Anti-Bullying Policy, Staff Code of Conduct and Behavioural Policy.

10.9. Where staff have an existing personal relationship with a parent or pupil, and thus are connected with them on social media, e.g. they are close family friends with a parent at the school, they will disclose this to the headteacher and will ensure that their social media conduct relating to that parent is appropriate for their position in the school.

Use on behalf of the school

10.10. The Staff Code of Conduct contains information on the acceptable use of social media – staff members are required to follow these expectations at all times.

11. The school website

11.1. The Assistant Headteacher is responsible for the overall content of the school website – they will ensure the content is appropriate, accurate and up-to-date, and meets government requirements.

11.2. The website complies with guidelines for publications including accessibility, data protection, respect for intellectual property rights, privacy policies and copyright law.

11.3. Personal information relating to staff and pupils is not published on the website.

11.4. Images and videos are only posted on the website if the provisions in the Images and Photography Policy are met.

12. Use of school-owned devices

12.1. Staff members are issued with the following devices to assist with their work:

- Laptop

12.2. Pupils are provided with school-owned devices as necessary to assist in the delivery of the curriculum, e.g. laptops to use during lessons.

12.3. Staff and pupils are not permitted to connect school-owned devices to public Wi-Fi networks.

12.4. All school-owned devices are password protected.

12.5. No software, apps or other programmes can be downloaded onto a device without authorisation from ICT technicians.

12.6. Staff members or pupils found to be misusing school-owned devices are disciplined in line with the Disciplinary Policy and Procedure and Pupil Behaviour and Discipline Policy.

13. Online hoaxes and harmful online challenges

13.1. For the purposes of this policy, an “online hoax” is defined as a deliberate lie designed to seem truthful, normally one that is intended to scaremonger or to distress individuals who come across it, spread on online social media platforms.

13.2. For the purposes of this policy, “harmful online challenges” refers to challenges that are targeted at young people and generally involve users recording themselves participating in an online challenge, distributing the video through social media channels and daring others to do the same. Although many online challenges are harmless, an online challenge becomes harmful when it could potentially put the participant at risk of harm, either directly as a result of partaking in the challenge itself or indirectly as a result of the distribution of the video online – the latter will usually depend on the age of the pupil and the way in which they are depicted in the video.

13.3. The DSL ensures that pupils are taught about how to critically identify when online content is untrue or harmful and how to respond to this content, in line with section 3 of this policy.

13.4. The DSL will work with the SENCO to assess whether some pupils, e.g. pupils who have been identified as being vulnerable or pupils with SEND, need additional help with identifying harmful online challenges and hoaxes, and tailor support accordingly.

13.5. The school will ensure all pupils are aware of who to report concerns to surrounding potentially harmful online challenges or hoaxes, e.g. by displaying posters.

13.6. Where staff suspect there may be a harmful online challenge or online hoax circulating amongst pupils in the school, they will report this to the DSL immediately.

13.7. The DSL will conduct a case-by-case assessment for any harmful online content brought to their attention, establishing the scale and nature of the possible risk to pupils, and whether the risk is one that is localised to the school or the local area, or whether it extends more widely across the country.

13.8. Where the harmful content is prevalent mainly in the local area, the DSL will consult with the LA about whether quick local action can prevent the hoax or challenge from spreading more widely.

13.9. The DSL will check the factual basis of harmful online challenges or hoaxes against a known, reliable and trustworthy source, e.g. the UK Safer Internet Centre, and will carefully consider if a challenge or story is a hoax or is harmful prior to providing any direct warnings to pupils or parents.

13.10. The school understands that discussing or naming a specific online hoax can, in some cases, needlessly increase pupils’ exposure to distressing content, and will avoid showing pupils distressing content where doing so is not considered absolutely necessary for preventing its spread or easing fears amongst the school community.

13.11. Where the DSL’s assessment finds an online challenge to be putting pupils at risk of harm, e.g. it encourages children to participate in age-inappropriate activities that could increase safeguarding risks or become a child protection concern, they will ensure that the challenge is directly addressed to the relevant pupils, e.g. those within a particular age range that is directly affected or even to individual children at risk where appropriate.

13.12. The DSL will only implement a school-wide approach to highlighting potential harms of a hoax or challenge when the risk of needlessly increasing pupils’ exposure to the risk is considered and mitigated as far as possible.

13.13. Prior to deciding how to respond to a harmful online challenge or hoax, the DSL will decide whether each proposed response is:

- Factual and avoids needlessly scaring or distressing pupils.
- Not inadvertently encouraging pupils to view the hoax or challenge where they would not have otherwise come across it, e.g. where content is explained to younger pupils that is almost exclusively being shared amongst older pupils.
- Proportional to the actual or perceived risk.
- Helpful to the pupils who are, or are perceived to be, at risk.
- Age-appropriate and appropriate for the relevant pupils' developmental stage.
- Supportive.

14. Use of personal devices

14.1. Personal devices are used in accordance with the Staff Code of Conduct Policy and Internet and Email Acceptable Use Policy

14.2. Any personal electronic device that is brought into school is the responsibility of the user.

14.3. Personal devices are not permitted to be used in the following locations:

- Toilets
- Classrooms
- Playgrounds

14.4. Staff members are not permitted to use their personal devices during lesson time, other than in an emergency.

14.5. Staff members are not permitted to use their personal devices to take photos or videos of pupils.

14.6. Staff members report concerns about their colleagues' use of personal devices on the school premises in line with the Whistleblowing Policy.

14.7. If a member of staff is thought to have illegal content saved or stored on a personal device, or to have committed an offence using a personal device, the headteacher will inform the police and action will be taken in line with appropriate school policies.

14.8. Appropriate signage is displayed to inform visitors to the school of the expected use of personal devices.

14.9. Any concerns about visitors' use of personal devices on the school premises are reported to the DSL.

14.10. The headteacher may authorise the use of mobile devices by a pupil for health reasons (e.g. diabetes monitoring).

14.11. The headteacher may authorise the use of mobile devices by pupils for direct curriculum use where supervised by an adult (e.g. Geocaching in Out & About)

15. Managing reports of online safety incidents

15.1. Staff members and pupils are informed about what constitutes inappropriate online behaviour in the following ways:

- Staff training

- The online safety curriculum
- Assemblies

15.2. Concerns regarding a staff member's online behaviour are reported to the headteacher who decides on the best course of action in line with the relevant policies, e.g. Staff Code of Conduct, Allegations of Abuse against Staff Policy and Disciplinary Policy and Procedures.

15.3. Concerns regarding a pupil's online behaviour are reported to the DSL who investigates concerns with relevant staff members, e.g. the headteacher and ICT technicians.

15.4. Concerns regarding a pupil's online behaviour are dealt with in accordance with relevant policies depending on their nature, e.g. Pupil Behaviour and Discipline Policy and Child Protection and Safeguarding Policy.

15.5. Where there is a concern that illegal activity has taken place, the headteacher contacts the police.

15.6. All online safety incidents and the school's response are recorded by the DSL.

15.7. Section 15 of this policy outlines how the school responds to specific online safety concerns, such as cyberbullying and peer-on-peer abuse.

16. Responding to specific online safety concerns

Cyberbullying

16.1. Cyberbullying, against both pupils and staff, is not tolerated.

16.2. Any incidents of cyberbullying are dealt with quickly and effectively whenever they occur.

Online sexual violence and sexual harassment between children (peer-on-peer abuse)

16.3. The school recognises that peer-on-peer abuse can take place online. Examples include the following:

- Non-consensual sharing of sexual images and videos
- Sexualised cyberbullying
- Online coercion and threats
- Unwanted sexual comments and messages on social media
- Online sexual exploitation

16.4. The school responds to all concerns regarding online peer-on-peer abuse, whether or not the incident took place on the school premises or using school-owned equipment.

16.5. Concerns regarding online peer-on-peer abuse are reported to the DSL who will investigate the matter in line with the Child Protection and Safeguarding Policy.

16.6. Information about the school's full response to incidents of online peer-on-peer abuse can be found in the Child Protection and Safeguarding Policy.

Upskirting

16.7. Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or

covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.

16.8. A “specified purpose” is namely:

- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim’s genitals, buttocks or underwear)
- To humiliate, distress or alarm the victim

16.9. “Operating equipment” includes enabling, or securing, activation by another person without that person’s knowledge, e.g. a motion activated camera.

16.10. Upskirting is not tolerated by the school.

16.11. Incidents of upskirting are reported to the DSL who will then decide on the next steps to take, which may include police involvement, in line with the Child Protection and Safeguarding Policy.

Sexting and the sharing of indecent imagery of pupils

16.12. Sharing indecent imagery is the sending or posting of sexually suggestive images of under-18s via mobile phones or over the internet. Creating and sharing sexual photos and videos of individuals under 18 is illegal.

16.13. Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and developmentally expected, and sexual behaviour that is inappropriate and/or harmful.

16.14. All concerns regarding sexting are reported to the DSL.

16.15. The DSL will use their professional judgement, in line with the Child Protection and Safeguarding Policy, to determine whether the incident is experimental, i.e. expected for the developmental stage of the pupils involved, or aggravated, i.e. involves additional or abusive elements, the images are used recklessly or there is an intent to harm the pupil depicted.

16.16. Where the incident is categorised as ‘experimental’, the pupils involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident.

16.17. Where there is reason to believe the incident will cause harm to the pupil depicted, or where the incident is classified as ‘aggravated’, the following process is followed:

- The DSL holds an initial review meeting with appropriate school staff
- Subsequent interviews are held with the pupils involved, if appropriate
- Parents are informed at an early stage and involved in the process unless there is a good reason to believe that involving the parents would put the pupil at risk of harm
- At any point in the process if there is a concern a pupil has been harmed or is at risk of harm, a referral will be made to children’s social care services and/or the police immediately
- The interviews with staff, pupils and their parents are used to inform the action to be taken and the support to be implemented

16.18. When investigating a report, staff members will not view nude and semi-nude images unless there is a good and clear reason to do so.

16.19. If a staff member believes there is a good reason to view nude or semi-nude imagery as part of an investigation, they discuss this with the headteacher first.

16.20. The decision to view imagery is based on the professional judgement of the DSL and always complies with the Child Protection and Safeguarding Policy.

16.21. If a decision is made to view the imagery, the DSL will be satisfied that viewing:

- Is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any pupil involved.
- Is necessary in order to report the image to a website or suitable reporting agency to have the image taken down, or to support the pupil in taking down the image or in making a report.
- Is unavoidable because a pupil has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network.

16.22. Where it is necessary to view the imagery the DSL will:

- Never copy, print, share, store or save images; this is illegal.
- Discuss the decision with the headteacher.
- Undertake the viewing themselves, or make sure viewing is undertaken by another member of the safeguarding team with delegated authority from the headteacher.
- Make sure viewing takes place with the headteacher or another member of the SLT in the room; additional people in the room will not view the imagery.
- Only view the imagery on the school premises.
- Record how and why the decision was made to view the imagery in line with the Record Management Policy and the Child Protection and Safeguarding Policy.
- Make sure that images are viewed by a member of staff of the same sex as the pupil, where appropriate.
- Ensure that, if devices need to be passed on to the police, the device is confiscated, disconnected from Wi-Fi and data and turned off immediately to avoid imagery being accessed remotely; the device will be secured until it can be collected by police.

16.23. Imagery will not be purposefully viewed where it will cause significant harm or distress to any pupil involved, in line with the DSL's professional judgement.

16.24. Any accidental or intentional viewing of imagery that is undertaken as part of an investigation is recorded.

16.25. Where a staff member has accidentally viewed a nude or semi-nude image, the DSL will ensure they are provided with the appropriate support, as viewing nude or semi-nude imagery of pupils can be distressing.

Online abuse and exploitation

16.26. Through the online safety curriculum, pupils are taught about how to recognise online abuse and where they can go for support if they experience it.

16.27. The school responds to concerns regarding online abuse and exploitation, whether or not it took place on the school premises or using school-owned equipment.

16.28. All concerns relating to online abuse and exploitation, including child sexual abuse and exploitation and criminal exploitation, are reported to the DSL and dealt with in line with the Child Protection and Safeguarding Policy.

Online hate

16.29. The school does not tolerate online hate content directed towards or posted by members of the school community.

16.30. Incidents of online hate are dealt with in line with the relevant school policy depending on the nature of the incident and those involved, e.g. Staff Code of Conduct, Anti-Bullying Policy.

Online radicalisation and extremism

16.31. Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. This process can occur through direct recruitment, e.g. individuals in extremist groups identifying, targeting and contacting young people with the intention of involving them in terrorist activity, or by exposure to violent ideological propaganda. Children who are targets for radicalisation are likely to be groomed by extremists online to the extent that they believe the extremist has their best interests at heart, making them more likely to adopt the same radical ideology.

16.32. The school's filtering system protects pupils and staff from viewing extremist content.

16.33. Concerns regarding a staff member or pupil being radicalised online are dealt with in line with the Child Protection and Safeguarding Policy.

17. Mental health

17.1. Staff will be aware that online activity both in and outside of school can have a substantial impact on a pupil's mental state, both positively and negatively. The DSL will ensure that training is available to help ensure that staff members understand popular social media sites and terminology, the ways in which social media and the internet in general can impact mental health, and the indicators that a pupil is suffering from challenges in their mental health. Concerns about the mental health of a pupil will be dealt with in line with the Social, Emotional and Mental Health (SEMH) Policy.

18. Remote learning

18.1. All remote learning is delivered in line with the school's Remote Learning Policy.

18.2. All staff and pupils using video communication must:

- Communicate in groups – one-to-one sessions are only carried out where necessary.
- Wear suitable clothing – this includes others in their household.
- Be situated in a suitable 'public' living area within the home with an appropriate background – 'private' living areas within the home, such as bedrooms, are not permitted during video communication.
- Use appropriate language – this includes others in their household.
- Maintain the standard of behaviour expected in school.
- Use the necessary equipment and computer programs as intended.
- Not record, store, or distribute video material without permission.
- Ensure they have a stable connection to avoid disruption to lessons.
- Always remain aware that they are visible.

18.3. All staff and pupils using audio communication must:

- Use appropriate language – this includes others in their household.
- Maintain the standard of behaviour expected in school.
- Use the necessary equipment and computer programs as intended.
- Not record, store, or distribute audio material without permission.
- Ensure they have a stable connection to avoid disruption to lessons.
- Always remain aware that they can be heard.

18.4. The school will consider whether one-to-one sessions are appropriate in some circumstances, e.g. to provide support for pupils with SEND. This will be decided and approved by the headteacher, in collaboration with the SENCO.

18.5. Pupils not using devices or software as intended will be disciplined in line with the Pupil Behaviour Policy.

18.6. The school will risk assess the technology used for remote learning prior to use and ensure that there are no privacy issues or scope for inappropriate use.

18.7. The school will ensure that all school-owned equipment and technology used for remote learning has suitable anti-virus software installed, can establish secure connections, can recover lost work, and allows for audio and visual material to be recorded or downloaded, where required.

18.8. The school will communicate to parents in writing about any precautionary measures that need to be put in place if their child is learning remotely using their own/family-owned equipment and technology, e.g. ensuring that their internet connection is secure.

18.9. During the period of remote learning, the school will maintain regular contact with parents to:

- Reinforce the importance of children staying safe online.
- Ensure parents are aware of what their children are being asked to do, e.g. sites they have been asked to use and staff they will interact with.
- Encourage them to set age-appropriate parental controls on devices and internet filters to block malicious websites.
- Direct parents to useful resources to help them keep their children safe online.
- The school will not be responsible for providing access to the internet off the school premises and will not be responsible for providing online safety software, e.g. anti-virus software, on devices not owned by the school.

19. Use of smart technology

19.1. Queensgate Foundation Primary School recognises that the use of smart technology can have educational benefits, there are also a variety of associated risks which the school will ensure it manages.

19.2. Pupils will be educated on the acceptable and appropriate use of personal devices and will use technology in line with the school's Technology Acceptable Use Agreement for Pupils.

19.3. Staff will use all smart technology and personal technology in line with the school's Staff ICT and Electronic Devices Policy.

19.4. The school recognises that pupils' unlimited and unrestricted access to the internet via mobile phone networks means that some pupils may use the internet in a way which breaches the school's acceptable use of ICT agreement for pupils.

19.5. Inappropriate use of smart technology may include:

- Using mobile and smart technology to sexually harass, bully, troll or intimidate peers.
- Sharing indecent images, both consensually and non-consensually.
- Viewing and sharing pornography and other harmful content.

19.6. Pupils will not be permitted to use smart devices or any other personal technology whilst in the classroom.

19.7. Where it is deemed necessary, the school will ban pupil's use of personal technology whilst on school site.

19.8. Where there is a significant problem with the misuse of smart technology among pupils, the school will discipline those involved in line with the school's Behavioural Policy.

19.9. The school will hold assemblies, where appropriate, which address any specific concerns related to the misuse of smart technology and outline the importance of using smart technology in an appropriate manner.

19.10. The school will seek to ensure that it is kept up to date with the latest devices, platforms, apps, trends, and related threats.

19.11. The school will consider the 4C's (content, contact, conduct and commerce) when educating pupils about the risks involved with the inappropriate use of smart technology and enforcing the appropriate disciplinary measures.

20. Monitoring and review

20.1. The school recognises that the online world is constantly changing; therefore, the DSL, ICT technician and the headteacher conduct termly light-touch reviews of this policy to evaluate its effectiveness.

20.2. The governing board, headteacher and DSL review this policy in full on an annual basis and following any online safety incidents.

20.3. Any changes made to this policy are communicated to all members of the school community.

Appendix 1: Online harms and risks – curriculum coverage

Subject area	Description and teaching content	Curriculum area the harm or risk is covered in
How to navigate the internet and manage information		
Age restrictions	Some online activities have age restrictions because they include content which is not appropriate for children under a specific age. Teaching includes the following: • That age verification exists and why some online platforms ask users to verify their age • Why age restrictions exist • That content that requires age verification can be damaging to under-age consumers • What the age of digital consent is (13 for most platforms) and why it is important	This risk or harm is covered in the following curriculum area(s): • Health education • Computing curriculum
How content can be used and shared	Knowing what happens to information, comments or images that are put online. Teaching includes the following: • What a digital footprint is, how it develops and how it can affect pupils' futures • How cookies work • How content can be shared, tagged and traced • How difficult it is to remove something once it has been shared online • What is illegal online, e.g. youth-produced sexual imagery (sexting)	This risk or harm is covered in the following curriculum area(s): • Relationships education • Health education • **[Secondary schools]** RSE • Computing curriculum

Disinformation, misinformation and hoaxes	Some information shared online is accidentally or intentionally wrong, misleading or exaggerated. Teaching includes the following: • Disinformation and why individuals or groups choose to share false information in order to deliberately deceive • Misinformation and being aware that false and misleading information can be shared inadvertently • Online hoaxes, which can be deliberately and inadvertently spread for a variety of reasons • That the widespread nature of this sort of content can often appear to be a stamp of authenticity, making it important to evaluate what is seen online • How to measure and check authenticity online • The potential consequences of sharing information that may not be true	This risk or harm is covered in the following curriculum area(s): • Relationships education • Health education • **[Secondary schools]** RSE • **[KS2 and above]** Computing curriculum • **[KS3 and KS4]** Citizenship
Fake websites and scam emails	Fake websites and scam emails are used to extort data, money, images and other things that can either be used by the scammer to harm the person targeted or sold on for financial, or other, gain. Teaching includes the following: • How to recognise fake URLs and websites • What secure markings on websites are and how to assess the sources of emails • The risks of entering information to a website which is not secure • What pupils should do if they are harmed/targeted/groomed as a result of interacting with a fake website or scam email • Who pupils should go to for support	This risk or harm is covered in the following curriculum area(s): • Relationships education • **[Secondary schools]** RSE • Health education • Computing curriculum
Online fraud	Fraud can take place online and can have serious consequences for individuals and organisations. Teaching includes the following: • What identity fraud, scams and phishing are • That children are sometimes targeted to access adults' data	This risk or harm is covered in the following curriculum area(s): • Relationships education • Computing curriculum

	• What 'good' companies will and will not do when it comes to personal details	
Password phishing	Password phishing is the process by which people try to find out individuals' passwords so they can access protected content. Teaching includes the following: • Why passwords are important, how to keep them safe and that others might try to get people to reveal them • How to recognise phishing scams • The importance of online security to protect against viruses that are designed to gain access to password information • What to do when a password is compromised or thought to be compromised	This risk or harm is covered in the following curriculum area(s): • Relationships education • Computing curriculum
Personal data	Online platforms and search engines gather personal data – this is often referred to as 'harvesting' or 'farming'. Teaching includes the following: • How cookies work • How data is farmed from sources which look neutral • How and why personal data is shared by online companies • How pupils can protect themselves and that acting quickly is essential when something happens • The rights children have with regards to their data • How to limit the data companies can gather	This risk or harm is covered in the following curriculum area(s): • Relationships education • **[Secondary schools]** RSE • Computing curriculum
Persuasive design	Many devices, apps and games are designed to keep users online for longer than they might have planned or desired. Teaching includes the following: • That the majority of games and platforms are designed to make money – their primary driver is to encourage people to stay online for as long as possible • How notifications are used to pull users back online	This risk or harm is covered in the following curriculum area(s): • Health education • Computing curriculum

Privacy settings	Almost all devices, websites, apps and other online services come with privacy settings that can be used to control what is shared. Teaching includes the following: • How to find information about privacy settings on various devices and platforms • That privacy settings have limitations	This risk or harm is covered in the following curriculum area(s): • Relationships education • Computing curriculum
Targeting of online content	Much of the information seen online is a result of some form of targeting. Teaching includes the following: • How adverts seen at the top of online searches and social media have often come from companies paying to be on there and different people will see different adverts • How the targeting is done • The concept of clickbait and how companies can use it to draw people to their sites and services	This risk or harm is covered in the following curriculum area(s): • Health education • Computing curriculum
How to stay safe online		
Online abuse	Some online behaviours are abusive. They are negative in nature, potentially harmful and, in some cases, can be illegal. Teaching includes the following: • The types of online abuse, including sexual harassment, bullying, trolling and intimidation • When online abuse can become illegal • How to respond to online abuse and how to access support • How to respond when the abuse is anonymous • The potential implications of online abuse • What acceptable and unacceptable online behaviours look like	This risk or harm is covered in the following curriculum area(s): • Relationships education • **[Secondary schools]** RSE • Health education • Computing curriculum • **[KS4]** Citizenship
Challenges	Online challenges acquire mass followings and encourage others to take part in what they suggest. Teaching includes the following:	This risk or harm is covered in the following curriculum area(s): • Relationships education • Health education

	• What an online challenge is and that, while some will be fun and harmless, others may be dangerous and even illegal • How to assess if the challenge is safe or potentially harmful, including considering who has generated the challenge and why • That it is okay to say no and to not take part in a challenge • How and where to go for help • The importance of telling an adult about challenges which include threats or secrecy – 'chain letter' style challenges	
Content which incites	Knowing that violence can be incited online and escalate very quickly into offline violence. Teaching includes the following: • That online content (sometimes gang related) can glamorise the possession of weapons and drugs • That to intentionally encourage or assist in an offence is also a criminal offence • How and where to get help if they are worried about involvement in violence	This risk or harm is covered in the following curriculum area(s): • Relationships education • **[Secondary schools]** RSE
Fake profiles	Not everyone online is who they say they are. Teaching includes the following: • That, in some cases, profiles may be people posing as someone they are not or may be 'bots' • How to look out for fake profiles	This risk or harm is covered in the following curriculum area(s): • Relationships education • Computing curriculum
Grooming	Knowing about the different types of grooming and motivations for it, e.g. radicalisation, child sexual abuse and exploitation (CSAE) and gangs (county lines). Teaching includes the following: • Boundaries in friendships with peers, in families, and with others • Key indicators of grooming behaviour • The importance of disengaging from contact with suspected grooming and telling a trusted adult • How and where to report grooming both in school and to the police	This risk or harm is covered in the following curriculum area(s): • Relationships education • **[Secondary schools]** RSE

	At all stages, it is important to balance teaching pupils about making sensible decisions to stay safe whilst being clear it is never the fault of the child who is abused and why victim blaming is always wrong.	
Live streaming	Live streaming (showing a video of yourself in real-time online either privately or to a public audience) can be popular with children, but it carries a risk when carrying out and watching it. Teaching includes the following: • What the risks of carrying out live streaming are, e.g. the potential for people to record livestreams and share the content • The importance of thinking carefully about who the audience might be and if pupils would be comfortable with whatever they are streaming being shared widely • That online behaviours should mirror offline behaviours and that this should be considered when making a livestream • That pupils should not feel pressured to do something online that they would not do offline • Why people sometimes do and say things online that they would never consider appropriate offline • The risk of watching videos that are being livestreamed, e.g. there is no way of knowing what will be shown next • The risks of grooming	This risk or harm is covered in the following curriculum area(s): • Relationships education • **[Secondary schools]** Health education
Pornography	Knowing that sexually explicit material presents a distorted picture of sexual behaviours. Teaching includes the following: • That pornography is not an accurate portrayal of adult sexual relationships • That viewing pornography can lead to skewed beliefs about sex and, in some circumstances, can normalise violent sexual behaviour • That not all people featured in pornographic material are doing so willingly, i.e. revenge porn or people trafficked into sex work	This risk or harm is covered in the following curriculum area(s): • **[Secondary schools]** RSE
Unsafe communication	Knowing different strategies for staying safe when communicating with others, especially people they do not know or have not met.	This risk or harm is covered in the following curriculum area(s):

	Teaching includes the following: • That communicating safely online and protecting your privacy and data is important, regardless of who you are communicating with • How to identify indicators of risk and unsafe communications • The risks associated with giving out addresses, phone numbers or email addresses to people pupils do not know, or arranging to meet someone they have not met before • What online consent is and how to develop strategies to confidently say no to both friends and strangers online	• Relationships education • **[Secondary schools]** RSE • Computing curriculum
Wellbeing		
Impact on confidence (including body confidence)	Knowing about the impact of comparisons to 'unrealistic' online images. Teaching includes the following: • The issue of using image filters and digital enhancement • The role of social media influencers, including that they are paid to influence the behaviour of their followers • The issue of photo manipulation, including why people do it and how to look out for it	This risk or harm is covered in the following curriculum area(s): • **[Secondary schools]** Health education
Impact on quality of life, physical and mental health and relationships	Knowing how to identify when online behaviours stop being fun and begin to create anxiety, including that there needs to be a balance between time spent online and offline. Teaching includes the following: • How to evaluate critically what pupils are doing online, why they are doing it and for how long (screen time) • How to consider quality vs. quantity of online activity • The need for pupils to consider if they are actually enjoying being online or just doing it out of habit due to peer pressure or the fear or missing out	This risk or harm is covered in the following curriculum area(s): • Health education

	• That time spent online gives users less time to do other activities, which can lead some users to become physically inactive • The impact that excessive social media usage can have on levels of anxiety, depression and other mental health issues • That isolation and loneliness can affect pupils and that it is very important for them to discuss their feelings with an adult and seek support • Where to get help	
Online vs. offline behaviours	People can often behave differently online to how they would act face to face. Teaching includes the following: • How and why people can often portray an exaggerated picture of their lives (especially online) and how that can lead to pressures around having perfect/curated lives • How and why people are unkind or hurtful online when they would not necessarily be unkind to someone face to face	This risk or harm is covered in the following curriculum area(s): • Relationships education
Reputational damage	What users post can affect future career opportunities and relationships – both positively and negatively. Teaching includes the following: • Strategies for positive use • How to build a professional online profile	This risk or harm is covered in the following curriculum area(s): • **[Secondary schools]** RSE
Suicide, self-harm and eating disorders	Pupils may raise topics including eating disorders, self-harm and suicide. Teachers must be aware of the risks of encouraging or making these seem a more viable option for pupils and should take care to avoid giving instructions or methods and avoid using language, videos and images.	