**Lawley Primary School**

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Online Safety Policy

(including Digital Images, Mobile and Smart technology and Social Networking)

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| Date policy last reviewed: | September 2023 |

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**Statement of intent**

Lawley 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 four areas of risk:

* **Content**: Being exposed to illegal, inappropriate or harmful material, e.g., pornography, fake news, self-harm and suicide, and discriminatory or extremist views.
* **Contact**: Being subjected to harmful online interaction with other users, e.g., peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children.
* **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.

# Legal framework

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)
* Data Protection Act 2018
* DfE (2021) ‘Harmful online challenges and online hoaxes’
* DfE (2021) ‘Keeping children safe in education 2021’
* 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’
* DfE (2019) ‘Teaching online safety in school’
* DfE (2018) ‘Searching, screening and confiscation’
* National Cyber Security Centre (2018) ‘Small Business Guide: Cyber Security’
* UK Council for Child Internet Safety (2020) ‘Education for a Connected World – 2020 edition’
* Criminal Justice and Courts Act 2015

This policy operates in conjunction with the following school policies:

* Social Media Policy
* Allegations of Abuse Against Staff Policy
* Acceptable Use Agreement
* Data and Cyber-security Breach Prevention and Management Plan
* Child Protection and Safeguarding Policy
* Anti-Bullying Policy
* PSHE Policy
* RSE and Health Education Policy
* Searching, Screening and Confiscation Policy
* Pupils’ Personal Electronic Devices Policy
* Staff Code of Conduct
* Behavioural Policy
* Disciplinary Policy and Procedures
* Data Protection Policy
* Confidentiality Policy
* Device User Agreement
* Prevent Duty Policy
* Pupil Remote Learning Policy
* Technology Acceptable Use Agreement for Pupils
* Technology Acceptable Use Agreement – Staff

# Roles and responsibilities

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.

The headteacher is responsible for:

* Ensuring that online safety is a running and interrelated theme throughout the school’s policies and procedures, including in those related to the curriculum, teacher training and safeguarding.
* Supporting the Computing leads 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 Computing leads and governing board to update this policy on an annual basis.

The Computing leads are 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.
* Ensuring online safety is recognised as part of the school’s safeguarding responsibilities and that a coordinated approach is implemented.
* Ensuring safeguarding is considered in the school’s approach to remote learning.
* Ensuring appropriate referrals are made to external agencies, as required.
* Keeping 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.
* Working with the headteacher and governing board to update this policy on an annual basis.

The ICT technician is 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.

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.
* Ensuring they are familiar with, and understand, the indicators that pupils may be unsafe online.
* 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.

Pupils are responsible for:

* Adhering to the Acceptable Use Agreement and other relevant policies.
* Seeking help from school staff if they are concerned about something they or a peer have experienced online.
* Reporting online safety incidents and concerns in line with the procedures within this policy.

# Managing online safety

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues affecting young people, particularly owing to the rise of social media and the increased prevalence of children using the internet.

The Computing leads have overall responsibility for the school’s approach to online safety, with support from deputies and the headteacher where appropriate, and will ensure that there are strong processes in place to handle any concerns about pupils’ safety online.

The importance of online safety is integrated across all school operations in the following ways:

* Staff receive regular online safety updates in the form of a monthly newsletter
* Staff receive regular email updates regarding any changes to online safety guidance or legislation
* Online safety is integrated into learning throughout the curriculum

**Handling online safety concerns**

Any disclosures made by pupils to staff members about online abuse, harassment or exploitation, whether they are the victim or disclosing on behalf of another child, will be handled in line with the Child Protection and Safeguarding Policy.

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., the Staff Code of Conduct, Allegations of Abuse Against Staff Policy, and Disciplinary Policy and Procedures. If the concern is about the headteacher, it is reported to the chair of governors.

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, and manages concerns in accordance with relevant policies depending on their nature, e.g., the Behavioural Policy and Child Protection and Safeguarding Policy.

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

All online safety incidents and the school’s response are recorded using CPOMS.

# Cyberbullying

Cyberbullying can include the following:

* Threatening, intimidating or upsetting text messages
* Threatening or embarrassing pictures and video clips sent via mobile phone cameras
* Silent or abusive phone calls or using the victim’s phone to harass others, to make them think the victim is responsible
* Threatening or bullying emails, possibly sent using a pseudonym or someone else’s name
* Menacing or upsetting responses to someone in a chatroom
* Unpleasant messages sent via instant messaging
* Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g., Facebook

Cyberbullying against pupils or staff is not tolerated under any circumstances. Incidents of cyberbullying are dealt with quickly and effectively wherever they occur in line with the Anti-bullying Policy.

# Peer-on-peer sexual abuse and harassment

Pupils may also use the internet and technology as a vehicle for sexual abuse and harassment. Staff will understand that this abuse can occur both in and outside of school and off and online and will remain aware that pupils are less likely to report concerning online sexual behaviours, particularly if they are using websites that they know adults will consider to be inappropriate for their age.

The following are examples of online harmful sexual behaviour of which staff will be expected to be aware:

* Threatening, facilitating or encouraging sexual violence
* Upskirting, i.e., taking a picture underneath a person’s clothing without consent and with the intention of viewing their genitals, breasts or buttocks
* Sexualised online bullying, e.g., sexual jokes or taunts
* Unwanted and unsolicited sexual comments and messages
* Consensual or non-consensual sharing of sexualised imagery

Staff will be aware that creating, possessing, and distributing indecent imagery of other children, i.e., individuals under the age of 18, is a criminal offence, even where the imagery is created, possessed, and distributed with the permission of the child depicted, or by the child themselves.

The school responds to all concerns regarding online peer-on-peer sexual abuse and harassment, regardless of whether the incident took place on the school premises or using school-owned equipment. Concerns regarding online peer-on-peer abuse are reported to the DSL, who will investigate the matter in line with the Peer-on-peer Abuse Policy and the Child Protection and Safeguarding Policy.

# Grooming and exploitation

Grooming is defined as the situation whereby an adult builds a relationship, trust and emotional connection with a child with the intention of manipulating, exploiting and/or abusing them.

Staff will be aware that grooming often takes place online and that pupils who are being groomed are commonly unlikely to report this behaviour for many reasons, including the following:

* The pupil believes they are talking to another child, when they are actually talking to an adult masquerading as someone younger with the intention of gaining their trust to abuse them.
* The pupil does not want to admit to talking to someone they met on the internet for fear of judgement, feeling embarrassed, or a lack of understanding from their peers or adults in their life.
* The pupil may have been manipulated into feeling a sense of dependency on their groomer due to the groomer’s attempts to isolate them from friends and family.
* Talking to someone secretly over the internet may make the pupil feel ‘special’, particularly if the person they are talking to is older.
* The pupil may have been manipulated into feeling a strong bond with their groomer and may have feelings of loyalty, admiration, or love, as well as fear, distress and confusion.

Due to the fact pupils are less likely to report grooming than other online offences, it is particularly important that staff understand the indicators of this type of abuse. The DSL will ensure that online safety training covers online abuse, the importance of looking for signs of grooming, and what the signs of online grooming are, including:

* Being secretive about how they are spending their time.
* Having an older boyfriend or girlfriend, usually one that does not attend the school and whom their close friends have not met.
* Having money or new possessions, e.g. clothes and technological devices, that they cannot or will not explain.

**Child sexual exploitation (CSE) and child criminal exploitation (CCE)**

Although CSE often involves physical sexual abuse or violence, online elements may be prevalent, e.g., sexual coercion and encouraging children to behave in sexually inappropriate ways through the internet. In some cases, a pupil may be groomed online to become involved in a wider network of exploitation, e.g., the production of child pornography or forced child prostitution and sexual trafficking.

CCE is a form of exploitation in which children are forced or manipulated into committing crimes for the benefit of their abuser, e.g., drug transporting, shoplifting and serious violence. While these crimes often take place in person, it is increasingly common for children to be groomed and manipulated into participating through the internet.

Where staff have any concerns about pupils with relation to CSE or CCE, they will bring these concerns to the DSL without delay, who will manage the situation in line with the Child Protection and Safeguarding Policy.

**Radicalisation**

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.

Staff members will be aware of the factors which can place certain pupils at increased vulnerability to radicalisation, as outlined in the Prevent Duty Policy. Staff will be expected to exercise vigilance towards any pupils displaying indicators that they have been, or are being, radicalised.

Where staff have a concern about a pupil relating to radicalisation, they will report this to the DSL without delay, who will handle the situation in line with the Prevent Duty Policy.

# Mental health

The internet, particularly social media, can be the root cause of a number of mental health issues in pupils, e.g., low self-esteem and suicidal ideation.

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.

# Online hoaxes and harmful online challenges

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.

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.

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.

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. 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.

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

* In line with any advice received from a known, reliable source, e.g. the UK Safer Internet Centre, when fact-checking the risk of online challenges or hoaxes.
* Careful to avoid 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 but 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.
* Appropriate for the relevant pupils’ age and developmental stage.
* Supportive.
* In line with the Child Protection and Safeguarding Policy.

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.

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.

# Cyber-crime

Cyber-crime is criminal activity committed using computers and/or the internet. There are two key categories of cyber-crime:

* **Cyber-enabled** – these crimes can be carried out offline; however, are made easier and can be conducted at higher scales and speeds online, e.g. fraud, purchasing and selling of illegal drugs, and sexual abuse and exploitation.
* **Cyber-dependent** – these crimes can only be carried out online or by using a computer, e.g. making, supplying or obtaining malware, illegal hacking, and ‘booting’, which means overwhelming a network, computer or website with internet traffic to render it unavailable.

The school will factor into its approach to online safety the risk that pupils with a particular affinity or skill in technology may become involved, whether deliberately or inadvertently, in cyber-crime. Where there are any concerns about a pupil’s use of technology and their intentions with regard to using their skill and affinity towards it, the DSL will consider a referral to the Cyber Choices programme, which aims to intervene where children are at risk of committing cyber-crime and divert them to a more positive use of their skills and interests.

The DSL and headteacher will ensure that pupils are taught, throughout the curriculum, how to use technology safely, responsibly and lawfully, and will ensure that pupils cannot access sites or areas of the internet that may encourage them to stray from lawful use of technology, e.g., the ‘dark web’, on school-owned devices or on school networks through the use of appropriate firewalls.

# Online safety training for staff

The DSLs ensures that all safeguarding training given to staff includes elements of online safety, including how the internet can facilitate abuse and exploitation. All staff will be made aware that pupils are at risk of abuse, by their peers and by adults, online as well as in person, and that, often, abuse will take place concurrently via online channels and in daily life.

Information about the school’s full responses to online safeguarding incidents can be found in the Anti-bullying Policy, the Peer-on-peer Abuse Policy and the Child Protection and Safeguarding Policy.

# Online safety and the curriculum

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

* RHE (Relationships and Health Education)
* Computing

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

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. 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
* What healthy and respectful relationships, including friendships, look like
* Body confidence and self-esteem
* Consent, e.g., with relation to the sharing of indecent imagery or online coercion to perform sexual acts
* 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

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 A](#AppendixTitle1) of this policy.

The Computing leads share a monthly newsletter with all parents and teachers which will outline the latest games and apps and online issues that may be relevant to our age group.

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?

Before conducting a lesson or activity on online safety, the class teacher and Computing leads 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. Staff member on how to best support any pupil who may be especially impacted by a lesson or activity. 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.

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 ask questions and are not worried about getting into trouble or being judged.

If a staff member is concerned about anything pupils raise during online safety lessons and activities, they will make a report in line with the Child Protection and Safeguarding Policy.

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 the Child Protection and Safeguarding Policy.

# Use of technology in the classroom

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

* Teacher computers
* iPads
* Laptops
* Email

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

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

# Use of smart technology

While the 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.

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.

Staff will use all smart technology and personal technology in line with the school’s Staff ICT, digital images and social networking policy.

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.

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

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

The school will ensure that it is kept up to date with the latest devices, platforms, apps, trends and related threats through the monthly e-safety newsletters.

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.

# Educating parents

The school works in partnership with parents to ensure pupils stay safe online at school and at home. Parents are provided with information about the school’s approach to online safety and their role in protecting their children. Parents are sent a copy of the Acceptable Use Agreement when they sign up to the iPad project and are encouraged to go through this with their child to ensure their child understands the document and the implications of not following it.

Parents will be made aware of the various ways in which their children may be at risk online, including, but not limited to:

* Child sexual abuse, including grooming.
* Exposure to radicalising content.
* Sharing of indecent imagery of pupils, e.g., sexting.
* Cyberbullying.
* Exposure to age-inappropriate content, e.g., pornography.
* Exposure to harmful content, e.g., content that encourages self-destructive behaviour.

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.

Parental awareness regarding how they can support their children to be safe online is raised in the following ways:

* Parents’ evenings
* Newsletters
* Online resources

# Internet access

Staff and other members of the school community are only granted access to the school’s internet network once they have read and signed the Acceptable Use Agreement.

All members of the school community are encouraged to use the school’s internet network, instead of 3G, 4G and 5G networks, as the network has appropriate filtering and monitoring to ensure individuals are using the internet appropriately.

Access to and the use of emails is managed in line with the Data Protection Policy, Acceptable Use Agreement, Pupil Confidentiality Policy and Staff and Volunteer Confidentiality Policy.

Staff and pupils are given approved school email accounts and are only able to use these accounts at school and when doing school related work outside of school hours.

# Filtering and monitoring online activity

The governing board in conjunction with the Headteacher and the ICT technician ensures the school’s network has appropriate filters and monitoring systems in place. The ICT technician ensures ‘over blocking’ does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding.

The headteacher and ICT technicians undertake a risk assessment to determine what filtering and monitoring systems are required. 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. ICT technicians undertake regularchecks on the filtering and monitoring systems to ensure they are effective and appropriate.

Deliberate breaches of the filtering system are reported to the DSL and ICT technicians, who will escalate the matter appropriately. If a pupil has deliberately breached the filtering system, they will be disciplined in line with the Behavioural Policy. If a member of staff has deliberately breached the filtering system, they will be disciplined in line with the Disciplinary Policy and Procedure.

If material that is believed to be illegal is accessed, inadvertently or deliberately, this material will be reported to the appropriate agency immediately.

The school’s network and school-owned devices are appropriately monitored. All users of the network and school-owned devices are informed about how and why they are monitored. Concerns identified through monitoring are reported to the Computing leads who manages the situation in line with the Child Protection and Safeguarding Policy.

# Network security

Technical security features, such as anti-virus software, are kept up-to-date and managed by ICT technicians. Firewalls are switched on at all times. ICT technicians review the firewalls on a regular basis to ensure they are running correctly, and to carry out any required updates.

Staff and pupils are advised not to download unapproved software or open unfamiliar email attachments and are expected to report all malware and virus attacks to ICT technicians.

All members of staff have their own unique usernames and private passwords to access the school’s systems. Staff members and pupils are responsible for keeping their passwords private. Passwords expire after 90 days, after which users are required to change them.

Users inform ICT technicians if they forget their login details, who will arrange for the user to access the systems under different login details. Users are not permitted to share their login details with others and are not allowed to log in as another user at any time. If a user is found to be sharing their login details or otherwise mistreating the password system, the headteacher is informed and decides the necessary action to take.

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

Full details of the school’s network security measures can be found in the Telford and Wrekin 2021 Info Security Breach Procedure Policy.

Access to and the use of emails is managed in line with the Data Protection Policy, Acceptable Use Agreement, and the Pupil Confidentiality Policy and Staff and Volunteer Confidentiality Policy.

Staff and pupils are given approved school email accounts and are only able to use these accounts at school and when doing school-related work outside of school hours. Prior to being authorised to use the email system, staff and pupils must agree to and sign the Acceptable Use Agreement. Personal email accounts are not permitted to be used on the school site. Any email that contains sensitive or personal information is only sent using secure and encrypted email.

Staff members and pupils are required to block spam and junk mail and report the matter to ICT technicians. The school’s monitoring system can detect inappropriate links, malware and profanity within emails – staff and pupils are made aware of this. Chain letters, spam and all other emails from unknown sources are deleted without being opened.

Any cyber-attacks initiated through emails are managed in line with the Data and Cyber-security Breach Prevention and Management Plan.

# The school website and using social media

The school website, Lawley Primary Facebook and Twitter accounts are important, public-facing communication channels. Many prospective and existing parents find it convenient to look at the school’s website/Facebook/twitter for information and it can be an effective way to share the school’s good practice and promote its work. Procedures and practice need to ensure these applications are all managed safely. The Website, Twitter and Facebook accounts are managed by permitted designated staff.

Official use of Images/Videos of Children by the School/Setting

All images taken by the school/setting will be used in a manner respectful of the eight Data Protection Principles. This means that images will be:

* + fairly and lawfully processed
  + processed for limited, specifically stated purposes only
  + used in a way that is adequate, relevant and not excessive
  + accurate and up to date
  + kept on file for no longer than is necessary
  + processed in line with an individual’s legal rights
  + kept securely
  + adequately protected if transferred to other countries

Most importantly, take care when using photographs or video footage of pupils on the school website or social media. Consider using group photographs rather than photos of individual children. Do not use the first name and last name of individuals in a photograph. This reduces the risk of inappropriate, unsolicited attention from people outside the school.

If showcasing school-made digital video work, take care to ensure that pupils aren't referred to by name on the video, and that pupils’ full names aren't given in credits at the end of the film.

When taking photographs to publish on social media and the school website consider the angle from which the photograph is shot.

If showcasing examples of pupil’s work consider using only their first names, rather than their full names.

Only use images of pupils in suitable dress to reduce the risk of inappropriate use.

In many cases, it is unlikely that the Data Protection Act will apply to the taking of images e.g., photographs taken for personal use, such as those taken by parents or grandparents at a school play or sports day. However, photographs taken for official school use, which are likely to be stored electronically alongside other personal data, may be covered by the Data Protection Act. As such, pupils should be advised why they are being taken.

Parental permission should be obtained before publishing any photographs, video footage etc of pupils on the school website, social media, in a DVD or in any other high profile public printed media. This ensures that parents are aware of the way the image of their child is representing the school; This permission is sought on the Lawley Primary School Admission Form.

Use excerpts of pupils’ work such as from written work, scanned images of artwork or photographs of items designed and made in technology lessons. This allows pupils to exhibit their work to a wider audience without increasing the risk of inappropriate use of images of pupils.

Links to any external websites should be thoroughly checked before inclusion on a school website to ensure that the content is appropriate both to the school and for the intended audience. Remember that the content of websites can change substantially, even in a short space of time. Check all links regularly, not only to ensure that they are still active, but that the content remains suitable too.

Text written by pupils should always be reviewed before publishing it on the school website. Make sure that the work doesn’t include the full name of the pupil, or reveal other personal information, such as membership of after school clubs or any other details that could potentially identify them. Although it may seem obvious, check that pupils’ work doesn’t contain any statements that could be deemed defamatory.

Ensure also that the school is not infringing copyright or intellectual property rights through any content published on the website. For example, using images sourced through Google, or using a Trademark for which copyright permission has not been sought.

If showcasing school-made digital video work, take care to ensure that pupils aren't referred to by name on the video, and that pupils’ full names aren't given in credits at the end of the film.

Digital images - photographs and video clips – should not be taken using mobile phones. All staff are expected to use school devices only.

**Technical:**

Digital images / video of pupils need to be stored securely on the school network or Showbie and old images deleted after a reasonable period, or when the pupil has left the school. All staff devices are password protected.

When saving pictures, ensure that the image file is appropriately named. Do not use pupils’ names in image file names.

**Education:**

All inappropriate use of images must be reported to the Headteacher. Staff and pupils also need to understand how to consider an external ‘audience’ when publishing or presenting work.

In this school:

* The Headteacher takes overall editorial responsibility to ensure that the website content is accurate, and quality of presentation is maintained.
* In consultation with SLT, uploading of information onto the forward-facing website is restricted to the school Gold ICT technician and Computing Leads.
* The school web site complies with the school's guidelines for publications.
* Most material is the school’s own work; where other’s work is published or linked to, we credit the sources used and state clearly the author's identity or status.
* The point of contact on the web site is the school address and telephone number. Home information or individual e-mail identities will not be published.
* Photographs published on the web do not have full names attached.
* We gain parental / carer permission for use of digital photographs or video involving their child as part of the school agreement form when their daughter / son joins the school.
* Digital images /video of pupils are stored in the teachers’ shared images folder on the network and images are deleted when the pupil leaves school – unless an item is specifically kept for a key school publication.
* We do not use pupils’ names when saving images in the file names or in the <ALT> tags when publishing to the school website.
* We do not include the full names of pupils in the credits of any published school produced video materials / DVDs.
* Pupils are only able to publish to their own ‘safe’ web-portal in school.
* Pupils are taught to publish for a wide range of audiences which might include governors, parents, or younger children as part of their ICT scheme of work.
* Pupils are taught about how images can be abused in their Esafety education programme.

Social Networking

At Lawley Primary School we are aware and acknowledge that increasing numbers of adults and children are using social networking sites. The widespread availability and use of social networking brings opportunities to understand, engage and communicate in new ways.

It is important, however, that we are able to use these technologies and services effectively and flexibly. This policy, alongside the Child Protection and ICT policies, is to protect our school community and advise on how to deal with potential inappropriate use of social networking sites. It should also be read alongside the Safeguarding Children Board: Raising Awareness document which is attached at the end of this policy.

We recognise that use of social networking applications has implication for our duty to safeguard children, young people and vulnerable adults.

**Purpose**

The purpose of this policy is to ensure that:

* Lawley Primary School, it’s leaders and Governors are not exposed to legal risks
* The reputation of the Lawley School Community is not adversely affected
* All children are safeguarded

**Terms of Use**

It is widely acknowledged that social networking can play a valuable part in education, but equally misuse of these applications can cause great damage to the moral and well-being of students, parents and staff.

Social networking applications include, but are not limited to:

* Blogs
* Online discussion forums
* Collaborative spaces (for example *Facebook*)
* Media sharing sites (for example *You Tube*)
* Micro blogging applications (for example *Twitter*)

All members of a school community, including parents have an obligation to use social networking in a responsible way and should bear in mind that information shared through these applications are still subject to copyright, data protection, freedom of information legislation, and other legislation including (but not exclusively) the **Protection from Harassment Act** **1997**, **Malicious Communications Act 1998**, **Criminal Justice and Public Order Act 1994** and the **Communications Act 2003.**

The children at Lawley Primary School have an acceptable use agreement/ safety rules which are taught by members of staff. These are available in the ICT/Internet Policy and are clearly visible around school as a reminder to children. E safety education begins as soon as a child enters school and is a planned part of our taught ICT program. If any child breaches these e safety rules, including Cyberbullying, then appropriate action is taken. This could include:

* Informing parents
* Further planned learning around safety
* Reporting to the Designated Safeguarding Lead
* Completion of a bullying incident form

All Telford & Wrekin schools endorse the rights of freedom of expression; however the use of social networks must pay due consideration to the rights of others and be in accordance with the following **Code of Conduct**.

* **T&W Schools Social Networking Code of Conduct**

Social Networking applications must not be used to publish any comment which may result in actions for defamation, discrimination, breaches of copyright, data protection or other claims for damages. This includes material of an illegal, sexual or offensive nature that may bring a school into disrepute.

Social Networking applications must not be used for the promotion of personal financial interest, commercial ventures or personal campaigns.

Social Networking applications must not be used in an abusive or hateful manner.

Social Networking applications must not be used for actions that would put school representatives in breach of school policies.

Social Networking applications must not breach the school’s misconduct, equal opportunities or bullying and harassment policies.

Social Networking applications must not make reference to any pupil, parent, member of staff or school activity / event unless prior permission has been obtained and agreed with the head teacher.

School staff should be aware that if out-of-work activity reported on social networking applications causes potential embarrassment to the school or detrimentally affects the school, then the school is entitled to take disciplinary action.[[1]](#endnote-1)

The following flow chart illustrates the course of action to be taken upon a breach of the Code of Conduct:

E-Safety Incident / Breach of Code of Conduct

Unsuitable material

Report to local e-safety lead (HT) and or T&WSCB

If child or YP:

If staff or parent

Review incident and decide on appropriate course of actions / sanctions in accordance with e-safety Use of ICT policy.

Level 1: Person(s) posting inappropriate comments informed by HT that they are in breach of the **code of conduct** and that further action will be taken if the comments are not removed within 5 working days.

Level 2: Chair of Govs writes formally to inform person(s) responsible for unsuitable material that the issue is being referred to the police if the matter is not resolved immediately

Level 3: Formal referral to the Police. Formal actions taken by school and / or Police

Illegal material, activity found or suspected

Report to Police

Illegal activity

Illegal content

Child or YP at risk

Report to IWF and/or Police

Report to CEOP (police if immediate risk)

Secure and preserve evidence

Support / assist with Police / IWF / CEOP response.

If no illegal material or activity is confirmed, revert to internal disciplinary procedures for staff / parents

If illegal material or activity is confirmed, support police or relevant authority to complete their investigations and seek advice from T&WSCB on treatment of offender / victim

Social Media Code of Conduct Timeline.

* **Debrief on incident.**
* **Review policies**
* **share experience and practice as required**
* **Monitor situation**

**Key (ctrl + click to follow link)**

[IWF: Internet Watch Foundation](http://www.iwf.org.uk/)

[CEOP: Child Exploitation & Online](http://ceop.police.uk/)

[Protection centre](http://ceop.police.uk/)

[T&WSCB: T&W Safeguarding Children](http://www.telfordsafeguardingboard.org.uk/)

[Board](http://www.telfordsafeguardingboard.org.uk/)

Day 1- 5

1. Person(s) responsible (if known) contacted and informed of concerns and that they may be in breach of the Code of Conduct.

HT / SMT made aware of comments posted on a Social Media site that could be considered inappropriate / offensive

2. If person not known then contact with the ISP to consider if the comments are a breach of their T&Cs.

Day 5 -10

Chair of Govs. Writes formally to person(s) responsible.

Matter will now be escalated if not resolved within next 5 days.

No resolution to issue following contact with the person(s) responsible and / or ISP.

**Further escalation / Action(s) taken:**

* **Referral to Police**
* **Referral to LA legal team**
* **Revoke Parent License (if applicable)**
* **Suspension of staff (if applicable) following staff disciplinary procedure**
* **Formal recording as breach of Social Media Code of Conduct**

**No resolution following formal response by Chair**

Day 10 -15

# Use of devices

**School-owned devices**

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

* Laptop or
* Tablet

Pupils in Y2-6 have 1:1 iPads. EYFS and Y1 pupils are provided with school-owned devices as necessary to assist in the delivery of the curriculum.

School-owned devices are used in accordance with the Device User Agreement. Staff and pupils are not permitted to connect school-owned devices to public Wi-Fi networks. All school-owned devices are password protected. All mobile school-owned devices are fitted with tracking software to ensure they can be retrieved if lost or stolen. All school-owned devices are fitted with software to ensure they can be remotely accessed, in case data on the device needs to be protected, retrieved or erased.

ICT technicians review all school-owned devices on a regular basis to carry out software updates and ensure there is no inappropriate material or malware on the devices. No software, apps or other programmes can be downloaded onto a device without authorisation from ICT technicians.

Cases of staff members or pupils found to be misusing school-owned devices will be managed in line with the Disciplinary Policy and Procedure and Behavioural Policyrespectively.

**Personal devices**

Personal devices are used in accordance with the Staff ICT and Electronic Devices Policy and the Pupils’ Personal Electronic Devices Policy. Any personal electronic device that is brought into school is the responsibility of the user.

Staff members are not permitted to use their personal devices during lesson time, other than in an emergency. Staff members are not permitted to use their personal devices to take photos or videos of pupils.

Staff members report concerns about their colleagues’ use of personal devices on the school premises in line with the Allegations of Abuse Against Staff Policy. 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 the Allegations of Abuse Against Staff Policy.

Pupils’ devices can be searched, screened and confiscated in accordance with the Searching, Screening and Confiscation Policy. If a staff member reasonably believes a pupil’s personal device has been used to commit an offence or may provide evidence relating to an offence, the device will be handed to the police.

# Remote learning

All remote learning is delivered in line with the school’s Pupil Remote Learning Policy.

# Monitoring and review

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

The next scheduled review date for this policy is September 2024.

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

**Appendix A: 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 areas:   * Health education * Computing |
| 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 areas:   * Relationships education |
| 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 areas:   * **[**Relationships and health education * **KS2** Computing |
| 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, or 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 areas:   * Relationships education |
| 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 * What ‘good’ companies will and will not do when it comes to personal details | This risk or harm is covered in the following curriculum areas:   * Relationships education |
| 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 areas:   * Relationships education |
| 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 areas:   * Relationships education |
| 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, and that 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 areas:   * Health education * Computing |
| 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 areas:   * Relationships education |
| 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 areas:   * Relationships education |
| **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 areas:   * Relationships education |
| Challenges | Online challenges acquire mass followings and encourage others to take part in what they suggest. Teaching includes the following:   * 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, such as ‘chain letter’ style challenges | This risk or harm is covered in the following curriculum areas:   * Relationships education |
| Content which incites violence | 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 areas:   * Relationships education |
| 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 areas:   * Relationships education |
| Grooming | Knowing about the different types of grooming and motivations for it, e.g. radicalisation, child sexual abuse and exploitation, and gangs and 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   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. | This risk or harm is covered in the following curriculum areas:   * Relationships education |
| Unsafe communication | Knowing different strategies for staying safe when communicating with others, especially people they do not know or have not met. 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 | This risk or harm is covered in the following curriculum areas:   * Relationships education |
| **Wellbeing** | | |
| 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 due to the fear or missing out * 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 | This risk or harm is covered in the following curriculum areas:   * Health education |
| 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 or 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 areas:   * Relationships education |

1. Governor Statement

   The Safeguarding Governor of Lawley Primary have agreed the above Policy. This is in line with the curriculum aims recommended by the LA, which were adapted and adopted by the Governors of this school.

   Headteachers signature …………………………………

   Safeguarding Governor signature

   (Review date – September 2024) [↑](#endnote-ref-1)