Online Safety Policy

West Heath School

Approved by:	Full Board Trustees	**Date:**	October 2024
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Contents

1. Aims

The purpose of West Heath School online safety policy is to:

- Safeguard and protect all members of West Heath School community online.
- Identify approaches to educate and raise awareness of online safety throughout the community.
- Enable all staff to work safely and responsibly, to role model positive behaviour online and to manage professional standards and practice when using technology.
- Identify clear procedures to use when responding to online safety concerns.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

2. Legislation and guidance

This policy is based on the Department for Education's (DfE's) statutory safeguarding guidance, Keeping Children Safe in Education, and its advice for schools on:

- Teaching online safety in schools
- Preventing and tackling bullying and cyber-bullying: advice for Principals and school staff
- Relationships and sex education
- Searching, screening and confiscation

It also refers to the DfE's guidance on protecting children from radicalisation.

It reflects existing legislation, including but not limited to the Education Act 1996 (as amended), the Education and Inspections Act 2006 and the Equality Act 2010. In addition, it reflects the Education Act 2011, which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on students ' electronic devices where they believe there is a 'good reason' to do so.

3. Roles and responsibilities

3.1 The Senior Management Team (SMT)

SMT has overall responsibility for monitoring this policy and holding the Principal to account for its implementation. The Designated Safeguarding Lead (DSL/DSAL) and Deputy Principal have lead responsibility for online safety.

West Heath School recognises that all members of the community have important roles and responsibilities to play with regards to online safety. SMT will make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.

SMT will also make sure all staff receive regular online safety updates (via email, e-bulletins and staff meetings), as required and at least annually, to ensure they are continually provided with the relevant skills and knowledge to effectively safeguard children.

SMT will co-ordinate regular meetings with appropriate staff to discuss online safety, requirements for training, and monitor online safety logs as provided by the designated safeguarding lead (DSL).

SMT should ensure children are taught how to keep themselves and others safe, including keeping safe online.

SMT must ensure the school has appropriate filtering and monitoring systems in place on school devices and school networks and will regularly review their effectiveness. The team will review the DfE filtering and monitoring standards, and discuss with IT staff and service providers what needs to be done to support the school in meeting the standards, which include:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing filtering and monitoring provisions at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet their safeguarding needs.

All trustees will:

- Ensure they have read and understood this policy
- Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet
- Ensure that online safety is a running and interrelated theme while devising and implementing their whole-school or college approach to safeguarding and related policies and/or procedures
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and students with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable

3.2 The Principal

The Principal is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school.

3.3 The designated safeguarding lead (DSL)

Details of the school's designated safeguarding lead (DSL) and deputies are set out in our child protection and safeguarding policy, as well as relevant job descriptions.

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

- Act as a named point of contact on all online safeguarding issues and liaise with other members of staff or other agencies, as appropriate.
- Work alongside Deputy DSLs to ensure online safety is recognised as part of the settings safeguarding responsibilities and that a coordinated approach is implemented.
- Ensure all members of staff receive regular, up-to-date and appropriate online safety training.
- Access regular and appropriate training and support to ensure they understand the unique risks associated with online safety and have the relevant knowledge and up to date required to keep learners safe online.
- Access regular and appropriate training and support to ensure they recognise the additional risks that learners with SEN and disabilities (SEND) face online.

- Keep up-to-date with current research, legislation and trends regarding online safety and communicate this with the community, as appropriate.
- Work with staff to coordinate participation in local and national events to promote positive online behaviour, such as Safer Internet Day.
- Ensure that online safety is promoted to parents, carers and the wider community, through a variety of channels and approaches.
- Maintain records of online safety concerns, as well as actions taken, as part of the settings safeguarding recording mechanisms.
- Monitor online safety incidents to identify gaps and trends, and use this data to update the education response, policies and procedures.
- Report online safety concerns, as appropriate, to the Senior Management Team of West Heath School and to the Board of Trustees.
- Work with SMT to review and update online safety policies on a regular basis (at least annually) with stakeholder input.
- Meet regularly once a term with the Trustee with a lead responsibility for safeguarding and/or online safety
- There are at least three online safety meetings per academic year. The Online Safety Lead, Head of Care and Safeguarding and/or DDSL responsible for Online Safety attend the Kent Online Safety Group meetings.

This list is not intended to be exhaustive.

3.4 The IT Netmanager

The ICT manager is responsible for:

- Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems on school devices and school networks, which are reviewed and updated at least annually to assess effectiveness and ensure students are kept safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
- Ensuring that the school's IT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring the school's IT systems daily
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files

This list is not intended to be exhaustive.

3.5 All staff and volunteers

All staff, including contractors and agency staff, and volunteers are responsible for:

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Model good practice when using technology and maintain a professional level of conduct in their personal use of technology, both on and off site.
- Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet (appendix 1)
- Knowing that the DSL is responsible for the filtering and monitoring systems and processes and being aware of how to report any incidents of those systems or processes failing by contacting DSL and/or ICT manager with concerns identified.
- Following the correct procedures by DSL and ICT manager if they need to bypass the filtering and monitoring systems for educational purposes

- Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy
- Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline, and maintaining an attitude of ***‘it could happen here’***

This list is not intended to be exhaustive.

3.6 Parents/carers

Parents/carers are expected to:

- Support our online safety approaches by discussing online safety issues with their children and reinforcing appropriate and safe online behaviours at home.
- Abide by the home-school agreement and/or acceptable use policies.
- Identify changes in behaviour that could indicate that their child is at risk of harm online.
- Seek help and support from the setting, or other appropriate agencies, if they or their child encounter risk or concerns online.
- Use our systems, such as learning platforms, and other network resources, safely and appropriately.
- Take responsibility for their own awareness in relation to the risks and opportunities posed by new and emerging technologies.

Parents/carers can seek further guidance on keeping children safe online from the following organisations and websites:

- What are the issues? – UK Safer Internet Centre
- Hot topics – Childnet
- Parent resource sheet – Childnet

3.7 Visitors and members of the community

Visitors and members of the community who use the school’s ICT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use.

4. Educating students about online safety

All schools have to teach:

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

4.1 Education and Engagement Approaches

Education and engagement with learners

- The setting will establish and embed a progressive online safety curriculum to raise awareness and promote safe and responsible internet use amongst learners by:
- Ensuring education regarding safe and responsible use precedes internet access.
- Including online safety in Personal, Social, Health and Economic (PSCHE), Relationships and Sex Education (RSE), computing programmes of study and Acceptable Use of the School’s Network Policies and Safeguarding Children Policy and Procedures.
- Reinforcing online safety messages whenever technology or the internet is in use.

- Educating learners in the effective use of the internet to research; including the skills of knowledge location, retrieval and evaluation.
- Teaching learners to be critically aware of the materials they read and shown how to validate information before accepting its accuracy.
- The setting will support learners to read and understand the acceptable use policies in a way which suits their age and ability by:
- Displaying acceptable use posters in all rooms with internet access.
- Informing learners that network and internet use will be monitored for safety and security purposes and in accordance with legislation.
- Rewarding positive use of technology. Use of external providers to offer safe online workshops for our learners and assemblies.
- Implementing appropriate peer education approaches.
- Providing online safety education and training as part of the transition programme across the key stages and when moving between establishments.
- Seeking learner voice when writing and developing online safety policies and practices, including curriculum development and implementation.
- Using support, such as external visitors, where appropriate, to complement and support our internal online safety education approaches.

4.2 Vulnerable Learners

- West Heath School recognises that some learners are more vulnerable online due to a range of factors. This may include, but is not limited to children in care, children with Special Educational Needs and Disabilities (SEND) or mental health needs, children with English as an additional language (EAL) and children experiencing trauma or loss.
- West Heath School will ensure that differentiated and ability appropriate online safety education, access and support is provided to vulnerable learners. This policy should be read in conjunction with the Anti-Bullying, Acceptable Use of the School Network Policies and Child Protection and Safeguarding Policy and Procedures.
- When implementing an appropriate online safety policy and curriculum West Heath School will seek input from specialist staff as appropriate, including Lead online safety DDSL, IT Manager, IT Analyst, and the ICT Teacher.

5. Educating parents/carers about online safety

West Heath School recognises that parents and carers have an essential role to play in enabling children and young people to become safe and responsible users of the internet and associated technologies. The school will raise parents/carers' awareness of internet safety in letters or other communications home, and in information via our website. This policy will also be shared with parents/carers.

The school will let parents/carers know:

- What systems the school uses to filter and monitor online use

If parents/carers have any queries or concerns in relation to online safety, these should be raised in the first instance with the DSL and/or the Principal.

Concerns or queries about this policy can be raised with any member of staff.

6. Cyber-bullying

6.1 Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of 1 person or group by another person or group, where the relationship involves an imbalance of power.

6.2 Preventing and addressing cyber-bullying

Cyberbullying, along with all other forms of bullying will not be tolerated at West Heath School.

Teaching staff are encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSCHE) education, and other subjects where appropriate.

In relation to a specific incident of cyber-bullying, the school will follow the processes set out in the school behaviour policy. Where illegal, inappropriate or harmful material has been spread among students, the school will use all reasonable endeavours to ensure the incident is contained.

The DSL will report the incident and provide the relevant material to the police as soon as is reasonably practicable, if they have reasonable grounds to suspect that possessing that material is illegal. They will also work with external services if it is deemed necessary to do so.

6.3 Examining electronic devices

The Principal, and any member of staff authorised to do so by the Principal, can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or students, and/or
- Is identified in the school rules as a banned item for which a search can be carried out, and/or
- Is evidence in relation to an offence

Before a search, if the authorised staff member is satisfied that they have reasonable grounds for suspecting any of the above, they will also:

- Make an assessment of how urgent the search is and consider the risk to other students and staff. If the search is not urgent, they will seek advice from the Principal / Deputy Principal / DSL / appropriate staff member
- Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it
- Seek the pupil's co-operation

Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so.

When deciding whether there is a 'good reason' to examine data or files on an electronic device, the staff member should reasonably suspect that the device has, or could be used to:

- Cause harm, and/or
- Undermine the safe environment of the school or disrupt teaching, and/or
- Commit an offence

If inappropriate material is found on the device, it is up to the DSL / Deputy Principal / other member of the SMT to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response.

When deciding if there is a good reason to erase data or files from a device, staff members will consider if the material may constitute evidence relating to a suspected offence. In these instances, they will not delete the material, and the device will be handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if:

- They reasonably suspect that its continued existence is likely to cause harm to any person, and/or
- The pupil and/or the parent/carer refuses to delete the material themselves

If a staff member **suspects** a device **may** contain an indecent image of a child (also known as a nude or semi-nude image), they will:

- **Not** view the image
- Confiscate the device and report the incident to the DSL (or equivalent) immediately, who will decide what to do next. The DSL will make the decision in line with the DfE's latest guidance on screening, searching and confiscation and the UK Council for Internet Safety (UKCIS) guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people

Any searching of students will be carried out in line with:

- The DfE's latest guidance on searching, screening and confiscation
- UKCIS guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people

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

6.4 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, students and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

West Heath School recognises that AI has many uses to help students learn but may also have the potential to be used to bully others. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real. This includes deepfake pornography: pornographic content created using AI to include someone's likeness. West Heath School takes the safety and privacy of all staff and students very seriously. Should the school become aware of any incidents involving 'fake or altered images' being made or shared, the police being informed immediately, and disciplinary action will be taken in line with our promoting positive behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out a risk assessment where new AI tools are being used by the school.

7. Acceptable use of the internet in school

All students, parents/carers, staff, volunteers and Trustees are expected to sign an agreement regarding the acceptable use of the school's ICT systems and the internet. Visitors will be expected to read and agree to the school's terms on acceptable use, if relevant.

Use of the school's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role.

We will monitor the websites visited by students, staff, volunteers, Trustees and visitors (where relevant) to ensure they comply with the above and restrict access through filtering systems where appropriate.

8. Students using mobile devices in school

Students are allowed to bring mobile phones into school with the expectation that phones must be handed to Form Tutors at the beginning of the day, who will keep them for the remainder of the day.

Students should not have their mobile phones on their person during lessons or unstructured times such as break and lunch time. All mobile phones will be returned to students at the end of the school day.

Exception: Sixth Form and HEART students are permitted to have their mobile phones in their possession.

Any breach of the acceptable use agreement by a pupil may trigger disciplinary action in line with the school promoting positive behaviour policy, which may result in the confiscation of their device.

9. Staff using work devices outside school

All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- Keeping the device password-protected
- Ensuring their hard drive is encrypted – this means if the device is lost or stolen, no one can access the files stored on the hard drive by attaching it to a new device
- Making sure the device locks if left inactive for a period of time
- Not sharing the device among family or friends
- Keeping operating systems up to date by always installing the latest updates

Staff members must not use the device in any way that would violate the school's terms of acceptable use, as set out in the IT Network Acceptable Use Policy.

Work devices must be used solely for work activities.

If staff have any concerns over the security of their device, they must seek advice from ICT Department.

10. How the school will respond to issues of misuse

Where a pupil misuses the school's ICT systems or internet, we will follow the procedures set out in our policies on promoting positive behaviour and ICT and acceptable internet use. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the school's ICT systems or the internet or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with the staff code of conduct. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The school will consider whether incidents that involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

11. Training

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

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

By way of this training, all staff will be made aware that:

- Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse
- Children can abuse their peers online through:
    - Abusive, threatening, harassing and misogynistic messages
    - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
    - Sharing of abusive images and pornography, to those who don't want to receive such content
- Physical abuse, sexual violence and initiation/hazing type violence can all contain an online element

Training will also help staff:

- Develop better awareness to assist in spotting the signs and symptoms of online abuse

- Develop the ability to ensure students can recognise dangers and risks in online activity and can weigh up the risks
- Develop the ability to influence students to make the healthiest long-term choices and keep them safe from harm in the short term

The DSL and deputies will undertake child protection and safeguarding training, which will include online safety, at least every 2 years. They will also update their knowledge and skills about online safety at regular intervals, and at least annually.

Trustees will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

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

12. Monitoring arrangements

This policy will be reviewed every year by the DSL. At every review, the policy will be shared with the Senior Management Team. The review (such as the one available here) will be supported by an annual risk assessment that considers and reflects the risks students face online. This is important because technology, and the risks and harms related to it, evolve and change rapidly.

13. Links with other policies

This online safety policy is linked to our:

- Child protection and safeguarding policy
- Promoting positive behaviour policy
- Staff disciplinary procedures
- Data protection policy and privacy notices
- Complaints procedure
- ICT and internet acceptable use policy