Introduction

THE QUEENSWELL FEDERATION

ONLINE SAFETY POLICY

Policy Written by: Susan Smith

Date Written: March 2024

Date for Review: February 2025

Ratified by Governors: May 2024

Key people / dates

Designated Safeguarding Lead (DSL), with lead responsibility for filtering and monitoring	Mrs E Longworth
Deputy Designated Safeguarding Leads	Ms Chris Donaghy Miss Leanne Oppenheimer Miss Teleri Ruben Mrs Amanda Van De Merwe Miss Laura Evans Miss Lisa Oxland Mrs Nancy Harryman Mrs Sally Shearly Mrs Helen Myers Mrs Elizabeth Johnston
Link governor for safeguarding	Ms Enowanyo Nsoatabe
Curriculum leads with relevance to online safeguarding and their role	Mrs Susan Smith Computing & Online Safety Mr Kevin Williams PSHE
Network manager	Mr Kartik Asher, Platinum IT

Rationale

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. Accordingly, this policy is written in line with 'Keeping Children Safe in Education' 2023 (KCSIE), 'Teaching Online Safety in Schools', statutory RSHE guidance and other statutory documents. It is cross-curricular (with relevance beyond Relationships, Health and Sex Education, Citizenship and Computing) and designed to sit alongside or be integrated into your school's statutory Child Protection & Safeguarding

Policy. Any issues and concerns with online safety must always follow the school's safeguarding and child protection procedures.

Equalities

At The Queenswell Federation, we believe it is the right of all pupils, regardless of their gender, ethnicity, physical ability or linguistic, cultural or home background to have access to high quality learning experiences in stimulating and supporting environment, where prejudice and stereotyping are challenged.

We recognise that certain groups and individuals may be discriminated against and therefore are strongly committed to positive action to remove and challenge discrimination in all aspects of the Federation and its work. The importance of staff awareness regarding the dangers of preconceived expectations based on stereotypes is addressed when teaching online safety.

Who is it for?

This policy should be a living document, subject to full annual review but also amended where necessary during the year in response to developments in the school and local area. Although many aspects will be informed by legislation and regulations, we will involve staff, governors, pupils and parents in writing and reviewing the policy and ensure the policy makes sense and it is possible to follow it in all respects. This will help ensure all stakeholders understand the rules that are in place and why, and that the policy affects day-to-day practice.

Who is in charge of online safety?

KCSIE makes clear that "the designated safeguarding lead should take **lead** responsibility for safeguarding and child protection (including online safety)." The DSL can delegate activities but not the responsibility for this area and whilst subject leads, e.g. for SHE will plan the curriculum for their area, it is important that this ties into a whole-school approach.

What are the main online safety risks in 2023/2024?

Current Online Safeguarding Trends

In our school over the past year, we have noticed the following in terms of device use and abuse and types of online/device-based incidents which affect the wellbeing and safeguarding of our pupils:

Pupil WhatsApp incidents have declined. This may be due to educating pupils on positive online behaviour or a different cohort of pupils in years 5 and 6 which is when WhatsApp appears to be mainly used by pupils. It may also be due to promoting online safety to parents with advice and guidance in the Federation newsletter, on the Federation website and on social media.

Device abuse in school has been monitored since September 2023. Advertisements appear to be the cause of websites being blocked. An innocuous search may return a site blocked and categorised as pornography or gambling, etc. in the monthly report if an advertisement has been placed into a blocked category by LGFLs filtering engine.

Nationally, some of the latest trends of the past twelve months are outlined below. These should be reflected in this policy and the acceptable use agreements we use, and seen in the context of the 4 Cs (see KCSIE for more details), a whole-school contextual safeguarding approach that incorporates policy and practice for curriculum, safeguarding and technical teams.

We may be updating this policy during the year to reflect any changes resulting from the Online Safety Bill being passed into law.

Self-generative artificial intelligence has been a significant change, with pupils having often unfettered access to tools that generate text and images at home or in school. These tools not only represent a challenge in terms of accuracy when young people are genuinely looking for information, but also in terms of plagiarism for teachers and above all safety: none of the mainstream tools have end-user safety settings, most have an age limit of 13 or even 18 and in spite of basic rude words not delivering results, will easily produce inappropriate material. Schools not only need to tackle this in terms of what comes into school but also educating young people and their parents on use of these tools in the home.

The continued cost-of-living crisis has meant that children have spent more time online and therefore exposed to all manner of online harms as families have had to cut back on leisure activities and the public provision of free activities for young people has reduced further.

Against this background, the Ofcom 'Children and parents: media use and attitudes report 2023' has shown that YouTube remains the most used site or app among all under 18s and the reach of WhatsApp, TikTok and Snapchat increased yet further. As a school we recognise that many of our children and young people are on these apps regardless of age limits, which are often misunderstood or ignored. We therefore remember to remind about best practice while remembering the reality for most of our pupils is quite different.

This is striking when you consider that 20% of 3-4 year olds have access to their OWN mobile phone (let alone shared devices), rising to over 90 percent by the end of Primary School, and the vast majority have no safety controls or limitations to prevent harm or access to inappropriate material. At the same time, even 3 to 6 year olds are being tricked into 'self-generated' sexual content (Internet Watch Foundation Annual Report) while considered to be safely using devices in the home and the 7-10 year old age group is the fastest growing for this form of child sexual abuse material, up 60 percent within 12 months to represent over 60,000 cases found (of this same kind where the abuser is not present).

In the past year, more and more children and young people used apps such as snapchat as their source of news and information, with little attention paid to the veracity of influencers sharing news. The 2023 Revealing-Reality: Anti-social-Media Report highlights that this content is interspersed with highly regular exposure to disturbing, graphic and illegal content such as fights, attacks, sexual acts and weapons. At the same time, the Children's Commissioner revealed that younger children are regularly consuming pornography and living out inappropriate behaviour and relationships due to 'learning from' pornography. This has coincided with the rise of misogynistic influencers such as Andrew Tate, which had a significant influence on many young boys over the past year which schools have had to counter.

From the many schools that LGfL spoke to over the past year, there was a marked increase in the number of schools having issues with fights being filmed and shared, a disturbing increase in the cases of self-harm and sexual abuse being coerced with threats of violence (many even in primary schools).

There has been a significant increase in the number of fake profiles causing issues in schools, both for schools – where the school logo and/or name have been used to share inappropriate content about pupils and also spread defamatory allegations about staff, and also for pupils, including where these are used to bully others (sometimes even pretending to be one pupil to bully a second pupil).

How will this policy be communicated?

This policy can only impact upon practice if it is a (regularly updated) living document. It must be accessible to and understood by all stakeholders. It will be communicated in the following ways:

- Posted on the school website
- Part of school induction pack for all new staff (including temporary, supply and non-classroom-based staff and those starting mid-year)
- Integral to safeguarding updates and training for all staff (especially in September refreshers)
- Clearly reflected in the Acceptable Use Policies (AUPs) for staff, volunteers, contractors, governors, pupils and parents/carers (which must be in accessible language appropriate to these groups), which will be issued to whole school community, on entry to the school, annually and whenever changed, plus displayed in school [when reviewing policies, ask those checking such as governors and staff to flag any inconsistencies between AUPs and this policy]

Contents

Overview

Aims

This policy aims to promote a whole school approach to online safety by:

- Setting out expectations for all The Queenswell Federation community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline)
- Helping safeguarding and senior leadership teams to have a better understanding and awareness of all elements of online safeguarding through effective collaboration and communication with technical colleagues (e.g. for filtering and monitoring), curriculum leads (e.g. PSHE) and beyond.
- Helping all stakeholders to recognise that online/digital behaviour standards (including social media activity) must be upheld beyond the confines of the school gates and school day, regardless of device or platform, and that the same standards of behaviour apply online and offline.
- Facilitating the safe, responsible, respectful and positive use of technology to support teaching & learning, increase attainment and prepare children and young people for the risks and opportunities of today's and tomorrow's digital world, to survive and thrive online
- Helping school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
    - for the protection and benefit of the children and young people in their care, and
    - for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice
    - for the benefit of the school, supporting the school ethos, aims and objectives, and protecting the reputation of the school and profession
- Establishing clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as Behaviour Policy or Anti-Bullying Policy)

Further Help and Support

Internal school channels should always be followed first for reporting and support, as documented in school policy documents, especially in response to incidents, which should be reported in line with your Child Protection & Safeguarding Policy. The DSL will handle referrals to local authority multi-agency safeguarding hubs (MASH) and normally the headteacher will handle referrals to the LA designated officer (LADO). The local authority, academy trust or third-party support organisations you work with may also have advisors to offer general support.

Beyond this, **reporting.lgfl.net** has a list of curated links to external support and helplines for both pupils and staff, including the Professionals' Online-Safety Helpline from the UK Safer Internet Centre and the NSPCC Report Abuse Helpline for sexual harassment or abuse, as well as hotlines for hate crime, terrorism and fraud which might be useful to share with parents, and anonymous support for children and young people. Training is also available via **safetraining.lgfl.net**

Scope

This policy applies to all members of The Queenswell Federation community (including teaching, supply and support staff, governors, volunteers, contractors, pupils, parents/carers,

visitors and community users) who have access to our digital technology, networks and systems, whether on-site or remotely, and at any time, or who use technology in their school role.

Roles and responsibilities

This Federation is a community, and all members have a duty to behave respectfully online and offline, to use technology for teaching and learning and to prepare for life after school, and to immediately report any concerns or inappropriate behaviour, to protect staff, pupils, families and the reputation of the school. We learn together, make honest mistakes together and support each other in a world that is online and offline at the same time.

Depending on their role, all members of the school community should **read the relevant section in Annex A of this document** that describes individual roles and responsibilities. Please note there is one for All Staff which must be read even by those who have a named role in another section. There are also pupil, governor, etc role descriptions in the annex.

In 2023/2024, it is vital that all members understand their responsibilities and those of others when it comes to filtering and monitoring. All staff have a key role to play in feeding back on potential issues.

Education and curriculum

It is important that schools establish a carefully sequenced curriculum for online safety that builds on what pupils have already learned and identifies subject content that is appropriate for their stage of development.

As well as teaching about the underpinning knowledge and behaviours that can help pupils navigate the online world safely and confidently regardless of the device, platform or app, Teaching Online Safety in Schools recommends embedding teaching about online safety and harms through a whole school approach and provides an understanding of these risks to help tailor teaching and support to the specific needs of pupils, including vulnerable pupils – dedicated training around this with curriculum mapping for RSHE/PSHE and online safety leads is available at safetraining.lgfl.net

The following subjects have the clearest online safety links (see the relevant role descriptors above for more information):

- Relationships education, relationships and sex education (RSE) and health (also known as RSHE or PSHE)
- Computing
- Citizenship

However, as stated in the role descriptors above, it is the role of all staff to identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils)

Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc) in school or setting as homework tasks, all staff should encourage

sensible use, monitor what pupils are doing and consider potential dangers and the age appropriateness of websites (ask your DSL what appropriate filtering and monitoring policies are in place). “Parents and carers are likely to find it helpful to understand what systems schools use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online” (KCSIE 2023).

Equally, all staff should carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular, extended school activities if relevant and remote teaching), supporting them with search skills, critical thinking (e.g. disinformation, misinformation and fake news), age appropriate materials and signposting, and legal issues such as copyright and data law. saferesources.lgfl.net has regularly updated theme-based resources, materials and signposting for teachers and parents.

At The Queenswell Federation, we recognise that online safety and broader digital resilience is important. It is taught as part of the Computing and PSHE curriculum.

Handling safeguarding concerns and incidents

It is vital that all staff recognise that online safety is a part of safeguarding (as well as being a curriculum strand of Computing and PSHE).

General concerns must be handled in the same way as any other safeguarding concern; safeguarding is often referred to as a jigsaw puzzle, so all stakeholders should err on the side of talking to the online-safety lead / designated safeguarding lead to contribute to the overall picture or highlight what might not yet be a problem.

Support staff will often have a unique insight and opportunity to find out about issues first in the playground, corridors, toilets and other communal areas outside the classroom (particularly relating to bullying and sexual harassment and violence).

School procedures for dealing with online safety will be mostly detailed in the following policies (primarily in the first key document):

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Acceptable Use Agreements
- GDPR Data Protection Policy

The Federation commits to take all reasonable precautions to ensure safeguarding pupils online, but recognises that incidents will occur both inside school and outside school (and that those from outside school will continue to impact pupils when they come into school or during extended periods away from school). All members of the school are encouraged to report issues swiftly to allow us to deal with them quickly and sensitively through the school’s escalation processes.

Any suspected online risk or infringement should be reported to the online safety lead / designated safeguarding lead on the same day – where clearly urgent, it will be made by the end of the lesson.

Any concern/allegation about staff misuse is always referred directly to the Executive Headteacher, unless the concern is about the Executive Headteacher in which case the complaint is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer). Staff may also use the NSPCC Whistleblowing Helpline

The Federation will actively seek support from other agencies as needed (i.e. the local authority, LGfL, UK Safer Internet Centre's Professionals' Online Safety Helpline (POSH), NCA CEOP, Prevent Officer, Police, IWF and Harmful Sexual Behaviour Support Service). The DfE guidance Behaviour in Schools, advice for headteachers and school staff September 2022 provides advice and related legal duties including support for pupils and powers of staff when responding to incidents – see pages 32-34 for guidance on child on child sexual violence and harassment, behaviour incidents online and mobile phones.

We will inform parents/carers of online-safety incidents involving their children, and the Police where staff or pupils engage in or are subject to behaviour which we consider is particularly concerning or breaks the law (particular procedures are in place for sexting and upskirting; see section below).

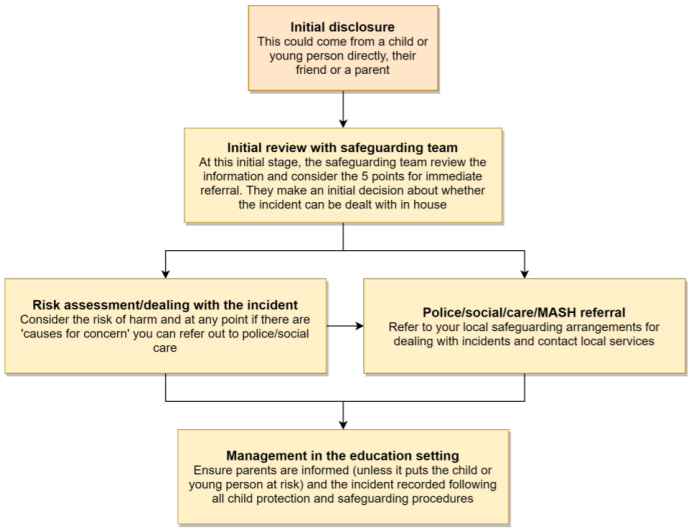
The school should evaluate whether reporting procedures are adequate for any future closures/lockdowns/isolation etc and make alternative provisions in advance where these might be needed.

Sexting – sharing nudes and semi-nudes

All schools (regardless of phase) should refer to the UK Council for Internet Safety (UKCIS) guidance on sexting - now referred to as Sharing nudes and semi-nudes: advice for education settings to avoid unnecessary criminalisation of children. NB - where one of the parties is over 18, this is no longer sexting but child sexual abuse.

There is a one-page overview called Sharing nudes and semi-nudes: how to respond to an incident for all staff (not just classroom-based staff) to read, in recognition of the fact that it is mostly someone other than the designated safeguarding lead (DSL) or online safety lead to first become aware of an incident, and it is vital that the correct steps are taken. Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL.

The school DSL will in turn use the full guidance document, Sharing nudes and semi-nudes – advice for educational settings to decide next steps and whether other agencies need to be involved.



***Consider the 5 points for immediate referral at initial review:**

1. The incident involves an adult
2. There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
3. What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
4. The images involves sexual acts and any pupil in the images or videos is under 13
5. You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

It is important that everyone understands that whilst sexting is illegal, pupils can come and talk to members of staff if they have made a mistake or had a problem in this area.

The documents referenced above and materials to support teaching about sexting can be found at sexting.lgfl.net

Upskirting

It is important that everyone understands that upskirting (taking a photo of someone under their clothing, not necessarily a skirt) is now a criminal offence and constitutes a form of sexual harassment as highlighted in Keeping Children Safe in Education. As with other forms of child on child abuse pupils can come and talk to members of staff if they have made a mistake or had a problem in this area.

Bullying

Online bullying, including incidents that take place outside school or from home should be treated like any other form of bullying and the school bullying policy should be followed for online bullying, which may also be referred to as cyberbullying, including issues arising from banter. It is important to be aware that in the past 12 months there has been an increase in anecdotal reports of fights being filmed and fake profiles being used to bully children in the name of others. When considering bullying, staff will be reminded of these issues.

Materials to support teaching about bullying and useful Department for Education guidance and case studies are at bullying.lgfl.net

Child-on-child sexual violence and sexual harassment

Part 5 of Keeping Children Safe in Education covers 'Child-on-child sexual violence and sexual harassment' and it would be useful for all staff to be aware of many aspects outlined there to support a whole-school response; case studies are also helpful for training.

Any incident of sexual harassment or violence (online or offline) should be reported to the DSL who will follow the full guidance. Staff should work to foster a zero-tolerance culture and maintain an attitude of 'it could happen here'. The guidance stresses that schools must take all forms of sexual violence and harassment seriously, explaining how it exists on a continuum and that behaviours incorrectly viewed as 'low level' are treated seriously and not allowed to perpetuate. The document makes specific reference to behaviours such as bra-strap flicking and the careless use of language.

In the online environment, the recent proliferation of misogynistic content is particularly relevant when it comes to considering reasons for and how to combat this kind of behaviour.

Misuse of school technology (devices, systems, networks or platforms)

Clear and well communicated rules and procedures are essential to govern pupil and adult use of school networks, connections, internet connectivity and devices, cloud platforms and social media (both when on school site and outside of school).

These are defined in the relevant Acceptable Use Policy as well as in this document, for example in the sections relating to the professional and personal use of school platforms/networks/clouds, devices and other technology.

Where pupils contravene these rules, the school behaviour policy will be applied; where staff contravene these rules, action will be taken as outlined in the Pupil & Staff Infringements.

It will be necessary to reinforce these as usual at the beginning of any school year but also to remind pupils that **the same applies for any home learning** that may take place in future periods of absence/ closure/quarantine etc.

Further to these steps, the school reserves the right to withdraw – temporarily or permanently – any or all access to such technology, or the right to bring devices onto school property.

The new responsibilities for filtering and monitoring, led by the DSL and following the new DfE standards, may mean that more such incidents will be discovered in the coming year but the school will do its best to remind pupils and staff of this increased scrutiny at the start of the year.

Social media incidents

See the social media section later in this document for rules and expectations of behaviour for children and adults in The Queenswell community. These are also governed by school Acceptable Use Policies and the Federation social media policy.

Breaches will be dealt with in line with the social media policy.

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community, The Queenswell Federation will request that the post be deleted and will expect this to be actioned promptly.

Where an offending post has been made by a third party, the school may report it to the platform it is hosted on, and may contact the Professionals' Online Safety Helpline, POSH, (run by the UK Safer Internet Centre) for support or help to accelerate this process.

Data protection and cybersecurity

All pupils, staff, governors, volunteers, contractors and parents are bound by the school's data protection policy and agreements. It is important to remember that there is a close relationship between both data protection and cybersecurity and a school's ability to effectively safeguard children. Schools are reminded of this in KCSIE which also refers to the DfE Standards of Cybersecurity for the first time in 2023.

Schools should remember that data protection does not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in *Data protection in schools*, 2023, "It's not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child." And in KCSIE 2023, "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children."

Appropriate filtering and monitoring

Keeping Children Safe in Education has long asked schools to ensure "appropriate" web filtering and monitoring systems which keep children safe online but do not "overblock".

Since KCSIE 2023, in recognition of the importance of these systems to keeping children safe, the designated safeguarding lead now has lead responsibility for filtering and monitoring (see

page 1 for the DSL name and the named governor with responsibility for filtering and monitoring).
LGFLs filtering system blocks access to harmful sites and content, e.g. self harm, gambling, pornography, extremism, etc.
LGFLs monitoring system identifies when a user accesses or searches for certain types of harmful content on a school device (it doesn't stop someone accessing it, see filtering explanation above). The Federation is then alerted to any concerning content so it can intervene and respond.

Schools are also asked to follow the new DfE filtering and monitoring standards, which require them to:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

As schools get to grips with these new standards, the challenge for DSLs and SLT is to better understand, review and drive the rationale behind decisions in this area. Tech teams and safeguarding teams will need to work much more closely together for this to be possible and technicians will be charged to carry out regular checks and feed back to DSL teams.

ALL STAFF need to be aware of the changes and renewed emphasis and play their part in feeding back about areas of concern, potential for pupils to bypass systems and any potential overblocking. They can submit concerns at any point and will be asked for feedback at the time of the regular checks which will now take place.

Staff will be reminded of the systems in place and their responsibilities at induction and start of year safeguarding as well as via AUAs and regular training reminders in the light of the annual review and regular checks that will be carried out.

It is very important that schools understand the difference between filtering and monitoring, the meaning of overblocking and other terms, as well as how to get the best out of systems. There are guidance videos and flyers to help with this at https://safefiltering.lgfl.net and training is provided for all staff / safeguarding teams / technical teams as appropriate.

At The Queenswell Federation:

- web filtering is provided by LGFL for devices on site
- changes can be made by Kartik Asher
- overall responsibility is held by the DSL, Mrs E Longworth
- technical support and advice, setup and configuration are from Platinum IT
- regular checks are made half termly by Kartik Asher to ensure filtering is still active and functioning everywhere. These are evidenced in reports sent to DSL
- guidance on how the system is ‘appropriate’ is available at appropriate.lgfl.net

- According to the DfE standards, “a variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

1. physically monitoring by staff watching screens of users
2. live supervision by staff on a console with device management software
3. network monitoring using log files of internet traffic and web access
4. individual device monitoring through software or third-party services

At The Queenswell Federation, we have decided that options 1 and 2 are appropriate. At home, when a pupil logs into their Chrome profile their account can be monitored.

Messaging/commenting systems (incl. email, learning platforms & more)

Authorised systems

- Pupils at this school communicate with each other and with staff using Google Classroom.
- Staff at this school use the email system provided by LGFL for all school emails. They never use a personal/private email account (or other messaging platform) to communicate with children or parents, or to colleagues when relating to school/child data, using a non-school-administered system. Staff are permitted to use this email system to communicate with parents via a no reply class email.
- Staff at this school use Google Classroom to communicate with children / parents, or with staff when concerning school/child data.

Any systems above are centrally managed and administered by the school or authorised IT partner (i.e. they can be monitored/audited/viewed centrally; are not private or linked to private accounts). This is for the mutual protection and privacy of all staff, pupils and parents, supporting safeguarding best-practice, protecting children against abuse, staff against potential allegations and in line with UK data protection legislation.

Use of any new platform with communication facilities or any child login or storing school/child data must be approved in advance by the school and centrally managed.

Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Executive Headteacher (if by a staff member).
Where devices have multiple accounts for the same app, mistakes can happen, such as an email being sent from or data being uploaded to the wrong account. If this a private account is used for communication or to store data by mistake, the DSL/Executive Headteacher/DPO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately, e.g. Google Photos.

Behaviour / usage principles

- Appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff.
- Data protection principles will be followed at all times when it comes to all school communications, in line with the school Data Protection Policy and only using the authorised systems mentioned above.
- Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination (and will be dealt with according to the appropriate policy and procedure).

Online storage or learning platforms

All the principles outlined above also apply to any system to which you log in online to conduct school business, whether it is to simply store files or data (an online 'drive') or collaborate, learn, teach, etc.

For all these, it is important to consider data protection and cybersecurity before adopting such a platform or service and at all times when using it. The Queenswell Federation has a clear data protection policy which staff, governors and volunteers must follow at all times.

School website

The Federation website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. The Executive Headteacher, HOSs, subject and phase leaders have day-to-day responsibility of updating the content of the website. The site is hosted by Primary Site.

Where staff submit information for the website, they are asked to remember that schools have the same duty as any person or organisation to respect and uphold copyright law – schools have been fined thousands of pounds for copyright breaches. Sources must always be credited and material only used with permission. There are many open-access libraries of public-domain images/sounds etc that can be used. Finding something on Google or YouTube does not mean that copyright has been respected.

Digital images and video

When a pupil joins the school, parents/carers are asked if they give consent for their child's image to be captured in photographs or videos for a specific purpose (beyond internal assessment, which does not require express consent).

Parents/carers are asked to give consent for their child's image to be used as follows:

- Displays around the school
- School books
- School newsletter
- School website
- School social media platforms

They are also asked to confirm they understand they can change their permission at any time by contacting the school office.

Whenever a photo or video is taken/made, the member of staff taking it will check the latest database before using it for any purpose.

Any pupils shown in public facing materials are never identified with more than first name (and photo file names/tags do not include full names to avoid accidentally sharing them).

All staff are governed by their contract of employment and the school's Acceptable Use Agreement, which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. At The Queenswell Federation, members of staff may use personal phones to capture photos or videos of pupils, but these will be appropriate, linked to school activities, taken without secrecy and not in a one-to-one situation, and always moved to school storage as soon as possible, after which they are deleted from personal devices or cloud services (NB – many phones automatically back up photos).

Photos are stored in line with the retention schedule of the school Data Protection Policy.

Staff and parents are reminded about the importance of not sharing without permission, due to reasons of child protection (e.g. looked-after children often have restrictions for their own protection), data protection, religious or cultural reasons, or simply for reasons of personal privacy.

We encourage young people to think about their online reputation and digital footprint, so we should be good adult role models by not oversharing (or providing embarrassment in later life – and it is not for us to judge what is embarrassing or not).

Pupils are taught about how images can be manipulated in their online safety education programme and also taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children.

Pupils are advised to be very careful about placing any personal photos on social media. They are taught to understand the need to maintain privacy settings so as not to make public, personal information.

Pupils are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location. We teach them about the need to keep their data secure and what to do if they / or a friend are subject to bullying or abuse.

Social media

Our SM presence

The Queenswell Federation works on the principle that if we don't manage our social media reputation, someone else will.

Online Reputation Management (ORM) is about understanding and managing our digital footprint (everything that can be seen or read about the school online).

Few parents will apply for a school place without first Googling the school, and the Ofsted pre-inspection check includes monitoring what is being said online.

Negative coverage almost always causes some level of disruption. Up to half of all cases dealt with by the Professionals Online Safety Helpline (POSH: helpline@saferinternet.org.uk) involve schools' (and staff members') online reputation.

Accordingly, we manage and monitor our social media footprint carefully to know what is being said about the school and to respond to criticism and praise in a fair, responsible manner.

Susan Smith is responsible for managing our social media accounts.

Staff, pupils' and parents' SM presence

Social media (including all apps, sites and games that allow sharing and interaction between users) is a fact of modern life, and as a school, we accept that many parents, staff and pupils will use it. However, as stated in the acceptable use policies which all members of the school community sign, we expect everybody to behave in a positive manner, engaging respectfully with the school and each other on social media, in the same way as they would face to face.

This positive behaviour can be summarised as not making any posts which are or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which might bring the school or (particularly for staff) teaching profession into disrepute. This applies both to public pages and to private posts, e.g. parent chats, pages or groups.

If parents have a concern about the school, we would urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, The Federation complaints procedure should be followed. Sharing complaints on social media is unlikely to help resolve the matter, but can cause upset to staff, pupils and parents, also undermining staff morale and the reputation of the school (which is important for the pupils we serve).

Many social media platforms have a minimum age of 13 (note that WhatsApp is 16+), but the school regularly deals with issues arising on social media involving pupils under the age of 13. We ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use. It is worth noting that Online Harms regulation is likely to require more stringent age verification measures over the coming years.

However, the Federation has to strike a difficult balance of not encouraging underage use at the same time as needing to acknowledge reality in order to best help our pupils to avoid or cope with issues if they arise. Online safety lessons will look at social media and other online behaviour, how to be a good friend online and how to report bullying, misuse, intimidation or abuse. However, children will often learn most from the models of behaviour they see and experience, which will often be from adults.

Parents can best support this by talking to their children about the apps, sites and games they use (you don't need to know them – ask your child to explain it to you), with whom, for how long, and when (late at night / in bedrooms is not helpful for a good night's sleep and productive teaching and learning at school the next day). You may wish to refer to the Digital Family Agreement to help establish shared expectations and the Top Tips for Parents poster along with relevant items and support available from parentsafe.lgfl.net and introduce the Children's Commission Digital 5 A Day.

Although the Federation has an official Instagram account and will respond to general enquiries about the school, it asks parents/carers not to use these channels, especially not to communicate about their children.

Email is the official electronic communication channel between parents and the school. Social media, including chat apps such as WhatsApp, are not appropriate for school use.

Pupils are not allowed* to be 'friends' with or make a friend request** to any staff, governors, volunteers and contractors or otherwise communicate via social media.

Pupils are discouraged from 'following' staff, governor, volunteer or contractor public accounts (e.g. following a staff member with a public Instagram account) as laid out in the AUPs. However, we accept that this can be hard to control (but this highlights the need for staff to remain professional in their private lives). In the reverse situation, however, staff must not follow such public pupil accounts.

* Exceptions may be made, e.g. for pre-existing family links, but these must be approved by the Executive Headteacher, and should be declared upon entry of the pupil or staff member to the school).

** Any attempt to do so may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Executive Headteacher (if by a staff member).

Staff are reminded that they are obliged not to bring the school or profession into disrepute and the easiest way to avoid this is to have the strictest privacy settings and avoid inappropriate sharing and oversharing online. They should never discuss the school or its stakeholders on social media and be careful that their personal opinions might not be attributed to the school, trust or local authority, bringing the school into disrepute.

The serious consequences of inappropriate behaviour on social media are underlined by the fact that there has been a significant number of Prohibition Orders issued by the Teacher Regulation Agency to teaching staff that involved misuse of social media/technology.

All members of the school community are reminded that particularly in the context of social media, it is important to comply with the school policy on Digital images and video and permission is sought before uploading photographs, videos or any other information about other people.

The statements of the Acceptable Use Agreements (AUAs) which all members of the school community have signed are also relevant to social media activity, as is the school's Data Protection Policy.

Device usage

AUAs remind those with access to school devices about rules on the misuse of school technology – devices used at home should be used just like if they were in full view of a teacher or colleague. Please read the following in conjunction with those AUAs and the sections of this document which impact upon device usage, e.g. copyright, data protection, social media, misuse of technology, and digital images and video.

Personal devices including wearable technology and bring your own device (BYOD)

- **Pupils** in years 5 & 6 are allowed to bring mobile phones in for emergency use only and must be handed into a teacher in the morning and collected at the end of the day. Any attempt to use a phone in lessons without permission to take illicit photographs or videos will lead to the withdrawal of mobile privileges.
- Important messages and phone calls to or from parents can be made at the school office, which will also pass on messages from parents to pupils in emergencies.
- **All staff who work directly with children** should leave their mobile phones on silent and only use them in private staff areas during school hours. See also the Digital images and video section on page 15 and Data protection and data security section on page 19. Child/staff data should never be downloaded onto a private phone. If a staff member is expecting an important personal call when teaching or otherwise on duty, they may leave their phone with the school office to answer on their behalf or ask for the message to be left with the school office.
- **Volunteers, contractors, governors** should leave their phones in their pockets and turned off. Under no circumstances should they be used in the presence of children or to take photographs or videos. If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the SLT should be sought and this should be done in the presence of a member of staff.
- **Parents** are asked to leave their phones in their pockets and turned off when they are on site. They should ask permission before taking any photos, e.g. of displays in corridors or classrooms, and avoid capturing other children. When at school events, please refer to the Digital images and video section of this document (see page 15). Parents are asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office.

Use of school devices

Staff and pupils are expected to follow the terms of the school acceptable use policies for appropriate use and behaviour when on school devices, whether on site or at home.
School devices are not to be used in any way which contravenes AUAs, behaviour policy / staff code of conduct.
Pupils are not allowed networked file access via personal devices. All such use is monitored.
Home devices are issued to some students. These are restricted to the apps/software installed by the school and may be used for learning at home but all usage may be tracked. When a pupil signs into a school managed device their account can be monitored. Filtering is the responsibility of the parents via their Internet service provider and any parental controls they add but Google SafeSearch is enforced on the device and pupils are restricted from opening incognito sessions.

School devices for staff or pupils are restricted to the apps/software installed by the school, whether for use at home or school, and may be used for learning and reasonable as well as appropriate personal use.

All and any usage of devices and/or systems and platforms may be tracked.

Trips / events away from school

Teachers using their personal phone in an emergency will ensure that the number is hidden to avoid a parent or student accessing a teacher's private phone number.

Searching and confiscation

In line with the DfE guidance '[Searching, screening and confiscation: advice for schools]', the Executive Headteacher and staff authorised by them have a statutory power to search pupils/property on school premises. This includes the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material, including but not exclusive to sexual images, pornography, violence or bullying.

Full details of the school's search procedures are available in the school Behaviour Policy.

Roles

Please read the relevant roles & responsibilities section from the following pages. All school staff must read the "All Staff" section as well as any other relevant to specialist roles

Roles:

- All Staff
- Executive Headteacher
- Designated Safeguarding Lead / Online Safety Lead
- Governing Body, led by Online Safety Link Governor
- PSHE Lead
- Computing Lead
- Subject leaders
- Network Manager
- Data Protection Officer (DPO)
- Volunteers and contractors (including tutors)
- Pupils
- Parents/carers
- External groups including parent associations

All staff

All staff should sign and follow the staff acceptable use policy in conjunction with this policy, the school's main safeguarding policy and relevant parts of Keeping Children Safe in Education to support a whole-school safeguarding approach.

This includes reporting any concerns, no matter how small, to the designated safety lead as named in the AUA, maintaining an awareness of current online safety issues (see the start of this document for issues in 2023) and guidance (such as KCSIE), modelling safe, responsible and professional behaviours in their own use of technology at school and beyond and avoiding scaring, victim-blaming language.

Staff should also be aware of the new DfE standards and relevant changes to filtering and monitoring and play their part in feeding back about overblocking, gaps in provision or pupils bypassing protections.

Executive Headteacher – Mrs E Longworth

Key responsibilities:

- Foster a culture of safeguarding where online-safety is fully integrated into whole-school safeguarding
- Oversee and support the activities of the designated safeguarding lead team and ensure they work with technical colleagues to complete an online safety audit in line with KCSIE (including technology in use in the school) – [see LGfL's template with suggested questions at onlinesafetyaudit.lgfl.net]
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and Local Safeguarding Children Partnership support and guidance
- Ensure ALL staff undergo safeguarding training (including online-safety) at induction and with regular updates and that they agree and adhere to policies and procedures
- Ensure ALL governors and trustees undergo safeguarding and child protection training and updates (including online-safety) to provide strategic challenge and oversight into policy and practice and that governors are regularly updated on the nature and effectiveness of the school's arrangements. [LGfL's Safeguarding Training for School Governors is free to all governors at safetraining.lgfl.net]
- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including remote systems are implemented according to child-safety first principles
- Better understand, review and drive the rationale behind decisions in filtering and monitoring as per the new DfE standards—through regular liaison with technical colleagues and the DSL– in particular understand what is blocked or allowed for whom, when, and how as per KCSIE. [LGfL's Safeguarding Shorts: Filtering for DSLs and SLT twilight provides an overview]
    - In 2023/4 this will involve starting regular checks and annual reviews, upskilling the DSL and appointing a filtering and monitoring governor.
- Liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information
- Support safeguarding leads and technical staff as they review protections for pupils in the home and remote-learning procedures, rules and safeguards [see remotesafe.lgfl.net for policy guidance and an infographic overview of safeguarding considerations for remote teaching technology]
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information

- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
- Ensure the school website meets statutory requirements

Designated Safeguarding Lead Mrs E Longworth / Online Safety Susan Smith

Key responsibilities (remember the DSL can delegate certain online-safety duties but not the overall responsibility; this assertion and all quotes below are from Keeping Children Safe in Education):

- The DSL should "take **lead responsibility** for safeguarding and child protection (**including online safety and understanding the filtering and monitoring** systems and processes in place).
- Ensure "An effective whole school approach to online safety as per KCSIE
- In 2023/4 working to take up the new responsibility for filtering and monitoring by working closely with technical colleagues, SLT and the new filtering governor to learn more about this area, better understand, review and drive the rationale behind systems in place and initiate regular checks and annual reviews, including support for devices in the home. [LGfL's Safeguarding Shorts: Filtering for DSLs and SLT twilight provides a quick overview and there is lots of information for DSLs at safefiltering.lgfl.net and appropriate.lgfl.net]
- Where online-safety duties are delegated and in areas of the curriculum where the DSL is not directly responsible but which cover areas of online safety, ensure there is regular review and open communication and that the DSL's clear overarching responsibility for online safety is not compromised or messaging to pupils confused
- Ensure ALL staff and supply staff undergo safeguarding and child protection training (including online-safety) at induction and that this is regularly updated.
    - In 2023/4 this must include filtering and monitoring and help them to understand their roles
    - all staff must read KCSIE Part 1 and all those working with children also Annex B – translations are available in 13 community languages at kcsietranslate.lgfl.net (B the condensed Annex A can be provided instead to staff who do not directly work with children if this is better)
    - cascade knowledge of risks and opportunities throughout the organisation
    - safecpd.lgfl.net has helpful CPD materials including PowerPoints, videos and more
- Ensure that ALL governors undergo safeguarding and child protection training (including online-safety) at induction to enable them to provide strategic challenge and oversight into policy and practice and that this is regularly updated – [LGfL's Safeguarding Training for school governors is free to all governors at safetraining.lgfl.net]
- Take day-to-day responsibility for safeguarding issues and be aware of the potential for serious child protection concerns
- Be mindful of using appropriate language and terminology around children when managing concerns, including avoiding victim-blaming language [see spotlight.lgfl.net

for a resource to use with staff on how framing things linguistically can have a safeguarding impact, and some expressions we use might be unhelpful]

- Remind staff of safeguarding considerations as part of a review of remote learning procedures and technology, including that the same principles of online-safety and behaviour apply
- Work closely with SLT, staff and technical colleagues to complete an online safety audit (including technology in use in the school) – [see LGfL's template with questions to use at onlinesafetyaudit.lgfl.net]
- Work with the DPO and governors to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Stay up to date with the latest trends in online safeguarding and "undertake Prevent awareness training." – see safetraining.lgfl.net and prevent.lgfl.net
- Review and update this policy, other online safety documents (e.g. Acceptable Use Agreements) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others) and submit for review to the governors.
- Receive regular updates in online-safety issues and legislation, be aware of local and school trends – see safeblog.lgfl.net for examples or sign up to the LGfL safeguarding newsletter
- Ensure that online safety education is embedded across the curriculum.
- Promote an awareness of and commitment to online-safety throughout the school community, with a strong focus on parents, including hard-to-reach parents – dedicated resources at parentsafe.lgfl.net
- Communicate regularly with SLT and the safeguarding governor/committee to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring work and have been functioning/helping.
- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident.
- Ensure adequate provision for staff to flag issues when not in school and for pupils to disclose issues when off site, especially when in isolation/quarantine, e.g. a survey to facilitate disclosures and an online form on the school home page about 'something that worrying me' that gets mailed securely to the DSL inbox
- Ensure staff adopt a zero-tolerance, whole school approach to all forms of child-on-child abuse, and don't dismiss it as banter (including bullying).
- Pay particular attention to online tutors, e.g. who have been engaged by the school as part of the DfE scheme, they can be asked to sign the contractor AUA.

Governing Body, led by Online Safety Link Governor – Ms Enowanyo Nsoatabe

Key responsibilities (quotes are taken from Keeping Children Safe in Education)

- Approve this policy and strategy and subsequently review its effectiveness, e.g. by asking the questions in the helpful document from the UK Council for Child Internet Safety (UKCIS) Online safety in schools and colleges: Questions from the Governing Board
- Undergo (and signpost all other governors and Trustees to attend) safeguarding and child protection training (including online safety) at induction to provide strategic challenge and into policy and practice, ensuring this is regularly updated – [LGfL's Safeguarding Training for school governors is free to all governors at safetraining.lgfl.net]
- Ensure that all staff also receive appropriate safeguarding and child protection (including online) training at induction and that this is updated
- Appoint a filtering and monitoring governor to work closely with the DSL on the new filtering and monitoring standards [there is guidance for governors at safefiltering.lgfl.net]
- Support the school in encouraging parents and the wider community to become engaged in online safety activities
- Have regular strategic reviews with the online-safety coordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings
- Work with the DPO, DSL and Executive Headteacher to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Check all school staff have read Part 1 of KCSIE; SLT and all working directly with children have read Annex B
- Ensure that all staff undergo safeguarding and child protection training (including online safety and now also reminders about filtering and monitoring
- "Ensure that children are taught about safeguarding, including online safety […] as part of providing a broad and balanced curriculum […] Consider a whole school approach to online safety [with] a clear policy on the use of mobile technology."

PSHE – Kevin Williams

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online as well as raising awareness of the risks and challenges from recent trends in self-generative artificial intelligence, financial extortion and sharing intimate pictures online into the PSHE / Relationships education, relationships and sex education (RSE) and health education curriculum. "This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age appropriate way that is relevant to their pupils' lives."

- Focus on the underpinning knowledge and behaviours outlined in Teaching Online Safety in Schools in an age appropriate way to help pupils to navigate the online world safely and confidently regardless of their device, platform or app.
- Assess teaching to "identify where pupils need extra support or intervention [through] tests, written assignments or self evaluations, to capture progress" – [see LGfL's SafeSkills Online Safety Quiz and diagnostic teaching tool at safeskillsinfo.lgfl.net] to complement the computing curriculum,.
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSE.
- Note that an RSE policy should be included on the school website.
- Work closely with the Computing subject leader to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach

Computing Lead – Susan Smith

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum
- Work closely with the PSHE lead to avoid overlap but ensure a complementary whole-school approach
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements

Subject leaders

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Look for opportunities to embed online safety in your subject or aspect, especially as part of the PSHE curriculum, and model positive attitudes and approaches to staff and pupils alike
- Consider how teaching online safety can be applied in your context
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Ensure subject specific action plans also have an online-safety element

Network Manager - Kartik Asher, Platinum IT

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Collaborate regularly with the DSL and leadership team to help them make key strategic decisions around the safeguarding elements of technology.

- Note that KCSIE changes expect a great understanding of technology and its role in safeguarding when it comes to filtering and monitoring and in 2023/4 you will be required to support safeguarding teams to understand and manage these systems and carry out regular reviews and annual checks.
- Support DSLs and SLT to carry out an annual online safety audit as now recommended in KCSIE. [LGfL has a free template you can use at https://onlinesafetyaudit.lgfl.net] This should also include a review of technology, including filtering and monitoring systems (what is allowed, blocked and why and how 'over blocking' is avoided as per KCSIE) to support their role as per the new DfE standards, [we recommend you signpost them to LGfL's Safeguarding Shorts: Filtering for DSLs and SLT twilight at safetraining.lgfl.net which provides a quick overview to help build their understanding] protections for pupils in the home [e.g. LGfL HomeProtect filtering for the home – https://homeprotect.lgfl.net] and remote-learning. [see remotesafe.lgfl.net for guidance]
- Keep up to date with the school's online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- Work closely with the designated safeguarding lead / online safety lead / data protection officer / LGfL nominated contact / PSHE lead to ensure that school systems and networks reflect school policy and there are no conflicts between educational messages and practice.
- Ensure the above stakeholders understand the consequences of existing services and of any changes to these systems (especially in terms of access to personal and sensitive records / data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms etc
- Maintain up-to-date documentation of the school's online security and technical procedures.
- To report online-safety related issues that come to their attention in line with school policy.
- Manage the school's systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption and backup for data, including disaster recovery plans, and auditable access controls.
- Ensure the data protection policy and cybersecurity policy are up to date, easy to follow and practicable
- Monitor the use of school technology and online platforms and that any misuse/attempted misuse is identified and reported in line with school policy

Data Protection Officer (DPO) – David Powell, Sapphire Skies Ltd

Key responsibilities:

- Alongside those of other staff, provide data protection expertise and training and support the DP and cybersecurity policy and compliance with those and legislation and ensure that the policies conform with each other and with this policy.
- Not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in *Data protection in schools*, 2023, "It's not usually necessary to ask

for consent to share personal information for the purposes of safeguarding a child." And in KCSIE 2023, "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children."

- Note that retention schedules for safeguarding records may be required to be set as 'Very long term need (until pupil is aged 25 or older)'. However, some local authorities require record retention until 25 for all pupil records. An example of an LA safeguarding record retention policy can be read at safepolicies.lgfl.net, but you should check the rules in your area.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited

Volunteers and contractors (including tutor)

Key responsibilities:

- Read, understand, sign and adhere to an acceptable use policy (AUA)
- Report any concerns, no matter how small, to the designated safety lead
- Maintain an awareness of current online safety issues and guidance
- Model safe, responsible and professional behaviours in their own use of technology at school and as part of remote teaching or any online communications
- Note that as per AUA agreement a contractor will never attempt to arrange any meeting, **including tutoring session,** without the full prior knowledge and approval of the school, and will never do so directly with a pupil. The same applies to any private/direct communication with a pupil.

Pupils

Key responsibilities:

Read, understand, sign and adhere to the pupil acceptable use agreement

Parents/carers

Key responsibilities:

- Read, sign and adhere to the school's parental acceptable use agreement (AUA), read the pupil AUA and encourage their children to follow it

External groups including parent associations

Key responsibilities:

- Any external individual/organisation will sign an acceptable use agreement prior to using technology or the internet within school
- Support the school in promoting online safety and data protection
- Model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about

others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers

Appendix – AUAs and related documents

1. Staff, Governors & Volunteers Online Safety Acceptable Use Agreement (inc. Contractors)
2. Pupil Online Safety Acceptable Use Agreement
3. Parents / Carers Online Safety Acceptable Use Agreement
4. How will pupil & staff infringements be handled?
5. Staff Guidance: What do we do if?
6. The Queenswell Federation Online Safety Rules

The Queenswell Federation

Staff, Governors & Volunteers (Inc. Contractors) Online Safety Acceptable Use Agreement

Background

We ask everyone involved in the life of The Queenswell Federation to sign an Acceptable Use Agreement (AUA), which outlines how we expect them to behave when they are online, and/or using school networks, connections, internet connectivity and devices, cloud platforms and social media (both when on school site and outside of school).

Staff, governors and volunteers (Inc. Contractors) are asked to sign this AUA when starting at the school and whenever changes are made. All staff (including support staff), governors and volunteers have particular legal / professional obligations and it is imperative that all parties understand that online safety is part of safeguarding as well as part of the curriculum, and it is everybody's responsibility to uphold the school's approaches, strategy and policy as detailed in the full Online Safety Policy.

What am I agreeing to?

1. **(This point for staff and governors):**
   I have read and understood The Queenswell Federation's full Online Safety policy and agree to uphold the spirit and letter of the approaches outlined there, both for my behaviour as an adult and enforcing the rules for pupils/students. I will report any breaches or suspicions (by adults or children) in line with the policy without delay as outlined in the Online Safety Policy.
2. I understand online safety is a core part of safeguarding and part of everyone's job. It is my duty to support a whole-school safeguarding approach and to learn more each year about best-practice in this area. I have noted the section in our online safety policy which describes trends over the past year at a national level and in this school.
3. I will report any behaviour which I believe may be inappropriate or concerning in any way to the Designated Safeguarding Lead (if by a child) or Executive Headteacher (if by an adult) and make them aware of new trends and patterns that I might identify.
4. I will follow the guidance in the Safeguarding and Online Safety policies for reporting incidents (including for handling incidents and concerns about a child in general, sharing nudes and semi-nudes, upskirting, bullying, sexual violence and harassment, misuse of technology and social media)
5. I understand the principle of 'safeguarding as a jigsaw' where my concern or professional curiosity might complete the picture; online-safety issues (particularly relating to bullying and sexual harassment and violence) are most likely to be overheard in the playground, corridors, toilets and other communal areas outside the classroom. understand the sections on.
6. I will take a zero-tolerance approach to all forms of child-on-child abuse (not dismissing it as banter), including bullying and sexual violence & harassment – know that 'it could happen here'!

7. I will be mindful of using appropriate language and terminology around children when addressing concerns, including avoiding victim-blaming language
8. I will identify opportunities to thread online safety through all school activities as part of a whole school approach in line with the RSHE curriculum, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils).
9. When overseeing the use of technology in school or for homework or remote teaching, I will encourage and talk about appropriate behaviour and how to get help and consider potential risks and the age-appropriateness of websites (find out what appropriate filtering and monitoring systems are in place and how they keep children safe).
10. I will follow best-practice pedagogy for online-safety education, avoiding scaring and other unhelpful prevention methods. [See onlinesafetyprinciples.lgfl.net]
11. I will prepare and check all online sources and classroom resources before using for accuracy and appropriateness. I will not carry out a live search in front of children without having prepared beforehand. I will flag any concerns about overblocking to the DSL.
12. I will carefully supervise and guide pupils when engaged in learning activities involving online technology, supporting them with search skills, critical thinking, age-appropriate materials and signposting, and legal issues such as copyright and data protection.
13. During any periods of remote learning, I will not behave any differently towards students compared to when I am in school and will follow the same safeguarding principles as outlined in the main child protection and safeguarding policy when it comes to behaviour, ways to contact and the relevant systems and behaviours.
14. I understand that school systems and users are protected by security, monitoring and filtering services, and that my use of school devices, systems and logins on my own devices and at home (regardless of time, location or connection), including encrypted content, can be monitored/captured/viewed by the relevant authorised staff members.
15. I know the filtering and monitoring systems used within school and the types of content blocked and am aware of the increased focus on these areas in KCSIE 2023, now led by the DSL. If I discover pupils may be bypassing blocks or accessing inappropriate material, I will report this to the DSL without delay. Equally, if I feel that we are overblocking, I shall notify the school to inform regular checks and annual review of these systems.
16. I understand that I am a role model and will promote positive online safety and model safe, responsible and positive behaviours in my own use of technology both in and outside school, including on social media, e.g. by not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, regardless of whether they are members of the school community or not.
17. I will not contact or attempt to contact any pupil or to access their contact details (including their usernames/handles on different platforms) in any way other than school-approved and school-monitored ways, which are detailed in the school's Online Safety Policy. I will report any breach of this by others or attempts by pupils to do the same to the Executive Headteacher.
18. Details on social media behaviour, the general capture of digital images/video and on my use of personal devices is stated in the full Online Safety policy. If I am ever not sure, I will ask first.
19. I agree to adhere to all provisions of the school's Data Protection Policy at all times, whether or not I am on site or using a school device, platform or network.
20. I will never use school devices and networks/internet/platforms/other technologies to access material that is illegal or in any way inappropriate for an education setting. I will not attempt to bypass security or monitoring and will look after devices loaned to me.

21. I will not support or promote extremist organisations, messages or individuals, nor give them a voice or opportunity to visit the school. I will not browse, download or send material that is considered offensive or of an extremist nature.
22. I understand and support the commitments made by pupils, parents/carers and fellow staff, governors and volunteers in their Acceptable Use Agreements and will report any infringements in line with school procedures.
23. I understand that breach of this AUA and/or of the school's full Online Safety Policy may lead to appropriate staff disciplinary action or termination of my relationship with the school and where appropriate, referral to the relevant authorities.

To be completed by the user

I have read, understood and agreed to this policy. I understand that it is my responsibility to ensure I remain up to date and read and understand the school's most recent online safety & safeguarding policies. I understand that failure to comply with this agreement could lead to disciplinary action.

Signature: _____

Name: _____

Job Title : _____

Date: _____

To be completed by Head of School

I approve this user to be allocated credentials for school systems as relevant to their role.

Signature: _____

Name: _____

Date: _____

LGfL SafeguardED

The Queenswell Federation

Pupil Online Safety Acceptable Use Agreement

Please help your child to sign the Pupil Online Safety Acceptable Use Agreement below. This AUA will be discussed at the beginning of each school year in class.

Pupil Name: _____ Class _____

I only **USE** devices or apps, sites or games if a trusted adult says so.	
I **ASK** for help if I'm stuck or not sure.	
I **TELL** a trusted adult if I'm upset, worried, scared or confused.	
If I get a **FUNNY FEELING** in my tummy, I talk to a trusted adult.	
I look out for my **FRIENDS** and tell someone if they need help.	
I **KNOW** that online people aren't always who they say they are and things I read are not always **TRUE.**	
Anything I do online can be shared and might stay online **FOREVER.**	
I don't keep **SECRETS**🚫 unless they are a present or a nice surprise.	
I don't have to do **DARES OR CHALLENGES**❌, even if someone tells me I must.	
I don't change **CLOTHES** or get undressed in front of a camera	
I always check before **SHARING** my personal information or other people's stories and photos.	
I am **KIND** and polite to everyone.	

My trusted adults are: _____ at school.

_____ at home.

Pupil Signature: _____ Date: ___/___/___

LGfL
SafeguardED

The Queenswell Federation

Parents / Carers Online Safety Acceptable Use Agreement

What is an AUA?

We ask all children, young people and adults involved in the life of The Queenswell Federation to sign an Acceptable Use Agreement, to outline how we expect them to behave when they are online, and/or using school networks, connections, internet connectivity and devices, cloud platforms and social media (both when on school site and outside of school).

Why do we need an AUA?

These rules have been written to help keep everyone safe and happy when they are online or using technology. Sometimes things go wrong and people can get upset, but these rules should help us avoid it when possible, and be fair to everybody. School systems and users are protected and monitored by security and filtering services to provide safe access to digital technologies. This means anything on a school device or using school networks/platforms/internet may be viewed by one of the staff members who are here to keep your children safe.

We tell your children that they should not behave any differently when they are out of school or using their own device or home network. What we tell pupils about behaviour and respect applies to all members of the school community. We seek the support of parents and carers to reinforce this message and help children to behave in a safe way when online:

"Treat yourself and others with respect at all times; treat people in the same way when you are online or on a device as you would face to face."

Where can I find out more?

You can read The Queenswell Federation's full Online Safety Policy on the school's website for more detail on our approach to online safety and links to other relevant policies (e.g. Safeguarding Policy, Behaviour Policy, etc.).

What am I agreeing to?

1. I understand that The Queenswell Federation uses technology as part of the daily life of the school when it is appropriate to support teaching & learning and the smooth running of the school, and to help prepare the children and young people in our care for their future lives.
2. I understand that the school takes every reasonable precaution to keep pupils safe and to prevent pupils from accessing inappropriate materials, including behaviour policies and agreements, physical and technical monitoring, education and support and web filtering.
3. School network protections will be superior to most home filtering. However, please note that accessing the internet always involves an element of risk and the school cannot be held responsible for the nature and content of materials accessed through the internet and mobile technologies. Schools are asked not to overblock or provide an experience which is so locked down as to block educational content or not train pupils for life in an online world.
4. I understand that internet and device use in school, and use of school-owned devices, networks and cloud platforms out of school may be subject to filtering and monitoring.
5. I understand and will help my child to use any devices at home in the same manner as when in school, including during any remote learning periods.
6. I will promote positive online safety and model safe, responsible and positive behaviours in my own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments

about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers.

7. Parents are kindly asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office.
8. The impact of social media use is often felt strongly in schools, which is why we expect certain behaviours from pupils when using social media. I will support the school's social media policy and not encourage my child to join any platform where they are below the minimum age.
9. I will follow the school's digital images and video policy, which outlines when I can capture and/or share images/videos. I will not share images of other people's children on social media and understand that there may be cultural or legal reasons why this would be inappropriate or even dangerous. The school sometimes uses images/video of my child for internal purposes such as recording attainment, but it will only do so publicly if I have given my consent on the relevant form.
10. I understand that for my child to grow up safe online, s/he will need positive input from school and home, so I will talk to my child about online safety and refer to parentsafe.lgfl.net for advice and support on safe settings, parental controls, apps and games, talking to them about life online, screentime and relevant topics from bullying to accessing pornography, extremism and gangs, sharing inappropriate content etc...
11. I understand that my child needs a safe and appropriate place to do home learning, whether for homework or during times of school closure. When on any video calls with school, my child will be fully dressed and not in bed, and the camera angle will point away from beds/bedding/personal information etc. Where it is possible to blur or change the background, I will help my child to do so.
12. If my child has online tuition, I will refer to the Online Tutors – Keeping children Safe poster and undertake necessary checks where I have arranged this privately, ensuring they are registered/safe and reliable, and for any tuition to remain in the room where possible, ensuring my child knows that tutors should not arrange new sessions or online chats directly with them.
13. I understand that whilst home networks are much less secure than school ones, I can apply child safety settings to my home internet and to various devices, operating systems, consoles, apps and games. There are also child-safe search engines e.g. swiggle.org.uk and YouTube Kids is an alternative to YouTube with age appropriate content. [Previous sentence best suited to primary parents] Find out more at parentsafe.lgfl.net
14. I understand that it can be hard to stop using technology sometimes, and I will talk about this to my child.
15. I understand and support the commitments made by my child in the Acceptable Use Agreement (AUA)) which s/he has signed and I understand that s/he will be subject to sanctions if s/he does not follow these rules.
16. I can find out more about online safety at The Queenswell Federation by reading the full Online Safety Policy on the Queenswell Federation website. I can talk class teacher if I have any concerns about my child/ren's use of technology, or about that of others in the community, or if I have questions about online safety or technology use in school.

I/we have read, understood and agreed to this policy.

Name of parent/carer _____ **Date:** _____

Signed: _____

Child's name: _____ **Class:** _____

The Queenswell Federation

How will pupil & staff infringements be handled?

Whenever a pupil or staff member infringes the Online Safety Policy, the final decision on the level of sanction will be at the discretion of the school management and will reflect the school's behaviour and disciplinary procedures.

The following are provided as **exemplification** only:

PUPIL	
Category A infringements	**Possible Sanctions:**
• Use of non-educational sites during lessons • Unauthorised use of gaming sites • Unauthorised use of mobile phone (or other technologies) in lessons e.g. to send texts to friends • Use of unauthorised instant messaging / social media	**Refer to class teacher** Escalate to: Online Safety Lead / SLT
Category B infringements	**Possible Sanctions:**
• Continued use of non-educational sites during lessons after being warned • Continued unauthorised use of gaming sites after being warned • Continued unauthorised use of mobile phone (or other technologies) after being warned • Continued use of unauthorised instant messaging / chatrooms, social media • Trying to buy items over online • Accidentally corrupting or destroying others' data without notifying a member of staff of it • Accidentally accessing offensive material and not logging off or notifying a member of staff of it	**Refer to Class teacher/ Online Safety Lead/ SLT** Escalate to: removal of Internet access rights for a period / removal of phone until end of day / contact with parent

PUPIL	
Category C infringements	**Possible Sanctions:**
• Deliberately corrupting or destroying someone's data, violating privacy of others or posts inappropriate messages, videos or images on social media. • Sending an email or message that is regarded as harassment or of a bullying nature (one-off) • Trying to access offensive or pornographic material (one-off) • Purchasing or ordering of items online • Transmission of commercial or advertising material	**Refer to Class teacher / Online Safety Lead / SLT / Head of School / removal of Internet** Escalate to: contact with parents / removal of equipment **Other safeguarding actions if inappropriate web material is accessed:** Ensure appropriate technical support filters the site
Category D infringements	**Possible Sanctions:**
• Continued sending of emails or messages regarded as harassment or of a bullying nature after being warned • Deliberately creating accessing, downloading or disseminating any material deemed offensive, obscene, defamatory, racist, homophobic or violent • Receipt or transmission of material that infringes the copyright of another person or infringes the conditions of the Data Protection Act, revised 1988 • Bringing the school name into disrepute	**Refer to Head of School / Contact with parents** **Other possible safeguarding actions:** • Secure and preserve any evidence • Inform the sender's email service provider. • Liaise with relevant service providers/ instigators of the offending material to remove • Report to Police / CEOP where child abuse or illegal activity is suspected

STAFF	
Category A infringements (Misconduct)	**Possible Sanctions:**
• Excessive use of the Internet for personal activities not related to professional development e.g. online shopping, personal email, instant messaging etc. • Use of personal data storage media (e.g. USB memory sticks) without considering access and appropriateness of any files stored. • Not implementing appropriate safeguarding procedures. • Any behaviour on the World Wide Web that compromises the staff members professional standing in the school and community. • Misuse of first level data security, e.g. wrongful use of passwords. • Breaching copyright or license e.g. installing unlicensed software on a network.	**Refer to line manager / LMT** Escalate to: *Warning given*
Category B infringements (Gross Misconduct)	**Possible Sanctions:**
• Serious misuse of, or deliberate damage to, any school / Council computer hardware or software; • Any deliberate attempt to breach data protection or computer security rules; • Deliberately creating, accessing, downloading and disseminating any material deemed offensive, obscene, defamatory, racist, homophobic or violent; • Receipt or transmission of material that infringes the copyright of another person or infringes the conditions of the Data Protection Act, revised 1988; • Bringing the school name into disrepute	**Refer to Executive Headteacher / Governors;** **Other safeguarding actions:** • Remove the device to a secure place to ensure that there is no further access to the device or laptop. • Instigate an audit of all computing equipment by an outside agency, such as the school's ICT managed service providers - to ensure there is no risk of pupils accessing inappropriate materials in the school. • Identify the precise details of the material. • *Escalate to:* *report to LA /LSCB, Personnel, Human resource.* Report to Police / CEOP where child abuse or illegal activity is suspected.

If a member of staff commits an exceptionally serious act of gross misconduct The member of staff should be instantly suspended. Normally though, there will be an investigation before disciplinary action is taken for any alleged offence. As part of that the member of staff will be asked to explain their actions and these will be considered before any disciplinary action is taken. Schools are likely to involve external support agencies as part of these investigations e.g. an ICT technical support service to investigate equipment and data evidence, HR, the LADO.
Child abuse images found In the case of Child abuse images being found, the member of staff should be **immediately suspended** and the Police should be called. Anyone may report any inappropriate or potentially illegal activity or abuse with or towards a child online to the Child Exploitation and Online Protection (CEOP): http://www.ceop.gov.uk/reporting_abuse.html http://www.iwf.org.uk

How will pupils and staff be informed of these procedures?

- They will be fully explained and included within the school's Online Safety Policy. All staff will be required to sign the school's Online Safety Acceptable Use Agreement;
- Pupils will be taught about responsible and acceptable use and given strategies to deal with incidents so they can develop 'safe behaviours'. Pupils will sign an age appropriate online safety acceptable use agreement;
- The Federation's online safety policy will be made available and explained to parents, and parents will sign an acceptable use agreement when their child starts at the school.
- Information on reporting abuse / bullying, etc. will be made available by the school for pupils, staff and parents.
- Staff are issued with the 'What to do if?' guide on online-safety issues.

The Queenswell Federation

Staff Guidance: What do we do if?

An inappropriate website is accessed <u>unintentionally</u> in school by a teacher or pupil.

1. Play the situation down; don't make it into a drama.
2. Report to the Head of School / Online Safety Lead and decide whether to inform parents of any pupils who viewed the site.
3. Inform the school technician and ensure the site is filtered if necessary

An inappropriate website is accessed <u>intentionally</u> by a pupil.

1. Refer to the acceptable use agreement that was signed by the child, and apply agreed sanctions.
2. Notify the parents of the child.
3. Inform the school technician and ensure the site is filtered if necessary.

An inappropriate website is accessed <u>intentionally</u> by a staff member.

1. Ensure all evidence is stored and logged
2. Refer to the acceptable use and staffing policy that was signed by the staff member, and apply disciplinary procedure.
3. Notify the Governing body.
4. Inform the school technician and ensure the site is filtered if necessary.
5. In an extreme case where the material is of an illegal nature: Contact the local police and follow their advice.

An adult uses school computing equipment inappropriately.

1. If you become aware of misuse of computing equipment by an adult do not review the misuse alone.
2. Report the misuse immediately to the LMT and ensure that there is no further access to the device. Record all actions taken.
3. If the material is offensive but not illegal, the LMT should then:
   - Remove the device to a secure place.
   - Instigate an audit of all computing equipment by the school's ICT managed service providers or technical teams to ensure there is no risk of pupils accessing inappropriate materials in the school.
   - Identify the precise details of the material.
   - Take appropriate disciplinary action (undertaken by LMT).
   - Inform governors of the incident.

   In an extreme case where the material is of an illegal nature:
   - Contact the local police and follow their advice.
   - Remove the device to a secure place and document what you have done.

All of the above incidents must be reported immediately to the LMT and Online Safety Coordinator.

A bullying incident directed at a child occurs online, e.g. via mobile phone, either inside or outside of school time.

1. Advise the child not to respond to the message.
2. Refer to relevant policies including online safety, anti-bullying and PSHE and apply appropriate sanctions.
3. Secure and preserve any evidence through screenshots and printouts.
4. Notify parents of all the children involved.
5. Consider delivering a parent workshop for the school community.
6. Inform the police if necessary.
7. Inform other agencies if required (LA, Child protection, LGFL).

Malicious or threatening comments are posted on an Internet site (such as social media) about members of the school community (including pupils and staff).

1. Inform and request the comments be removed if the site is administered externally.
2. Secure and preserve any evidence.
3. Send all the evidence to CEOP at www.ceop.gov.uk/contact_us.html.
4. Endeavour to trace the origin and inform police as appropriate.
5. Inform LA and other agencies (child protection, Governing body, etc.).
6. The school may wish to consider delivering a parent workshop for the school community.

You are concerned that a child's safety is at risk because you suspect someone is using communication technologies (such as social media sites or gaming) to make inappropriate contact with the child

1. Report to and discuss with the named child protection officer in school and contact parents.
2. Advise the child on how to terminate the communication and save all evidence.
3. Contact CEOP http://www.ceop.gov.uk/
4. Consider the involvement of police and social services.
5. Inform LA and other agencies.
6. Consider delivering a parent workshop for the school community.

You are concerned that a child's safety is at risk because you suspect they are playing computer games that are inappropriate or certificated beyond the age of the child

1. Report to and discuss with the named child protection officer in school and contact parents.
2. Advise the child and parents on appropriate games and content. You may want to use LGFL template letters to inform all or targeted parents.
3. If the game is played within school environment, ensure that the technical team block access to the game
4. Consider the involvement of social services and child protection agencies.
5. Consider delivering a parent workshop for the school community.

You are aware of social media posts and pages created by parents about the school. While no inaccurate information is posted, it is inflammatory and disruptive and staff are finding it hard not to respond.

1. Contact the poster or page creator and discuss the issues in person
2. Provide central staff training and discuss as a staff how to behave when finding such posts and appropriate responses.
3. Contact governing body and parent association

4. Consider delivering a parent workshop for the school community.

All of the above incidents must be reported immediately to the LMT and Online Safety Coordinator.

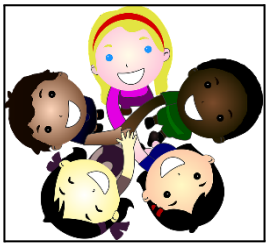
Children should be confident in a no-blame culture when it comes to reporting inappropriate incidents involving the internet or mobile technology: they must be able to do this without fear.

The Queenswell Federation Online Safety Rules

Always be kind and respectful online, treat everyone as you would like to be treated.

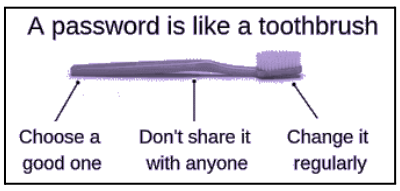
Never share personal information.

Although it might seem nice to make friends online, don't talk to strangers online, don't agree to meet anyone in person online, only be friends with people you know in real life.



Only download games and apps that are appropriate for you and your age group.

If you see something that gives you that uncomfortable butterfly feeling in your tummy, tell a trusted adult.



Do not share your password. Think of your password as a toothbrush, no one shares their toothbrush so no one should share their password.

Written by the pupils of The Queenswell Federation