

## Samuel Rhodes School

### Online Safety Policy – 2024/5

#### Introduction

#### Key People/Dates

Samuel Rhodes School	Designated Safeguarding Lead (DSL), with lead responsibility for filtering and monitoring	Jenny Johns
	Deputy Designated Safeguarding Leads / DSL Team Members	Cerys Normanton, Chelsea Day-Bourne, Annu Saha, Jo Jones
	Link governor for safeguarding	Alison Kahn
	Curriculum leads with relevance to online safeguarding and their role	Mary McKoy- PSHCE lead Nicola Cartwright Computing Teacher
	Network manager / other technical support	WWCS
	Date this policy was reviewed and by whom	November 2024
	Date of next review and by whom	November 2025

## What is this policy?

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' 2024 (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.

## Who is it for; when is it reviewed?

This policy is 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 make sure the policy makes sense and is possible to follow in all respects. This will help all stakeholders to understand the rules that are in place and why, and that the policy affects day-to-day practice. Acceptable Use Policies for different stakeholders help with this – ensure these are reviewed alongside this overarching policy. Any changes to this policy should be immediately disseminated to all the above stakeholders.

## 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 and understanding the filtering and monitoring systems and processes in place).” The DSL can delegate activities but not the responsibility for this area and whilst subject leads, e.g. for RSHE will plan the curriculum for their area, it is important that this ties into a whole-school approach.

## What were the main online safety risks in 2023/2024?

### Current Online Safeguarding Trends

In our school over the past year, we have particularly 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 students:

- Online safety concerns of pupils when they are at home, especially on apps like WhatsApp
- At school pupils trying to use to use to unlock the filtering systems.
- 2 pupils have had to have support as the have been have dialogues with AI bots
- Inappropriate content accessed on YouTube at home and pupils repeating harmful language at school.

Nationally, some of the latest trends of the past twelve months are outlined below. These are reflected in this policy and the acceptable use agreements we use and seen in the context of the 5 Cs (see KCSIE for more details), a whole-school contextual safeguarding approach that incorporates policy and practice for curriculum, safeguarding and technical teams.

Self-generative artificial intelligence has become rapidly more accessible, with many students often having 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 (gen AI can be responsible for incorrect and sometime harmful 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. Self-generative AI has also made it easier than ever to create sexualised images and deepfake videos. Whilst they may not be real, they have a devastating effect on a young person's emotional wellbeing and physical safety, and

can also be used to blackmail, humiliate and abuse. The Internet Watch Foundation has reported AI-generated imagery of child sexual abuse progressing at such a worrying rate.

Ofcom's 'Children and parents: media use and attitudes report 2024' 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 (especially with the minimum age for use of WhatsApp now 13). With children aged 3 - 17 spending an average 3 hours 5 minutes per day online, four in ten parents report finding it hard to control their child's screentime. Notably, 45% of 8-11s feel that their parents' screentime is too high, underlining the importance of modelling good behaviour.

Given the 13+ minimum age requirement on most social media platforms, it is notable that half (51%) of children under 13 use them. Despite age restrictions, four in ten admit to giving a fake age online, exposing them to content inappropriate for their age and increasing their risk of harm, with over a third (36%) of parents of all 3-17s saying they would allow their child to have a profile on sites or apps before they had reached the minimum age.

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 will remind about best practice while remembering the reality for most of our students is quite different.

This is striking when you consider that over 95 percent of students have their own mobile phone by the end of Year 7, and the vast majority do not have safety controls or limitations to prevent harm of access to inappropriate material. This is particularly pertinent given that 141, cases of self-generated child sexual abuse material were found of 11–13-year-olds (Internet Watch Foundation Annual Report). These were predominantly (but importantly not only) girls; it is important also to recognise the increasing risk of sextortion, where older teenage boys have been financially exploited after being tricked into sharing intimate pictures online. This resulted in the National Crime Agency releasing an [alert](#) to all schools in Spring 2024.

Growing numbers of children and young people are using social media and apps such as Snapchat as their source of news and information, with little attention paid to the facts or veracity of

influencers sharing news. The alarming speed and scale at which misinformation about the attack in Southport (August 2024) was shared, resulting in Islamophobic and racist violence, rioting and looting across England is particularly concerning, with much of it was fuelled by false online accusations about the assailant. Despite attempts by Police and national news to correct the misleading information, it racked up millions of views on social media sites like X and was actively promoted by several high-profile users with large followings.

There have also been significant safeguarding concerns where parents have filmed interactions with staff outside the school gates and posted this on social media, putting children and the wider school community at risk of harm. See [nofilming.lgfl.net](https://nofilming.lgfl.net) to find out more.

Cyber Security is an essential component in safeguarding children and now features within KCSIE. Sadly, the education sector remains a clear target for cyber-attacks, with the Cyber Security Breaches Survey 2024 highlighting an increase in school attacks nationally, with 71% of secondary schools reporting a breach or attack in the past year, and 52% of primary schools.

### **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
- 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
- Discussed in parent webinars/workshops

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## Overview

### Aims

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

- Setting out expectations for all Samuel Rhodes 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. RSHE) 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).

## Scope

This policy applies to all members of the Samuel Rhodes School 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 school 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 Appendix 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. All staff have a key role to play in feeding back on potential issues.

## Education and curriculum

Despite the risks associated with being online, Samuel Rhodes school recognises the opportunities and benefits of children being online. Technology is a fundamental part of our adult lives and so developing the competencies to understand and use it, are critical to children's later positive outcomes. The choice to use technology in school will always be driven by pedagogy and inclusion.

It is important that schools establish a carefully sequenced curriculum for online safety that develops competencies (as well as knowledge about risks) and 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.

RSHE guidance also recommends that schools assess teaching to “identify where pupils need extra support or intervention [through] tests, written assignments or self-evaluations, to capture progress.”

The teaching of online safety, features in these particular areas of curriculum delivery:

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

However, as stated previously, 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.

Whenever overseeing the use of technology (devices, the internet, generative AI tools, etc.) in school or setting as homework tasks, all staff should remind/encourage sensible use, monitor what pupils/students are doing and consider potential risks and the age appropriateness of tasks. This includes supporting them with search skills, reporting and accessing help, critical thinking (e.g. disinformation, misinformation and fake news), access to age-appropriate materials and signposting, and legal issues such as copyright and data law. [saferesources.lgfl.net](https://saferesources.lgfl.net) has regularly updated theme-based resources, materials and signposting for teachers and parents.

At Samuel Rhodes School, we recognise that online safety and broader digital resilience must be thread throughout the curriculum and that is why we adopt the cross-curricular framework 'Education for a Connected World – 2020 edition' from UKCIS (the UK Council for Internet Safety).

At Samuel Rhodes we use resources provided by the National Centre for Computing Education on using technology safely (<https://teachcomputing.org/primary-online-safety-recommendations>).

These help us to meet

- National Curriculum computing programs of study for KS2 and helps students to be able to use technology safely, respectfully and responsibly; recognise

acceptable/unacceptable behaviour; identify a range of ways to report concerns about content and contact.

- National Curriculum computing programs of study for KS3 and helps students to be able to understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy; recognise inappropriate content, contact and conduct and know how to report concerns.

Annual reviews of schemes of work take place and are used as an opportunity to follow this framework more closely in its key areas. This is done within the context of an annual online safety audit, which is a collaborative effort led by Jenny Johns and any key information you find may be useful. Note that there is a free template for online safety audits at [onlinesafetyaudit.lgfl.net](https://onlinesafetyaudit.lgfl.net).

We communicate with parents and carers about how we support pupils with their online safety learning, including what their children are being asked to do online and the sites they will be asked to access by doing coffee mornings.

## Handling safeguarding concerns and incidents

It is vital that all staff recognise that online safety is a part of safeguarding and so 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 speak to the safeguarding lead with any concerns (no matter how small these seem) 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.

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 (including school sanctions)
- Acceptable Use Policies
- Data Protection Policy, agreements and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc)

This school commits to take all reasonable precautions to safeguard 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 designated safeguarding lead as soon as possible on the same day. The reporting member of staff will ensure that a record is made of the concern on CPOMs- this includes any concerns raised by the filtering and monitoring systems (see section further on in this policy for more information).

Any concern/allegation about staff misuse is always (similar to any safeguarding concern) referred directly to the Headteacher, unless the concern is about the 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 school 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 2024 provides advice and related legal duties including support for pupils and powers of staff when responding to incidents – see pages 31-33 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.

The school should ensure all online safety reporting procedures are sustainable for any unforeseen periods of closure.

For more information on reporting channels for online safety concerns, please visit [reporting.lgfl.net](http://reporting.lgfl.net).

The following sub-sections provide details on managing particular types of concern.

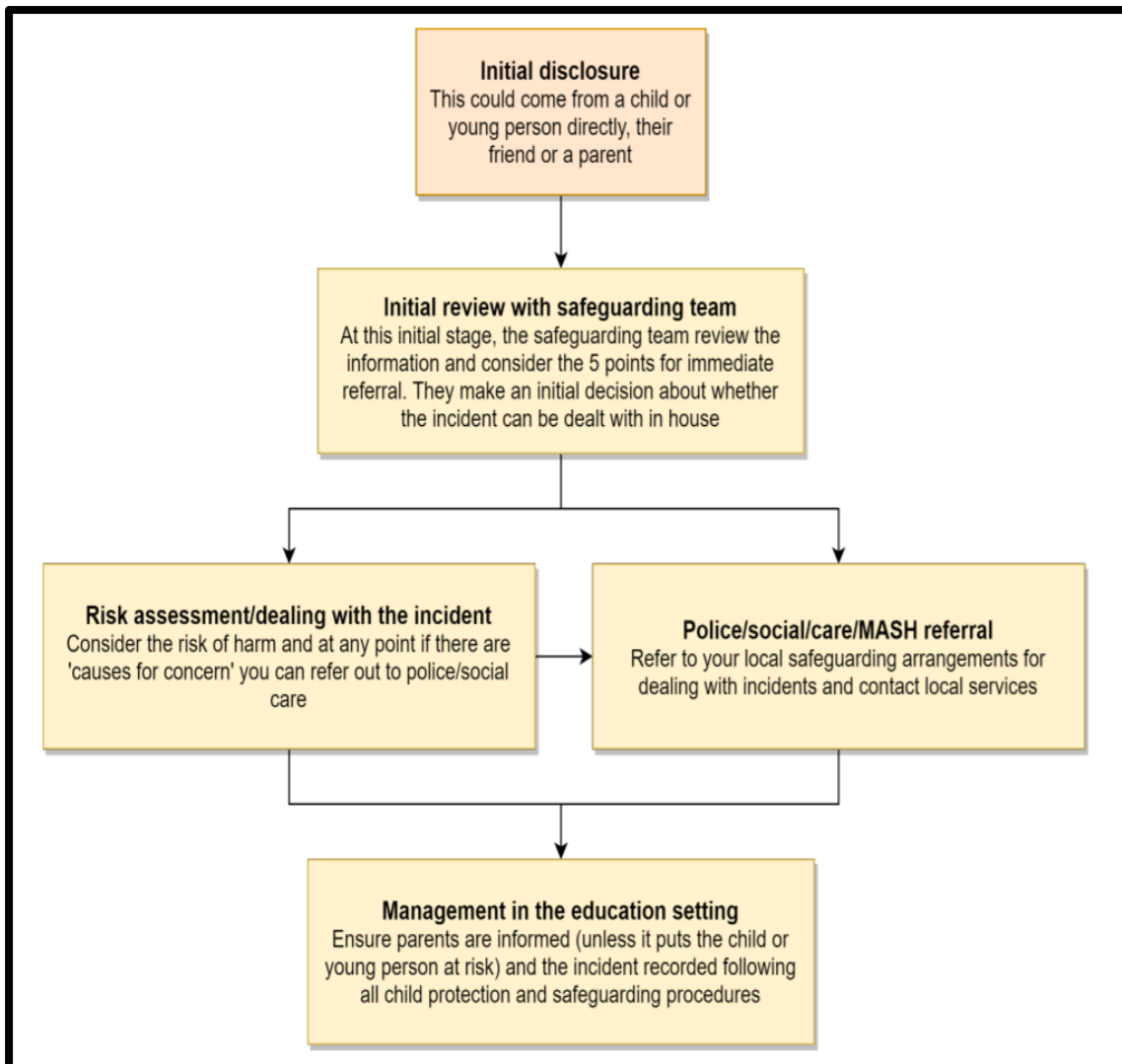
### **Nudes – sharing nudes and semi-nudes**

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](#).

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.**

It is important that everyone understands that whilst the sharing of nudes involving children is illegal, students should be encouraged and supported to talk to members of staff if they have made a mistake or had a problem in this area. The UKCIS guidance seeks to avoid unnecessary criminalisation of children.

The school DSL will 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 (see flow chart below from the UKCIS guidance) and next steps regarding liaising with parents and supporting pupils.



The following LGfL document (available at [nudes.lgfl.net](https://nudes.lgfl.net)) may also be helpful for DSLs in making their decision about whether to refer a concern about sharing of nudes:

**SAFEGUARDING QUESTION TIME**


**Q: WHEN SHOULD WE REFER NUDE SHARING?**  
**A: IMMEDIATELY \*IF\* THE IMAGE/VIDEO:**

- involves an adult
- is potentially coerced, blackmailed or groomed or concerns about capacity to consent
- might depict sexual acts unusual for their developmental stage or violent
- involves sexual acts / under 13s
- or the young person is at immediate risk of harm[...], suicidal or self-harming

Text simplified, taken from page 20 of 'Sharing Nudes and Semi-Nudes', UKCIS – search.gov.uk

*"We recommend DSLs read the entire UKCIS document; there is much more to know than this, and many helpful resources including training, scenarios and further guidance. Note also the one-pager for all staff!"*

**LGfL**  
SafeguardED



## Priority Areas

How to communicate online and who to speak to if something goes wrong.

Privacy with personal information including personal information including passwords.

How to share documents, pictures or messages safely.

Safer gaming.

## Online incidents

Online bullying (which may also be referred to as cyberbullying), including incidents that take place outside of school should be treated like any other form of bullying and the school bullying

policy should be followed. This includes issues arising from banter. Please see behaviour policy [here](#).

It is important to be aware that sometimes fights are being filmed, live streamed or shared online and fake profiles are 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](http://bullying.lgfl.net).

### **Child-on-child sexual violence and sexual harassment**

Any incident of sexual harassment or violence (online or offline) should be reported to the DSL who will follow the guidance in KCSIE. 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. This will be discussed in staff training.

<https://www.contextualsafeguarding.org.uk/resources/toolkit-overview/beyond-referrals-harmful-sexual-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, as well as to BYOD (bring your own device) policy.



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 staff code of conduct.

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.

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.

## Social media incidents

Social media incidents involving pupils are often safeguarding concerns and should be treated as such and staff should follow the [Safeguarding Policy](#). Other policies that govern these types of incidents are the school's Acceptable Use Policies.

Breaches will be dealt with in line with the school [Behaviour Policy](#) (for pupils) or code of conduct/handbook (for staff). See the social media section later in this document for rules and expectations of behaviour for children and adults in the Samuel Rhodes community.

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community (e.g. parent or visitor), Samuel Rhodes 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.

## CCTV

Please see the school CCTV Policy [here](#).

## Extremism

The school has obligations relating to radicalisation and all forms of extremism under the Prevent Duty (Safeguarding and Child Protection Policy).

Staff will not support or promote extremist organisations, messages or individuals, give them a voice or opportunity to visit the school, nor browse, download or send material that is considered offensive or of an extremist nature. We ask for parents' support in this also, especially relating to social media, where extremism and hate speech can be widespread on certain platforms.

## Data protection and cyber security

All pupils, staff, governors, volunteers, contractors and parents are bound by the school's [Data Protection Policy](#). It is important to remember that there is a close relationship between both data protection and cyber security and a school's ability to effectively safeguard children. Schools are reminded of this in KCSIE which also refers to the DfE Standards of Cyber Security for Schools and Colleges.

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 2024, "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

The designated safeguarding lead (DSL) Jenny Johns has lead responsibility for filtering and monitoring and works closely with WWCS to implement the DfE filtering and monitoring standards, which require schools 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.

We look to provide 'appropriate filtering and monitoring (as outlined in Keeping Children Safe in Education) at all times.

We ensure ALL STAFF are aware of filtering and monitoring systems and play their part in feeding back about areas of concern, potential for students to bypass systems and any potential overblocking. They can submit concerns at any point via CPOMs and will be asked for feedback at the time of the regular checks which will now take place.

Technical and safeguarding colleagues work together closely to carry out annual reviews and check and also to ensure that the school responds to issues and integrates with the curriculum.

We carry out half-termly checks to ensure all systems are in operation, functioning as expected, etc and an annual review as part of an online safety audit of strategy, approach etc. More details of both documents and results are available on request dependent on staff roles from.

Safe Search is enforced on any accessible search engines on all devices.

We recommend the use of Google as a search engine.

Our YouTube mode give teachers the ability to restrict all content on YouTube and then only approve content you want them to be able to see whether that be certain videos or content creators/searches.

During the past year, we have had difficulties using the LGFL monitoring system which has led to us buying into Netsweeper OnGuard to ensure we are monitoring internet usage and keeping our pupils safe.

Out of hours, our policies are:

Pupils do not have school devices at home

- for filtering devices, we still report any issues to WWCS
- for monitoring devices, we still get a daily email from Netsweeper.

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

The DSL checks filtering reports and notifications daily and takes any necessary action as a result.

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

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

At Samuel Rhodes School we use Netsweeper on all computers, Chromebooks and IPADs.

Jenny Johns and Cerys Normanton are sent alert emails daily and WWCS also support to check these alerts.

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

### **Authorised systems**

- Pupils at this school communicate with each other and with staff emails (however this is normally only during KS4 and KS5 during Computing lessons).
- Staff at this school use the email system provided by Outlook for all school emails. Staff can also use Arbor and Class Dojo to communicate with parents. 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.

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 or app with communication facilities or any child login or storing school/child data must be approved in advance by the school and centrally managed. Bernadette Napleton (Data Protection Officer) and Cerys Normanton (Headteacher) approve any new systems. They also share this information with the governors.

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 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/Headteacher/DPO (the particular

circumstances of the incident will determine whose remit this is) should be informed immediately.

### **Behaviour / usage principles of messaging/commenting systems**

- 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.
- Pupils and staff are allowed to use the email system for reasonable (not excessive, not during lessons) personal use but should be aware that all use is monitored, their emails may be read, and the same rules of appropriate behaviour apply at all times. 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).

### **Use of generative AI**

At Samuel Rhodes School, we acknowledge that generative AI platforms (e.g. ChatGPT or Bard for text creation or the use of Co-Pilot or Adobe Firefly to create images and videos) are becoming widespread. We are aware of and follow the [DfE's guidance](#) on this. In particular:

- We will talk about the use of these tools with pupils, staff and parents – their practical use as well as their ethical pros and cons.
- We are aware that there will be use of these apps and exposure to AI creations on devices at home for some students – these experiences may be both positive/creative and also negative (inappropriate data use, misinformation, bullying, deepfakes, undressing apps).
- The use of any generative AI in Exams, or to plagiarise and cheat is prohibited, and the [Behaviour Policy](#) will be used for any pupil found doing so.

- In school, we allow Staff to use Chat GPT however block general AI ‘bundle’ on the filter system. If staff want to do a different AI SLT will assess if they are appropriate on case-by case basis.

## 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. In Samuel Rhodes School this includes Office 365, CPOMs and Arbor.

For all these, it is important to consider data protection and cyber security before adopting such a platform or service and at all times when using it. Any new platforms will be approved by SLT.

## School website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. The Headteacher and Governors have delegated the day-to-day responsibility of updating the content of the website and ensuring compliance with DfE.

The website is hosted by Juniper Education.

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. If in doubt, check with Bernadette Napleton.

## Digital images and video

When a pupil/student joins the school, parents/carers are asked if they give consent for their child’s image to be captured in photographs or videos, for what purpose (beyond internal

assessment, which does not require express consent) and for how long. Parents answer as follows:

- For displays around the school
- For the newsletter
- For use in paper-based school marketing
- For online prospectus or websites
- For social media
- For a specific high-profile image for display or publication

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 Policy](#), which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. At Samuel Rhodes School no member of staff will ever use their personal phone to capture photos or videos of pupils.

Photos are stored in office 365 in line with the retention schedule of the school Data Protection Policy. [Bernadette Napleton and WWCS] is responsible for checking images/video on all school devices. Any concerns about the nature of these images will be reported to the DSL.

Staff and parents are reminded annually about the importance of not sharing images on social media or otherwise without permission, due to reasons of child protection (e.g. children who are looked after by the local authority may have restrictions in place 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**

Samuel Rhodes School 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](mailto: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.

Peter Flett is responsible for managing our Instagram account and senior leaders check our Wikipedia and Google reviews and other mentions online.

### **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 urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, the school 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 but the school regularly deals with issues arising on social media involving pupils/students 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.

However, the school 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/students 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](http://parentsafe.lgfl.net) and introduce the [Children's Commission Digital 5 A Day](#).

Although the school has an official Facebook / X-Twitter 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.

As outlined in the Acceptable Use Policies, pupils/students 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/students 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 student accounts.

\* Exceptions may be made, e.g. for pre-existing family links, but these must be approved by the Headteacher/Principal 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 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 considerable 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. Parents must **not** covertly film or make recordings of any interactions with pupils or adults in schools or near the school gates, nor share images of other people's children on social media as there may be cultural or legal reasons why this would be inappropriate or even dangerous (see [nofilming.lgfl.net](http://nofilming.lgfl.net) for more information). The school sometimes uses images/video of children for internal purposes such as recording attainment, but it will only do so publicly if parents have given consent on the relevant form.

## Device usage

AUPs 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 AUPs 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/students** are allowed to bring mobile phones in for emergency use only. When they arrive at school they must hand their phones in. Any attempt to use a phone in lessons without permission or to take illicit photographs or videos will be supported by the class team and SLT by having a restorative conversation and parents will be contacted. 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. Our approach to pupils using mobile phones is in line with DfE, [Mobile Phone Guidance](#)
- **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 of this document and the school data protection policy. 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.
- **Medical conditions** we have one pupil who has a medical condition and has a 1.1. adult supporting them. The phone can be used throughout the day to monitor the medical condition and communicate with parents.
- **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 headteacher should be sought (the headteacher may choose to delegate this) and this should be done in the presence of a member 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. Please see the Digital images and video section of this document for more information about filming and photography at school events. 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 AUPs, behaviour policy / staff code of conduct.

Wi-Fi is accessible to staff and visiting professionals for school-related internet use and limited personal use within the framework of the [Acceptable Use Policy](#). All such use is monitored.

School devices for staff or students 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

For school trips, teachers are allowed their own phones to use for any authorised or emergency communications with parents. Teachers will ensure that the number is hidden to avoid a parent or student accessing a teacher's private phone number. Any deviation from this policy will be notified immediately to the Headteacher. Pupils will keep their phones at school.

## Searching and confiscation

In line with the DfE guidance '[Searching, screening and confiscation: advice for schools](#)', the 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](#).

## Appendix – 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
- Headteacher/Principal
- Designated Safeguarding Lead
- Governing Body, led by Online Safety / Safeguarding Link Governor
- PSHE / RSHE Lead/s
- Computing Lead
- Subject / aspect leaders
- Network Manager/technician
- Data Protection Officer (DPO)
- Volunteers and contractors (including tutor)
- 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](#), the [code of conduct](#)/handbook and relevant parts of [Keeping Children Safe in Education](#) to support a whole-school safeguarding approach.

They must report any concerns, no matter how small, to the designated safety lead as named in the AUP, maintaining an awareness of current online safety issues (see the start of this document for issues in 2024) 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 DfE standards for filtering and monitoring and play their part in feeding back to the DSL about overblocking, gaps in provision or pupils bypassing protections.

All staff are also responsible for the physical monitoring of pupils' online devices during any session/class they are working within.

## Headteacher – Cerys Normanton

### 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 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](https://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 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](https://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 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]



safeguarding and technology work together. This will include a decision on relevant YouTube mode and preferred search engine/s etc. See page 19.

- 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 (e.g. RSHE), 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.
  - 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](https://kcsietranslate.lgfl.net) (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.
- 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](https://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](https://spotlight.lgfl.net) for a CPD resource to use with staff and [saferesources.lgfl.net](https://saferesources.lgfl.net) for further support].
- 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](https://onlinesafetyaudit.lgfl.net) ].
- Work with the headteacher, 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](https://safetraining.lgfl.net) and [prevent.lgfl.net](https://prevent.lgfl.net) ].
- Review and update this policy, other online safety documents (e.g. Acceptable Use Policies) 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 about online safety issues and legislation, be aware of local and school trends.
- Ensure that online safety education is embedded across the curriculum in line with the statutory RSHE guidance (e.g. by use of the updated UKCIS framework ‘[Education for a Connected World – 2020 edition](#)’) and beyond, in wider school life.
- 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](https://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**, both those engaged by the school as part of the DfE scheme who can be asked to sign the contractor AUP, [ template you can use at [safepolicies.lgfl.net](https://safepolicies.lgfl.net) with provisions ] and those hired by parents. [ share [the Online Tutors – Keeping Children Safe](#) poster at [parentsafe.lgfl.net](https://parentsafe.lgfl.net) to remind parents of key safeguarding principles ].

### **Governing Body, led by Online Safety / Safeguarding Link Governor – Alison Kahn**

#### **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 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](https://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](https://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 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 / RSHE Lead/s – Mary McKoy

### 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 latest 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.” [training is available at [safetraining.lgfl.net](https://safetraining.lgfl.net) ].
- 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](https://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 / RSHE.
- Note that an RSHE 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 Teacher- Nicola Cartwright

### 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 RSHE 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 RSHE curriculum, and model positive attitudes and approaches to staff and pupils alike.
- Consider how the UKCIS framework Education for a Connected World and Teaching Online Safety in Schools 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/other technical support roles – WWCS

### 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.
- Support safeguarding teams to understand and manage filtering and monitoring systems and carry out regular reviews and annual checks [e.g. [schoolprotect.lgfl.net](https://schoolprotect.lgfl.net) and [monitoring.lgfl.net](https://monitoring.lgfl.net). There is a free template available for filtering checks here-[safefiltering.lgfl.net](https://safefiltering.lgfl.net) ].
- Support DSLs and SLT to carry out an annual online safety audit as 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 DfE standards, 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](https://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 / RSHE 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.
- Ensure filtering and monitoring systems work on new devices and services before releasing them to students and staff.
- 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 is up to date, easy to follow and practicable [ Network managers/technicians at LGfL schools may want to ensure that you take advantage of the following solutions which are part of your package: Sophos Phish Threat, Sophos Intercept X Advanced, Sophos Intercept X Advanced for Server, ThreatDown Incident Response, Egress and Meraki Mobile Device Management. These solutions which are part of your package will help protect the network and users on it].
- Monitor the use of school technology, online platforms and social media presence and that any misuse/attempted misuse is identified and reported in line with school policy.
- Work with the Headteacher to ensure the school website meets statutory DfE requirements.

### **Data Protection Officer (DPO) – Bernadette Napleton**

#### **Key responsibilities:**

- Alongside those of other staff, provide data protection expertise and training and support the DP policy and compliance with those and legislation and ensure that the policy conforms 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, "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. You should check the requirements 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](#) (AUP).
- 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 AUP 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 Policy](#).

## Parents/carers

### Key responsibilities:

- Read, sign and adhere to the school’s parental [Acceptable Use Policy](#) (AUP), read the pupil AUP and encourage their children to follow it.