

# Garratt Park School 45. Online & Digital Safety Policy

| Staff<br>Responsible  | Committee                | l            | Review<br>date/term | Circulation           |
|-----------------------|--------------------------|--------------|---------------------|-----------------------|
| S Gladstone<br>L Ward | Curriculum<br>F, P and P | FGB: Nov '23 | Autumn 2025         | Staff file<br>Website |

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#### Appendix - Roles

All staff

Headteacher

Designated Safeguarding Lead

Safeguarding Link Governor

PSHE / RSHE Curriculum Lead

ICT Curriculum Lead

Curriculum leaders

ICT & Resource Manager

Data Protection Officer (DPO)

Volunteers and contractors (including tutor)

Students

Parents/carers

#### 1. Aims

Our school aims to:

- Have robust processes in place to ensure the online safety of students, staff, volunteers and governors
- Deliver an effective approach to online safety, which empowers us to protect and educate
  the whole school community in its use of technology, including mobile and smart
  technology (which we refer to as 'mobile phones')
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate **The 4 key categories of risk**

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

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

#### 2. Legislation and guidance

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

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

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

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

The policy also takes into account the National Curriculum computing programmes of study

#### 3. 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, students, 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 student, 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.

| Headteacher   | Sharon Gladstone                               |  |
|---|--|--|
| Designated Safeguarding Lead (DSL), with lead responsibility for filtering and monitoring | Laura Ward                                     |  |
| Deputy Designated Safeguarding Leads /  | Kaz Islam                                      |  |
| DSL Team Members  | (Daniel Hier,, Kevin Patterson, Vikkie Jane, ) |  |
| Link governor for safeguarding  | Shahib Uddin                                   |  |
|   |  |  |
| Curriculum leads with relevance to online   | George Michail - PSHE (RSHE) Lead              |  |
| safeguarding and their role [ e.g. PSHE/RSHE/RSE/Computing leads ]                        | Geoffrey Whyne - ICT Lead                      |  |
| ICT & Resource Manager  | Paul Jordan                                    |  |
|   |  |  |
| DPO   | Gary Hipple (Wandsworth)                       |  |
|   | (In School - Sharon Gladstone)                 |  |

#### 4. Context

#### **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. All of our students have SEND and many have an online presence. We understand that their special needs, including social and communication needs, ASD along with moderate learning difficulties can make them vulnerable to dangers online. In addition, they can find it difficult to express their concerns. Staff need to be particularly vigilant to comments and behaviours in relation to online behaviour and use the safeguarding procedures to alert the DSL to their concerns in a timely manner.

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 5 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 students 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 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 130,556 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 more and more older teenage boys being financially extorted after sharing intimate pictures online.

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 the ever 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 students and also spread defamatory allegations about staff, and also for students, including where these are used to bully others (sometimes even pretending to be one student to bully a second student).

#### 5. Educating students about online safety

It is important that schools establish a carefully sequenced curriculum for online safety that builds on what students 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 students navigate the online world safely and confidently regardless of the device, platform or app, <a href="Teaching Online Safety in Schools">Teaching Online Safety in Schools</a> 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 students, including vulnerable students – dedicated training around this with curriculum mapping for RSHE/PSHE and online safety leads is available at safetraining.lgfl.net

RSHE guidance also recommends schools assess teaching to "identify where students need extra support or intervention [through] tests, written assignments or self evaluations, to capture progress." 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 students)

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 students/students 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 students 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. <a href="mailto:saferesources.lgfl.net">saferesources.lgfl.net</a> has regularly updated theme-based resources, materials and signposting for teachers and parents.

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

Annual reviews of learning journeys and medium term teaching plans are used as an opportunity to follow this framework more closely in its key areas of Self-image and Identity, Online relationships, Online reputation, Online bullying, Managing online information, Health, Wellbeing and lifestyle, Privacy and security, and Copyright and ownership.

This is done within the context of an annual online safety audit, which is a collaborative effort led by the PSHE Lead and the ICT lead.

### As a special school it is important for us to ensure understanding and repeat aspects of the primary school curriculum.

#### By the **end of primary school**, students will know:

- That people sometimes behave differently online, including by pretending to be someone they are not
- That the same principles apply to online relationships as to face-to-face relationships, including the importance of respect for others online including when we are anonymous
- The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them
- How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met
- How information and data is shared and used online
- What sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know

#### In **Key Stage 3**, students will be taught 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 students in **Key Stage 4 and 5** will be taught:
- To understand how changes in technology affect safety, including new ways to protect their online privacy and identity
- How to report a range of concerns

#### By the end of secondary school, students will know:

• Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online

- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- How information and data is generated, collected, shared and used online
- How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours
- How people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)

The safe use of social media and the internet will be covered in:

- PSHE
- SMSC
- ICT & Computing
- PDP

Plus other subjects, where relevant.

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some students with SEND.

#### 6. Cyber-bullying

#### 6.1 Definition

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

#### 6.2 Preventing and addressing cyber-bullying

To help prevent cyber-bullying, we will ensure that students understand what it is and what to do if they become aware of it happening to them or others. We will ensure that students know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim. They are able to do this in person or by using the Sharp system.

The school will actively discuss cyber-bullying with students, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Both form tutors and class teachers will discuss cyber-bullying with their tutor and subject teaching groups.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate. This is also covered in our online programme 'Gooseberry

Planet' which students access with their tutor in SMSC.

All staff, governors and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support students, as part of safeguarding training (see section 11 for more detail).

The school also sends information/leaflets on cyber-bullying to parents so that they are aware of the signs, how to report it and how they can support children who may be affected.

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

The DSL will consider whether the incident should be reported to the police if it involves illegal material, and will work with external services if it is deemed necessary to do so.

#### 6.3 Examining electronic devices

School staff have the specific power under the Education and Inspections Act 2006 (which has been increased by the Education Act 2011) to search for and, if necessary, delete inappropriate images or files on students' electronic devices, including mobile phones, iPads and other tablet devices, where they believe there is a 'good reason' to do so.

When deciding whether there is a good reason to examine or erase data or files on an electronic device, staff must reasonably suspect that the data or file in question has been, or could be, used to:

- Cause harm, and/or
- Disrupt teaching, and/or
- Break any of the school rules

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL or other member of the senior leadership team to decide whether they should:

- Delete that material, or
- Retain it as evidence (of a criminal offence or a breach of school discipline), and/or • Report it to the police\*
- \* Staff may also confiscate devices for evidence to hand to the police, if a student discloses that they are being abused and that this abuse includes an online element.

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

- The DfE's latest guidance on screening, searching and confiscation
- UKCIS guidance on <u>sharing nudes and semi-nudes</u>: <u>advice for education settings working</u> with children and young people
- The school's COVID-19 risk assessment

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

#### 7. Handling Incidents and Concerns

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

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
- Anti-Bullying Policy
- Behaviour Policy (including school sanctions)
- Acceptable Use Policies
- Prevent Risk Assessment / Policy
- Data Protection Policy, agreements and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc)
- Cybersecurity

This school commits to take all reasonable precautions to ensure safeguarding students online, but recognises that incidents will occur both inside school and outside school (and that those from outside school will continue to impact students 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 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 (you may want to display a poster with details of this / other helplines in the staff room – see <u>posters.lgfl.net</u> and <u>reporting.lgfl.net</u>).

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 2022 provides advice and related legal duties including support for students 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 students 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.

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

Clear and well communicated rules and procedures are essential to govern student 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 students 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 students 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 students and staff of this increased scrutiny at the start of the year.

#### 9. Social media incidents

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

Breaches will be dealt with in line with the school behaviour policy (for students) or code of conduct (for staff).

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community, Garratt Park School 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.

#### 10. Data protection and cybersecurity

All students, staff, governors, volunteers, contractors and parents are bound by the school's data protection and cybersecurity policy which can be found here. 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."

#### 17. Appropriate filtering and monitoring

Keeping Children Safe in Education has long asked schools to ensure "appropriate" webfiltering 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).

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 students to bypass systems and any potential overblocking. They can submit concerns at any point via the usual safeguarding procedures (CPOMS, and/or in person for emergency concerns 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 AUPs 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 <a href="https://safefiltering.lgfl.net">https://safefiltering.lgfl.net</a> and training is provided for all staff / safeguarding teams / technical teams as appropriate.

#### At Garratt Park School

- web filtering is provided by London Grid For Learning (LGFL) AdEPT Managed Firewall. on school site and for school devices used in the home
- changes can be made by Paul Jordan (onsite), Gary Hipple, Daren Marsh, Debbie Emmons,
   Shalu Gujral, John Gray, Trevor Hatley, Carlos Cox and Gavin Clark (Wandsworth IT)
- overall responsibility is held by the DSL with support from DDSL
- technical support and advice, setup and configuration are from Paul Jordan & Wandsworth IT team listed above.
- regular checks are made half termly by the IT Manager to ensure filtering is still active and functioning everywhere. LGFL would notify all nominated contacts(Paul Jordan & Wandsworth IT team) should there be any issue with the firewall or other service.
- an annual review is carried out using <u>onlinesafetyaudit.lgfl.net</u>]
- 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:
  - 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 Garratt Park School we use

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

Authorised systems

- students at this school communicate with each other and with staff using Gmail, Google classroom
- Staff at this school use the email system provided by Gmail 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.

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, students 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 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.

#### 12. 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 stipulations to Paul Jordan, ICT & Resource Manager.

The site is hosted by Greenhouse School Websites

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 Paul Jordan, ICT & Resource Manager.

#### 13. Digital images and video

When a 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 non-photo consent list before using it for any purpose.

Any students 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 students, and where these are stored. Staff will not use technology in school to view material that is illegal, inappropriate or likely to be deemed offensive. This includes, but is not limited to, sending obscene emails, gambling and viewing pornography or other inappropriate content.

If a member of staff uses a device, with permission, to photograph or record a student activity, this should be uploaded as soon as possible to the school system and deleted from the device in the

presence of your line manager or IT manager. The member of staff should not retain images or recordings overnight.

We have the right to monitor emails and internet use on the school IT system.

The School has strict rules of the taking and use of images which are contained within the School's Safeguarding Policy. All members of staff should have regard to these rules. Under no circumstances should members of staff use their personal equipment to take images of students at, or on behalf of, the School or display or distribute images of students except as authorised by their Line Manager or Senior Leadership Team and with appropriate consent.

We have the right to monitor emails and internet use on the school IT system.

Photos are stored on Google Drive (Google Workspace for Education) or the schools local network drive in line with the retention schedule of the school Data Protection Policy.

Staff are reminded annually 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).

Students 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

Students 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.

Students 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.

#### 14. Social Media

Our SM presence

Garratt Park 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: <a href="https://helpline@saferinternet.org.uk">helpline@saferinternet.org.uk</a>) 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. Paul Jordan,

ICT & Resource Manager is responsible for managing our X-Twitter and checking our Wikipedia and Google reviews and other mentions online.

#### Staff, students' 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 students 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 school complaints procedure should be followed. Sharing complaints on social media is unlikely to help resolve the matter, but can cause upset to staff, students and parents, also undermining staff morale and the reputation of the school (which is important for the students 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 students/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. It is worth noting that Online Harms regulation is likely to require more stringent age verification measures over the coming years.

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 students/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). We refer to the <u>Digital Family Agreement</u> to help establish shared expectations and the <u>Top Tips for Parents</u> poster along with relevant items and support available from <u>parentsafe.lgfl.net</u> and introduce the <u>Children's Commission Digital 5 A Day</u>.

Although the school has an official 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. 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.

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, and should be declared upon entry of the student 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 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 Policies (AUPs) which all members of the school community have signed are also relevant to social media activity, as is the school's Data Protection Policy.

#### 15. 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)

- Students are not allowed to bring mobile phones onto school site. All mobile phones and
  devices with internet access should be handed in to reception on arrival to school, where
  they are stored safely and collected on leaving the site. Any attempt to use a phone in
  school will be actioned according to the Behaviour Policy. 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 students 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 of this document and the school data protection cybersecurity policies.

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 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. When at school events, please refer to the Digital images and video section of this document on page. Parents are asked not to call students on their mobile phones during the school day; urgent messages can be passed via the school office.

#### Use of school devices

Staff and students 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.

We have a guest Wifi network which is accessible to all staff and visitors who would like to work whilst using their own devices (BYOD), or for school-related internet use / limited personal use within the framework of the acceptable use policy.

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/events away from school, teachers will be issued a school duty phone and this number used for any authorised or emergency communications with students/students and parents. Any deviation from this policy (e.g. by mistake or because the school phone will not work) will be notified immediately to the Headteacher. 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.

#### 16. Searching and confiscation

In line with the DfE guidance 'Searching, screening and confiscation: advice for schools', the Headteacher/Principal and staff authorised by them have a statutory power to search students/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 and Responsibilities

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)
- students
- 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 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 AUP, 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 students bypassing protections.

#### Headteacher/Principal - Sharon Gladstone

#### 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)
- 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
- 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.
  - o 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 students in the home and remote-learning procedures, rules and safeguards
- 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 students, including risk of children being radicalised
- Ensure the school website meets statutory requirements

## Designated Safeguarding Lead / Online Safety Lead – Laura Ward (supported by DDSL, Kaz Islam)

**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.
- 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 students 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
  - o all staff must read KCSIE Part 1 and all those working with children also Annex B translations are available in 13 community languages at <a href="kcsietranslate.lgfl.net">kcsietranslate.lgfl.net</a> (B the condensed Annex A can be provided instead to staff who do not directly work with children if this is better)
  - o cascade knowledge of risks and opportunities throughout the organisation
  - o safecpd.lqfl.net has helpful CPD materials including PowerPoints, videos and more
- Ensure that ALL governors and trustees 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
- 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
- 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)
- 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 <u>safetraining.lqfl.net</u> and <u>prevent.lqfl.net</u>
- 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/trustees.
- Receive regular updates in online-safety issues and legislation, be aware of local and school trends – see <u>safeblog.lgfl.net</u> for examples or sign up to the <u>LGfL safeguarding newsletter</u>
- 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 <u>parentsafe.lgfl.net</u>
- Communicate regularly with SLT and the safeguarding governors 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 students to disclose issues when off site, especially when in isolation/quarantine, e.g. a <u>survey to</u>

| • | facilitate disclosures and an online form on the school home page about 'something the 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-chabuse, and don't dismiss it as banter (including bullying). |  |  |
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