


THE PRIORY PRIMARY ACADEMY TRUST	DATE AGREED	April 2024
POLICY AND PROCEDURE STATEMENT	REVISION DATE	April 2025
 <b>The Priory Primary School</b>		
<b>Online Safety Policy</b>		
HEAD TEACHER	MATT WALSH	
CHAIR OF GOVERNORS	PRUBIE SAHOTA	

## Edits and Changes

April 2024	<ul style="list-style-type: none"> <li>Added section 6.4 on Artificial Intelligence (AI)</li> </ul>

## Contents

1. Aims	3
2. Legislation and guidance	3
3. Roles and responsibilities	4
4. Educating pupils about online safety	5
5. Educating parents about online safety	6
6. Cyber-bullying	6
7. Acceptable use of the internet in school	7
8. Pupils using mobile devices in school	7
9. Staff using work devices outside school	7
10. How the school will respond to issues of misuse	8
11. Training	8
12. Monitoring arrangements	8
13. Links with other policies	8
Appendix 1: acceptable use agreement (pupils and parents/carers)	9
Appendix 2: acceptable use agreement (staff, governors, volunteers and visitors)	10
Appendix 3: online safety training needs – self-audit for staff	11
Appendix 4: online safety incident report log	12

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## 1. Aims

Our school aims to:

- Have robust processes in place to ensure the online safety of pupils, 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
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

## 2. Legislation and guidance

This policy is based on the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and its advice for schools on [preventing and tackling bullying](#) and [searching, screening and confiscation](#). It also refers to the Department's guidance on [protecting children from radicalisation](#).

It reflects existing legislation, including but not limited to the [Education Act 1996](#) (as amended), the [Education and Inspections Act 2006](#) and the [Equality Act 2010](#). In addition, it reflects the [Education Act 2011](#), which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on pupils' 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](#).

This policy complies with our funding agreement and articles of association.

This policy refers to, and complies with, the following legislation and guidance:

- [Data Protection Act 2018](#)
- [The General Data Protection Regulation](#)
- [Computer Misuse Act 1990](#)
- [Human Rights Act 1998](#)
- [The Telecommunications \(Lawful Business Practice\) \(Interception of Communications\) Regulations 2000](#)
- [Education Act 2011](#)
- [Freedom of Information Act 2000](#)
- [The Education and Inspections Act 2006](#)
- [Keeping Children Safe in Education 2021](#)
- [Searching, screening and confiscation: advice for schools](#)
- [National Cyber Security Centre \(NCSC\)](#)
- [Education and Training \(Welfare of Children Act\) 2021](#)

## 3. Roles and responsibilities

### 3.1 The governing board

The governing board has overall responsibility for monitoring this policy and holding the headteacher to account for its implementation.

The governing board will make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.

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

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

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

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

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

The governor who oversees online safety is Prubie Sahota

All governors will:

Ensure they have read and understand this policy

Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet (appendix 3)

Ensure that online safety is a running and interrelated theme while devising and implementing their whole-school or college approach to safeguarding and related policies and/or procedures

Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable

### 3.2 The headteacher

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

### **3.3 The designated safeguarding lead**

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

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

- Supporting the headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school
- Working with the headteacher and governing board to review this policy annually and ensure the procedures and implementation are updated and reviewed regularly
- Taking the lead on understanding the filtering and monitoring systems and processes in place on school devices and school networks
- Working with the ICT manager to make sure the appropriate systems and processes are in place
- Working with the headteacher, ICT manager and other staff, as necessary, to address any online safety issues or incidents
- Managing all online safety issues and incidents in line with the school's child protection policy
- Ensuring that any online safety incidents are logged (see appendix 4) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety (appendix 4 contains a self-audit for staff on online safety training needs)
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the headteacher and/or governing board
- Undertaking annual risk assessments that consider and reflect the risks children face
- Providing regular safeguarding and child protection updates, including online safety, to all staff, at least annually, in order to continue to provide them with relevant skills and knowledge to safeguard effectively

This list is not intended to be exhaustive.

### **3.4 External (offsite) IT Management Company (SchoolCare)**

Will be responsible for:

- Putting in place appropriate filtering and monitoring systems, which are updated on a regular basis and keep pupils safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
- Ensuring that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring the school's ICT systems on a monthly basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are logged (see appendix 4) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

### **3.5 All staff and volunteers**

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

- Maintaining an understanding of this policy

- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet (appendix 2), and ensuring that pupils follow the school's terms on acceptable use (appendix 1)
- Working with the DSL to ensure that any online safety incidents are logged (see appendix 4) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

### 3.6 Parents

Parents are expected to:

- Notify a member of staff or the headteacher of any concerns or queries regarding this policy
- Ensure their child has read, understood and agreed to the terms on acceptable use of the school's ICT systems and internet (appendix 1)

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

- What are the issues?, UK Safer Internet Centre: <https://www.saferinternet.org.uk/advice-centre/parents-and-carers/what-are-issues>
- Hot topics, Childnet International: <http://www.childnet.com/parents-and-carers/hot-topics>
- Parent factsheet, Childnet International: <http://www.childnet.com/ufiles/parents-factsheet-09-17.pdf>

### 3.7 Visitors and members of the community

Visitors and members of the community who use the school's ICT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use (appendix 2).

## 4. Educating pupils about online safety

Pupils will be taught about online safety as part of the curriculum.

In **Key Stage 1**, pupils will be taught to:

- Use technology safely and respectfully, keeping personal information private
- Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies

Pupils in **Key Stage 2** will be taught to:

- Use technology safely, respectfully and responsibly
- Recognise acceptable and unacceptable behaviour
- Identify a range of ways to report concerns about content and contact

The safe use of social media and the internet will also be covered in other subjects where relevant.

The school will use assemblies to raise pupils' awareness of the dangers that can be encountered online and may also invite speakers to talk to pupils about this.

## 5. Educating parents about online safety

The school's DSL will raise parents' awareness of internet safety in letters or other communications home, and in information via our our safeguarding newsletter and online. This policy will also be shared with parents.

The school will let parents/carers know what systems the school uses to filter and monitor online use.

The school will tell parents/carers what their children are being asked to do online (e.g. sites they need to visit or who they'll be interacting with online).

Online safety will also be covered during parents' evenings.

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

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

## **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 pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The school will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Class teachers will discuss cyber-bullying with their classes, and the issue will be addressed in assemblies.

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.

All staff, governors receive training on cyber-bullying, its impact and ways to support pupils, 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 pupils, 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**

The headteacher, and DSL, can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or pupils, and/or

- Is identified in the school rules as a banned item for which a search can be carried out, and/or

- Is evidence in relation to an offence

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

- Make an assessment of how urgent the search is, and consider the risk to other pupils and staff. If the search is not urgent, they will seek advice from the headteacher / DSL

Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it

Seek the pupil's co-operation

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

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

Cause harm, and/or

Undermine the safe environment of the school or disrupt teaching, and/or

Commit an offence

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

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

They reasonably suspect that its continued existence is likely to cause harm to any person, and/or

The pupil and/or the parent/carer refuses to delete the material themselves

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

Not view the image

Confiscate the device and report the incident to the DSL (or equivalent) immediately, who will decide what to do next. The DSL will make the decision in line with the DfE's latest guidance on screening, searching and confiscation and the UK Council for Internet Safety (UKCIS) guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people

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

The DfE's latest guidance on searching, screening and confiscation

UKCIS guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people

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

## **6.4 Artificial intelligence (AI)**

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

The Priory School recognises that AI has many uses to help pupils learn, but may also have the potential to be used to bully others. For example, in the form of 'deepfakes', where AI is used to create images, audio or

video hoaxes that look real. This includes deepfake pornography: pornographic content created using AI to include someone's likeness.

We will treat any use of AI to bully pupils in line with our anti-bullying and behaviour policies.

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

## **7. Acceptable use of the internet in school**

***Refer to the ICT and Internet Acceptable Use Policy.***

All pupils, parents, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of the school's ICT systems and the internet (appendices 1 and 2). Visitors will be expected to read and agree to the school's terms on acceptable use if relevant.

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

We will monitor the websites visited by pupils, staff, volunteers, governors and visitors (where relevant) to ensure they comply with the above.

More information is set out in the acceptable use agreements in appendices 1 and 2.

## **8. Pupils using mobile devices in school**

***Refer to the Mobile Phone / Personal Device Policy.***

Pupils may bring mobile devices into school, but are not permitted to use them during:

- Lessons
- Break/lunch time
- Clubs before or after school, or any other activities organised by the school

Any use of mobile devices in school by pupils must be in line with the acceptable use agreement (see appendix 1).

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

## **9. Staff using work devices outside school**

Staff members using a work device outside school must not install any unauthorised software on the device and must not use the device in any way which would violate the school's terms of acceptable use, as set out in appendix 2.

Staff must ensure that their work device is secure and password-protected, and that they do not share their password with others. They must take all reasonable steps to ensure the security of their work device when using it outside school. Any USB devices containing data relating to the school must be encrypted.

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

Work devices must be used solely for work activities.



## **10. How the school will respond to issues of misuse**

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

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

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

## **11. Training**

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

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

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

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

Volunteers will receive appropriate training and updates, if applicable.

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

## **12. Monitoring arrangements**

The DSL logs behaviour and safeguarding issues related to online safety. An incident report log can be found in appendix 4.

This policy will be reviewed annually by the Headteacher. At every review, the policy will be shared with the governing board.

## **13. Links with other policies**

This online safety policy is linked to our:

- Child protection and safeguarding policy
- Behaviour policy
- Staff disciplinary procedures
- Data protection policy and privacy notices
- Complaints procedure
- Mobile Phone and Devices Policy
- VR Policy
- ICT Acceptable Use Policy



## Appendix 1: acceptable use agreement (pupils and parents/carers)



### Acceptable use of the school's ICT facilities and internet: agreement for pupils and parents/carers

**Name of pupil:**

**When I use the school's ICT facilities (like computers and equipment) and get on the internet in school, I will not:**

- Use them without asking a teacher first, or without a teacher in the room with me
- Use them to break school rules
- Go on any inappropriate websites
- Go on any social networking sites (unless my teacher said I could as part of a lesson)
- Use chat rooms
- Open any attachments in emails, or click any links in emails, without checking with a teacher first
- Use mean or rude language when talking to other people online or in emails
- Share my password with others or log in using someone else's name or password
- Bully other people

I understand that the school will check the websites I visit and how I use the school's computers and equipment. This is so that they can help keep me safe and make sure I'm following the rules.

I will tell a teacher or a member of staff I know immediately if I find anything on a school computer or online that upsets me, or that I know is mean or wrong.

I will always be responsible when I use the school's ICT systems and internet.

I understand that the school can discipline me if I do certain unacceptable things online, even if I'm not in school when I do them.

**Signed (pupil):**

**Date:**

**Parent/carer agreement:** I agree that my child can use the school's ICT systems and internet when appropriately supervised by a member of school staff. I agree to the conditions set out above for pupils using the school's ICT systems and internet, and for using personal electronic devices in school, and will make sure my child understands these.

**Signed (parent/carer):**

**Date:**



## Appendix 2: acceptable use agreement (staff, governors, volunteers and visitors)

### Acceptable use of the school's ICT facilities and the internet: agreement for staff, governors, volunteers and visitors

Name of staff member/governor/volunteer/visitor:

When using the school's ICT facilities and accessing the internet in school, or outside school on a work device, I will not:

- Access, or attempt to access inappropriate material, including but not limited to material of a violent, criminal or pornographic nature (or create, share, link to or send such material)
- Use them in any way which could harm the school's reputation
- Access social networking sites or chat rooms
- Use any improper language when communicating online, including in emails or other messaging services
- Install any unauthorised software, or connect unauthorised hardware or devices to the school's network
- Share my password with others or log in to the school's network using someone else's details
- Share confidential information about the school, its pupils or staff, or other members of the community
- Access, modify or share data I'm not authorised to access, modify or share
- Promote private businesses, unless that business is directly related to the school

**Social Media:**

- No reference should be made in social media to pupils, parents /carers or school staff
- Do not engage in online discussion on personal matters relating to members of the school community
- Personal opinions should not be attributed to the school

I will only use the school's ICT systems and access the internet in school, or outside school on a work device, for educational purposes or for the purpose of fulfilling the duties of my role.

I agree that the school will monitor the websites I visit.

I will take all reasonable steps to ensure that work devices are secure and password-protected when using them outside school, and keep all data securely stored in accordance with this policy and the school's data protection policy.

I will let the designated safeguarding lead (DSL) and ICT manager know if a pupil informs me they have found any material which might upset, distress or harm them or others, and will also do so if I encounter any such material.

I will always use the school's ICT systems and internet responsibly, and ensure that pupils in my care do so too.

Signed (staff member/governor/volunteer/visitor):

Date:

### Appendix 3: online safety training needs – self-audit for staff

Online safety training needs audit	
<b>Name of staff member/volunteer:</b>	<b>Date:</b>
Do you know the name of the person who has lead responsibility for online safety in school?	
Do you know what you must do if a pupil approaches you with a concern or issue?	
Are you familiar with the school's acceptable use agreement for staff, volunteers, governors and visitors?	
Are you familiar with the school's acceptable use agreement for pupils and parents?	
Do you regularly change your password for accessing the school's ICT systems?	
Are you familiar with the school's approach to tackling cyber-bullying?	
Are there any areas of online safety in which you would like training/further training? Please record them here.	

