

ONLINE SAFETY POLICY

REVIEWED 17TH JULY 2025 RATIFIED 8TH SEPTEMBER 2025

REGULATIONS PART 3: Welfare, Health and safety.

TO BE READ IN CONJUNCTION WITH:

Child Protection and Safeguarding Policy, Cyber Security Policy, Data Protection Policy, Searching, Screening and Confiscation Policy

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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 (DfE's) statutory guidance Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023), the Maintained schools governance guide and Academy trust governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

- > Teaching online safety in schools
- Preventing and tackling bullying and cyber-bullying: advice for Head of Schools and school staff
- > Searching, screening and confiscation
- ➤ Online Safety Act 2023

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the **Serious** Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

Schedule 4 of the **Safeguarding Vulnerable Groups Act 2006**, which defines what 'regulated activity' is in relation to children

Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination

All schools with children under the age of 8 years old - The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children

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

3. Roles and responsibilities

3.1 The Proprietorial board

The Proprietorial board has overall responsibility for monitoring this policy and holding the Executive Team and Head of School to account for its implementation.

The Proprietorial Board will co-ordinate regular meetings with the Executive Team and Head of School to discuss online safety and monitor online safety logs as provided by the designated safeguarding lead (DSL).

All of the Proprietorial Board will:

- Ensure that they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the school's IT systems and the internet

3.2 The Head of School

The Head of School 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 DSL and deputy DSL 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:

- Ensuring that staff understand this policy and that it is being implemented consistently throughout the school
- Working to address any online safety issues or incidents
- Ensuring that any online safety incidents are logged 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
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the Head of School and/or critical friends.

This list is not intended to be exhaustive.

The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- > Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- ➤ Have a good understanding of harmful sexual behaviour
- ➤ Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also:

- ➤ Keep the head of school informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- ➤ Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- ➤ Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The Overarching Framework.

The school's approach to safeguarding pupils from potentially harmful and inappropriate online material is framed around four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide,anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: 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; for example, making, sending and receiving explicit images(e.g consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **commerce** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

It is recognised that an increasing number of pupils own or have access to internet enabled devices and their exposure to the internet and social media platforms brings significant risks. This risk can be from people they know (including close/intimate relationships) and people they think they know but who have adopted fake profiles and are seeking to groom children for purposes of abuse and/or exploitation. Online safety, in terms of staff awareness and educating children to remain safe whilst on-line as well as off-line, is at the core of our safeguarding commitment.

See: Useful resources below

3.3 The IT manager

The IT manager is 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 IT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring the school's IT systems on a regular basis
- ➤ Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files

This list is not intended to be exhaustive.

3.4 All staff

All staff, including contractors, 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 IT systems and the internet, and ensuring that pupils follow the school's terms on acceptable use
- ➤ Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

This list is not intended to be exhaustive.

3.5 Parents

Parents are expected to:

- Notify a member of staff or the Head of School 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 IT systems and internet

Parents can seek further guidance on keeping children safe online from the following organisations and websites (see also resources section):

- What are the issues? **UK Safer Internet Centre**
- Hot topics Childnet International
- Parent factsheet Childnet International

3.6 Visitors and members of the community

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

4. Educating pupils about online safety

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

In EYFS and 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

Pupils in **Key Stage 3**, pupils 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

Pupils in **Key Stage 4** 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

Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK

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 will raise parents' awareness of internet safety in letters or other communications home, and in information via our social media channel. This policy will also be available for parents on request. Online safety will also be covered during IEP visits when appropriate.

If parents have any queries or concerns in relation to online safety, these should be raised in the first instance with the Head of School.

Concerns or queries about this policy can be raised with the Head of School.

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.)

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors

Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

Set clear guidelines for the use of mobile phones for the whole school community

Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

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.

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 receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training

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.

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

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 pupils' electronic devices, including mobile phones, iPads and other tablet devices, where they believe there is a 'good reason' to do so. This should not be done without proper consultation with the DSL. 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:

Retain it as evidence (of a criminal offence or a breach of school discipline), and/or Report it to the Police

Any searching of pupils will be carried out in line with the DfE's current guidance on screening, searching and confiscation.

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

7. Acceptable use of the internet in school

All pupils and staff are expected to sign an agreement regarding the acceptable use of the school's IT systems and the internet. Visitors will be expected to read and agree to the school's terms on acceptable use if relevant.

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

We will monitor the websites visited by pupils and staff to ensure they comply with the above.

8. 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.

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. No USB devices should to be used unless approved by the Head of School, only use encrypted removable media where possible and keep this securely stored.

If staff have any concerns over the security of their device, they must seek advice from the IT manager. Work devices must be used solely for work activities.

Requirements around the use of school-owned devices can be found in the school's Device User Agreement.

8.1 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 Gemini.

The Hopedale group recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

The Hopedale group will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying/behaviour policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

9. Training

- All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation and filtering & monitoring.
- 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 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.
- More information about safeguarding training is set out in our Child Protection and Safeguarding Policy.

10. Filtering and Monitoring Systems

- We actively promote monitoring at the first level within the classroom. Pupils are closely supervised when accessing the Internet and the carousel system of teaching ensures there are regular check-ins when working independently.
- All devices within the school connect to our WAN which is provided and managed by Evolving Networks. The network firewall and filtering system is a product called Fortinet and is hosted by independent school specialist MSPLab. Our school network uses Office 365 and Entra for user authentication. Microsoft Defender is present on all Windows devices which adds another layer of security and filtering when those devices are off-site (staff devices).
- Securly Filter is used across all schools for students to provide real-time reporting and alerts to
 IT staff, Group DSL and HOS. Securly Filter is integrated into our Office 365 platform and
 policies can be applied to any group or user. Securly Aware is a product that monitors our Office
 365 platform, apps such as E-Mail, Teams and On Drive (files). AI is used to review all these
 areas and will place any concerns into a relevant category such as self-harm, bullying, violence, or
 nudity. Stakeholders are notified immediately of any concerns.
- The IT manager meets with the Group DSL weekly to discuss and review any concerns. Biweekly meetings between the IT Manager, Group DSL and Heads of School allow feedback and updates regarding filtering issues or concerns. Any issues within the school are raised as a discussion with SLT, an incident report or a cause for concern.
- Termly filter tests are conducted alongside constant filter list management following any incident. Annual Filtering & Monitoring reviews are conducted by the IT Manager, Group DSL, Group Operations Manager and a member of the Proprietorial Body
- Our internet filtering provider is a member of the Internet Watch Foundation (IWF), signed up to Counter-Terrorism Internet Referral Unit list (CTIRU) and blocks access to illegal content

including child sexual abuse material (CSAM). A thorough annual filter test is conducted alongside constant filter list management following any incident.

Evolving Networks

https://www.evolvingnetworks.net.uk/

MSPLab

https://www.msplab.cloud/

Useful Resources:

Keeping children safe in education 2024

Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)

UK Safer Internet Centre | SWGfL

Online safety resources for schools and organisations | NSPCC Learning

https://www.childnet.com/

https://www.bullying.co.uk/cyberbullying/

https://www.ceop.police.uk/safety-centre/

https://www.gov.uk/government/publications/teaching-online-safety-in-schools