Holy Trinity CE Primary Academy and Nursery

E-Safety Policy

Date Approved: October 2022

Date to be Reviewed: October 2023

Approved By:

Liz Holmes - Executive Principal Mrs E Holmes Date: 15th October 2022

Chris Harris - Chair of Local Academy Committee Date: 15th October 2023

Approved by:	**Date:**
Last reviewed on:	
Next review due by:	

Contents

1. Aims

Our academy aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and LAC members
- Deliver an effective approach to online safety, which empowers us to protect and educate the whole academy 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, antisemitism, 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 scams

2. Legislation and guidance

This policy is based on the Department for Education's (DfE's) 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 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.

3. Roles and responsibilities

3.1 The LAC and the Trust

The Trust board has overall responsibility for monitoring this policy (under our scheme of delegation the LAC members will undertake this on the Trusts behalf as needed) and holding the Executive Principal to account for its implementation.

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

All LAC members will:

- Ensure that they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the academy's ICT systems and the internet (appendix 3)
- Ensure that online safety is a running and interrelated theme while devising and implementing their whole academy approach to safeguarding and related policies and 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 Executive Principal

The Executive Principal is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school. The day to day managing of this will be delegated to the Head of School (who is also DSL).

3.3 The designated safeguarding lead

Details of the academy's designated safeguarding lead (DSL) and DDSLs 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 the academy, in particular:

- Supporting the Executive Principal in ensuring that staff understand this policy and that it is being implemented consistently throughout the school

- Working with the Executive Principal, 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 academy's safeguarding and child protection policy
- Ensuring that any online safety incidents are logged (see appendix 5) 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 academy 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 the academy to the Executive Principal and the Trust (represented by the LAC members)

This list is not intended to be exhaustive.

3.4 Head of School supported by the ICT technician

The ICT manager is responsible for:

- Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems, which are reviewed and updated on a regular basis to assess effectiveness and ensure pupils are kept 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 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the academy's behaviour policy

This list is not intended to be exhaustive.

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 academy's ICT systems and the internet (appendix 3), and ensuring that pupils follow the school's terms on acceptable use (appendices 1 and 2)
- Working with the DSL to ensure that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the academy behaviour policy
- Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline and maintaining an attitude of 'it could happen here'

This list is not intended to be exhaustive.

3.6 Parents

Parents are expected to:

- Notify a member of staff, Head of School or Executive Principal 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 (appendices 1 and 2)

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

- What are the issues? – UK Safer Internet Centre
- Hot topics – Childnet International
- Parent resource sheet – Childnet International
- The academy's website also includes useful links and information

3.7 Visitors and members of the community

Visitors and members of the community who use the academy'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 3).

4. Educating pupils about online safety

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

The text below is taken from the National Curriculum computing programmes of study.

It is also taken from the guidance on relationships education, relationships and sex education (RSE) and health education.

All schools and academies have to teach:

- Relationships education and health education in primary schools

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

By the **end of primary school**, pupils 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

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

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

5. Educating parents about online safety

The academy will raise parents' awareness of internet safety in letters or other communications home, parents' information sessions and in information via our website. This policy will also be shared with parents.

The academy will let parents know:

- What systems the academy uses to filter and monitor online use
- What their children are being asked to do online, including the sites they will be asked to access and who from the academy (if anyone) their child will be interacting with online

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, the Head of School or Executive Principal.

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 1 person or group by another person or group, where the relationship involves an imbalance of power. (See also the academy 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 academy 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. The curriculum already includes teaching about cyber-bullying in our personal, social, health and economic (PSHE) education, and opportunities may be used in other subjects where appropriate.

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

The academy also sends information 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 academy will follow the processes set out in the academy behaviour policy. Where illegal, inappropriate or harmful material has been spread among pupils, the academy will use all reasonable endeavours to ensure the incident is contained.

The DSL will report the incident and provide the relevant material to the police as soon as is reasonably practicable, if they have reasonable grounds to suspect that possessing that material is illegal. They will also work with external services if it is deemed necessary to do so.

6.3 Examining electronic devices

The Executive Principal, head of School, and any member of staff authorised to do so by the executive Principal, 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 academy 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 Head of School / DSL or Assistant Principal
- 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 cooperation

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 staff member,in conjunction with the DSL, Head of School or other member of the senior leadership team 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 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
- Our behaviour policy

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

7. Acceptable use of the internet in school

All pupils, parents, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of the academy's ICT systems and the internet (appendices 1 to 3). Visitors will be expected to read and agree to the academy's terms on acceptable use if relevant.

Use of the academy'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 to 3.

8. Pupils using mobile devices in school

Pupils may only bring mobile devices into the academy with prior agreement from the Head of School (some pupils in Y5 and 6 whose parents have requested that they walk to and from the academy unaccompanied need to bring mobile phones into the academy for use at these times. They must hand their device to their teacher at the start of the day who will lock the devices away securely. The teacher will return the device to the child at the end of the day. They are not be permitted to use them during the academy day.

Any use of mobile devices by pupils must be in line with the acceptable use agreement (see appendices 1 and 2).

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

9. Staff using work devices outside school

All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- Keeping the device password-protected – strong passwords are at least 8 characters, with a combination of upper and lower-case letters, numbers and special characters (e.g. asterisk or currency symbol)
- Passwords must be changed at least every half term
- Not using any external hard drives
- Making sure the device locks if left inactive for a period of time
- Not sharing the device among family or friends
- Ensuring the installed anti-virus and anti-spyware software are active
- Keeping operating systems up to date by always installing the latest updates

Staff members must not use the device in any way which would violate the academy's terms of acceptable use, as set out in appendix 3.

Work devices must be used solely for work activities.

If staff have any concerns over the security of their device, they must seek advice the Head of School who will in turn contact the ICT technicians for further advice and support

10. How the academy will respond to issues of misuse

Where a pupil misuses the academy's ICT systems or internet, we will follow the procedures set out in our procedures on acceptable use. 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 academy'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 code of

conduct and disciplinary procedures. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The academy 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 of online radicalisation.

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).

By way of this training, all staff will be made aware that:

- Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse
- Children can abuse their peers online through:
    - Abusive, harassing, and misogynistic messages
    - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
    - Sharing of abusive images and pornography, to those who don't want to receive such content
- Physical abuse, sexual violence and initiation/hazing type violence can all contain an online element

Training will also help staff:

- Develop better awareness to assist in spotting the signs and symptoms of online abuse
- Develop the ability to ensure pupils can recognise dangers and risks in online activity and can weigh up the risks
- Develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term

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.

LAC members 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 5.

This policy will be reviewed every year by the Executive Principal. At every review, the policy will be shared with the LAC members. The review (such as the one available here) will be supported by an annual risk assessment that considers and reflects the risks pupils face online. This is important because technology, and the risks and harms related to it, evolve and change rapidly.

13. Links with other policies

This online safety policy is linked to our:

- Child protection and safeguarding policy
- Behaviour policy
- Staff disciplinary procedures

- Staff Code of Conduct
- Data protection policy and privacy notices
- Complaints procedure

Appendix 1: EYFS and KS1 acceptable use agreement (pupils and parents/carers)

ACCEPTABLE USE OF THE SCHOOL'S ICT SYSTEMS AND INTERNET: AGREEMENT FOR PUPILS AND PARENTS/CARERS	
Name of pupil:	

When I use the academy's ICT systems (like computers and I-Pads) and get onto the internet in the academy I will:
• Ask a teacher or adult if I can do so before using them
• Only use websites that a teacher or adult has told me or allowed me to use
• Tell my teacher immediately if:
  ○ I click on a website by mistake
  ○ I receive messages from people I don't know
  ○ I find anything that may upset or harm me or my friends
• Use academy computers for academy work only
• Be kind to others and not upset or be rude to them
• Look after the academy ICT equipment and tell a teacher straight away if something is broken or not working properly
• Only use the username and password I have been given
• Try my hardest to remember my username and password
• Never share my password with anyone, including my friends
• Never give my personal information (my name, address or telephone numbers) to anyone without the permission of my teacher or parent/carer
• Save my work on the academy network
• Check with my teacher before I print anything
• Log off or shut down a computer when I have finished using it and ensure it is put back
I agree that the academy will monitor the websites I visit and that there will be consequences if I don't follow the rules.	

Signed (pupil):	**Date:**
Parent/carer agreement: I agree that my child can use the academy's ICT systems and internet when appropriately supervised by a member of academy staff. I agree to the conditions set out above for pupils using the academy's ICT systems and internet, and will make sure my child understands these.	
Signed (parent/carer):	**Date:**

Appendix 2: KS2, KS3 and KS4 acceptable use agreement (pupils and parents/carers)

ACCEPTABLE USE OF THE SCHOOL'S ICT SYSTEMS AND INTERNET: AGREEMENT FOR PUPILS AND PARENTS/CARERS	
Name of pupil:	
I will read and follow the rules in the acceptable use agreement policy. **When I use the academy's ICT systems (like computers) and get onto the internet in the academy I will:** • Always use the academy's ICT systems and the internet responsibly and for educational purposes only • Only use them when a teacher is present, or with a teacher's permission • Keep my usernames and passwords safe and not share these with others • Keep my private information safe at all times and not give my name, address or telephone number to anyone without the permission of my teacher or parent/carer • Tell a teacher (or sensible adult) immediately if I find any material which might upset, distress or harm me or others • Always log off or shut down a computer when I've finished working on it **I will not:** • Access any inappropriate websites including: social networking sites, chat rooms and gaming sites etc • Open any attachments in emails, or follow any links in emails, without first checking with a teacher • Use any inappropriate language when communicating online, including in emails • Create, link to or post any material that is offensive, obscene or otherwise inappropriate • Log in to the academy's network using someone else's details • Arrange to meet anyone offline **If I am permitted to bring a personal mobile phone into the academy because I walk to school:** • I will give it to my teacher first thing in the morning to be locked away and collect it at the end of the day • I will use it responsibly, and will not access any inappropriate websites or other inappropriate material or use inappropriate language when communicating online **I agree that the academy will monitor the websites I visit and that there will be consequences if I don't follow the rules.**	
Signed (pupil):	**Date:**
Parent/carer's agreement: I agree that my child can use the academy's ICT systems and internet when appropriately supervised by a member of the academy staff. I agree to the conditions set out above for pupils using the academy's ICT systems and internet, and for using personal electronic devices in the academy, and will make sure my child understands these.	
Signed (parent/carer):	**Date:**

Appendix 3: acceptable use agreement (staff, governors, volunteers and visitors)

ACCEPTABLE USE OF THE ACADEMY'S ICT SYSTEMS AND INTERNET: AGREEMENT FOR STAFF, GOVERNORS, VOLUNTEERS AND VISITORS	
Name of staff member/governor/volunteer/visitor:	
When using the academy's ICT systems and accessing the internet in the academy, or outside the acdemy on a work device (if applicable), 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 academy'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 academy's network • Share my password with others or log in to the academy's network using someone else's details • Take photographs of pupils without checking with teachers first • Share confidential information about the academy, 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 academy	
I will only use the academy's ICT systems and access the internet in the academy, or outside on a work device, for educational purposes or for the purpose of fulfilling the duties of my role. I agree that the academy will monitor the websites I visit and my use of the academy's ICT facilities and systems. I will take all reasonable steps to ensure that work devices are secure and password-protected when using them outside the academy, and keep all data securely stored in accordance with this policy and the academy'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 academy's ICT systems and internet responsibly, and ensure that pupils in my care do so too.	
Signed (staff member/governor/volunteer/visitor):	**Date:**

Appendix 4: online safety training needs – self-audit for staff

ONLINE SAFETY TRAINING NEEDS AUDIT	
Name of staff member/volunteer:	**Date**:
Question	**Yes/No (add comments if necessary)**
Do you know the name of the person who has lead responsibility for online safety in academy?	
Are you aware of the ways pupils can abuse their peers online?	
Do you know what you must do if a pupil approaches you with a concern or issue?	
Are you familiar with the academy's acceptable use agreement for staff, volunteers, governors and visitors?	
Are you familiar with the academy's acceptable use agreement for pupils and parents?	
Do you regularly change your password for accessing the academy's ICT systems?	
Are you familiar with the academy's approach to tackling cyber-bullying?	
Are there any areas of online safety in which you would like training/further training?	

Appendix 5: online safety incident report log

ONLINE SAFETY INCIDENT LOG				
Date	**Where the incident took place**	**Description of the incident**	**Action taken**	**Name and signature of staff member recording the incident**