
Milverton Community Primary School and Pre-School



We Care. We Aspire. We Belong.

Online Safety Policy

Date: November 2025

Review Date: November 2026

Scope of the Online Safety Policy

This Online Safety Policy outlines the commitment of Milverton Community Primary School and Pre-School to safeguard members of our school community online in accordance with statutory guidance and best practice.

This Online Safety Policy applies to all members of the school community (including staff, learners, governors, volunteers, parents and carers, visitors, community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

Milverton Community Primary School and Pre-School will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents/carers of incidents of inappropriate online safety behaviour that take place out of school.

Policy development, monitoring and review

This policy is used in conjunction with other school policies and has been developed by a working group, including representatives from all groups within the school.

Schedule for development, monitoring and review

The implementation of this Online Safety Policy will be monitored by:	Nicola Stoddart (DSL) Katy Smith (DDSL) Meera Pow (DDSL) Peter Coupe (DDSL) Stephen Penny (Online Safety Lead) Marian Barlow (Office Manager) Kieran Neale (Online Safety Governor)
Monitoring will take place at regular intervals:	Once a term.
The governing body will receive a report on the implementation of the Online Safety Policy generated by the monitoring group (which will include anonymous details of online safety incidents) at regular intervals:	Once a term.
The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new technological developments, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	November 2026
Should serious online safety incidents take place, the following external persons/agencies should be informed:	<i>Nicola Stoddart (DSL), Katy Smith (DDSL), Meera Pow (DDSL), Peter Coupe (DDSL), Anthony Goble (LADO) – 0300 1232244</i>

Process for monitoring the impact of the Online Safety Policy

The school will monitor the impact of the policy using:

- logs of reported incidents
- Filtering and monitoring logs
- internal monitoring data for network activity
- surveys/questionnaires of:
 - learners
 - parents and carers
 - staff.

Policy and leadership

Responsibilities

To ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviours, learning from each other and from good practice elsewhere, reporting inappropriate online behaviours, concerns, and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals and groups within the school.

Headteacher and senior leaders

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding, though the day-to-day responsibility for online safety is held by the Designated Safeguarding Lead, as defined in Keeping Children Safe in Education.
- The headteacher and (at least) another member of the senior leadership team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff.
- The headteacher/senior leaders are responsible for ensuring that the Designated Safeguarding Lead / Online Safety Lead, IT provider/technical staff, and other relevant staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.
- The headteacher/senior leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role.
- The headteacher/senior leaders will receive regular monitoring reports from the Designated Safeguarding Lead / Online Safety Lead.
- The headteacher/senior leaders will work with the responsible Governor, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring.

Governors

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy.

This review will be carried out by the governing body whose members will receive regular information about online safety incidents and monitoring reports. A member of the governing body will take on the role of Online Safety Governor to include:

- regular meetings with the Designated Safeguarding Lead / Online Safety Lead
- regularly receiving (collated and anonymised) reports of online safety incidents
- checking the provision outlined in the Online Safety Policy (e.g. online safety education provision and staff training is taking place as intended)
- Ensuring that the filtering and monitoring provision is reviewed and recorded, at least annually. (The review will be conducted by members of the SLT, the DSL, and the IT service provider and involve the responsible governor) - in-line with the [DfE Filtering and Monitoring Standards](#)
- reporting at Full Governor Body meetings regularly
- Receiving (at least) basic cyber-security training to enable the governors to check that the school meets the [DfE Cyber-Security Standards](#)
- membership of the school Online Safety Group

The governing body will also support the school in encouraging parents/carers and the wider community to become engaged in online safety activities.

Designated Safety Lead (DSL)

The DSL will:

- hold the lead responsibility for online safety, within their safeguarding role
- receive relevant and regularly updated training in online safety to enable them to understand the risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online
- meet regularly with the Online Safety Lead and online safety governor to discuss current issues, review (anonymised) incidents and filtering and monitoring logs and ensuring that annual (at least) filtering and monitoring checks are carried out
- attend relevant governing body meetings/groups
- report regularly to headteacher/senior leadership team
- be responsible for receiving reports of online safety incidents and handling them, and deciding whether to make a referral by liaising with relevant agencies, ensuring that all incidents are recorded
- liaise with staff and IT providers on matters of safety and safeguarding and welfare (including online and digital safety)

Online Safety Lead

The Online Safety Lead will:

- lead the Online Safety Group
- work closely on a day-to-day basis with the Designated Safeguarding Lead (DSL)
- receive reports of online safety issues, being aware of the potential for serious child protection concerns and ensure that these are logged to inform future online safety developments
- have a leading role in establishing and reviewing the school online safety policies/documents
- promote an awareness of and commitment to online safety education / awareness raising across the school and beyond
- liaise with curriculum leaders to ensure that the online safety curriculum is planned, mapped, embedded and evaluated
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents
- provide (or identify sources of) training and advice for staff/governors/parents/carers/learners
- liaise with (school/local authority/external provider) technical staff, pastoral staff and support staff (as relevant)
- receive regularly updated training to allow them to understand how digital technologies are used and are developing (particularly by learners) with regard to the areas defined In Keeping Children Safe in Education:
 - content
 - contact
 - conduct

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- commerce

Curriculum Leads

Curriculum Leads will work with the DSL/OSL to develop a planned and coordinated online safety education programme.

This will be provided through:

- a discrete programme which utilises planned learning sequences on Purple Mash
- PHSRE programmes
- a mapped cross-curricular programme
- assemblies and pastoral programmes
- through relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week.

Teaching and support staff

School staff are responsible for ensuring that:

- they have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices
- they understand that online safety is a core part of safeguarding
- they have read, understood, and signed the staff acceptable use agreement (AUA)
- they follow all relevant guidance and legislation including, for example, Keeping Children Safe in Education and UK GDPR regulations
- all digital communications with learners, parents and carers and others should be on a professional level and only carried out using official school systems and devices (where staff use AI, they should only use school-approved AI services for work purposes which have been evaluated to comply with organisational security and oversight requirements)
- they immediately report any suspected misuse or problem to the DSL for investigation/action, in line with the school safeguarding procedures
- all digital communications with learners and parents/carers are on a professional level and only carried out using official school systems
- online safety issues are embedded in all aspects of the curriculum and other activities
- ensure learners understand and follow the Online Safety Policy and acceptable use agreements, have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they supervise and monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other school activities (where allowed) and implement current policies regarding these devices
- in lessons where internet use is pre-planned learners are guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- where lessons take place using live-streaming or video-conferencing, there is regard to national safeguarding guidance and local safeguarding policies (n.b. the guidance contained in the SWGfL Safe Remote Learning Resource)

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- there is a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc.
 - they model safe, responsible, and professional online behaviours in their own use of technology, including out of school and in their use of social media
 - they adhere to the school's technical security policy, with regard to the use of devices, systems and passwords and have an understanding of basic cybersecurity
 - they have a general understanding of how the learners in their care use digital technologies out of school, in order to be aware of online safety issues that may develop from the use of those technologies
 - they are aware of the benefits and risks of the use of AI services in school, being transparent in how they use these services, prioritising human oversight. AI should assist, not replace, human decision-making. Staff must ensure that final judgements, particularly those affecting people, are made by humans, fact-checked and critically evaluated.

IT Provider

If the school has a technology service provided by an outside contractor, it is the responsibility of the school to ensure that the provider carries out all the online safety measures that the school's obligations and responsibilities require. It is also important that the provider follows and implements school Online Safety Policy and procedures.

The IT Provider is responsible for ensuring that:

- they are aware of and follow the school Online Safety Policy and Technical Security Policy to carry out their work effectively in line with school policy
- the school technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets (as a minimum) the required online safety technical requirements as identified by the [DfE Meeting Digital and Technology Standards in Schools & Colleges](#) and guidance from local authority / MAT or other relevant body
- there is clear, safe, and managed control of user access to networks and devices
- they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- the use of technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported to the DSL for investigation and action
- the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person

Learners

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement and Online Safety Policy
- should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology

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- should avoid plagiarism and uphold copyright regulations, taking care when using AI services to protect the intellectual property of themselves and others and checking the accuracy of content accessed through AI services
 - should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school, if related to their membership of the school.

Parents and carers

The school will take every opportunity to help parents and carers understand these issues through:

- publishing the school Online Safety Policy on the school website
- providing them with a copy of the learners' acceptable use agreement on the school website
- publish information about appropriate use of social media relating to posts concerning the school in our Parent, Carer and Visitor Code of Conduct 2023.
- seeking their permissions concerning digital images, cloud services etc
- parents'/carers' evenings, newsletters, website, social media and information about national/local online safety campaigns and literature.

Parents and carers will be encouraged to support the school in:

- reinforcing the online safety messages provided to learners in school.

Community users

The school encourages the engagement of agencies/members of the community who can provide valuable contributions to the online safety provision and actively seeks to share its knowledge and good practice with other schools and the community.

Online Safety Group

The Online Safety Group has the following members (amend as appropriate):

- Designated Safeguarding Lead
- Online Safety Lead
- senior leaders
- online safety governor
- technical staff
- teacher and support staff members
- learners
- parents/carers

Members of the Online Safety Group will assist the DSL/OSL with:

- the production/review/monitoring of the school Online Safety Policy/documents
- the production/review/monitoring of the school filtering policy and requests for filtering changes
- mapping and reviewing the online safety education provision – ensuring relevance, breadth and progression and coverage

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- reviewing network/filtering/monitoring/incident logs, where possible
 - encouraging the contribution of learners to staff awareness, emerging trends and the school online safety provision
 - consulting stakeholders – including staff/parents/carers about the online safety provision
 - monitoring improvement actions identified through use of the 360-degree safe self-review tool.

Professional Standards

There is an expectation that required professional standards will be applied to online safety as in other aspects of school life i.e.

- there is a consistent emphasis on the central importance of literacy, numeracy, digital competence and digital resilience. Learners will be supported in gaining skills across all areas of the curriculum and every opportunity will be taken to extend learners' skills and competence
- there is a willingness to develop and apply new techniques to suit the purposes of intended learning in a structured and considered approach and to learn from the experience, while taking care to avoid risks that may be attached to the adoption of developing technologies e.g. AI tools
- staff are able to reflect on their practice, individually and collectively, against agreed standards of effective practice and affirm and celebrate their successes
- policies and protocols are in place for the use of online communication technology between the staff and other members of the school and wider community, using officially sanctioned school mechanisms.

Policy

Online Safety Policy

The school Online Safety Policy:

- sets expectations for the safe and responsible use of digital technologies for learning, administration, and communication
- allocates responsibilities for the delivery of the policy
- is regularly reviewed in a collaborative manner, taking account of online safety incidents and changes/trends in technology and related behaviours
- establishes guidance for staff in how they should use digital technologies responsibly, protecting themselves and the school and how they should use this understanding to help safeguard learners in the digital world
- describes how the school will help prepare learners to be safe and responsible users of online technologies
- establishes clear procedures to identify, report, respond to and record the misuse of digital technologies and online safety incidents, including external support mechanisms
- is supplemented by a series of related acceptable use agreements
- is made available to staff at induction and through normal communication channels (MyConcern)

- is published on the school website.

Acceptable use

The school has defined what it regards as acceptable/unacceptable use and this is shown in the tables below.

Acceptable use agreements

The Online Safety Policy and acceptable use agreements define acceptable use at the school. The acceptable use agreements will be communicated through:

- staff induction and handbook
- posters/notices around where technology is used
- communication with parents/carers
- built into education sessions
- school website
- peer support.

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not access online content (including apps, games, sites) to make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	<p>Any illegal activity for example:</p> <ul style="list-style-type: none"> • Child sexual abuse imagery* • Child sexual abuse/exploitation/grooming • Terrorism • Encouraging or assisting suicide • Offences relating to sexual images i.e., revenge and extreme pornography • Incitement to and threats of violence • Hate crime • Public order offences - harassment and stalking • Drug-related offences • Weapons / firearms offences • Fraud and financial crime including money laundering <p>N.B. Schools should refer to guidance about dealing with self-generated images sexting – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges</p>					X
Users shall not undertake activities that might be classed as cyber-crime under the Computer Misuse Act (1990)	<ul style="list-style-type: none"> • Using another individual's username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised) • Gaining unauthorised access to school networks, data and files, through the use of computers/devices 					X

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
	<ul style="list-style-type: none"> • Creating or propagating computer viruses or other harmful files • Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords) • Disable/Impair/Disrupt network functionality through the use of computers/devices • Using penetration testing equipment (without relevant permission) <p>N.B. Schools will need to decide whether these should be dealt with internally or by the police. Serious or repeat offences should be reported to the police. The National Crime Agency has a remit to prevent learners becoming involved in cyber-crime and harness their activity in positive ways– further information here</p>					
Users shall not undertake activities that are not illegal but are classed as unacceptable in school policies:	Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs)				X	
	Promotion of any kind of discrimination				X	
	Using school systems to run a private business				X	
	Using systems, applications, websites or other mechanisms that bypass the filtering/monitoring or other safeguards employed by the school				X	
	Infringing copyright				X	
	Unfair usage (downloading/uploading large files that hinders others in their use of the internet)			X	X	
	Any other information which may be offensive to others or breaches the integrity of the ethos of the school or brings the school into disrepute				X	

Consideration should be given for the following activities when undertaken for non-educational purposes: Schools may wish to add further activities to this list.	Staff and other adults				Learners			
	Not allowed	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission/awareness
Online gaming			X		X			
Online shopping/commerce			X		X			

File sharing			X		X			
Social media			X		X			
Messaging/chat			X		X			
Entertainment streaming e.g. Netflix, Disney+			X		X			
Use of video broadcasting, e.g. YouTube, Twitch, TikTok			X		X			
Mobile phones may be brought to school		X						X
Use of mobile phones for learning at school	X				X			
Use of mobile phones in social time at school		X			X			
Taking photos on mobile phones/cameras	X				X			
Use of other personal devices, e.g. tablets, gaming devices		X			X			
Use of personal e-mail in school, or on school network/wi-fi			X		X			
Use of school e-mail for personal e-mails	X				X			

When using communication technologies, the school considers the following as good practice:

- when communicating in a professional capacity, staff should ensure that the technologies they use are officially sanctioned by the school.
- any digital communication between staff and learners or parents/carers (e-mail, learning platform, etc.) must be professional in tone and content. *Personal e-mail addresses, text messaging or social media must not be used for these communications.*
- staff should be expected to follow good practice when using personal social media regarding their own professional reputation and that of the school and its community
- users should immediately report to a nominated person – in accordance with the school policy – the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.

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- relevant policies and permissions should be followed when posting information online e.g., school website. Only school e-mail addresses should be used to identify members of staff and learners.

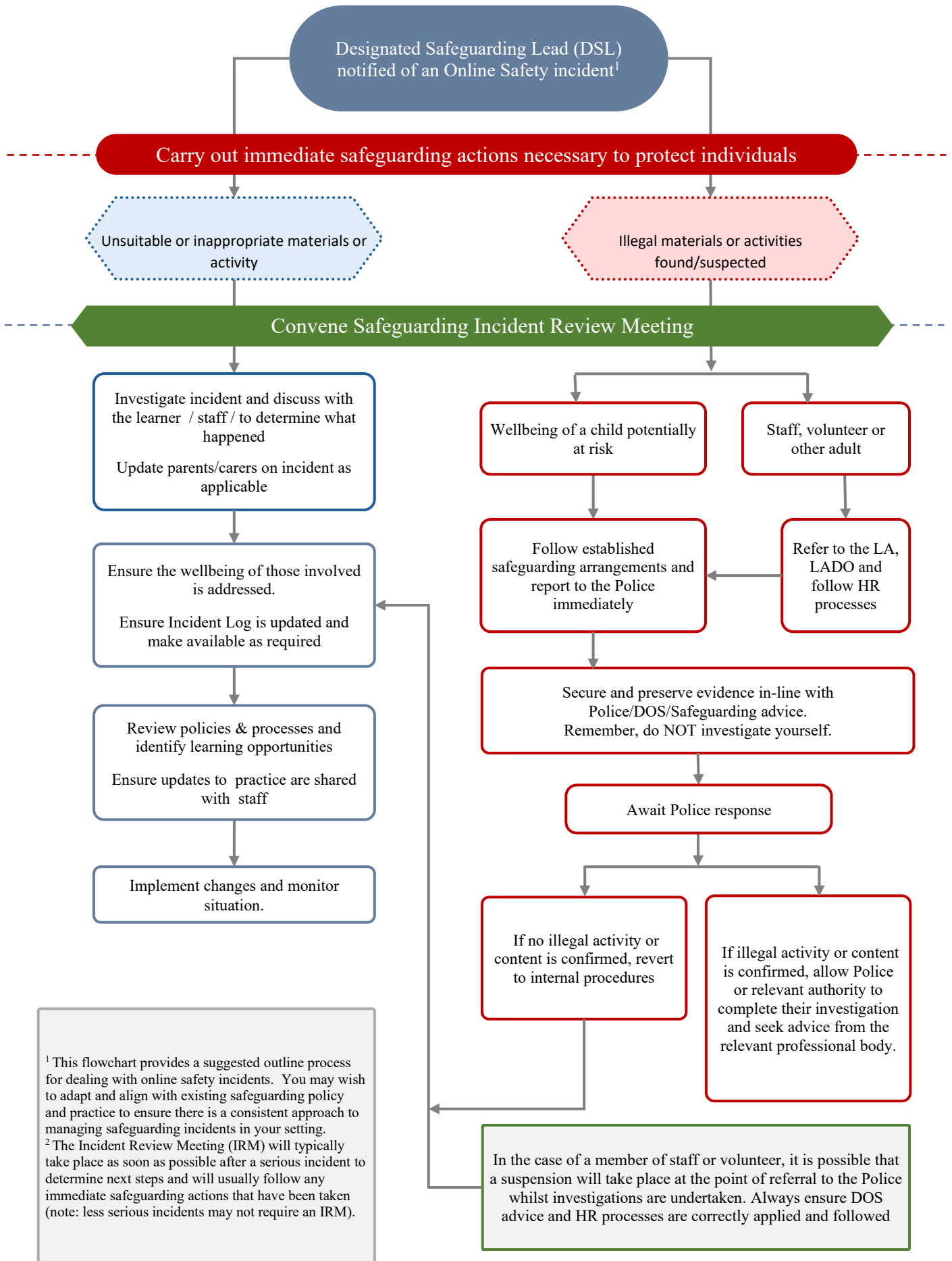
Reporting and responding

The school will take all reasonable precautions to ensure online safety for all school users but recognises that incidents may occur inside and outside of the school (with impact on the school) which will need intervention. The school will ensure:

- there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the school safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies
- all members of the school community will be made aware of the need to report online safety issues/incidents
- reports will be dealt with as soon as is practically possible once they are received
- the Designated Safeguarding Lead, Online Safety Lead and other responsible staff have appropriate skills and training to deal with online safety risks.
- if there is any suspicion that the incident involves any illegal activity or the potential for serious harm (see flowchart on page 14 and appendix 3) the incident must be escalated through the agreed school safeguarding procedures, this may include:
 - Non-consensual images
 - Self-generated images
 - Terrorism/extremism
 - Hate crime/ Abuse
 - Fraud and extortion
 - Harassment/stalking
 - Child Sexual Abuse Material (CSAM)
 - Child Sexual Exploitation Grooming
 - Extreme Pornography
 - Sale of illegal materials/substances
 - Cyber or hacking [offences under the Computer Misuse Act](#)
 - Copyright theft or piracy
- any concern about staff misuse will be reported to the Headteacher, unless the concern involves the Headteacher, in which case the complaint is referred to the Chair of Governors and the local authority / MAT
- where AI is used to support monitoring and incident reporting, human oversight is maintained to interpret nuances and context that AI might miss
- where there is no suspected illegal activity, devices may be checked using the following procedures:
 - one or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
 - conduct the procedure using a designated device that will not be used by learners and, if necessary, can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). Use the same device for the duration of the procedure.
 - ensure that the relevant staff have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).

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- record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed, and attached to the form
 - once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:
 - internal response or discipline procedures
 - involvement by local authority
 - police involvement and/or action
 - it is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively
 - there are support strategies in place e.g., peer support for those reporting or affected by an online safety incident
 - incidents should be logged on MyConcern following school procedures
 - relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority; police; [Professionals Online Safety Helpline](#); [Reporting Harmful Content](#); [CEOP](#).
 - those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions.
 - learning from the incident (or pattern of incidents) will be provided (as relevant and anonymously) to:
 - *the Online Safety Group for consideration of updates to policies or education programmes and to review how effectively the report was dealt with*
 - *staff, through regular briefings*
 - *learners, through assemblies/lessons*
 - *parents/carers, through newsletters, school social media, website*
 - *governors, through regular safeguarding updates*
 - *local authority/external agencies, as relevant*

The school will make the flowchart below available to staff to support the decision-making process for dealing with online safety incidents.



¹ This flowchart provides a suggested outline process for dealing with online safety incidents. You may wish to adapt and align with existing safeguarding policy and practice to ensure there is a consistent approach to managing safeguarding incidents in your setting.

² The Incident Review Meeting (IRM) will typically take place as soon as possible after a serious incident to determine next steps and will usually follow any immediate safeguarding actions that have been taken (note: less serious incidents may not require an IRM).

In the case of a member of staff or volunteer, it is possible that a suspension will take place at the point of referral to the Police whilst investigations are undertaken. Always ensure DOS advice and HR processes are correctly applied and followed

School actions

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour/disciplinary procedures as follows:

Responding to Learner Actions

Incidents	Refer to/inform class teacher	Refer to Headteacher/Deputy Head	Refer to DSL and Online Safety Lead	Refer to Police/Social Work	Refer to local authority technical support for advice/action	Inform parents/carers	Remove device/network/internet access rights	Issue a warning	Further sanction, in line with behaviour policy
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on User Actions on unsuitable/inappropriate activities).	X	X	X	X	X	X	X	X	X
Attempting to access or accessing the school network, using another user's account (staff or learner) or allowing others to access school network by sharing username and passwords	X	X				X	X	X	X
Corrupting or destroying the data of other users.	X	X				X	X	X	X
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature within school.	X	X	X		X	X	X	X	X
Unauthorised downloading or uploading of files or use of file sharing.	X	X	X			X	X	X	X
Using proxy sites or other means to subvert the school's filtering system.	X	X	X		X	X	X	X	X
Accidentally accessing offensive or pornographic material and failing to report the incident.	X	X	X			X		X	X
Deliberately accessing or trying to access offensive or pornographic material.	X	X	X	X	X	X	X	X	X

Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act.	X	X				X		X	X
Unauthorised use of digital devices (including taking images)	X	X	X			X		X	X
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.	X	X				X	X	X	X
Continued infringements of the above, following previous warnings or sanctions.	X	X	X	X	X	X	X	X	X

Responding to Staff Actions

Incidents	Refer to line manager	Refer to Headteacher/DSL	Refer to local authority/HR	Refer to Police	Refer to LA / Technical Support Staff for action re filtering, etc.	Issue a warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities)		X	X	X	X		X	X
Deliberate actions to breach data protection or network security rules.	X	X	X		X	X		X
Deliberately accessing or trying to access offensive or pornographic material		X	X		X		X	X
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	X	X			X	X		X
Using proxy sites or other means to subvert the school's filtering system.	X	X	X		X	X		X
Unauthorised downloading or uploading of files or file sharing	X	X			X	X		X
Breaching copyright or licensing regulations.	X	X				X		
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account.		X	X		X	X		X
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature	X	X				X		X
Using personal e-mail/social networking/messaging to carry out digital communications with learners and parents/carers	X	X	X	X	X	X	X	X
Inappropriate personal use of the digital technologies e.g. social media / personal e-mail	X	X	X			X		X
Careless use of personal data, e.g. displaying, holding or transferring data in an insecure manner	X	X	X		X	X		
Actions which could compromise the staff member's professional standing	X	X				X		X
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.	X	X				X		X
Failing to report incidents whether caused by deliberate or accidental actions	X	X				X		X
Continued infringements of the above, following previous warnings or sanctions.	X	X	X	X	X		X	X

The use of Artificial Intelligence (AI) systems in school

As Generative Artificial Intelligence (gen AI) continues to advance and influence the world we live in, its role in education is also evolving. There are currently 3 key dimensions of AI use in schools: learner support, teacher support and school operations; ensuring all use is safe, ethical and responsible is essential.

We will educate staff and learners about safe and ethical use of AI, preparing them for a future in which these technologies are likely to play an increasing role.

The safeguarding of staff and learners will, as always, be at the forefront of our policy and practice.

Policy Statements

- The school acknowledges the potential benefits of the use of AI in an educational context - including enhancing learning and teaching, improving outcomes, improving administrative processes, reducing workload and preparing staff and learners for a future in which AI technology will be an integral part. Staff are encouraged to use AI based tools to support their work where appropriate, within the frameworks provided below and are required to be professionally responsible and accountable for this area of their work.
- We will comply with all relevant legislation and guidance, with reference to guidance contained in Keeping Children Safe in Education and UK GDPR
- We will provide relevant training for staff and governors in the advantages, use of and potential risks of AI. We will support staff in identifying training and development needs to enable relevant opportunities.
- We will seek to embed learning about AI as appropriate in our curriculum offer, including supporting learners to understand how gen AI works, its potential benefits, risks, and ethical and social impacts. The school recognises the importance of equipping learners with the knowledge, skills and strategies to engage responsibly with AI tools..
- As set out in the staff acceptable use agreement, staff will be supported to use AI tools responsibly, ensuring the protection of both personal and sensitive data. Staff should only input anonymised data to avoid the exposure of personally identifiable or sensitive information.
- Staff will always ensure AI tools used comply with UK GDPR and other data protection regulations. They must verify that tools meet data security standards before using them for work related to the school.
- Only those AI technologies approved by the school may be used. Staff should always use school-provided AI accounts for work purposes. These accounts are configured to comply with organisational security and oversight requirements, reducing the risk of data breaches.
- We will protect sensitive information. Staff must not input sensitive information, such as internal documents or strategic plans, into third-party AI tools unless explicitly vetted for that purpose. They must always recognise and safeguard sensitive data.

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- The school will ensure that when AI is used, it will not infringe copyright or intellectual property conventions – care will be taken to avoid intellectual property, including that of the learners, being used to train generative AI models without appropriate consent.
 - AI incidents must be reported promptly. Staff must report any incidents involving AI misuse, data breaches, or inappropriate outputs immediately to the relevant internal teams. Quick reporting helps mitigate risks and facilitates a prompt response.
 - We are aware of the potential risk for discrimination and bias in the outputs from AI tools and have in place interventions and protocols to deal with any issues that may arise. When procuring and implementing AI systems, we will follow due care and diligence to prioritise fairness and safety.

Online Safety Education Programme

While regulation and technical solutions are particularly important, their use must be balanced by educating learners to take a responsible approach. The education of learners in online safety is therefore an essential part of the school's online safety provision. Learners need the help and support of the school to recognise and avoid online safety risks and develop their resilience.

The 2021 Ofsted "Review of Sexual Abuse in Schools and Colleges" highlighted the need for:

"a carefully sequenced RSHE curriculum, based on the Department for Education's (DfE's) statutory guidance, that specifically includes sexual harassment and sexual violence, including online. This should include time for open discussion of topics that children and young people tell us they find particularly difficult, such as consent and the sending of 'nudes'.."

Keeping Children Safe in Education states:

"Governing bodies and proprietors should ensure online safety is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum ..."

Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:

- A planned online safety curriculum for all year groups utilising a planned sequence of lessons on Purple Mash
- Lessons are matched to need; are age-related and build on prior learning
- Lessons are context-relevant with agreed objectives leading to clear and evidenced outcomes
- Learner's needs and progress are addressed through effective planning and assessment utilising resources on Purple Mash
- Digital competency is planned and effectively threaded through the appropriate digital pillars in other curriculum areas e.g. PSHRE; English etc

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- it incorporates/makes use of relevant national initiatives and opportunities e.g. [Safer Internet Day](#) and [Anti-bullying week](#)
 - the programme will be accessible to learners at different ages and abilities such as those with additional learning needs or those with English as an additional language
 - learners should be taught in all lessons to be critically aware of the materials/content they access online and be guided to validate the accuracy of information (including where the information is gained from Artificial Intelligence services)
 - learners should be taught to acknowledge the source of information used and to respect copyright/intellectual property when using material accessed on the internet and particularly through the use of Artificial Intelligence services
 - vulnerability is actively addressed as part of a personalised online safety curriculum e.g., for victims of abuse and SEND.
 - learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school. Acceptable use is reinforced across the curriculum, with opportunities to discuss how to act within moral and legal boundaries online, with reference to the Computer Misuse Act 1990. Lessons and further resources are available on the [CyberChoices](#) site
 - staff should act as good role models in their use of digital technologies the internet and mobile devices
 - in lessons where internet use is pre-planned, it is best practice that learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
 - where learners are allowed to freely search the internet, staff should be vigilant in supervising the learners and monitoring the content of the websites/tools (including AI systems) the young people visit
 - it is accepted that from time to time, for good educational reasons, students may need to research topics, (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff should be able to request the temporary removal of those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need
 - the online safety education programme should be relevant and up to date to ensure the quality of learning and outcomes.

Contribution of Learners

The school acknowledges, learns from, and uses the skills and knowledge of learners in the use of digital technologies. We recognise the potential for this to shape the online safety strategy for the school community and how this contributes positively to the personal development of young people. Their contribution is recognised through:

- mechanisms to canvass learner feedback and opinion
- appointment of digital leaders
- the Online Safety Group has learner representation

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- learners contribute to the online safety education programme e.g. peer education, digital leaders leading lessons for younger learners, online safety campaigns
 - learners designing/updating acceptable use agreements

Staff/volunteers

The DfE guidance “Keeping Children Safe in Education” states:

“All staff should receive appropriate safeguarding and child protection training (**including online safety**) at induction. The training should be **regularly updated**. In addition, all staff should receive safeguarding and child protection (**including online safety**) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.”

“Governing bodies and proprietors should ensure... that safeguarding training for staff, **including online safety** training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning.”

All staff will receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- a planned programme of formal online safety and data protection training will be made available to all staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly.
- the training will be an integral part of the school’s annual safeguarding, data protection and cyber-security training for all staff
- all new staff will receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements. It includes explicit reference to classroom management, professional conduct, online reputation and the need to model positive online behaviours.
- the Online Safety Lead and Designated Safeguarding Lead will receive regular updates through attendance at external training events, (e.g. SWGfL/LA/other relevant organisations) and by reviewing guidance documents released by relevant organisations
- this Online Safety Policy and its updates will be presented to and discussed by staff
- the Designated Safeguarding Lead/Online Safety Lead will provide advice/guidance/training to individuals as required.

Governors

Governors should take part in online safety training/awareness sessions, with particular importance for those who are members of any sub-committee/group involved in technology/online safety/health and safety/safeguarding. This may be offered in several ways such as:

- attendance at training provided by the local authority or other relevant organisation (e.g., SWGfL)
- participation in school training/information sessions for staff or parents (this may include attendance at assemblies/lessons).

A higher level of training will be made available to (at least) the Online Safety Governor. This will include:

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- Cyber-security training (at least at a basic level)
 - Training to allow the governor to understand the school's filtering and monitoring provision, in order that they can participate in the required checks and review.

Families

The school will seek to provide information and awareness to parents and carers through:

- regular communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes
- the learners – who are encouraged to pass on to parents the online safety messages they have learned in lessons and by learners leading sessions at parent/carer evenings.
- letters, newsletters, website, learning platform,
- high profile events / campaigns e.g. Safer Internet Day
- reference to the relevant web sites/publications, e.g. SWGfL; www.saferinternet.org.uk/; www.childnet.com/parents-and-carers (see Appendix for further links/resources).
- sharing good practice with other schools in clusters and or the local authority

Adults and Agencies

The school will provide opportunities for local community groups and members of the wider community to gain from the school's online safety knowledge and experience. This may be offered through the following:

- online safety messages targeted towards families and relatives
- providing family learning courses in use of digital technologies and online safety
- providing online safety information via their website for the wider community
- supporting community groups, e.g. early years settings, childminders to enhance their online safety provision

Technology

The school is responsible for ensuring that the school infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. The school should ensure that all staff are made aware of policies and procedures in place on a regular basis and explain that everyone is responsible for online safety and data protection.

Filtering & Monitoring

The DfE guidance (for England) on filtering and monitoring in "Keeping Children Safe in Education" states:

"It is essential that governing bodies and proprietors ensure that appropriate filtering and monitoring systems are in place ...governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the ... risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and

understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified...

The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty. To support schools and colleges to meet this duty, the Department for Education has published [filtering and monitoring standards](#)...

The school filtering and monitoring provision is agreed by senior leaders, governors and the IT Service Provider and is regularly reviewed (at least annually) and updated in response to changes in technology and patterns of online safety incidents/behaviours.

Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The DSL will have lead responsibility for safeguarding and online safety and the IT service provider will have technical responsibility.

The filtering and monitoring provision are reviewed by senior leaders, the Designated Safeguarding Lead and a governor with the involvement of the IT Service Provider.

- checks on the filtering and monitoring system are carried out by the IT Service Provider with the involvement of a senior leader, the Designated Safeguarding Lead and a governor, in particular when a safeguarding risk is identified, there is a change in working practice.

Filtering

The DfE Technical Standards for Schools and Colleges states:

“Schools and colleges have a statutory responsibility to keep children and young people safe online as well as offline. Governing bodies and proprietors should make sure their school or college has appropriate filtering and monitoring systems in place, as detailed in the statutory guidance, Keeping children safe in education.

Filtering is preventative. It refers to solutions that protect users from accessing illegal, inappropriate and potentially harmful content online. It does this by identifying and blocking specific web links and web content in the form of text, images, audio and video.

These standards help school and college leaders, designated safeguarding leads and IT support understand how to work together to make sure they can effectively safeguard their students and staff.”

- a member of the SLT and a governor, are responsible for ensuring these standards are met. Roles and responsibilities of staff and third parties, for example, in-house or third-party IT support are clearly defined
- the school manages access to content across its systems for all users and on all devices using the schools internet provision. The filtering provided meets the standards defined in the DfE Filtering standards for schools and colleges and the guidance provided in the UK Safer Internet Centre [Appropriate filtering](#).
- illegal content (e.g., child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation URL list and the police

assessed list of unlawful terrorist content, produced on behalf of the Home Office. Content lists are regularly updated.

- there are established and effective routes for users to report inappropriate content, recognising that no system can be 100% effective. These are acted upon in a timely manner, within clearly established procedures
- there is a clear process in place to deal with, and log, requests/approvals for filtering changes ([see Appendix for more details](#))
- filtering logs are regularly reviewed and alert the Designated Safeguarding Lead to breaches of the filtering policy, which are then acted upon
- there are regular checks of the effectiveness of the filtering systems. Checks are undertaken across a range of devices at least termly and the results recorded and analysed to inform and improve provision. The DSL and Governor are involved in the process and aware of the findings.
- Devices that are provided by the school have school-based filtering applied irrespective of their location
- the school has (if possible) provided enhanced/differentiated user-level filtering (allowing different filtering levels for different groups of users: staff/learners, etc.)

If necessary, the school will seek advice from, and report issues to, the SWGfL [Report Harmful Content](#) site.

Monitoring

The DfE Technical Standards for Schools and Colleges states:

“Monitoring is reactive. It refers to solutions that monitor what users are doing on devices and, in some cases, records this activity. Monitoring can be manual, for example, teachers viewing screens as they walk around a classroom. Technical monitoring solutions rely on software applied to a device that views a user’s activity. Reports or alerts are generated based on illegal, inappropriate, or potentially harmful activities, including bullying. Monitoring solutions do not block users from seeing or doing anything.”

The school has monitoring systems in place to protect the school, systems and users:

- The school monitors all network use across all its devices and services.
- Monitoring reports are urgently picked up, acted on and outcomes are recorded by the Designated Safeguarding Lead, all users are aware that the network (and devices) are monitored.
- There are effective protocols in place to report abuse/misuse. There is a clear process for prioritising response to alerts that require rapid safeguarding intervention.
- Management of serious safeguarding alerts is consistent with safeguarding policy and practice.
- The monitoring provision is reviewed at least once every academic year and updated in response to changes in technology and patterns of online safety incidents and behaviours. The review should be conducted by members of the senior leadership team, the designated safeguarding lead, and technical staff. It will also involve the

responsible governor. The results of the review will be recorded and reported as relevant.

The school follows the UK Safer Internet Centre [Appropriate Monitoring](#) guidance and protects users and school systems through the use of the appropriate blend of strategies informed by the school's risk assessment. These may include:

- physical monitoring (adult supervision in the classroom)
- internet use is logged, regularly monitored and reviewed
- filtering logs are regularly analysed and breaches are reported to senior leaders
- pro-active alerts inform the school of breaches to the filtering policy, allowing effective intervention
- where possible, school technical staff regularly monitor and record the activity of users on the school technical systems
- use of a third-party assisted monitoring service to review monitoring logs and report issues to school monitoring lead(s)

Technical Security

The school technical systems will be managed in ways that ensure that the school meets recommended standards in the [DfE Technical Standards for Schools and Colleges](#) (and others outlined in local authority / MAT policy and guidance):

- responsibility for technical security resides with SLT who may delegate activities to identified roles.
- a documented access control model is in place, clearly defining access rights to school systems and devices. This is reviewed annually. All users (staff and learners) have responsibility for the security of their username and password and must not allow other users to access the systems using their log on details. Users must immediately report any suspicion or evidence that there has
- all users have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the IT service provider and will be reviewed, at least annually, by the SLT/Online Safety Group.
- password policy and procedures are implemented.
- the security of their username and password and must not allow other users to access the systems using their log on details.
- all users have responsibility for the security of their username and password and must not allow other users to access the systems using their log on details.
- all school networks and system will be protected by secure passwords. Passwords must not be shared with anyone.
- the administrator passwords for school systems are kept in a secure place, e.g. school safe.
- there is a risk-based approach to the allocation of learner usernames and passwords.

- there will be regular reviews and audits of the safety and security of school technical systems.
- servers, wireless systems and cabling are securely located and physical access restricted.
- appropriate security measures are in to protect the servers, firewalls, routers, wireless systems and devices from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up-to-date endpoint software.
- there are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud.
- the Headteacher is responsible for ensuring that all software purchased by and used by the school is adequately licenced and that the latest software updates (patches) are applied.
- an appropriate system is in place for users to report any actual/potential technical incident/security breach to the relevant person, as agreed).
- use of school devices out of school are not permitted to be used by family members.
- personal devices are not allowed on the school network.
- staff members are not permitted to install software on a school-owned devices without the consent of the SLT/IT service provider.
- removable media is not permitted unless approved by the SLT/IT service provider.
- systems are in place to control and protect personal data and data is encrypted at rest and in transit.
- where AI services are used for technical security, their effectiveness is regularly reviewed, updated and monitored for vulnerabilities.

Mobile technologies

The school acceptable use agreements for staff, learners, parents, and carers outline the expectations around the use of mobile technologies.

The school allows:

	School devices			Personal devices		
	School owned for individual use	School owned for multiple users	Authorised device ¹	Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	Yes*	Yes	Yes

¹ Authorised device – purchased by the learner/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school.

Full network access	Yes	Yes	Yes	No	No	No
Internet only				No	No	No
No network access				Yes	Yes	Yes

*On rare occasions (such as when a child walks to school/home on their own) we may allow children to bring in a mobile phone, but this must be handed into the school office to be stored during the school day. Outside of this, mobile technology, or wearable technology (watches which can record audio or visual (photos or videos), connect to the internet or other devices, or have access to features outside of telling the time) are not permitted for children to have in school. As a school, we ask that any wearable technology is kept at home and children only wear analogue watches to school. If a child is found to have mobile technology or wearable technology, it will be confiscated and placed in the school office until the end of the school day. If a child refuses to hand over devices in this situation, teachers or leaders, will follow the school behaviour policy.

School owned/provided devices:

- all school devices are managed through the use of Mobile Device Management software.
- there is an asset log that clearly states whom a device has been allocated to. There is clear guidance on where, when and how use is allowed.
- personal use (e.g. online banking, shopping, images etc.) is clearly defined and expectations are well-communicated.
- the use of devices on trips/events away from school is clearly defined and expectation are well-communicated.
- liability for damage aligns with current school policy for the replacement of equipment.
- education is in place to support responsible use.

Personal devices:

- staff and or volunteers are only permitted to use mobile devices or wearable technology in the staff room, staff car park or school office.
- staff and or volunteers will ensure that mobile devices are stored in a location away from and not visible to children.
- staff may use mobile devices when away from school on trips, but only to contact staff members or volunteers on the trip, the school or emergency services. If possible, these calls should be made away from the children. This will also apply to staff on residential trips when they are on duty with the children.
- where personal devices are brought to school, but their use is not permitted, appropriate, safe and secure storage should be made available.
- use of personal devices for school business is defined in the acceptable use policy, staff handbook and staff code of conduct.
- liability for loss/damage or malfunction of personal devices is clearly defined.
- there is clear advice and guidance at the point of entry for visitors to acknowledge school requirements.
- education about the safe and responsible use of mobile devices is included in the school online safety education programmes.

Social media

Personal use

- Personal communications are those made via personal social media accounts. In all cases, where a personal account is used which associates itself with, or impacts on, the school it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.
- Personal communications which do not refer to or impact upon the school are outside the scope of this policy.
- Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken.

Monitoring of public social media

- As part of active social media engagement, the school may pro-actively monitor the Internet for public postings about the school.
- The school should effectively respond to social media comments made by others according to a defined policy or process.
- When parents/carers express concerns about the school on social media we will urge them to make direct contact with the school, in private, to resolve the matter. Where this cannot be resolved, parents/carers should be informed of the school complaints procedure.

Digital and video images

The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- the school may use live-streaming or video-conferencing services in line with national and local safeguarding guidance / policies. [Guidance can be found on the SWGfL Safer Remote Learning web pages and in the DfE Safeguarding and remote education](#)
- when using digital images, staff will inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images.
- staff/volunteers must be aware of those learners whose images must not be taken/published. Those images should only be taken on school devices. The personal devices of staff should not be used for such purposes.
- in accordance with [guidance from the Information Commissioner's Office](#), parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites.
- staff and volunteers are allowed to take digital/video images to support educational aims, but must follow school policies concerning the sharing, storage, distribution and publication of those images.
- care should be taken when sharing digital/video images that learners are appropriately dressed.
- learners must not take, use, share, publish or distribute images of others without their permission.

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- photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with Online Safety Policy
 - learners' full names will not be used anywhere on a website or blog, particularly in association with photographs.
 - written permission from parents or carers will be obtained before photographs of learners are taken for use in school or published on the school website/social media.
 - parents/carers will be informed of the purposes for the use of images, how they will be stored and for how long – in line with the school data protection policy.
 - images will be securely stored in line with the school retention policy.

Online Publishing

The school communicates with parents/carers and the wider community and promotes the school through:

- Public-facing website
- Online newsletters
- Communication system - ParentMail

The school website is managed/hosted by Schudio. The school ensures that online safety policy has been followed in the use of online publishing e.g., use of digital and video images, copyright, identification of young people, publication of school calendars and personal information – ensuring that there is least risk to members of the school community, through such publications.

Where learner work, images or videos are published, their identities are protected, and full names are not published.

Data Protection

Personal data will be recorded, processed, transferred, and made available according to the current data protection legislation.

The school:

- has a Data Protection and Freedom of Information Policy
- implements the data protection principles and can demonstrate that it does so
- has paid the appropriate fee to the Information Commissioner's Office (ICO)
- has appointed an appropriate Data Protection Officer (DPO) who has effective understanding of data protection law and is free from any conflict of interest
- has a 'Record of Processing Activities' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- the Record of Processing Activities lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis is listed
- has an 'information asset register' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it

-
- information asset register lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis will have also been listed
 - will hold the minimum personal data necessary to enable it to perform its function and will not hold it for longer than necessary for the purposes it was collected for. The school 'retention schedule' supports this
 - data held is accurate and up to date and is held only for the purpose it was held for. Systems are in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
 - provides staff, parents, volunteers, teenagers, and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notices
 - has procedures in place to deal with the individual rights of the data subject, e.g. one of the dozen rights applicable is that of Subject Access which enables an individual to see/have a copy of the personal data held about them
 - carries out Data Protection Impact Assessments (DPIA) where necessary e.g. to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier
 - has undertaken appropriate due diligence and has data protection compliant contracts in place with any data processors
 - understands how to share data lawfully and safely with other relevant data controllers
 - has clear and understood policies and routines for the deletion and disposal of data
 - [reports any relevant breaches to the Information Commissioner](#) within 72hrs of becoming aware of the breach as required by law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents
 - has a Freedom of Information Policy which sets out how it will deal with FOI requests
 - provides data protection training for all staff at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff

When personal data is stored on any mobile device or removable media the:

- data will be encrypted, and password protected
- device will be password protected
- device will be protected by up-to-date endpoint (anti-virus) software
- data will be securely deleted from the device, in line with school policy once it has been transferred or its use is complete

Staff must ensure that they:

- at all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse

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- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
 - can help data subjects understand their rights and know how to handle a request whether verbal or written and know who to pass it to in the school
 - only use encrypted data storage for personal data
 - will not transfer any school personal data to personal devices.
 - use personal data only on secure password protected computers and other devices, ensuring that they are properly “logged-off” at the end of any session in which they are using personal data.
 - transfer data using encryption, a secure email account (where appropriate), and secure password protected devices.

Cyber Security

The DfE Cyber security standards for schools and colleges explains:

“Cyber incidents and attacks have significant operational and financial impacts on schools and colleges. These incidents or attacks will often be an intentional and unauthorised attempt to access, change or damage data and digital technology. They could be made by a person, group, or organisation outside or inside the school or college and can lead to:

- safeguarding issues due to sensitive personal data being compromised
- impact on student outcomes
- a significant data breach
- significant and lasting disruption, including the risk of repeated future cyber incidents and attacks, including school or college closure
- financial loss
- reputational damage”

The ‘Cyber-security in schools: questions for governing bodies and Trustees’ guidance produced by the National Cyber Security Centre (NCSC) aims to support governing bodies’ and management committees’ understanding of their education settings’ cyber security risks. The guidance includes eight questions to facilitate the cyber security conversation between the governing body and school leaders, with the governing body taking the lead.

The school may wish to consider the following statements, amending them in the light of their current cybersecurity policy, processes and procedures:

- the school has reviewed the DfE Cyber security standards for schools and colleges and is working toward meeting these standards
- the school will conduct a cyber risk assessment annually and review each term
- the school, (*in partnership with their technology support partner*), has identified the most critical parts of the school’s digital and technology services and sought assurance about their cyber security
- the school has an effective backup and restoration plan in place in the event of cyber attacks

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- the school's governance and IT policies reflect the importance of good cyber security
 - staff and Governors receive training on the common cyber security threats and incidents that schools experience
 - the school's education programmes include cyber awareness for learners
 - the school has a business continuity and incident management plan in place
 - there are processes in place for the reporting of cyber incidents. All students and staff have a responsibility to report cyber risk or a potential incident or attack, understand how to do this feel safe and comfortable to do so.

Outcomes

The impact of the Online Safety Policy and practice is regularly evaluated through the review/audit of online safety incident logs; behaviour/bullying reports; surveys of staff, learners; parents/carers and is reported to relevant groups:

- there is balanced professional debate about the evidence taken from the reviews/audits and the impact of preventative work e.g., online safety education, awareness, and training
- there are well-established routes to regularly report patterns of online safety incidents and outcomes to school leadership and Governors
- parents/carers are informed of patterns of online safety incidents as part of the school's online safety awareness raising
- online safety (and related) policies and procedures are regularly updated in response to the evidence gathered from these reviews/audits/professional debate
- the evidence of impact is shared with other schools, agencies and LAs to help ensure the development of a consistent and effective local online safety strategy

Online Safety Policy Appendices

Appendices

A1 - Staff (and Volunteer) Acceptable Use Policy Agreement

A2 – Children’s Acceptable Use Policy Agreement example

A3 – Responding to incidents of misuse flowchart

A1 Staff (and Volunteer) Acceptable Use Policy Agreement

School Policy

Digital technologies have become integral to the lives of everyone, including children and young people, both within schools and in their lives outside school. The internet and digital technologies are powerful tools, which can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. They also bring opportunities for staff to be more creative and productive in their work. The school has the right to protect itself and its systems and all users should have an entitlement to safe access to the internet and digital technologies at all times.

This acceptable use policy is intended to ensure:

- that staff and volunteers will be responsible users and stay safe while online and using digital technologies for educational, personal and recreational use
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk
- that staff are protected from potential risk in their use of technology in their everyday work.

The school will try to ensure that staff and volunteers will have good access to digital technology to enhance their work, to enhance learning opportunities and will, in return, expect staff and volunteers to agree to be responsible users.

Acceptable Use Policy Agreement

I understand that I must use school systems in a responsible way, to minimise the risk to the safety, privacy or security of the school community and its systems. I acknowledge the potential of digital technologies for enhancing learning and will endeavour to integrate them in a way that aligns with the school's policy, ethos and values.

For my professional and personal safety:

- I understand that Milverton Community Primary School and Pre-School will monitor my use of school devices and digital technology systems
- I understand that the rules set out in this agreement also apply to use of these devices and technologies out of school, and to the transfer of personal / sensitive data (digital or paper based) out of the school
- I understand that the school devices and digital technology systems are primarily intended for educational use and that I will only use them for personal or recreational use within the policies and rules set down by the school.
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.
- I will only use my mobile device or wearable technology in the staff room, staff car park or school office. When I use my mobile devices in school, I will follow the rules set out

in this agreement, in the same way as if I was using school equipment. I will also follow any additional rules set by the school about such use. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses.

- I understand and agree to the expectations around the use of mobile phones on school trips and residential as set out in the Online Safety Policy.

I will be professional in my communications and actions when using digital technologies and systems:

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner. I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and/or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital/video images, and taking account of parental permissions. I will not use my personal equipment to record these images, unless I have permission to do so. Where these images are published (e.g. on the school website) it will not be possible to identify by name, or other personal information, those who are featured.
- I will only use social networking sites in the school in accordance with school policies.
- I will only communicate with learners and parents/carers using official school systems. Any such communication will be professional in tone and manner.
- I will not engage in any online activity that may compromise my professional responsibilities.

The school has the responsibility to provide safe and secure access to technologies and ensure the smooth running of the school:

- I will not use personal email addresses on the school's ICT systems
- I will abide by all relevant guidance and legislation (e.g., Keeping Children Safe in Education / UK GDPR)
- I will ensure that I am aware of cyber-security risks and that I will not respond to any communications that might put my / school data or systems at risk from attack
- When using AI systems in my professional role I will use these responsibly and:
 - will only use AI technologies approved by the school
 - will be aware of the risks of bias and discrimination, critically evaluating the outputs of AI systems for such risks
 - to protect personal and sensitive data, I will ensure that I have explicit authorisation when uploading sensitive school-related information into AI systems
 - will take care not to infringe copyright or intellectual property conventions – care will be taken to avoid intellectual property, including that of the learners, being used to train generative AI models without appropriate consent.
 - ensure that documents, emails, presentations, and other outputs influenced by AI include clear labels or notes indicating AI assistance
 - critically evaluate AI-generated outputs to ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing
 - will use generative AI tools responsibly to create authentic and beneficial content, ensuring respect for individuals' identity and well-being

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- I will exercise informed safe and secure practice when accessing links to content from outside of my organisation to reduce the risk of cyber security threats.
 - I will ensure that my data is regularly backed up, in accordance with relevant school policies.
 - I will not access illegal, inappropriate or harmful content on school systems.
 - I will not bypass any filtering or security systems that are used to prevent access to such content.
 - I will not install or attempt to install unauthorised programmes of any type on a school device, nor will I try to alter device settings, unless this is allowed in school policies
 - I will not disable or cause any damage to school equipment, or the equipment belonging to others
 - I will only transport, hold, disclose or share personal information about myself or others, as outlined in the school Data Security Policy (or other relevant policy). Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper based documents containing personal data must be held in lockable storage.
 - I understand that the data protection policy requires that any staff or learner data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by school policy to disclose such information to an appropriate authority.
 - I will immediately report any damage or faults involving equipment or software, however this may have happened.

When using the internet in my professional capacity or for school sanctioned personal use:

- I will ensure that I have appropriate permissions to use the original work of others in my own work and will reflect this with appropriate acknowledgements, particularly where AI has been used to generate content
- Where content is protected by copyright, I will not download or distribute copies (including music and videos).

I understand that I am responsible for my actions in and out of the school:

- I understand that this acceptable use agreement applies to my use of digital technologies related to my professional responsibilities, within or outside of the school.
- I will ensure my use of technologies and platforms is in line with the school's agreed codes of conduct.
- I understand that if I fail to comply with this acceptable use agreement, I could be subject to disciplinary action. This could include a warning, a suspension, referral to Governors and/or the Local Authority / Trust in the event of illegal activities, the involvement of the Police.

I have read and understand the above and agree to use the school digital technology systems (both in and out of the school) and my own devices (in the school and when carrying out communications related to the school) within these guidelines.

Staff/Volunteer Name:
Signed:
Date:



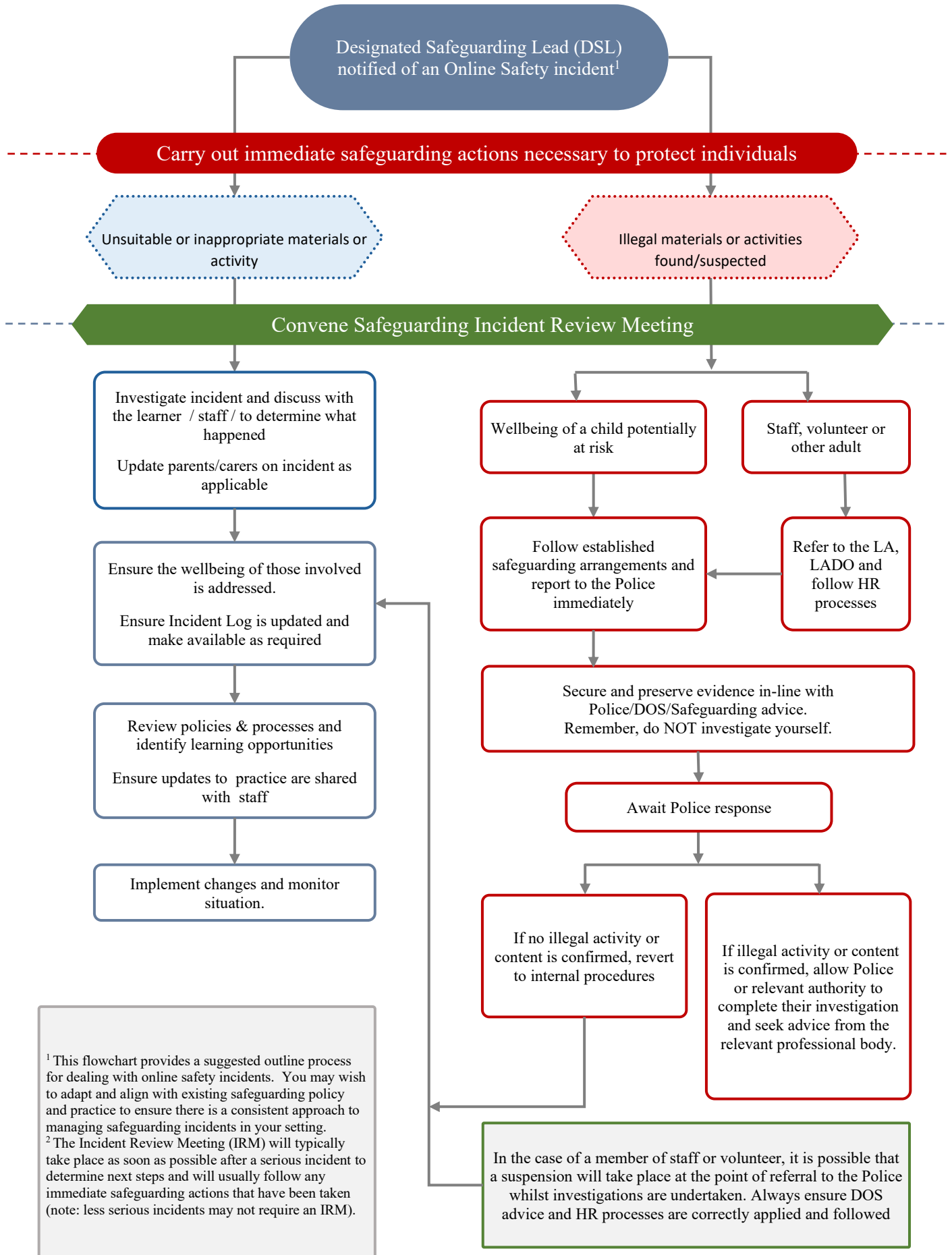
Class 6 Online Safety Charter

In Class 6, we have thought carefully about healthy habits whilst using technology and ways to keep ourselves safe online. We understand that we are responsible for looking after ourselves when using technology at home and in school.

To stay safe, we will:

- ✓ Treat others how we wish to be treated - always be kind!
- ✓ Check with a trusted adult if we can view things online and look for age ratings.
- ✓ Stay on safe, trusted websites - look for the padlock symbol.
- ✓ Monitor the amount of time we spend online.
- ✓ Talk to a trusted adult if we are ever worried.
- ✓ Report cyberbullying to a trusted adult.
- ✓ Only talk to people we know and never agree to meet with strangers.
- ✓ Never share personal information with people we don't know including: our full name, address, passwords, phone or contact numbers, email, school identity, photographs or information we hold about other people.

A3 Responding to incidents of misuse – flow chart



¹ This flowchart provides a suggested outline process for dealing with online safety incidents. You may wish to adapt and align with existing safeguarding policy and practice to ensure there is a consistent approach to managing safeguarding incidents in your setting.
² The Incident Review Meeting (IRM) will typically take place as soon as possible after a serious incident to determine next steps and will usually follow any immediate safeguarding actions that have been taken (note: less serious incidents may not require an IRM).

In the case of a member of staff or volunteer, it is possible that a suspension will take place at the point of referral to the Police whilst investigations are undertaken. Always ensure DOS advice and HR processes are correctly applied and followed