



# IT Online Safety and Online Safeguarding

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## Key Document Details

**School Name:** The White Horse Federation – all schools

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**Owner:** M Weller

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## **1. Introduction**

### **1.1. Statement**

The White Horse Federation believes that online safety is an essential element of safeguarding children and adults in the digital world. The internet and information communication technologies are an important part of everyday life so children must be supported to develop strategies to manage risk so to empower them to build resilience online.

The filtering of internet content within schools provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context. The filtering system cannot, however, provide a 100% guarantee that it will do so, because the content on the web changes dynamically and new technologies are constantly being developed. Therefore, it is crucial that a planned and progressive online safety curriculum is regularly taught and assessed, to provide children with the skills, knowledge, understanding and attitudes to stay safe.

### **1.2. Aim and purpose**

The White Horse Federation's aim is to provide quality Internet access to all areas of the school to raise education standards, promote student achievement, support professional work of staff and enhance management functions. The White Horse Federation also identifies that with this there is a clear duty to ensure that children are protected from potential harm online. This policy should be read in conjunction with the Anti- Bullying Policy, the ICT Misuse Policy, the Social Media Policy and the Video and Digital Image Policy.

### **1.3. Who it applies to:**

This Online Safety Policy applies to all members of the school community (including staff, the Local Governing Board, Director Members, learners, volunteers, parents and carers, visitors, community users and contractors) 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.

## **2. Policy**

### **2.1. Permissive/ non permissive**

#### **Internet Filtering**

Internet access is filtered for all users. The filtering of internet content provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context.

- WHFIT aim to provide differentiated internet access for agreed groups of users (see below) and customized filtering changes are managed by the WHFIT Support Team.
- Illegal content is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list and other illegal content lists.
- Filter content lists are regularly updated and internet use is logged and monitored. The monitoring process alerts the school to breaches of the filtering policy, which are then acted upon.
- There is a clear route for reporting and managing changes to the filtering system.
- All users have a responsibility to report immediately to the WHFIT Support Team any infringements of the school's filtering policy of which they become aware or any sites that are accessed, which they believe should have been filtered.

- Users must not knowingly attempt to use any Programs, software or external resources such as VPNs which may allow them to bypass the filtering / security systems in place to prevent access to such materials.
- Users must abide with both the spirit and terms of all IT and Comms Policies when using a device capable of 4G or 5G access to the Internet.

### **Education / Training / Awareness**

Pupils / students will be made aware of the importance of filtering and monitoring systems through teaching the Online Safety Curriculum.

Staff users will be made aware of the filtering systems through:

- the Acceptable Use Agreement
- induction training
- staff meetings, briefings and inset training

Parents will be informed of the school's filtering policy through the Acceptable Use Policy and through communication from the school.

### **Online bullying**

The White Horse Federation take any incident of online bullying extremely seriously and reserves the right to act upon it as per section 89 clause 5 of the Education and Inspections Act 2006. This means that the school reserves the right to deal with any bullying incident that pertains to the school "to such extent as is reasonable", whether it is on the school premises or in the online world. As there is no legal definition of bullying, for the purposes of this policy the school will use the following summary "the repeated use of electronic communication in any form, on any platform, which would cause harm or distress to another person."

### **Sexting**

Sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'. 'Sexting' does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police as part of the school's safeguarding.

Any incident of Sexting will be dealt with in line with government guidelines:

<https://www.gov.uk/government/publications/sexting-in-schools-and-colleges>

### **Up-Skirting**

Up-skirting is a criminal offence, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. All staff should be aware of aware of online bullying, 'upskirting' and sexting.

## **Compliance**

### **Online bullying**

The school will deal with any incidents on an individual case by case basis, using a set of sanctions that are proportionate to any behaviours demonstrated. The school will take into account:

- The context
- The intention
- The impact of any incident

before determining the response and actions to be taken.

Schools will retain a degree of flexibility in the application of actions e.g. a series of low-level incidents would likely to be treated differentially from persistent and more serious incidents.

### **Internet Filtering**

#### **Monitoring**

No filtering system can guarantee 100% protection against access to unsuitable sites. The school may therefore monitor the activities of users on the school network and on school equipment as indicated in the Acceptable Use agreement. Monitoring will be carried out by the WHFIT Support Team or relevant ISP.

#### **Audit / Reporting**

Logs of filtering change controls and of filtering incidents will be made available on request to:

- Principals
- Online safety coordinator
- Regional Director
- CEO
- Board of Trustees
- External Filtering provider / Local Authority / Police on request

The filtering policy will be reviewed in the response to the evidence provided by the audit logs of the suitability of the current provision.

### 3. Key steps in the process

#### 3.1. Roles and 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.

The following personal are responsible for the following posts across the White Horse Federation: Senior Information Risk Officer (SIRO) – IT Director and Data Protection Officer  
Data Protection Officer (DPO) - IT Director and Data Protection Officer  
Online Safety Director(s): Elected member of board of directors or CEO  
ICT Support and Ownership – IT Director and Data Protection Officer

Each school/establishment will need a named representative for the following posts, which will be recorded below: The position will be held by the Principal of the school unless otherwise specified.

- Online safety lead
- Designated safeguarding lead
- Child protection lead
- Information risk officer

#### Online safety director/CEO

This person is responsible for the reading, approval and scrutiny of all ICT Policies and reviewing the effectiveness of the policy. They are also responsible for holding the White Horse Federation to account for the effectiveness of policy implementation. This person is tasked with:

- Regular meetings with all online safety governors / lead
- Regular monitoring of online safety incident logs
- Regular monitoring of filtering / change control logs
- Reporting to relevant directors meeting

#### Online safety lead

The online safety lead is accountable and ultimately responsible for ensuring the safety (including online safety) of members of the school community. Typically, this post holder will be a member of the Senior Leadership Team and hold enhanced Child Protection Training. Online safety must be a 'whole school responsibility' in the same way that safeguarding is. The online safety lead must ensure that the day to day responsibility for online safety is seen as a whole community effort.

The online safety lead is responsible for:

- Ensuring that the online Safety coordinator and other relevant staff receive suitable training and development to enable them to carry out their online safety roles and train other colleagues, as relevant.
- Ensuring there is a system in place to monitor and support those who carry out the internal online safety monitoring role in school to provide a safety net.
- Updating the Senior Management Team (SMT) with regular monitoring reports
- Raising awareness of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff.
- Keeping up-to-date with current research, legislation and trends.

- Coordinating participation in local and national events to promote positive online behaviour, e.g. Safer Internet Day.
- Ensuring that online safety is promoted to parents and carers and the wider community through a variety of channels and approaches.
- Maintaining an online safety incident/action log to record incidents and actions taken as part of the schools safeguarding recording structures and mechanisms.
- Monitoring the school/settings online safety incidents to identify gaps/trends and update the education response to reflect need and to report to the school management team, governing body and other agencies as appropriate.
- Reviewing and updating online safety policies, Acceptable Use Policies (AUPs) and other procedures on a regular basis (at least annually) with stakeholder input.

### Online safety co-ordinator

Each WHF school will have a named member of staff who will be responsible for:

- Setting up and leading the online safety committee/ group
- Developing online safety policies / documents
- Raising staff awareness of the procedures that need to be followed in the event of an online safety incident taking place.
- Organising training and development for staff
- Monitoring reports of online safety incidents and the log of incidents to inform future online safety developments
- Meeting the online safety Lead to discuss current issues, review incident logs and filtering / change control logs when required.

### Online safety group

It is recommended that schools create an online safety group at their local site. The Online Safety Group provides a consultative group that has wide representation from the school community, with responsibility for issues regarding online safety and monitoring the Online Safety Policy including the impact of initiatives. Depending on the size or structure of the school this group may be part of the safeguarding group. The group will also be responsible for regular reporting to senior leaders and the governing body. will assist the Online Safety Lead with:

- The review, monitoring and compliance of the school online safety policy, school filtering policy and requests for filtering changes
- Mapping and reviewing the online safety curricular provision – ensuring relevance, breadth and progression
- Monitoring incident logs
- 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

### Designated safeguarding lead / child protection lead

The safeguarding and child protection leads should be aware of the potential for serious child protection/safeguarding issues to arise from:

- Sharing of personal data
- Access to illegal or inappropriate materials
- Inappropriate online contact with adults and strangers



- Potential or actual incidents of grooming
- Online bullying

### **Senior Information Risk Officer (SIRO) / Data Protection Officer (DPO)**

The Senior Information Risk Officer (SIRO) / Data Protection Officer (DPO) are responsible for:

- Overseeing the development of an Information Risk Policy, and a strategy for implementing the policy within the existing Information Governance Framework.
- To take ownership of risk assessment process for information risk, including review of the annual information risk assessment to support and inform the Statement of Internal Control.
- To review and agree action in respect of identified information risks.
- To provide a focal point for the resolution and/or discussion of information risk issues.
- To ensure TWHF board is adequately briefed on information risk issues.

### **Information Risk Officer (IRO)**

The Information Risk Officer (IRO) is responsible for ensuring:

- Data protection and information risk policies are adhered to within their school (working with the SIRO and DPO)
- Ongoing monitoring of data and information used in school to highlight any areas that need to be reviewed.
- The school's approach to information risk is effective in terms of resource, commitment and execution, being appropriately communicated to all staff.

### **Senior Management Team (SMT)**

The SMT is responsible for:

- Developing, owning and promoting the online safety vision and culture to all stakeholders in line with national and local best practice recommendations with appropriate support and consultation throughout the school community.
- Auditing and evaluating current online safety practice to identify strengths and areas for improvement.
- Supporting the online safety (online safety) lead in the development of an online safety culture within the setting.
- To ensure that suitable, age-appropriate and relevant filtering is in place to protect children from inappropriate content (including extremist material) to meet the needs of the school community and ensuring that the filtering and school network system is actively monitored.
- Ensuring all members of staff receive regular, up-to-date and appropriate training regarding online safety roles and responsibilities and provide guidance regarding safe appropriate communications.
- Ensuring that online safety is embedded within a progressive whole school curriculum which enables all students to develop an age-appropriate understanding of online safety and the associated risks and safe behaviours.
- Making appropriate resources available to support the development of an online safety culture.
- Ensure that appropriate risk assessments are undertaken regarding the safe use of technology, including ensuring the safe and responsible use of devices.
- To work with and support technical staff in monitoring the safety and security of school systems and networks.
- To ensure that the designated safeguarding lead (DSL) works in partnership with the online safety lead.

## Local Governing Board

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 Local Governing Board 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 Online Safety Lead.
- Regularly receiving (collated and anonymised) reports of online safety incidents.
- Checking that provision outlined in the Online Safety Policy (e.g. online safety education provision and staff training is taking place as intended).
- Reporting to relevant governors group/meeting.
- Membership of the school Online Safety Group.
- Occasional review of the filtering change control logs and the monitoring of filtering logs (where possible).
- The governing body will also support the school in encouraging parents/carers and the wider community to become engaged in online safety activities.

## Teaching and Support Staff

Teaching and Support 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 school staff acceptable use policy (AUP).
- they report any suspected misuse or problem to the online safety co-ordinator, principal, network manager or head of ICT and communications for investigation, action or sanction.
- all digital communications with learners and parents/carers should be on a professional level and only carried out using official school systems
- online safety teaching and learning are embedded in all aspects of the curriculum and other school activities
- ensure learners understand and follow the online safety policy and acceptable use policy
- 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 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 lessons take place using live-streaming or video-conferencing, staff must have full regard to national safeguarding guidance and local safeguarding policies and should take note of the guidance contained in the remote learning policy
- have 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.



## Curriculum Leads

Curriculum Leads will work with the Online Safety Lead to develop a planned and coordinated online safety education programme.

This will be provided through:

- A discrete online safety curriculum
- PHSE and SRE curriculum links
- Relevant national initiatives and opportunities e.g., Safer Internet Day and Anti-bullying week.

## WHFIT Support Team

The WHFIT Support Team are responsible for ensuring:

- that the ICT infrastructure is secure and is not open to misuse or malicious attack.
- that the TWHF meets the online safety technical requirements outlined in the Acceptable Use Policy.
- that users may only access the TWHF networks through a properly enforced password protection policy, in which passwords are regularly changed.
- the appropriate ISP, Principal, network Manager and Head of IT and Communications is informed of issues relating to filtering.
- the filtering policy is applied and updated on a regular basis.
- The team 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.
- that the use of the network / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Principal/ Network Manager for school-based misuse and Head of IT and Communications for central services misuse for investigation / action / sanction.
- that monitoring software / systems are implemented and updated regularly
- they report any breaches or concerns to the designated safeguarding lead and leadership team and together ensure that they are recorded on the e Safety Incident Log, and appropriate action is taken as advised.

## Students/pupils

- are responsible for using the school digital technology systems in accordance with the Student Acceptable Use Policy, which they will be expected to adhere/agree before being given access to school systems.
- will be taught to have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations.
- will be taught to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so.
- will be expected to know and understand school policies on the use of BYOD. They should also know and understand school policies on the taking / use of images and on online bullying.
- should understand the importance of adopting good online safety practice when using digital technologies out of school.
- be aware that this policy applies the school's Online Safety Policy covers their actions out of school, if related to their membership of the school in line with section 89 clause 5 of the of the Inspections Act 2006 "to such extent as is reasonable"

## Parents/carers

Parents/carers play a crucial role in ensuring that their children understand the need to use the Internet / mobile devices in an appropriate way. Research shows that many parents and carers do not fully understand the issues and are less experienced in the use of digital technologies than their children. Schools within the White Horse Federation will therefore take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website and information about national / local online safety campaigns / literature. Parents and carers will be responsible for:

- Endorsing and accepting the Student Acceptable Use Policy
- Reinforcing the online safety messages provided to learners in school
- Accessing the school website in accordance with the relevant school Acceptable Use Policy
- Adhering to reasonable online behaviour in regard to either individual schools or the Multi Academy Trust

## Community Users

Community users who access school systems as part of the wider school provision will be expected to sign a community user AUP before being provided with access to school systems.

TWHF 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.

## Internet Filtering

The responsibility for the management of the school's filtering policy will be held by the WHFIT Support Team. They will manage the school filtering, in line with this policy and will keep records / logs of changes and of breaches of the filtering systems.

All users have a responsibility to report immediately to the WHFIT Support Team any infringements of the school's filtering policy of which they become aware or any sites that are accessed, which they believe should have been filtered.

### 3.2. Procedures

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. Any concerns regarding the online conduct of any member of the school community will be reported and managed in accordance with existing school policies such as bullying, allegations against staff, behaviour and safeguarding/child protection.

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, the incident must be escalated through the agreed school safeguarding procedures.

### Internet Filtering

To ensure that there is a system of checks and balances and to protect those responsible, changes to the school filtering service must:

- be logged through the service desk system
- be reported on request of the Online Safety Group every term in the form of an audit of the change control logs

### 3.3. Local conditions statement

In some circumstances, local conditions mean that delivery will require local specific changes in the procedures. However, the core essence of the policy must be followed.

Please record below any school specific policy changes This must be signed by the principal of the school, who will be accountable for this change in policy guidelines.

#### Named roles at school

Role		Notes
Online safety lead	Click here to enter text.	
Online safety/computing coordinator	Click here to enter text.	
Designated safeguarding lead	Click here to enter text.	
Child Protection Lead	Click here to enter text.	
Information Risk Officer	Click here to enter text.	
We will operate an Online Safety Group Yes/No	Click here to enter text.	

### 4.0 Additional Resources

[Online Safety Group terms of reference](#)

[Responding to incidents of misuse flow chart](#)

[Personal Data Advice and Guidance](#)

[Description of legislative framework under which this Online Safety policy has been produced](#)

[Online Safety Policy template and appendices](#)

School Name:

Principal Name:

Signature:

Date: