

Online Safety Policy

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Statement of intent

Penwortham Priory Academy understands that using online services is an important aspect of raising educational standards, promoting pupil achievement, and enhancing teaching and learning. The use of online services is embedded throughout the school; therefore, there are a number of controls in place to ensure the safety of pupils and staff.

The breadth of issues classified within online safety is considerable, but they can be categorised into four areas of risk:

- **Content:** Being exposed to illegal, inappropriate or harmful content, e.g. pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news), and conspiracy theories.
- **Contact:** Being subjected to harmful online interaction with other users or generative AI applications that simulate this, e.g. peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children for sexual, criminal, financial or other purposes.
- **Conduct:** Online behaviour that increases the likelihood of, or causes, harm, e.g. making, sending and receiving explicit images including pornography, including those generated using AI and online bullying.
- **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

The measures implemented to protect pupils and staff revolve around these areas of risk. Our school has created this policy with the aim of ensuring appropriate and safe use of the internet and other digital technology devices by all pupils and staff. The requirement to ensure children and young people are able to use the internet and related communication technologies appropriately is addressed as part of our wider duty of care to which all who work in schools are bound. The school online policy will help to ensure safe and appropriate use.

The development and implementation of this policy will involve all of the stakeholders in a child's education from the Principal and Trustees to SLT and classroom teachers, support staff, parents and pupils themselves. Penwortham Priory Academy have robust safeguarding procedures in place and understands that online safety is an integral part of keeping children safe.

The use of these exciting and innovative technologies and tools in school and at home has been shown to raise educational standards and promote pupils achievement. However, the use of these new technologies can put young people at risk within and outside the school. Some of the dangers may include :-

- Access to illegal, harmful or inappropriate images or content
- Unauthorized access to / loss of / sharing of personal information
- The risk of subject to grooming by those with whom they have contact on the internet
- The sharing / distribution of personal images without an individual's consent or knowledge.
- Inappropriate communication / contact with others, including strangers
- Access to unsuitable video / internet games
- An inability to evaluate the quality, accuracy and relevance of information on the internet
- Plagiarism and copyright infringement
- Illegal downloading of music or video files

- The potential of excessive use which may impact on the social and emotional development and learning of the young person

Many of these risks reflect situation in the off-line world and it is essential that this online safety policy is used in conjunction with other school policies (eg. Behaviour and Discipline, Anti-Bullying and Safeguarding and Child Protection policies). As with all other risks, it is impossible to eliminate those risks completely. It is therefore essential through good education provision to build pupils' resilience and raise awareness of the risks to which they may be exposed, so that they have the confidence and skills to face and deal with these risks.

The school will demonstrate that it has provided the necessary safeguarding to help ensure that they have done everything that could reasonably be expected of them to manage and reduce these risks. The online safety policy that follows explains how we at Penwortham Priory Academy intend to do this, whilst also addressing wider educational issues in order to help young people to be responsible users and stay safe while using the internet and other communication technologies for educational, personal and recreational use.

Online safety encompasses not only internet technologies but also electronic communications via mobile phones games consoles and wireless technology. It highlights the need to educate children and young people about the benefits, risks and responsibilities of using information technology.

Online safety concerns safeguarding children and young people in the digital world

- Online safety emphasizes learning to understand and use new technologies in a positive way
- Online safety is less about restriction and more about education and risks as well as the benefits so we can feel confident online
- Online safety is concerned with supporting children and young people develop safer online behaviours both in and out of school

The internet is an unmanaged, open communications channel. The World Wide Web, emails, blogs and social networks all transmit information using the internet intentionally at low cost. Anyone can send messages, discuss ideas and publish material with little restriction. These features of the internet make it an invaluable resource used by billions of people every day.

Some of the material on the internet is published for an adult audience and can include violent and adult content. Information on weapons, crime, racism, extremism and radicalization may also be unsuitable for children and young people to access. Pupils need to develop critical skills to evaluate online material and learnt that publishing personal information could compromise their security and that of others. Schools have a duty of care to enable pupils to use online systems safely.

Penwortham Priory Academy needs to protect itself from legal challenge and ensure that staff work within boundaries of professional behaviour. The law is catching up with internet developments: for example it is an offence to use email, text or instant messaging (IM) to 'groom' children. It is the responsibility of the school to make it clear to staff, pupils and visitors that the use of school equipment for inappropriate reasons is 'unauthorised' and an acceptable use policy (AUP) is in place. Online safety training is an essential part of staff induction, continued INSET and part of our ongoing CPD programme.

IT System

- Schools firewalls are Fortigate 90G and operate 2 of these in a failover state. Our filtering is provided by Lightspeed Systems. On all school owned devices, Lightspeed filtering client installed and on pupil devices Lightspeed Alerting client has been installed
- Both the Fortigate & Lightspeed conform to the IWF and CTIRU lists of blocked websites and updates the systems accordingly.
- Fortigate & Lightspeed also check more on generative AI and this is all monitored within the school
- All staff and pupils sign the School Acceptable Use Agreement for use of computers in school.

The rapid development and accessibility of the internet and new technologies such as personal phishing and social networking, means that online safety is an ever growing and changing area of interest and concern. The school's online safety policy reflects this by keeping abreast of the vast changes taking place around us.

Please note : school devices will only be monitored in school work hours.

In the event of a cyberattack, the school will revert to its cyber risk policy.

This policy applies to all members of the school community which have access to and are users of school ICT systems, both in and out of school.

The Education and Inspections Act 2006 empowers Principals and Principals to such extent as it is reasonable, to regulate behaviours of pupils when they are off the school site and empowers members of staff to impose sanctions for inappropriate behaviours. This is pertinent to online bullying, which may take place out of school, but is linked to membership / belonging to the school. The school will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents, guardians and / or carers of incidents of inappropriate online behaviour that take place out of school.

The school will monitor the impact of the policy using :

- Internal monitoring data for network activity
- Internet monitoring which is done by schools own Lightspeed System & Filter
- Lead DSL logs on incidents
- Monitoring logs of internet activity, including sites visited
- Lightspeed safeguarding alerts sent to DSLs
- the IT support team who will work to ensure filtering systems are appropriate, efficient and as effective as possible. This will entail regular checks and ongoing monitoring.
- Lightspeed Systems with the appropriate firewall and all appropriate filters.
- virus protection that will be regularly updated. There should be procedures in place for virus protection to be updated on any laptops used by staff members or pupils. If staff or pupils discover unsuitable sites, the URL, time and date must be reported immediately to the network manager. There are processes in place to deal with such reports

Aims

At Penwortham Priory Academy, we are committed to using the internet technologies to:

- Make learning more exciting and interactive.
- Make lessons more varied. and other digital
- Enable pupils to gain access to a wide variety of knowledge in a safe way.
- Raise educational standards.
- Prepare our pupils for using the internet safely outside of school and throughout their education

Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Online Safety Act 2023
- Voyeurism (Offences) Act 2019
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Children's wellbeing and schools Act 2026
- DfE 'Filtering and monitoring standards for schools and colleges'
- DfE 'Harmful online challenges and online hoaxes'
- DfE 'Keeping children safe in education' (September 2026)
- DfE 'Teaching online safety in schools'
- DfE 'Searching, screening and confiscation'
- DfE 'Generative artificial intelligence (AI) in education'
- Department for Digital, Culture, Media and Sport and UK Council for Internet Safety 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- UK Council for Child Internet Safety 'Education for a Connected World – 2020 edition'
- National Cyber Security Centre 'Small Business Guide: Cyber Security'

This policy operates in conjunction with the following school policies:

- Social Media Policy
- Allegations of Abuse Against Staff Policy
- Acceptable Use Agreement
- Cyber Risk Policy
- Safeguarding and Child Protection Policy
- Child-on-Child Abuse Policy
- Anti-Bullying Policy
- Mobile Devices Policy
- Staff Code of Conduct
- Behaviour and Discipline Policy
- Disciplinary and Dismissal Procedure
- General Data Protection Regulations Policy
- Prevent Policy
- Reasonable Use of AI Policy

Roles and responsibilities

The *Board of Trustees* will be responsible for:

- Ensuring that this policy is effective and complies with relevant laws and statutory guidance.
- Ensuring the DSL's remit covers online safety.
- Reviewing this policy on an **annual** basis.
- Ensuring their own knowledge of online safety issues is up to date.
- Ensuring all staff undergo safeguarding and child protection training, including online safety, at induction and at regular intervals.
- Ensuring that there are appropriate filtering and monitoring systems in place.
- Ensuring that the effectiveness of filtering and monitoring systems is reviewed at least annually in liaison with ICT staff and service providers.
- Ensuring that the SLT and other relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, and manage them effectively and know how to escalate concerns when identified.
- Ensuring that all relevant school policies have an effective approach to planning for, and responding to, online challenges and hoaxes embedded within them.
- Ensuring compliance with the DfE's 'Meeting digital and technology standards in schools and colleges', with particular regard to the filtering and monitoring standards in relation to safeguarding.

At Penwortham Priory Academy, the Chair of Trustees is Miss Oliver and Safeguarding Trustee is Mrs Patel

The *Principal* will be responsible for:

- Ensuring that online safety is a running and interrelated theme throughout the school's policies and procedures, including in those related to the curriculum, teacher training and safeguarding.
- Supporting the DSL and the deputy DSL by ensuring they have enough time and resources to carry out their responsibilities in relation to online safety.
- Ensuring staff receive regular, up-to-date and appropriate online safety training and information as part of their induction and safeguarding training.
- Ensuring online safety practices are audited and evaluated.
- Organising engagement with parents to keep them up to date with current online safety issues and how the school is keeping pupils safe.
- Working with the DSL and IT support team to conduct **half-termly** light-touch reviews of this policy.
- Working with the DSL and Board of Trustees to update this policy on an **annual** basis.
- Identifying and assigning roles and responsibilities to manage the school's filtering and monitoring systems.
- Appointing an SLT digital lead in line with the Cyber Risk Policy.

At Penwortham Priory Academy, the Principal is Mr Eastham

The *DSL* will be responsible for:

- Taking the lead responsibility for online safety in the school.
- Undertaking training so they understand the risks associated with online safety and can recognise additional risks that pupils with SEND face online.

- Liaising with relevant members of staff on online safety matters, e.g. the SENCO and IT support team.
- Ensuring online safety is recognised as part of the school's safeguarding responsibilities and that a coordinated approach is implemented.
- Ensuring safeguarding is considered in the school's approach to any remote learning.
- Establishing a procedure for reporting online safety incidents and inappropriate internet use, both by pupils and staff, and ensuring all members of the school community understand this procedure.
- Understanding the filtering and monitoring processes in place at the school and ensuring they continue to meet the school's safeguarding needs.
- Ensuring that all safeguarding training given to staff includes an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring systems at the school.
- Maintaining records of reported online safety concerns as well as the actions taken in response to concerns.
- Monitoring online safety incidents to identify trends and any gaps in the school's provision and using this data to update the school's procedures.
- Reporting to the Board of Trustees about online safety on a **termly** basis.
- Working with the Principal and IT support team to conduct **half-termly** light-touch reviews of this policy.
- Working with the Principal and Board of Trustees to update this policy on an **annual** basis.

At Penwortham Priory Academy, Lead DSL is Mrs Crank (Assistant Principal) and DSLs are Mrs Holland and Mr Faulkner.

IT Support team will be responsible for:

- Providing technical support in the development and implementation of the school's online safety policies and procedures.
- Implementing appropriate security measures as directed by the Principal.
- Ensuring that the school's filtering and monitoring systems are updated as appropriate.
- Working with the DSL and Principal to conduct **half-termly** light-touch reviews of this policy.

All staff members will be responsible for:

- Taking responsibility for the security of ICT systems and electronic data they use or have access to.
- Modelling good online behaviours.
- Maintaining a professional level of conduct in their personal use of technology.
- Having an awareness of current and emerging online safety issues.
- Ensuring they are familiar with, and understand, the indicators that pupils may be unsafe online.
- Reporting concerns in line with the school's reporting procedure.
- Where relevant to their role, ensuring online safety is embedded in their teaching of the curriculum.

Pupils will be responsible for:

- Adhering to the Acceptable Use Agreement and other relevant policies.
- Seeking help from school staff if they are concerned about something they or a peer have experienced online.
- Reporting online safety incidents and concerns in line with the procedures within this policy.

Managing online safety

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues affecting young people. Staff will understand that pupils are at risk of abuse and other safeguarding concerns online as well as face to face, and in many cases, abuse will take place concurrently online and offline.

The DSL has overall responsibility for the school's approach to online safety, with support from deputies and the Principal where appropriate, and will ensure that there are strong processes in place to handle any concerns about pupils' safety online. The DSL should liaise with the police or children's social care services for support responding to harmful online sexual behaviour.

The importance of online safety is integrated across all school operations in the following ways:

- Staff and Board of Trustees receive regular training
- Staff receive regular email updates regarding online safety information and any changes to online safety guidance or legislation
- Online safety is integrated into learning throughout the curriculum
- Assemblies are conducted termly on the topic of remaining safe online

Handling online safety concerns

Any disclosures made by pupils to staff members about online abuse, harassment or exploitation, whether they are the victim or disclosing on behalf of another child, will be handled in line with the Safeguarding Policy and Child Protection Policy.

Staff will be aware that harmful online sexual behaviour can progress on a continuum, and appropriate and early intervention can prevent abusive behaviour in the future. Staff will also acknowledge that pupils displaying this type of behaviour are often victims of abuse themselves and should be suitably supported.

The victim of online harmful sexual behaviour may ask for no one to be told about the abuse. The DSL will consider whether sharing details of the abuse would put the victim in a more harmful position, or whether it is necessary in order to protect them from further harm. Ultimately the DSL will balance the victim's wishes against their duty to protect the victim and other young people. The DSL and other appropriate staff members will meet with the victim's parents to discuss the safeguarding measures that are being put in place to support their child and how the report will progress.

Confidentiality will not be promised, and information may be still shared lawfully, for example, if the DSL decides that there is a legal basis under UK GDPR such as the public task basis whereby it is in the public interest to share the information. If the decision is made to report abuse to children's social care or the police against the victim's wishes, this must be handled extremely carefully – the

reasons for sharing the information should be explained to the victim and appropriate specialised support should be offered.

Concerns regarding a staff member's online behaviour are reported to the Principal, who decides on the best course of action in line with the relevant policies. If the concern is about the Principal, it is reported to the Chair of Trustees.

Concerns regarding a pupil's online behaviour are reported to the DSL, who investigates concerns with relevant staff members, e.g. the Principal and IT support team, and manages concerns in accordance with relevant policies depending on their nature, e.g. the Behaviour and Discipline Policy and Safeguarding Policy and Child Protection Policy.

Where there is a concern that illegal activity has taken place, the Principal contacts the police.

The school will avoid unnecessarily criminalising pupils, e.g. calling the police, where criminal behaviour is thought to be inadvertent and as a result of ignorance or normal developmental curiosity, e.g. where a pupil has shared nudes or semi-nudes of themselves. The DSL will decide in which cases this response is appropriate and will manage such cases in line with the Safeguarding and Child Protection Policy.

All online safety incidents and the school's response will be recorded by the DSL.

Cyberbullying

Cyberbullying can include, but is not limited to, the following:

- Threatening, intimidating or upsetting text messages
- Threatening or embarrassing pictures and video clips sent via mobile phone cameras
- Silent or abusive phone calls or using the victim's phone to harass others, to make them think the victim is responsible
- Threatening or bullying emails, possibly sent using a pseudonym or someone else's name
- Unpleasant messages sent via instant messaging
- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g. Facebook
- Abuse between young people in intimate relationships online i.e. teenage relationship abuse
- Discriminatory bullying online i.e. homophobia, racism, misogyny/misandry.

The school will be aware that certain pupils can be more at risk of abuse and/or bullying online, such as lesbian, gay, bisexual, or gender questioning pupils and pupils with SEND.

Cyberbullying against pupils or staff is not tolerated under any circumstances. Incidents of cyberbullying are dealt with quickly and effectively wherever they occur in line with the Anti-bullying Policy.

Child-on-child sexual abuse and harassment

Pupils may use the internet and technology to facilitate child-on-child sexual abuse and harassment. Staff will understand that this abuse can occur both in and outside of school, offline and online, and that online elements may facilitate or accompany abuse that also occurs face to face.

The following are examples of online harmful sexual behaviour of which staff will be expected to be aware:

- Threatening, facilitating or encouraging sexual violence
- Upskirting, i.e. taking a picture underneath a person's clothing without consent and with the intention of viewing their genitals, breasts or buttocks
- Sexualised online bullying, e.g. sexual jokes or taunts
- Unwanted and unsolicited sexual comments and messages
- Consensual or non-consensual making or sharing of nudes and semi-nudes, including those generated or altered using AI.
- Abuse between young people in intimate relationships online, i.e. teenage relationship abuse

All staff will be aware of and promote a zero-tolerance approach to sexually harassing or abusive behaviour, and any attempts to pass such behaviour off as trivial or harmless. Staff will be aware that allowing such behaviour could lead to a school culture that normalises abuse and leads to pupils becoming less likely to report such conduct.

Staff will be aware that creating, possessing, and distributing nudes or semi-nudes involving other children, including images generated or altered using AI may constitute a criminal offence, even where the imagery is created, possessed, and distributed with the permission of the child depicted, or by the child themselves. Such incidents will be handled in accordance with the Making or Sharing of Nude or Semi-nude Images Policy.

The school will be aware that interactions between the victim of online harmful sexual behaviour and the alleged perpetrator(s) are likely to occur over social media following the initial report, as well as interactions with other pupils taking "sides", often leading to repeat harassment. The school will respond to these incidents in line with the Child-on-child Abuse Policy, Safeguarding and Child Protection Policy, and the Social Media Policy.

The school will respond to all concerns regarding online child-on-child sexual abuse and harassment, regardless of whether the incident took place on the school premises or using school-owned equipment. Concerns regarding online child-on-child abuse will be reported to the DSL, who will investigate the matter in line with the Child-on-child Abuse Policy and the Safeguarding and Child Protection policy.

Grooming and exploitation

Grooming is defined as the situation whereby an adult builds a relationship, trust and emotional connection with a child with the intention of manipulating, exploiting and/or abusing them.

Staff will be aware that grooming often takes place online and that pupils who are being groomed are commonly unlikely to report this behaviour for many reasons, e.g. the pupil may have been manipulated into feeling a strong bond with their groomer and may have feelings of loyalty, admiration, or love, as well as fear, distress and confusion.

Due to the fact pupils are less likely to report grooming than other online offences, it is particularly important that staff understand the indicators of this type of abuse. The DSL will ensure that online safety training covers online abuse, the importance of looking for signs of grooming, and what the signs of online grooming are, including:

- Being secretive about how they are spending their time online.

- Having an older boyfriend or girlfriend, usually one that does not attend the school and whom their close friends have not met.
- Having money or new possessions, e.g. clothes and technological devices, that they cannot or will not explain.

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

Although CSE often involves physical sexual abuse or violence, online elements may be prevalent, e.g. sexual coercion and encouraging children to behave in sexually inappropriate ways online. In some cases, a pupil may be groomed online to become involved in a wider network of exploitation, e.g. the production or distribution of child sexual abuse material (CSAM), or the sexual exploitation and trafficking of children.

CCE is a form of exploitation in which children are forced or manipulated into committing crimes for the benefit of their abuser, e.g. drug transporting (including county lines activity), shoplifting, serious violence and other forms of criminal exploitation. While these crimes often take place in person, it is increasingly common for children to be groomed and manipulated into participating online.

Where staff have any concerns about pupils with relation to CSE or CCE, they will bring these concerns to the DSL without delay, who will manage the situation in line with the Safeguarding and Child Protection policy.

Radicalisation

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. This process can occur through direct recruitment, e.g. individuals in extremist groups identifying, targeting and contacting young people with the intention of involving them in terrorist activity, or by exposure to violent ideological propaganda. Children who are targets for radicalisation are likely to be groomed by extremists online to the extent that they believe the extremist has their best interests at heart, making them more likely to adopt the same radical ideology.

Staff members will be aware of the factors which can place certain pupils at increased vulnerability to radicalisation, as outlined in the Prevent Duty Policy. Staff will be expected to exercise vigilance towards any pupils displaying indicators that they have been, or are being, radicalised.

Where staff have a concern about a pupil relating to radicalisation, they will report this to the DSL without delay, who will handle the situation in line with the Safeguarding and Child Protection Policy and Prevent Duty Policy.

Mental health

Staff will be aware that online activity both in and outside of school can have a substantial impact on a pupil's mental state, both positively and negatively. The DSL will ensure that training is available to help ensure that staff members understand apps, games and websites, online terminology, the ways in which social interactions online in general can impact mental health, and the indicators that a pupil is suffering from challenges in their mental health. Concerns about the mental health of a pupil will be dealt with in line with the Social, Emotional and Mental Health (SEMH) Policy.

Online hoaxes and harmful online challenges

For the purposes of this policy, an “**online hoax**” is defined as a deliberate lie designed to seem truthful, normally one that is intended to scaremonger or to distress individuals who come across it, spread on online, e.g. via social media, game chats, and messaging platforms.

For the purposes of this policy, “**harmful online challenges**” refers to challenges that are targeted at young people and generally involve users recording themselves participating in an online challenge, distributing the video online, e.g. through social media channels, and daring others to do the same. Although many online challenges are harmless, an online challenge becomes harmful when it could potentially put the participant at risk of harm, either directly as a result of partaking in the challenge itself or indirectly as a result of the distribution of the video online – the latter will usually depend on the age of the pupil and the way in which they are depicted in the video.

Where staff become aware of, or suspect, a harmful online challenge or online hoax that may pose a risk to pupils, they will report this to the DSL immediately.

The DSL will conduct a case-by-case assessment for any harmful online content brought to their attention, establishing the scale and nature of the possible risk to pupils, and whether the risk is one that is localised to the school or the local area, or whether it extends more widely across the country. Where the harmful content is prevalent mainly in the local area, the DSL will consult with the LA about whether quick local action can prevent the hoax or challenge from spreading more widely.

Prior to deciding how to respond to a harmful online challenge or hoax, the DSL and the Principal will decide whether each proposed response is:

- In line with any advice received from a known, reliable source, e.g. the UK Safer Internet Centre, when fact-checking the risk of online challenges or hoaxes.
- Careful to avoid needlessly scaring or distressing pupils.
- Not inadvertently encouraging pupils to view the hoax or challenge where they would not have otherwise come across it, e.g. where content is explained to younger pupils but is almost exclusively being shared amongst older pupils.
- Proportional to the actual or perceived risk.
- Helpful to the pupils who are, or are perceived to be, at risk.
- Appropriate for the relevant pupils’ age and developmental stage.
- Supportive.
- In line with the Safeguarding and Child Protection Policy.

Where the DSL’s assessment finds an online challenge to be putting pupils at risk of harm, they will ensure that the challenge is directly addressed to the relevant pupils, e.g. those within a particular age range that is directly affected or individual pupils at risk where appropriate.

The DSL and Principal will only implement a school-wide approach to highlighting potential harms of a hoax or challenge when the risk of needlessly increasing pupils’ exposure to the risk is considered and mitigated as far as possible.

Cyber-crime

Cyber-crime is criminal activity committed using computers and/or the internet. There are two key categories of cyber-crime:

- **Cyber-enabled** – these crimes can be carried out offline; however, are made easier and can be conducted at higher scales and speeds online, e.g. fraud, purchasing and selling of illegal drugs, and sexual abuse and exploitation.
- **Cyber-dependent** – these crimes can only be carried out online or by using a computer, e.g. making, supplying or obtaining malware, illegal hacking, and 'booting', which means overwhelming a network, computer or website with internet traffic to render it unavailable.

The school will factor into its approach to online safety the risk that pupils with a particular affinity or skill in technology may become involved, whether deliberately or inadvertently, in cyber-crime. Where there are any concerns about a pupil's use of technology and their intentions with regard to using their skill and affinity towards it, the DSL will consider a referral to the Cyber Choices programme, which aims to intervene where children are at risk of committing cyber-crime and divert them to a more positive use of their skills and interests.

The DSL and Principal will ensure that pupils are taught, throughout the curriculum, how to use technology safely, responsibly and lawfully.

Online safety training for staff

The DSL will ensure that all safeguarding training given to staff includes elements of online safety, including how the internet can facilitate abuse and exploitation, and understanding the expectations, roles and responsibilities relating to filtering and monitoring systems. All staff will be made aware that pupils are at risk of abuse, by their peers and by adults, online as well as in person, and that, often, abuse will take place concurrently via online channels and in daily life.

Staff training will include a specific focus on harmful online narratives such as misinformation, disinformation, and conspiracy theories, helping staff to recognise the signs of influence or vulnerability among pupils.

Training will equip staff with the knowledge and confidence to identify signs of online harm, respond appropriately to disclosures or concerns, and support pupils in developing critical thinking skills and safe online behaviours.

Staff will also be guided on how to embed online safety themes across the wider curriculum, promoting a consistent, whole-school approach to digital safeguarding.

Online safety and the curriculum

Online safety is embedded throughout the curriculum; however, it is particularly addressed in the following subjects:

- RSHE
- PSHE
- Citizenship
- ICT / Computing

Online safety teaching is always appropriate to pupils' ages and developmental stages.

Pupils are taught the underpinning knowledge and behaviours that can help them to navigate the online world safely and confidently regardless of the device, platform or app they are using. The underpinning knowledge and behaviours pupils learn through the curriculum include the following:

- How to evaluate what they see online

- How to recognise techniques used for persuasion
- Acceptable and unacceptable online behaviour
- How to identify online risks
- How and when to seek support
- Knowledge and behaviours that are covered in the government's online media literacy strategy

The online risks pupils may face online are always considered when developing the curriculum. The school's approach to teaching online safety in the curriculum will reflect the ever-evolving nature of online risks, ensuring pupils develop the knowledge and resilience to navigate digital spaces safely and responsibly. Online safety education will address four key categories of risk: content, contact, conduct, and commerce.

Content risks

Pupils will be taught how to critically evaluate online content and identify material that is illegal, inappropriate, or harmful. The curriculum will include discussions around harmful content such as AI-generated content, deepfakes, pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news), and conspiracy theories. Lessons will equip pupils with the skills to question sources, verify information, and understand the dangers of engaging with such content.

Contact risks

The school will educate pupils about the potential dangers of interacting with others online or generative AI applications that simulate this. Pupils will explore topics such as peer pressure, commercial exploitation, and grooming tactics used by adults who pose as children or young adults. They will learn how to recognise unsafe interactions, use privacy settings effectively, and report any concerning behaviour or messages to trusted adults and platforms.

Conduct risks

Pupils will be guided on how their own online behaviour can impact both themselves and others. The curriculum will address the risks associated with making, sharing or receiving nudes and semi-nudes, including images that have been generated or altered using AI. Online bullying, including the use of online platforms, e.g. social media and messaging platforms to harass or intimidate others, will also be a key focus. Pupils will be taught responsible digital conduct and the legal and emotional consequences of harmful behaviour.

Commerce risks

The curriculum will also include education on online commercial risks. Pupils will be informed about the dangers of online gambling, exposure to inappropriate advertising, and financial scams such as phishing. They will learn how to recognise fraudulent schemes, protect their personal and financial information, and seek help when confronted with suspicious online activity.

The DSL will be involved with the development of the school's online safety curriculum. Pupils will be consulted on the online safety curriculum, where appropriate, due to their unique knowledge of the kinds of websites they and their peers frequent and the kinds of behaviours in which they engage online.

Relevant members of staff, e.g. the SENCO and designated teacher for LAC, will work together to ensure the curriculum is tailored so that pupils who may be more vulnerable to online harms, e.g. pupils with SEND and LAC, receive the information and support they need.

The school will also endeavour to take a more personalised or contextualised approach to teaching about online safety for more susceptible children, and in response to instances of harmful online behaviour from pupils.

Class teachers will review external resources prior to using them for the online safety curriculum, to ensure they are appropriate for the cohort of pupils.

External visitors may be invited into school to help with the delivery of certain aspects of the online safety curriculum. The Principal and DSL will decide when it is appropriate to invite external groups into school and ensure the visitors selected are appropriate.

Before conducting a lesson or activity on online safety, the class teacher and DSL will consider the topic that is being covered and the potential that pupils in the class have suffered or may be suffering from online abuse or harm in this way. The DSL will advise the staff member on how to best support any pupil who may be especially impacted by a lesson or activity. Lessons and activities will be planned carefully so they do not draw attention to a pupil who is being or has been abused or harmed online, to avoid publicising the abuse.

During an online safety lesson or activity, the class teacher will ensure a safe environment is maintained in which pupils feel comfortable to say what they feel and ask questions, and are not worried about getting into trouble or being judged.

If a staff member is concerned about anything pupils raise during online safety lessons and activities, they will make a report in line with the Safeguarding and Child Protection Policy.

If a pupil makes a disclosure to a member of staff regarding online abuse following a lesson or activity, the staff member will follow the reporting procedure outlined in the Safeguarding and Child Protection Policy.

Use of technology in the classroom

A wide range of technology will be used during lessons, including the following:

- Computers
- Laptops
- Email

Prior to using any websites, tools, apps, AI systems or other online platforms in the classroom, or recommending that pupils use these platforms at home, the teacher will review and evaluate the resource to ensure it is appropriate, safe and suitable for the age and needs of the pupils. Teachers will ensure that any internet-derived materials are used in line with copyright law.

Pupils will be supervised when using online materials during lesson time – this supervision will be suitable to their age and ability.

Use of mobile devices

While the school recognises that the use of mobile devices can have educational benefits, there are also a variety of associated risks which the school will ensure it manages.

Pupils will not be permitted to use personal mobile devices at any point during the school day unless exceptions apply. The prohibited use of personal mobile devices will be managed in accordance with the school's Mobile Devices Policy.

Staff will use all personal technology in line with the school's Staff Acceptable Use Policy

The school recognises that pupils may have access to the internet through personal devices and mobile phone networks outside the school day, or where school restrictions are circumvented. This can increase the risk of online behaviour that places pupils at risk of harm and breaches the school's Mobile Devices Policy and Acceptable Use Agreement for Pupils.

Where there is a significant problem with the misuse of smart technology among pupils, the school will discipline those involved in line with the Behaviour and Discipline Policy.

Inappropriate use of smart technology may include:

- Using mobile devices to sexually harass, bully, troll or intimidate peers.
- Making or sharing nudes and semi-nudes, including images generated or altered using AI, both consensually and non-consensually.
- Viewing and sharing pornography and other harmful content.

The school will hold assemblies, where appropriate, which address any specific concerns related to the misuse of technology and outline the importance of using technology in an appropriate manner.

The school will seek to ensure that it remains up to date with emerging technologies, including AI tools, devices, platforms, apps, trends and related risks.

The school will consider the 4Cs (content, contact, conduct and commerce) when educating pupils about the risks involved with the inappropriate use of smart technology and enforcing the appropriate disciplinary measures.

Educating parents

The school will work in partnership with parents to ensure pupils stay safe online at school and at home. Parents will be provided with information about the school's approach to online safety and their role in protecting their children.

Parents will be made aware of the various ways in which their children may be at risk online, including, but not limited to:

- Child sexual abuse, including grooming.
- Exposure to radicalising content.
- Making or sharing nudes and semi-nudes, including images generated or altered using AI.
- Cyberbullying.
- Exposure to age-inappropriate content, e.g. pornography.
- Exposure to harmful content, e.g. content that encourages self-destructive behaviour.

Parents will be informed of the ways in which they can prevent their child from accessing harmful content at home, e.g. by implementing parental controls to block age-inappropriate content. Parental awareness regarding how they can support their children to be safe online will be raised in the following ways:

- School website
- Safeguarding newsletters
- Online resources

Internet access

Pupils, staff and other members of the school community will only be granted access to the school's internet network once they have read and signed the Acceptable Use Agreement.

All members of the school community will be encouraged to use the school's network, instead of 3G, 4G and 5G networks, as the network has appropriate filtering and monitoring to ensure individuals are using the internet appropriately.

Filtering and monitoring online activity

The Board of Trustees will ensure the school's ICT network has appropriate filters and monitoring systems in place and that it is meeting the DfE's 'Filtering and monitoring standards for schools and colleges'. The Board of Trustees will ensure 'over blocking' does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding.

The school will do all it reasonably can to limit pupils' exposure to online risks from the school's ICT system. The school will put in place appropriate filtering and monitoring systems and ensure that their effectiveness is reviewed at least annually and whenever there is a significant change to the school's network, safeguarding risks or technology provision. Reviews will be carried out by the SLT member responsible for filtering and monitoring with support from the DSL and IT support team.

Reviews will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record will be kept of these checks.

The DSL will ensure that specific roles and responsibilities are identified and assigned to manage filtering and monitoring systems and to ensure they meet the school's safeguarding needs.

The Principal and IT support team will undertake a risk assessment to determine what filtering and monitoring systems are required. The filtering and monitoring systems the school implements will be appropriate to pupils' ages, the number of pupils using the network, how often pupils access the network, and the proportionality of costs compared to the risks.

Requests regarding making changes to the filtering system will be directed to the Principal. Prior to making any changes to the filtering system, IT support team and the DSL will conduct a risk assessment. Any changes made to the system will be recorded by IT support team. Reports of inappropriate websites or materials will be made to an ICT support team immediately, who will investigate the matter and makes any necessary changes.

Deliberate breaches of the filtering system will be reported to the DSL and IT support team, who will escalate the matter appropriately. If a pupil has deliberately breached the filtering system, they will be disciplined in line with the Behaviour and Discipline Policy. If a member of staff has

deliberately breached the filtering system, they will be disciplined in line with the Disciplinary Policy and Procedure.

If material that is believed to be illegal is accessed, inadvertently or deliberately, this material will be reported to the appropriate agency immediately, e.g. the Internet Watch Foundation (IWF), CEOP and/or the police.

The school's network and school-owned devices will be appropriately monitored. All users of the network and school-owned devices will be informed about how and why they are monitored.

Concerns identified through monitoring will be reported to the DSL who will manage the situation in line with the Safeguarding and Child Protection Policy.

Network security

Technical security features, such as anti-virus software, will be kept up-to-date and managed by IT support team. Firewalls will be switched on at all times. IT support team will review the firewalls on a weekly basis to ensure they are running correctly, and to carry out any required updates.

Staff and pupils will be advised not to download unapproved software or open unfamiliar email attachments, and will be expected to report all malware and virus attacks to IT support team.

All members of staff will have their own unique usernames and private passwords to access the school's systems. Pupils in all years and above will be provided with their own unique username and private passwords. Staff members and pupils will be responsible for keeping their passwords private. Passwords will have a minimum and maximum length and require a mixture of letters, numbers and symbols to ensure they are as secure as possible. Passwords will expire after 90 days, after which users will be required to change them.

Users will inform IT support team if they forget their login details, who will arrange for the user to access the systems under different login details. Users will not be permitted to share their login details with others and will not be allowed to log in as another user at any time. If a user is found to be sharing their login details or otherwise mistreating the password system, the Principal will be informed and will decide the necessary action to take.

Users will be required to lock access to devices and systems when they are not in use.

The IT support team will be responsible for implementing appropriate network security measures in liaison with the DPO and DSL. Full details of the school's network security measures can be found in the Cyber-security Policy.

Emails

Access to and the use of emails will be managed in line with the General Data Protection Policy and Acceptable Use Agreement.

Staff and pupils will be given approved school email accounts and will only be able to use these accounts at school and when doing school-related work outside of school hours. Prior to being authorised to use the email system, staff and pupils must agree to and sign the Acceptable Use Agreement. Personal email accounts will not be permitted to be used on the school site. Any email that contains sensitive or personal information will only be sent using secure and encrypted email.

Staff members and pupils will be required to block spam and junk mail, and report the email to IT support team. The school's monitoring system can detect inappropriate links, malware and profanity within emails – staff and pupils will be made aware of this. Chain letters, spam and all other emails from unknown sources will be deleted without being opened. IT support team will organise annual cyber awareness training, including guidance on recognising phishing emails, AI-generated phishing attempts and other malicious communications. This training will include information on the following:

- How to determine whether an email address is legitimate
- The types of address a phishing email could use
- The importance of asking "does the email urge you to act immediately?"
- The importance of checking the spelling and grammar of an email

Any cyber-attacks initiated through emails will be managed in line with the Cyber Recovery Plan.

Artificial intelligence (AI)

The school will take steps to prepare pupils for changing and emerging technologies, including generative AI, and teach them how to use AI safely, responsibly and appropriately, taking account of their age and developmental stage.

The school will ensure its ICT system includes appropriate filtering and monitoring systems to limit pupil's ability to access or create harmful or inappropriate content through generative AI.

The school will ensure that pupils are not accessing or creating harmful or inappropriate content, including through generative AI.

The school will take steps to ensure that personal, confidential or sensitive information is not entered into AI tools unless this is authorised, secure and compliant with data protection legislation.

Where staff use AI tools to support teaching, learning or administrative tasks, they will do so in accordance with the school's Safe Use of AI Policy and DfE guidance on generative AI in education. The school will make use of any guidance and support that enables it to have a safe, secure and reliable foundation in place before using more powerful technology such as generative AI.

Social networking

The use of social media by staff and pupils will be managed in line with the school's Social Media Policy.

The school website

The Principal will be responsible for the overall content of the school website – they will ensure the content is appropriate, accurate, up-to-date and meets government requirements.

The website will be managed in line with the School Website Policy.

Use of devices

Staff members and pupils will be issued with school-owned devices to assist with their work, where necessary. The use of personal devices on the school premises and for the purposes of school work will be managed in line with the Acceptable Use Policy.

Remote learning

If remote learning is required, this will be delivered in line with the school's Remote Education Policy. This policy specifically sets out how online safety will be considered when delivering remote education.

Monitoring and review

The school recognises that the online world is constantly changing; therefore, the DSL, IT support team and the Principal conduct **half-termly** light-touch reviews of this policy to evaluate its effectiveness.

The Board of Trustees, Principal and DSL will review this policy in full on an **annual** basis and following any online safety incidents.

The next scheduled review date for this policy is **August 2027**