



Spa Education Trust ONLINE SAFETY POLICY

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1. Aims

Our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and trustees
- Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

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

2. Legislation and guidance

This policy is based on the Department for Education's (DfE) statutory safeguarding guidance, [Keeping Children Safe in Education](#), and its advice for schools on:

- [Teaching online safety in schools](#)
- [Preventing and tackling bullying](#) and [cyber-bullying: advice for headteachers and school staff](#)
- [Relationships and sex education](#)
- [Searching, screening and confiscation](#)

It also refers to the DfE's guidance on [protecting children from radicalisation](#).

It reflects existing legislation, including but not limited to the [Education Act 1996](#) (as amended), the [Education and Inspections Act 2006](#) and the [Equality Act 2010](#). In addition, it reflects the [Education Act 2011](#), which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on pupils' electronic devices where they believe there is a 'good reason' to do so.

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

This policy complies with our funding agreement and articles of association.

3. Roles and responsibilities

3.1 The trustees

The trustees have overall responsibility for monitoring this policy and holding the Heads of Schools to account for its implementation.

The trustees will make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.

The trustees will co-ordinate regular meetings with appropriate staff to discuss online safety with the designated safeguarding leads (DSL).

The trustees must ensure the school has appropriate filtering and monitoring systems in place on school devices and school networks, and will regularly review their effectiveness. The board will review the DfE filtering and monitoring standards, and discuss with IT staff and service providers what needs to be done to support the school in meeting the standards, which include:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems;
- Reviewing filtering and monitoring provisions at least annually;
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning;
- Having effective monitoring strategies in place that meet their safeguarding needs.

All trustees will:

- Ensure that they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet (appendix 1)
- Ensure that online safety is a running and interrelated theme while devising and implementing their whole school or college approach to safeguarding and related policies and/or procedures
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and pupils with SEND because of the importance of recognising that a 'one size fits all' approach is not appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable

3.2 The Head of School

The Head of School of each school is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school.

3.3 The designated safeguarding lead and deputy designated safeguarding leads

Details of each school's DSL/ DDSLs are set out in our child protection and safeguarding policy.

The DSL and DDSL take lead responsibility for online safety in school, in particular:

- Ensuring that staff understand this policy and that it is being implemented consistently throughout the school
- Taking the lead on understanding the filtering and monitoring systems and processes in place on school devices and school networks
- Working with all staff, as necessary, to address any online safety issues or incidents
- Managing all online safety issues and incidents in line with the school child protection policy
- Ensuring that any online safety incidents are logged on CPOMS and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety (appendix 2 contains a self-audit for staff on online safety training needs)
- Liaising with other agencies and/or external services if necessary
- Undertaking annual risk assessments that consider and reflect the risks children face
- Providing regular reports on online safety in school to the headteacher and/or governing board

This list is not intended to be exhaustive.

3.4 The ICT manager

The ICT manager is responsible for:

- Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems, which are reviewed and updated on a regular basis to assess effectiveness and ensure pupils are kept safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
- Ensuring that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting full security checks and monitoring the school's ICT systems on a regular basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are logged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

This list is not intended to be exhaustive.

The Head of School works with Classroom 365 to ensure that the duties of the ICT Manager are discharged appropriately.

3.5 All staff and volunteers

All staff, including contractors and agency staff, and volunteers are responsible for:

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet, and ensuring that pupils follow the school's terms on acceptable use

- › Knowing that the DSL is responsible for the filtering and monitoring systems and processes, and being aware of how to report any incidents of those systems or processes failing by reporting to the DSL and recording on CPOMS
- › Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately in line with this policy
- › Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy
- › Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline and maintaining an attitude of 'it could happen here'

This list is not intended to be exhaustive.

3.6 Families

Families are expected to:

- › Notify a member of staff or the head of school of any concerns or queries regarding this policy
- › Support pupils in learning to use ICT safely in line with school policy

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

- › What are the issues? – [UK Safer Internet Centre](#)
- › Hot topics – [Childnet International](#)
- › Parent resource sheet – [Childnet International](#)

3.7 Visitors and members of the community

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

4. Educating pupils about online safety

Pupils will be taught about online safety as part of the curriculum. The curriculum is designed to meet the needs of pupils with autism. Our Online Safety curriculum is personalised to meet the needs of individual pupils.

The Spa Online Safety curriculum develops knowledge and understanding across the following key areas:

- › Using technology safely and respectfully, responsibly and keeping personal information private
- › Identifying where to go for help and support when they have concerns about content or contact on the internet or other online technologies
- › Recognising acceptable and unacceptable behaviour
- › Identifying a range of ways to report concerns about content and contact

Pupils develop understanding: That people sometimes behave differently online, including by pretending to be someone they are not

- › That the same principles apply to online relationships as to face-to-face relationships, including the importance of respect for others online including when we are anonymous
- › The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them
- › How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met
- › How information and data is shared and used online
- › What sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)

- › How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know

Secondary aged pupils develop further understanding and know:

- › Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- › About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- › Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- › What to do and where to get support to report material or manage issues online
- › The impact of viewing harmful content
- › That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners
- › That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- › How information and data is generated, collected, shared and used online
- › How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours
- › How people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)

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

Our teaching about safeguarding, including online safety, is adapted to meet the individual developmental needs of each of your pupils.

5. Educating families about online safety

The schools raise families' awareness of internet safety in letters or other communications home, and in information via our website. Face to face training is provided for groups and individual families. Our Family Support Worker works with ParentZone to provide bespoke training for those families who need it.

This policy will also be shared with parents and carers.

Online safety will also be covered during parent / teacher meetings and annual reviews.

The school will let parents know:

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

If parents have any queries or concerns in relation to online safety, these should be raised in the first instance with the head, deputy and/or the DSL.

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

6. Cyber-bullying

6.1 Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power. (See also the school behaviour policy.)

6.2 Preventing and addressing cyber-bullying

To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The school will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Teaching takes place through our PSHE and Computing curriculum.

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

The school also sends information on cyber-bullying to parents so that they are aware of the signs, how to report it and how they can support children who may be affected.

In relation to a specific incident of cyber-bullying, the school will follow the processes set out in the school behaviour policy. Where illegal, inappropriate or harmful material has been spread among pupils, the school will use all reasonable endeavours to ensure the incident is contained.

The DSL will consider whether the incident should be reported to the police if it involves illegal material, and will work with external services if it is deemed necessary to do so.

6.3 Examining electronic devices

The head of school, and any member of staff authorised to do so by the head of school, can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- o Poses a risk to staff or pupils, and/or
- o Is evidence in relation to an offence

Before a search, if the head of school is satisfied that they have reasonable grounds for suspecting any of the above, they will also:

- o Make an assessment of how urgent the search is and consider the risk to other pupils and staff. If the search is not urgent, they will seek advice from the executive headteacher
- o Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it
- o Seek the pupil's co-operation

Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so.

When deciding whether there is a 'good reason' to examine data or files on an electronic device, the staff member should reasonably suspect that the device has, or could be used to:

- o Cause harm, and/or
- o Undermine the safe environment of the school or disrupt teaching, and/or
- o Commit an offence

If inappropriate material is found on the device, it is up to the head of school in conjunction with the executive headteacher to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response

When deciding if there is a good reason to erase data or files from a device, staff members will consider if the material may constitute evidence relating to a suspected offence. In these instances, they will not delete the material, and the device will be handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if:

- o They reasonably suspect that its continued existence is likely to cause harm to any person, and/or
- o The pupil and/or the parent/carer refuses to delete the material themselves

If a staff member **suspects** a device **may** contain an indecent image of a child (also known as a nude or semi-nude image), they will:

- o **Not** view the image
- o Confiscate the device and report the incident to the DSL (or equivalent) immediately, who will decide what to do next. The DSL will make the decision in line with the DfE's latest guidance on [screening, searching and confiscation](#) and the UK Council for Internet Safety (UKCIS) guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

Any searching of pupils will be carried out in line with:

- o The DfE's latest guidance on [searching, screening and confiscation](#)
- o UKCIS guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- o Our behaviour policy

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

6.4 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Spa School recognises that AI has many uses to help pupils learn, but may also have the potential to be used to bully others. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real. This includes deepfake pornography: pornographic content created using AI to include someone's likeness.

Spa will treat any use of AI to bully pupils in line with our anti-bullying and behaviour policies

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out a risk assessment where new AI tools are being used by the Trust.

8. Pupils using mobile devices in school

Pupils bringing mobile phones to school must leave them for secure storage with the school office.

Pupils do not use their own devices during school time.

9. Staff using work devices outside school

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

- Keeping the device password-protected – strong passwords are at least 8 characters, with a combination of upper and lower-case letters, numbers and special characters (e.g. asterisk or currency symbol)
- Ensuring their hard drive is encrypted – this means if the device is lost or stolen, no one can access the files stored on the hard drive by attaching it to a new device
- Making sure the device locks if left inactive for a period of time
- Not sharing the device among family or friends
- Installing anti-virus and anti-spyware software
- Keeping operating systems up to date – always install the latest updates

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

Work devices must be used solely for work activities.

If staff have any concerns over the security of their device, they must seek advice from the RM technician.

10. How the school will respond to issues of misuse

Where a pupil misuses the school's ICT systems or internet, we will follow the procedures set out in our behaviour and safeguarding policies.

The action taken will depend on the individual circumstances and nature of the specific incident, and will be proportionate.

Where a staff member misuses the school's ICT systems or the internet, or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with the staff disciplinary procedures. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The school will consider whether incidents which involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

11. Training

All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation.

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

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

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

Training will also help staff:

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

The DSL and DDSs will undertake child protection and safeguarding training, which will include online safety, at least every 2 years. They will also update their knowledge and skills on the subject of online safety at regular intervals, and at least annually.

Trustees will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

More information about safeguarding training is set out in our child protection and safeguarding policy.

12. Monitoring arrangements

The DSL logs behaviour and safeguarding issues related to online safety using CPOMS.

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

13. Links with other policies

This online safety policy is linked to our:

- Child protection and safeguarding policy
- Behaviour policy
- Staff disciplinary procedures
- Data protection policy and privacy notices
- Complaints procedure
- ICT and internet acceptable use policy

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

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