

**Online Safety Policy**

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| **Approved by chair of governors:** | Mark Lawson | **Date:** 24.05.23 |
| **Last reviewed on:** | 20.06.20 | | |
| **Revised on:** | 22.05.23 | | |
| **Next review due by:** | 05.06.24 | | |
| **Linked policies:** | Child Protection  Relational Behaviour Policy  Staff Code of Conduct  Data Protection  Complaints Procedure | | |

**Equality Impact Assessment – initial screening record**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| * What area of work is being considered? | | | Helping to keep people safe online | | | |
| * Upon whom will this impact? | | | Pupils, parents, staff | | | |
| * How would the work impact upon groups, are they included and considered? | | | | | | |
|  | **The Equality Strands** | **Negative Impact** | **Positive Impact** | | **No Impact** |  |
|  | Minority ethnic groups |  | √ | |  |  |
|  | Gender |  | √ | |  |  |
|  | Disability |  | √ | |  |  |
|  | Religion, Faith or Belief |  | √ | |  |  |
|  | Sexual Orientation |  | √ | |  |  |
|  | Transgender |  | √ | |  |  |
|  | Age |  | √ | |  |  |
|  | Rurality |  | √ | |  |  |
|  | | | | | | |
| * Does data inform this work, research and/or consultation. And has it been broken down by the equality strands? | | | | | | |
|  | **The Equality Strands** | **No** | **Yes** | | **Uncertain** |  |
|  | Minority ethnic groups |  | √ | |  |  |
|  | Gender |  | √ | |  |  |
|  | Disability |  | √ | |  |  |
|  | Religion, Faith or Belief |  | √ | |  |  |
|  | Sexual Orientation | √ |  | |  |  |
|  | Transgender | √ |  | |  |  |
|  | Age |  | √ | |  |  |
|  | Rurality | √ |  | |  |  |
|  | | | | | | |
| * Does the initial screening highlight potential issues that may be illegal? No | | | | | | |
|  | Further comments: | | | | |  |
| Do you consider that a full Equality Impact Assessment is required? No | | | | | | |
|  | Initial screening carried out by Senior Leadership Team  Kim's signature  Signed: | | | Dated: 23.05.23 | | |
| Comment by Headteacher: | | | | | | |

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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 governors
* Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology

Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

**The 4 key categories of risk**

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

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

# 2. Legislation and guidance

This policy is based on the Department for Education’s (DfE’s) statutory safeguarding guidance, [Keeping Children Safe in Education](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2), and its advice for schools on:

* [Teaching online safety in schools](https://www.gov.uk/government/publications/teaching-online-safety-in-schools)
* [Preventing and tackling bullying](https://www.gov.uk/government/publications/preventing-and-tackling-bullying) and [cyber-bullying: advice for headteachers and school staff](https://www.gov.uk/government/publications/preventing-and-tackling-bullying)
* [[Relationships and sex education](https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education)
* [Searching, screening and confiscation](https://www.gov.uk/government/publications/searching-screening-and-confiscation)

It also refers to the DfE’s guidance on [protecting children from radicalisation](https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty).

It reflects existing legislation, including but not limited to the [Education Act 1996](https://www.legislation.gov.uk/ukpga/1996/56/contents) (as amended), the [Education and Inspections Act 2006](https://www.legislation.gov.uk/ukpga/2006/40/contents) and the [Equality Act 2010](https://www.legislation.gov.uk/ukpga/2010/15/contents). In addition, it reflects the [Education Act 2011](http://www.legislation.gov.uk/ukpga/2011/21/contents/enacted), 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 programmes of study.

# 3. Roles and responsibilities

**3.1 The Management Committee**

The Management Committee has overall responsibility for monitoring this policy and holding the Headteacher to account for its implementation. The governor who oversees online safety is Mark Lawson. The DSL will report online safety within regular safeguarding updates to the Management Committee.

All governors 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 2)

**3.2 The Headteacher**

The Headteacher 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**

Details of the school’s Designated Safeguarding Lead (DSL) and deputies are set out in our Child Protection Policy.

The DSL takes lead responsibility for online safety in school, in particular:

* Supporting the Headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school
* Working with the Headteacher, E-Safety Lead and other staff, as necessary, to address any online safety issues or incidents
* Ensuring that any online safety incidents are logged on Behaviourwatch or MyConcern, which will be dealt with as safeguarding procedures according to the type of incident
* Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the Relational Behaviour Policy
* Updating and delivering or arranging delivery of staff training on online safety (appendix 3 contains a self-audit for staff on online safety training needs)
* Liaising with other agencies and/or external services if necessary
* Providing regular reports on online safety in school to the Headteacher and/or governing board

This list is not intended to be exhaustive.

**3.4 The E-Safety Lead**

The E-safety Lead is responsible for:

* Putting in place appropriate filtering and monitoring systems, which are updated on a regular basis and keep pupils safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
* Ensuring that the school’s ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
* Conducting a full security check and monitoring the school’s ICT systems on a fortnightly 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 on Behaviourwatch or MyConcern and dealt with appropriately in line with this policy
* Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the Behaviour Management Policy

This list is not intended to be exhaustive.

**3.5 All staff and volunteers**

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

* Maintaining an understanding of this policy
* Implementing this policy consistently
* Agreeing and adhering to the terms on acceptable use of the school’s ICT systems and the internet (appendix 2), and ensuring that pupils follow the school’s terms on acceptable use (appendix 1)
* Working with the DSL to ensure that any online safety incidents are logged (see appendix 4) 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.

**3.6 Parents**

Parents are expected to:

* Notify a member of staff or the Headteacher of any concerns or queries regarding this policy
* Ensure their child has read, understood and agreed to the terms on acceptable use of the school’s ICT systems and internet (appendix 1)

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

* What are the issues?, UK Safer Internet Centre: <https://www.saferinternet.org.uk/advice-centre/parents-and-carers/what-are-issues>
* Hot topics, Childnet International: <http://www.childnet.com/parents-and-carers/hot-topics>
* Parent factsheet, Childnet International: <http://www.childnet.com/ufiles/parents-factsheet-09-17.pdf>

**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 (appendix 2).

# 4. Educating pupils about online safety

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

Pupils in **Key Stage 2** will be taught to:

* Use technology safely, respectfully and responsibly
* Recognise acceptable and unacceptable behaviour
* Identify a range of ways to report concerns about content and contact

By the **end of primary school**, pupils will know:

* That people sometimes behave differently online, including by pretending to be someone they are not
* That the same principles apply to online relationships as to face-to-face relationships, including the importance of respect for others online including when we are anonymous
* The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them
* How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met
* How information and data is shared and used online
* What sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
* How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know

In **Key Stage 3**, pupils will be taught to:

* Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
* Recognise inappropriate content, contact and conduct, and know how to report concerns

Pupils in **Key Stage 4** will be taught:

* To understand how changes in technology affect safety, including new ways to protect their online privacy and identity
* How to report a range of concerns

The safe use of social media and the internet will also be covered in other subjects where relevant. The school will use PSHE lessons and keyworker sessions to raise pupils’ awareness of the dangers that can be encountered online and may also invite speakers to talk to pupils about this.

By the **end of secondary school**, pupils will 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.

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

# 5. Educating parents about online safety

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

Online safety will also be covered during parent consultations.

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 Headteacher and/or the DSL.

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

# 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 Behaviour Management 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. Keyworkers will discuss cyber-bullying with their tutor groups, and, additionally, the issue will be addressed in class when it arises.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE, Self) education, and other subjects where appropriate.

All staff, governors 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/leaflets 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 Behaviour Management 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**

School staff have the specific power under the Education and Inspections Act 2006 (which has been increased by the Education Act 2011) to search for and, if necessary, delete inappropriate images or files on pupils’ electronic devices, including mobile phones, iPads and other tablet devices, where they believe there is a ‘good reason’ to do so.

When deciding whether there is a good reason to examine or erase data or files on an electronic device, staff must reasonably suspect that the data or file in question has been, or could be, used to:

* Cause harm to staff or pupils, and/or
* Disrupt teaching, and/or
* Break any of the school rules
* Is evidence in relation to an offence

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

* Make an assessment of how urgent the search is, and consider the risk to other pupils and staff. If the search is not urgent, they will seek advice from the Headteacher/DSL
* Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it
* Seek the pupil’s cooperation

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

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL or other member of the senior leadership team to decide whether they should:

* Delete that material, or
* Retain it as evidence (of a criminal offence or a breach of school discipline), and/or
* Report it to the police

Any searching of pupils will be carried out in line with the DfE’s latest guidance on [screening, searching and confiscation](https://www.gov.uk/government/publications/searching-screening-and-confiscation).

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

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

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

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

* **Not** view the image
* Confiscate the device and report the incident to the DSL (or equivalent) immediately, who will decide what to do next. The DSL will make the decision in line with the DfE’s latest guidance on [screening, searching and confiscation](https://www.gov.uk/government/publications/searching-screening-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](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)

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

* The DfE’s latest guidance on [searching, screening and confiscation](https://www.gov.uk/government/publications/searching-screening-and-confiscation)
* UKCIS guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)
* Our Relational 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.

# 7. Acceptable use of the internet in school

All pupils, parents, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of the school’s ICT systems and the internet (appendices 1 and 2). Visitors will be expected to read and agree to the school’s terms on acceptable use if relevant.

Use of the school’s internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual’s role.

We will monitor the websites visited by pupils, staff, volunteers, governors and visitors (where relevant) to ensure they comply with the above.

More information is set out in the acceptable use agreements in appendices 1 and 2.

# 8. Pupils using mobile devices in school

Pupils may bring mobile devices into school, but must hand them in to staff upon their arrival. They can be collected at the end of the school day. Pupils going out at lunchtime can collect them and return prior to entering school for the afternoon lessons. Pupils and parents are asked to sign the Home School Agreement upon induction to agree to this process.

If a young person refuses, the parent/carer will be asked to ensure the phone is left at home on subsequent days.

Parents may call the main office number if they need to leave a message for their child.

Any breach of the Home School Agreement by a pupil may trigger disciplinary action in line with the Relational Behaviour Policy.

# 9. Staff using work devices outside school

Staff members using a work device outside school must not install any unauthorised software on the device and must not use the device in any way which would violate the school’s terms of acceptable use, as set out in appendix 2.

Staff must ensure that their work device is secure and password-protected, and that they do not share their password with others. They must take all reasonable steps to ensure the security of their work device when using it outside school. Any USB devices containing data relating to the school must be encrypted.

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

Work devices must be used solely for work activities.

# 10. How the school will respond to issues of misuse

Where a pupil misuses the school’s ICT systems or internet their access will be blocked or limited. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the 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 up the risks
* Develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term

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

Governors 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 is set out in our Child Protection Policy.

# 12. Monitoring arrangements

Online safety incidents are recorded on Behaviourwatch or MyConcern depending on the seriousness and potential impact. The DSL monitors all such recordings and ensures that appropriate actions are taken.

This policy will be reviewed annually by the DSL and deputies and the Management Committee. The E-Safety Lead carries out the SWGfL 360 Degree Safe review annually. 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 Policy
* Relational Behaviour Policy
* Staff Code of Conduct
* Data Protection Policy and privacy notices
* Complaints Procedure

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

|  |  |
| --- | --- |
| **The Forum Centre**  **Acceptable use of the school’s ICT systems and internet: agreement for pupils and parents/carers** | |
| **Name of pupil:** | |
| **When using the school’s ICT systems and accessing the internet in school, I will not:**   * Use them for a non-educational purpose * Use them without a teacher being present, or without a teacher’s permission * Access any inappropriate websites * Access social networking sites (unless my teacher has expressly allowed this as part of a learning activity) * Use chat rooms * Open any attachments in emails, or follow any links in emails, without first checking with a teacher * Use any inappropriate language when communicating online, including in emails * Share my password with others or log in to the school’s network using someone else’s details * Give my personal information (including my name, address or telephone number) to anyone without the permission of my teacher or parent/carer * Arrange to meet anyone offline without first consulting my parent/carer, or without adult supervision   I agree that the school will monitor the websites I visit.  I will immediately let a teacher or other member of staff know if I find any material which might upset, distress or harm me or others.  I will always use the school’s ICT systems and internet responsibly.  If I bring a personal mobile phone or other personal electronic device into school it will be handed into the office upon arrival. | |
| **Signed (pupil):** | **Date:** |
| **Parent/carer agreement:** I agree that my child can use the school’s ICT systems and internet when appropriately supervised by a member of school staff. I agree to the conditions set out above for pupils using the school’s ICT systems and internet, and for handing personal electronic devices in to staff upon arrival at school, and will make sure my child understands these. | |
| **Signed (parent/carer):** | **Date:** |

# Appendix 2: acceptable use agreement (staff, governors, volunteers and visitors)

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| --- | --- |
| **The Forum Centre**  **Acceptable use of the school’s ICT systems and the internet: agreement for staff, governors, volunteers and visitors** | |
| **Name of staff member/governor/volunteer/visitor:** | |
| When using the school’s ICT systems and accessing the internet in school, or outside school on a work device, I will not:   * Access, or attempt to access inappropriate material, including, but not limited to, material of a violent, criminal or pornographic nature * Use them in any way which could harm the school’s reputation * Access social networking sites or chat rooms * Use any improper language when communicating online, including in emails or other messaging services * Install any unauthorised software * Share my password with others or log in to the school’s network using someone else’s details | |
| I will only use the school’s ICT systems and access the internet in school, or outside school on a work device, for educational purposes or for the purpose of fulfilling the duties of my role.  I agree that the school will monitor the websites I visit.  I will take all reasonable steps to ensure that work devices are secure and password-protected when using them outside school, and keep all data securely stored in accordance with this policy and the school’s data protection policy.  I will let the Designated Safeguarding Lead (DSL) and E-Safety Lead know if a pupil informs me they have found any material which might upset, distress or harm them or others, and will also do so if I encounter any such material.  I will always use the school’s ICT systems and internet responsibly, and ensure that pupils in my care do so too. | |
| **Signed (staff member/governor/volunteer/visitor):** | **Date:** |

# Appendix 3: online safety training needs – self-audit for staff

|  |  |  |
| --- | --- | --- |
| **The Forum Centre**  **Online safety training needs audit** | | |
| **Name of staff member/volunteer:** | | **Date:** |
| Do you know the name of the person who has lead responsibility for online safety in school? | |  |
| 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, governors 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? Please record them here. |  | |