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Online Safety Policy

#SG43

**Last amended 6th March 2025**

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**Common abbreviations and acronyms**

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| --- | --- | --- | --- |
| **AA** | Admissions Authority | **GPA** | Government Procurement Arrangement |
| **AAI** | Adrenaline Auto-Injector (Epi Pen) | **HASH** | Herefordshire Association of Secondary Heads |
| **ACM** | Asbestos Containing Materials | **HBV** | Honour Based Violence |
| **AFH** | Academies Financial Handbook | **HR** | Human Resources |
| **AHT** | Assistant Headteacher | **H&S** | Health and Safety |
| **AIR** | Attendance Intervention Reviews | **HoS** | Head of School |
| **APIs** | Application Programme Interfaces | **HSE** | Health and Safety Executive |
| **BAME** | Black, Asian and Minority Ethnic Backgrounds | **ICO** | Information Commissioners Office |
| **BCP** | Business Continuity Plan | **ICT** | Information Communication Technology |
| **BFR** | Budget Forecast Return | **IHP** | Individual Healthcare Plan |
| **CAMHS** | Child and Adolescent Mental Health Services | **IRMS** | Information and Records Management Society |
| **CEO** | Chief Executive Officer | **IWF** | Internet Watch Foundation |
| **CFO** | Chief Financial Officer | **KCSIE** | Keeping Children Safe in Education |
| **CIF** | Condition Improvement Fund | **KS1/2/3/4** | Key Stage 1/2/3/4 |
| **CIN** | Child in Need | **LAC** | Looked After Child |
| **CLA** | Children Looked After | **LADO** | Local Authority Designated Officer |
| **CMIE** | Child Missing in Education | **LGB** | Local Governing Body |
| **COO** | Chief Operating Officer | **LLC** | Low-Level Concerns |
| **COSHH** | Control and Substances Hazardous to Health | **LSA** | Learning Support Assistants |
| **CP** | Child Protection | **MASH** | Multi-Agency Safeguarding Hub |
| **CPD** | Continuing Professional Development | **MAT** | Multi-Academy Trust |
| **CSCS** | Children’s Social Care Services | **MFA** | Multi-Factor Authentication |
| **CSE** | Child Sexual Exploitation | **MFL** | Modern Foreign Language |
| **CTIRU** | Counter-Terrorism Internet Referral Unit | **NCSC’s** | National Cyber Security Centres |
| **CWD** | Children with Disabilities | **NPQEL** | National Professional Qualification in Executive Leadership |
| **DBS** | Disclosure and Barring Service | **PA** | Persistent Absence |
| **DDSL** | Deputy Designated Safeguarding Lead | **PAN** | Published Admission Number |
| **DfE** | Department for Education | **PECR** | Privacy and Electronic Communications Regulations |
| **DHT** | Deputy Headteacher | **PEP** | Personal Education Plan |
| **DSE** | Display Screen Equipment | **PEEP** | Personal Emergency Evacuation Plan |
| **DSL** | Designated Safeguarding Lead | **PEx** | Permanent Exclusion |
| **DPO** | Data Protection Officer | **PLAC** | Previously Looked After Child |
| **EAL** | English as an Additional Language | **PP** | Pupil Premium |
| **ECT** | Early Career Teacher | **PSHE** | Personal, Social and Health Education |
| **EHA** | Early Help Assessment | **PSED** | Public Sector Equality Duty |
| **EHCNA** | Education, Health and Care Needs Assessment | **PTFA** | Parent, Teacher and Friends Association |
| **EHCP** | Education, Health and Care Plan | **RHE** | Relationships and Health Education |
| **EHE** | Elective Home Education | **RIDDOR** | Reporting of Injuries, Diseases and Dangerous Occurrences Regulations |
| **ELSA** | Emotional, Literacy and Support Assistant | **RSHE** | Relationships, Sex and Health Education |
| **ELSI** | Executive Leader for Safeguarding and Inclusion | **SALT** | Speech and Language Therapist |
| **ESFA** | Education and Skills Funding Agency | **SARC** | Sexual Assault Referral Centre |
| **EVC** | Educational Visit Coordinator | **SBM** | School Business Manager |
| **EWO** | Education Welfare Officer | **SCCs** | Standard Contractual Clauses |
| **EYFS** | Early Years Foundation Stage | **SDQ** | Strengths and Difficulties Questionnaire |
| **FBV** | Fundamental British Values | **SEMH** | Social, Emotional, and Mental Health |
| **FGM** | Female Genital Mutilation | **SENCO** | Special Educational Needs Coordinator |
| **FOI** | Freedom of Information | **SEND** | Special Educational Needs and Disabilities |
| **FSM** | Free School Meals | **SLA’s** | Service Level Agreements |
| **FTS** | Find a Tender Service | **STEM** | Science, Technology, Engineering and Maths |
| **GAG** | General Annual Grant | **TA** | Teaching Assistant |
| **GDPR** | General Data Protection Regulation | **TCAT** | Three Counties Academy Trust |
| **GIAS** | Get Information about Schools | **VSH** | Virtual School Headteacher |

**Statement of intent**

Three Counties Academy Trust (TCAT) 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 material, e.g. pornography, fake news, self-harm and suicide, and discriminatory or extremist views
* **Contact**: Being subjected to harmful online interaction with other users, e.g. peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children
* **Conduct**: Personal online behaviour that increases the likelihood of, or causes, harm, e.g. sending and receiving explicit messages, and cyberbullying
* **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. TCAT 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.

# Legal framework

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

* Voyeurism (Offences) Act 2019
* DfE (2023) ‘Filtering and monitoring standards for schools and colleges’
* DfE (2021) ‘Harmful online challenges and online hoaxes’
* Department for Digital, Culture, Media and Sport and UK Council for Internet Safety (2020) ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’
* National Cyber Security Centre (2020) ‘Small Business Guide: Cyber Security’
* The UK General Data Protection Regulation (UK GDPR)
* Data Protection Act 2018
* UK Council for Child Internet Safety (2020) ‘Education for a Connected World – 2020 edition’
* DfE (2023) ‘Teaching online safety in school’
* DfE (2024) ‘Keeping children safe in education 2024’
* DfE (2022) ‘Searching, screening and confiscation’
* DfE (2023) ‘Generative artificial intelligence in education’

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies:

* Social Media Policy (SG24)
* Allegations of Abuse Against Staff Policy (SG5)
* Cyber-Security Policy (FI15)
* Child Protection and Safeguarding Policy and Procedures (SG1)
* Child-on-Child Abuse Policy (SG10)
* Anti-Bullying Policy (SG19)
* Pupils’ Personal Electronic Devices Policy (SG45)
* Staff Code of Conduct (HR26)
* Behaviour Policy
* Disciplinary Policy and Procedure (HR3)
* Data Protection Policy (FI20)
* Photography and Images Policy (SG9)
* Staff ICT and Electronic Devices Policy (FI16)
* Prevent Duty Policy (SG2)
* Remote Education Policy
* School Website Policy (FI17)
* Pupil Confidentiality Policy (SG28)
* Staff and Volunteer Confidentiality Policy (HR32)

and the following internal documents:

* Cyber Response and Recovery Plan
* Technology Acceptable Use Agreement
* Device User Agreement

Central TCAT policies have the policy number identified, e.g. “SG1”. Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school’s website.

# Roles and Responsibilities

The Trust Board will be responsible for:

* Ensuring that this policy is effective and complies with relevant laws and statutory guidance
* Ensuring each DSL’s remit covers online safety
* Reviewing this policy on a regular 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 trust and school leaders 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 policies have an effective approach to planning for, and responding to, online challenges and hoaxes embedded within them

Each Headteacher/Head of School will be responsible for:

* Ensuring that online safety is a running and interrelated theme throughout their school’s policies and procedures, including in those related to the curriculum, teacher training and safeguarding
* Supporting their DSL and deputy DSL’s 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 their DSL and ICT technicians to conduct regular light-touch reviews of this policy
* Working with their DSL, ICT Technician and Executive Leaders to update this policy on a regular basis

Each DSL will be responsible for:

* Taking the lead responsibility for online safety in their 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 ICT technician
* Ensuring online safety is recognised as part of their school’s safeguarding responsibilities and that a coordinated approach is implemented
* Ensuring safeguarding is considered in their school’s approach to remote learning
* Establishing a procedure for reporting online safety incidents and inappropriate internet use, both by pupils and staff, and ensuring all members of their school community understand this procedure
* Understanding the filtering and monitoring processes in place at their school
* 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 their 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 their school’s provision, and using this data to update their school’s procedures
* Reporting to their own Local Governing Body and the Trust Board about online safety on a regular basis
* Working with the Headteacher/Head of School and ICT technician to conduct regular light-touch reviews of this policy

The ICT Technician will be responsible for:

* Providing technical support in the development and implementation of TCAT and each school’s online safety policies and procedures
* Implementing appropriate security measures as directed by the Executive Leadership and the Headteacher/Head of School
* Ensuring that filtering and monitoring systems are updated as appropriate
* Working with each DSL and Headteacher/Head of School to conduct regular 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 online safety issues
* Ensuring they are familiar with, and understand, the indicators that pupils may be unsafe online
* Reporting concerns in line with their school or TCAT’s reporting procedures
* Where relevant to their role, ensuring online safety is embedded in their teaching of the curriculum

Pupils will be responsible for:

* Adhering to the Technology Acceptable Use Agreement and other relevant policies
* Seeking help from 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, particularly owing to the rise of social media and the increased prevalence of children using the internet.

Each DSL has overall responsibility for their school’s approach to online safety, with support from DDSL’s and the Headteacher/Head of School where appropriate and will ensure that there are strong processes in place to handle any concerns about pupils’ safety online. Each DSL should liaise with the police or children’s social care services for support when responding to harmful online sexual behaviour.

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

* Staff, trustees and governors 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, including, but not limited to, the PSHE curriculum
* Assemblies are conducted regularly 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 Child Protection and Safeguarding Policy and Procedures.

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 still be 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. Where the DSL is in need of further guidance, they will consult with TCAT’s Executive Leader for Safeguarding and Inclusion.

Concerns regarding a staff member’s online behaviour are reported to the Executive Headteacher/CEO, who decides on the best course of action in line with the relevant policies. If the concern is about the Executive Headteacher/CEO, it is reported to the Chair of the Trust Board.

Concerns regarding a member of the TCAT Central Teams’ online behaviour are reported to the Executive Headteacher/CEO or Chief Financial Officer as appropriate, who decides on the best course of action in line with the relevant policies. If the concern is about the Headteacher/Head of School, it is reported to the Chair of the Local Governing Body. In all instances the Executive Headteacher/CEO must be informed.

Concerns regarding a pupil’s online behaviour are reported to their DSL, who investigates concerns with relevant staff members, e.g. the Headteacher/Head of School and ICT technician, and manages concerns in accordance with relevant policies depending on their nature, e.g. the Behaviour Policy and Child Protection and Safeguarding Policy and Procedures.

Where there is a concern that illegal activity has taken place, the Headteacher/Head of School will confer with the Executive Headteacher/CEO who will contact the police.

TCAT avoids 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. a pupil has taken and distributed indecent imagery of themselves. The DSL will decide in which cases this response is appropriate and will manage such cases in line with the Child Protection and Safeguarding Policy and Procedures.

All online safety incidents and the individual TCAT school’s response are recorded by relevant 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.

TCAT staff are aware that certain pupils can be more at risk of abuse and/or bullying online, such as LGBTQ+ pupils and pupils with SEND.

Cyberbullying against pupils or staff is not tolerated by TCAT 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 also use the internet and technology as a vehicle for sexual abuse and harassment. Staff will understand that this abuse can occur both in and outside of school, off and online, and will remain aware that pupils are less likely to report concerning online sexual behaviours, particularly if they are using websites that they know adults will consider to be inappropriate for their age.

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 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 sharing of sexualised imagery
* 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 indecent imagery of other children, i.e. individuals under the age of 18, is a criminal offence, even where the imagery is created, possessed, and distributed with the permission of the child depicted, or by the child themselves.

Each TCAT 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. TCAT will respond to these incidents in line with the Child-on-Child Abuse Policy and the Social Media Policy.

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

# 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.

TCAT 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. DSL’s 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 through the internet. In some cases, a pupil may be groomed online to become involved in a wider network of exploitation, e.g. the production of child pornography or forced child prostitution and sexual trafficking.

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, shoplifting and serious violence. While these crimes often take place in person, it is increasingly common for children to be groomed and manipulated into participating through the internet.

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

**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 their DSL without delay, who will handle the situation in line with the Prevent Duty Policy.

# Mental health

TCAT 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. Each DSL will ensure that training is available to help ensure that staff members understand popular social media sites and terminology, the ways in which social media and the internet 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 social media 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 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 suspect there may be a harmful online challenge or online hoax circulating amongst pupils in their school, they will report this to their 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. They will communicate the risk in any regard to all TCAT DSL’s.

Prior to deciding how to respond to a harmful online challenge or hoax, the DSL and their Headteacher/Head of School 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 Child Protection and Safeguarding Policy and Procedures

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 Headteacher/Head of School 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

TCAT and our schools will factor into their 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 Headteacher/Head of School will ensure that pupils are taught, throughout the curriculum, how to use technology safely, responsibly and lawfully.

# Online safety training for staff

School DSL’s 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.

# Online safety and the curriculum

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

* RSHE (secondary)
* Relationships and health education (primary)
* PSHE
* Citizenship
* ICT

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 risks that are considered and how they are covered in the curriculum can be found in appendix A of this policy.

Each DSL will be involved with the development of their 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.

Each 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 Headteacher/Head of School and their 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 Child Protection and Safeguarding Policy and Procedures.

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 Child Protection and Safeguarding Policy and Procedures.

# Use of technology in the classroom

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

* Computers
* Laptops
* Tablets
* Intranet
* Email
* Cameras

Prior to using any websites, tools, apps or other online platforms in the classroom, or recommending that pupils use these platforms at home, the class teacher will review and evaluate the resource. Class 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 is suitable to their age and ability.

# Use of smart technology

While each TCAT school appropriate to their context recognises that the use of smart technology can have educational benefits, there are also a variety of associated risks which each school will ensure it manages at a local level according to their need.

Pupils will be educated on the acceptable and appropriate use of personal devices and will use technology in line with the TCAT’s Technology Acceptable Use Agreement.

Staff will use all smart technology and personal technology in line with the TCAT’s Staff ICT and Electronic Devices Policy.

TCAT recognises that pupils’ unlimited and unrestricted access to the internet via mobile phone networks means that some pupils may use the internet in a way which breaches our Technology Acceptable Use Agreement.

Inappropriate use of smart technology may include:

* Using mobile and smart technology to sexually harass, bully, troll or intimidate peers
* Sharing indecent images, both consensually and non-consensually
* Viewing and sharing pornography and other harmful content

Pupils will not be permitted to use smart devices or any other personal technology whilst in the classroom, unless an individual school has made provision to do so within their curriculum plans and it is clearly referenced in their individual Behaviour Policy.

Where it is deemed necessary, TCAT schools will ban pupil’s use of personal technology whilst on school site.

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

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

Each school will seek to ensure that they keep up to date with the latest devices, platforms, apps, trends and related threats.

Each 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

TCAT and our schools will work in partnership with parents to ensure pupils stay safe online at school and at home. Parents will be provided with information about TCAT and their school’s approach to online safety and their role in protecting their children. Parents will be able to access the Technology Acceptable Use Agreement and are encouraged to go through this with their child to ensure their child understands the document and the implications of not following it.

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
* Sharing of indecent imagery of pupils, e.g. sexting
* 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 may be raised in the following ways:

* Parents’ evenings
* Twilight training sessions
* Newsletters
* Online resources

# Internet access

Pupils, staff and other members of the TCAT community should only be granted access to our internet network once they have read and signed the Acceptable Use Agreement.

All members of the TCAT community will be encouraged to use TCAT’s internet 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 Trust Board will ensure all TCAT school’s ICT networks have appropriate filters and monitoring systems in place and that it is meeting the DfE’s ‘Filtering and monitoring standards for schools and colleges’. The Trust Board will ensure ‘over blocking’ does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding.

Each DSL will ensure that specific roles and responsibilities are identified and assigned to manage filtering and monitoring systems and to ensure they meet their school’s safeguarding needs.

The filtering and monitoring systems TCAT 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. The ICT technician will undertake regular checks on the filtering and monitoring systems to ensure they are effective and appropriate.

Requests regarding making changes to the filtering system will be directed to the Executive Leadership Team. Prior to making any changes to the filtering system, the ICT technician and the Executive Leader for Safeguarding and Inclusion will conduct a risk assessment. Any changes made to the system will be recorded by the ICT technician. Reports of inappropriate websites or materials will be made to the ICT technician immediately, who will investigate the matter and make any necessary changes.

Deliberate breaches of the filtering system will be reported to the Executive Leader for Safeguarding and Inclusion and ICT technician, who will escalate the matter appropriately. If a pupil has deliberately breached the filtering system, they will be disciplined in line with their school’s Behaviour Policy. If a member of staff has deliberately breached the filtering system, they will be disciplined in line with the TCAT Disciplinary Policy and Procedures.

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), Child Exploitation and Online Protection (CEOP) and/or the police.

TCAT’s network and Trust-owned devices will be appropriately monitored. All users of the network and Trust-owned devices will be informed about how and why they are monitored. Concerns identified through monitoring will be reported to the Executive Leader for Safeguarding and Inclusion who will manage the situation in line with the Child Protection and Safeguarding Policy and Procedures.

# Network security

Technical security features, such as anti-virus software, will be kept up-to-date and managed by the ICT technician. Firewalls will be switched on at all times. The ICT technician will review the firewalls on a regular 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 the ICT technician.

All members of staff will have their own unique usernames and private passwords to access TCAT’s systems. Pupils as appropriate to their age 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 regularly, after which users will be required to change them.

Users will inform the ICT technician 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 Headteacher/Head of School 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.

Full details of TCAT’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 our Data Protection Policy, Technology Acceptable Use Agreement, and the Pupil Confidentiality Policy and Staff and Volunteer Confidentiality Policy.

Staff and pupils as appropriate will be given approved 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 should agree to and sign the Technology Acceptable Use Agreement. Personal email accounts will not be permitted to be used on any TCAT 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 matter to the ICT technician. TCAT’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. The ICT technician will organise assemblies at appropriate intervals where it is explained what a phishing email and other malicious emails might look like – this assembly 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 Response and Recovery Plan.

# Generative artificial intelligence (AI)

TCAT will take steps to prepare pupils for changing and emerging technologies, e.g. generative AI and how to use them safely and appropriately with consideration given to pupils’ age.

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

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

Each school will take steps to ensure that personal and sensitive data is not entered into generative AI tools and that it is not identifiable.

Each 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 TCAT’s Social Media Policy and Staff Code of Conduct.

# The school website

The TCAT website will be maintained by the Executive Headteacher/CEO. The Headteacher/Head of School will be responsible for the overall content of their individual 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 TCAT School Website Policy.

# Use of devices

Staff members and pupils will be issued with Trust-owned devices to assist with their work, where necessary.

The use of personal devices on TCAT premises and for the purposes of schoolwork will be managed in line with the Staff ICT and Electronic Devices Policy and Pupils’ Personal Electronic Devices Policy.

# Remote learning

All remote learning will be delivered in line with the individual TCAT school’s Remote Education Policy. This policy specifically sets out how online safety will be considered when delivering remote education.

# Monitoring and review

This policy will be reviewed in line with the published schedule at the front of this document and at any point material changes require it by the Executive Headteacher/CEO in collaboration with the Board appointed Trustee, the Trust Board and Executive and Senior Leadership.

Any changes made to the policy will be amended by the Executive Headteacher/CEO and will be communicated to Executive Leaders, the TCAT Central Team and to Headteachers/Heads of School, who, in turn, will alert school-based staff.

The next scheduled review date for this policy is 31st August 2026.

|  |  |  |  |
| --- | --- | --- | --- |
| Signed by: | | | |
|  | Executive Headteacher/CEO | Date: |  |
|  | Board appointed Trustee | Date: |  |

**Appendices: Online harm and risks – curriculum coverage**

|  |  |  |
| --- | --- | --- |
| **Subject area** | **Description and teaching content** | **Curriculum area the harm or risk is covered in** |
| **How to navigate the internet and manage information** | | |
| **Age restrictions** | Some online activities have age restrictions because they include content which is not appropriate for children under a specific age. Teaching will include the following:   * That age verification exists and why some online platforms ask users to verify their age * Why age restrictions exist * That content that requires age verification can be damaging to under-age consumers * What the age of digital consent is (13 for most platforms) and why it is important | This risk or harm will be covered in the following curriculum areas:   * Health education * Computing |
| **How content can be used and shared** | Knowing what happens to information, comments or images that are put online. Teaching will include the following:   * What a digital footprint is, how it develops and how it can affect pupils’ futures * How cookies work * How content can be shared, tagged and traced * How difficult it is to remove something once it has been shared online * What is illegal online, e.g. youth-produced sexual imagery (sexting) | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools]RSHE * Computing |
| **Disinformation, misinformation and hoaxes** | Some information shared online is accidentally or intentionally wrong, misleading or exaggerated. Teaching will include the following:   * Disinformation and why individuals or groups choose to share false information in order to deliberately deceive * Misinformation and being aware that false and misleading information can be shared inadvertently * Misinformation and understanding that some genuine information can be published with the deliberate intent to harm, e.g. releasing private information or photographs * Online hoaxes, which can be deliberately and inadvertently spread for a variety of reasons * That the widespread nature of this sort of content can often appear to be a stamp of authenticity, making it important to evaluate what is seen online * How to measure and check authenticity online * The potential consequences of sharing information that may not be true | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships and health education * [Secondary schools] RSHE * [KS2 and above] Computing * [KS3 and KS4] Citizenship |
| **Fake websites and scam emails** | Fake websites and scam emails are used to extort data, money, images and other things that can either be used by the scammer to harm the person targeted or sold on for financial, or other, gain. Teaching will include the following:   * How to recognise fake URLs and websites * What secure markings on websites are and how to assess the sources of emails * The risks of entering information to a website which is not secure * What pupils should do if they are harmed, targeted, or groomed as a result of interacting with a fake website or scam email * Who pupils should go to for support * The risk of ‘too good to be true’ online offers, advertising and fake product sales designed to persuade people to part with money for products and services that do not exist | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE * Computing |
| **Online fraud** | Fraud can take place online and can have serious consequences for individuals and organisations. Teaching will include the following:   * What identity fraud, scams and phishing are * That online fraud can be highly sophisticated and that anyone can be a victim * How to protect yourself and others against different types of online fraud * How to identify ‘money mule’ schemes and recruiters * The risk of online social engineering to facilitate authorised push payment fraud, where a victim is tricked into sending a payment to the criminal * The risk of sharing personal information that could be used by fraudsters * That children are sometimes targeted to access adults’ data * What ‘good’ companies will and will not do when it comes to personal details * How to report fraud, phishing attempts, suspicious websites and adverts | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE * Computing |
| **Password phishing** | Password phishing is the process by which people try to find out individuals’ passwords so they can access protected content. Teaching will include the following:   * Why passwords are important, how to keep them safe and that others might try to get people to reveal them * How to recognise phishing scams * The importance of online security to protect against viruses that are designed to gain access to password information * What to do when a password is compromised or thought to be compromised | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE * Computing |
| **Personal data** | Online platforms and search engines gather personal data – this is often referred to as ‘harvesting’ or ‘farming’. Teaching will include the following:   * How cookies work * How data is farmed from sources which look neutral * How and why personal data is shared by online companies * How pupils can protect themselves and that acting quickly is essential when something happens * The rights children have with regards to their data * How to limit the data companies can gather | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE * Computing |
| **Persuasive design** | Many devices, apps and games are designed to keep users online for longer than they might have planned or desired. Teaching will include the following:   * That the majority of games and platforms are designed to make money, and that their primary driver is to encourage people to stay online for as long as possible to encourage them to spend money or generate advertising revenue * How notifications are used to pull users back online | This risk or harm will be covered in the following curriculum areas:   * Health education * Computing |
| **Privacy settings** | Almost all devices, websites, apps and other online services come with privacy settings that can be used to control what is shared. Teaching will include the following:   * How to find information about privacy settings on various sites, apps, devices and platforms * That privacy settings have limitations | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE * Computing |
| **Targeting of online content** | Much of the information seen online is a result of some form of targeting. Teaching will include the following:   * How adverts seen at the top of online searches and social media have often come from companies paying to be on there and different people will see different adverts * How the targeting is done * The concept of clickbait and how companies can use it to draw people to their sites and services | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE * Computing |
| **How to stay safe online** | | |
| **Online abuse** | Some online behaviours are abusive. They are negative in nature, potentially harmful and, in some cases, can be illegal. Teaching will include the following:   * The types of online abuse, including sexual harassment, bullying, trolling and intimidation * When online abuse can become illegal * How to respond to online abuse and how to access support * How to respond when the abuse is anonymous * The potential implications of online abuse * What acceptable and unacceptable online behaviours look like | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE * Computing * [KS4] Citizenship |
| **Radicalisation** | Pupils are at risk of accessing inappropriate and harmful extremist content online, including terrorist material. Extremist and terrorist groups use social media to identify and target vulnerable individuals. Teaching will include the following:   * How to recognise extremist behaviour and content online * Which actions could be identified as criminal activity * Techniques used for persuasion * How to access support from trusted individuals and organisations | All areas of the curriculum |
| **Challenges** | Online challenges acquire mass followings and encourage others to take part in what they suggest. Teaching will include the following:   * What an online challenge is and that, while some will be fun and harmless, others may be dangerous and even illegal * How to assess if the challenge is safe or potentially harmful, including considering who has generated the challenge and why * That it is okay to say no and to not take part in a challenge * How and where to go for help * The importance of telling an adult about challenges which include threats or secrecy, such as ‘chain letter’ style challenges | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE |
| **Content which incites violence** | Knowing that violence can be incited online and escalate very quickly into offline violence. Teaching will include the following:   * That online content (sometimes gang related) can glamorise the possession of weapons and drugs * That to intentionally encourage or assist in an offence is also a criminal offence * How and where to get help if they are worried about involvement in violence | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE |
| **Fake profiles** | Not everyone online is who they say they are. Teaching will include the following:   * That, in some cases, profiles may be people posing as someone they are not or may be ‘bots’ * How to look out for fake profiles | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE * Computing |
| **Grooming** | Knowing about the different types of grooming and motivations for it, e.g. radicalisation, child sexual abuse and exploitation, gangs and financial exploitation. Teaching will include the following:   * Boundaries in friendships with peers, in families, and with others * Key indicators of grooming behaviour * The importance of disengaging from contact with suspected grooming and telling a trusted adult * How and where to report grooming both in school and to the police   At all stages, it is important to balance teaching pupils about making sensible decisions to stay safe whilst being clear it is never the fault of the child who is abused and why victim blaming is always wrong. | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE |
| **Livestreaming** | Livestreaming (showing a video of yourself in real-time online, either privately or to a public audience) can be popular with children, but it carries a risk when carrying out and watching it. Teaching will include the following:   * What the risks of carrying out livestreaming are, e.g. the potential for people to record livestreams and share the content * That online behaviours should mirror offline behaviours and that this should be considered when making a livestream * That pupils should not feel pressured to do something online that they would not do offline * The risk of watching videos that are being livestreamed, e.g. there is no way of knowing what will be shown next * The risks of grooming | This risk or harm will be covered in the following curriculum areas:   * [Secondary schools] RSHE |
| **Pornography** | Knowing that sexually explicit material presents a distorted picture of sexual behaviours. Teaching will include the following:   * That pornography is not an accurate portrayal of adult sexual relationships * That viewing pornography can lead to skewed beliefs about sex and, in some circumstances, can normalise violent sexual behaviour * That not all people featured in pornographic material are doing so willingly, e.g. revenge porn or people trafficked into sex work | This risk or harm will be covered in the following curriculum areas:   * [Secondary schools] RSHE |
| **Unsafe communication** | Knowing different strategies for staying safe when communicating with others, especially people they do not know or have not met. Teaching will include the following:   * That communicating safely online and protecting your privacy and data is important, regardless of who you are communicating with * How to identify indicators of risk and unsafe communications * The risks associated with giving out addresses, phone numbers or email addresses to people pupils do not know, or arranging to meet someone they have not met before * What online consent is and how to develop strategies to confidently say no to both friends and strangers online | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE * Computing |
| **Wellbeing** | | |
| **Impact:**  **Confidence** | Knowing about the impact of comparisons to ‘unrealistic’ online images. Teaching will include the following:   * The issue of using image filters and digital enhancement * The role of social media influencers, including that they are paid to influence the behaviour of their followers * That ‘easy money’ lifestyles and offers may be too good to be true * The issue of photo manipulation, including why people do it and how to look out for it | This risk or harm will be covered in the following curriculum areas:   * [Secondary schools] RSHE |
| **Impact:**  **Quality of life**  **Physical health**  **Mental health**  **Relationships** | Knowing how to identify when online behaviours stop being fun and begin to create anxiety, including that there needs to be a balance between time spent online and offline. Teaching will include the following:   * How to evaluate critically what pupils are doing online, why they are doing it and for how long (screen time) * How to consider quality vs. quantity of online activity * The need for pupils to consider if they are actually enjoying being online or just doing it out of habit, due to peer pressure or due to the fear or missing out * That time spent online gives users less time to do other activities, which can lead some users to become physically inactive * The impact that excessive social media usage can have on levels of anxiety, depression and other mental health issues * That isolation and loneliness can affect pupils and that it is very important for them to discuss their feelings with an adult and seek support * Where to get help | This risk or harm will be covered in the following curriculum areas:   * Health education |
| **Online vs. offline behaviours** | People can often behave differently online to how they would act face to face. Teaching will include the following:   * How and why people can often portray an exaggerated picture of their lives (especially online) and how that can lead to pressure How and why people are unkind or hurtful online when they would not necessarily be unkind to someone face to face | This risk or harm will be covered in the following curriculum areas:   * [Primary schools] Relationships education * [Secondary schools] RSHE |
| **Reputational damage** | What users post can affect future career opportunities and relationships – both positively and negatively. Teaching will include the following:   * Strategies for positive use * How to build a professional online profile | This risk or harm will be covered in the following curriculum areas:   * [Secondary schools] RSHE |
| **Suicide**  **Self-harm**  **Eating**  **disorders** | Pupils may raise topics including eating disorders, self-harm and suicide. Teachers must be aware of the risks of encouraging or making these seem a more viable option for pupils and should take care to avoid giving instructions or methods and avoid using language, videos and images. |  |