



Online Safety Policy

Approved by: Full Governing Body

Date: September 2025

Review: September 2026

Signed:


Chair: Mr. C Harris

What's different about this policy for 2025:

The DSL has now been asked to take lead responsibility for web filtering and monitoring, marking a clear shift. Schools now need to follow the new DfE standards and consider the roles and responsibilities of all staff. For the DSLs and SLT, the challenge is to better understand, review and drive the rationale behind decisions in this area. Tech teams and safeguarding teams will need to work much more closely together for this to be possible and technicians will be charged to carry out regular checks and feed back to DSL teams. All staff need to be aware of the changes and renewed emphasis and play their part in feeding back about overblocking or gaps in the filtering provision. Schools will also be reviewing their approaches to monitoring in line with the standards (note that filtering and monitoring are not the same. There is guidance around this for DSLs at <https://safefiltering.lgfl.net>).

Introduction

Key people / dates

	Designated Safeguarding Lead (DSL), with lead responsibility for filtering and monitoring	Mrs. A Bashir Pugh
	Deputy Designated Safeguarding Leads / DSL Team Members	Mrs. J Nisbett Mr. John Stokes Mrs. H Rogers Mrs. T Whitehurst Mrs. K Beard
	Link governor for safeguarding	Mr. C Harris
	Link governor for webfiltering	Mr. C Harris

Curriculum leads with relevance to online safeguarding and their role	Mrs. T Whitehurst – Computing and Curriculum Lead Mrs. L Baker - PSHE Lead
Network manager / other technical support	SIPS Education Mr. A Beard
Date this policy was reviewed and by whom	September 2025 Mrs. T Whitehurst Mrs. A Bashir Pugh Mr. A Beard
Date of next review and by whom	September 2026

What is this policy?

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. Accordingly, this policy is written in line with 'Keeping Children Safe in Education' 2024 (KCSiE), 'Teaching Online Safety in Schools', statutory RSHE guidance and other statutory documents. It is cross-curricular (with relevance beyond Relationships, Health and Sex Education, Citizenship and Computing) and designed to sit alongside or be integrated into your school's statutory Child Protection & Safeguarding Policy. Any issues and concerns with online safety must always follow the school's safeguarding and child protection procedures.

Who is it for, when is it reviewed?

This policy is a living document, subject to full annual review but also amended where necessary during the year in response to developments in the school and local area. Although many aspects will be informed by legislation and regulations, we will involve staff, governors, pupils and parents in writing and reviewing the policy and make sure the policy makes sense and it is possible to follow it in all respects. This will help ensure all stakeholders understand the rules that are in place and why, and that the policy affects day-to-day practice. Acceptable Use Policies (see appendices) for different stakeholders help with this. Any changes to this policy should be immediately disseminated to all the above stakeholders.

What are the main online safety risks

Current Online Safeguarding Trends

In our school over the past year, we have particularly an increase in terms of device use and abuse and types of online/device-based incidents which affect the wellbeing and safeguarding of our students at Reddal Hill Primary School.

Nationally, some of the latest trends of the past twelve months are outlined below. These should be reflected in this policy and the acceptable use agreements we use and seen in the context of the 5 Cs (see KCSiE for more details), a whole-school contextual safeguarding approach that incorporates policy and practice for curriculum, safeguarding and technical teams. We may update this policy during the year to reflect any changes resulting from the Online Safety Bill being passed into law.

Last year, we highlighted the rapid rise of generative AI (GenAI). Since then, the trend has exploded. Thousands of sites now offer AI-generated content, including disturbing levels of abusive, pornographic, and even illegal material like child sexual abuse content. Some platforms host AI "girlfriends," unregulated therapy bots, and even chatbots that encourage self-harm or suicide—tools many students can access freely at home or school. Chatbots can also blur reality, offering harmful advice or engaging in sexualised and bullying conversations. Their addictive design and unmoderated nature heighten the risk of overuse and exploitation.

When used for generating text, GenAI presents multiple risks. It can spread misinformation, facilitate plagiarism, and most worryingly, bypass safety settings. Many tools lack effective age controls and produce inappropriate content.

Beyond text, GenAI makes it easier than ever to create sexualised images and deepfake videos. These can have a devastating emotional and physical impact on young people, including blackmail and abuse. The Internet Watch Foundation has warned of a sharp rise in AI-generated child sexual abuse imagery. Alarming reports also show children using nudifying apps to create illegal content of peers.

We regularly see AI searches involving sexualised and harmful content. It's critical to stress that in the UK, *any* CSAM (child sexual abuse material)—AI-generated, photographic, or even cartoon—is illegal to create, possess, or share.

Schools must address this not just in the classroom, but by educating parents and students on safe use at home. For guidance and resources, visit genai.lgfl.net.

Ofcom's 'Children and parents: media use and attitudes report 2025' has shown that YouTube remains the most used site or app among all under 18s, followed by WhatsApp, TikTok, Snapchat and Instagram. With children aged 8-14 spending an average of 2 hours 59 minutes a day online across smartphone, tablet and computer — with girls spending more time online than boys, four in ten parents continue to report finding it hard to control their child's screentime. Notably, 52% of 8-11s feel that their parents' screentime is also too high, underlining the importance of modelling good behaviour.

Given the 13yrs+ minimum age requirement on most social media platforms, it is notable that over half of 3-12-year olds (55%) were reported using at least one app. Despite age restrictions, four in ten admit to giving a fake age online, exposing them to content inappropriate for their age and increasing their risk of harm, with over a third of parents of all 3-17s saying they would allow their child to have a profile on sites or apps before they had reached the minimum age.

We have also come across online communications platforms that offer anonymous chat services and connect users with random strangers allowing text and video chats. Most of these are easily accessible to children on devices.

As a school we recognise that many of our children and young people are on these apps regardless of age limits, which are often misunderstood or ignored. We therefore will remind about best practice while remembering the reality for most of our students is quite different.

This is striking when you consider that 25% of 3-4 year olds have access to their OWN mobile phone (let alone shared devices), rising to over 90 percent by the end of Primary School, and the vast majority have no safety controls or limitations to prevent harm or access to inappropriate material. At the same time, even 3- to 6-year-olds are being tricked into 'self-generated' sexual content (Internet Watch Foundation Annual Report) while considered to be safely using devices in the home and for the first time, there were more 7-10-year-olds visible in child sexual abuse material (CSAM) images than 11-13s.

Growing numbers of children and young people are using social media and apps, primarily TikTok as their source of news and information, with little attention paid to the facts or veracity of influencers sharing news.

There have also been significant safeguarding concerns where parents have filmed interactions with staff outside the school gates and posted this on social media, putting children and the wider school community at risk of harm. See nofilming.lgfl.net to find out more.

Cyber Security is an essential component in safeguarding children and features within KCSIE. Sadly, the education sector remains a clear target for cyber-attacks, with the Cyber Security Breaches Survey 2025 reporting high levels of schools being attacked nationally, with 60% of secondary schools and 44% of primary schools reporting a breach or attack in the past year.

How will this policy be communicated?

This policy can only impact upon practice if it is a (regularly updated) living document. It must be accessible to and understood by all stakeholders. It will be communicated in the following ways:

- Posted on the school website
- Part of school induction pack for all new staff (including temporary, supply and non-classroom-based staff and those starting mid-year).
- Integral to safeguarding updates and training for all staff (especially in September refreshers).
- Clearly reflected in the Acceptable Use Policies (AUPs) for staff, volunteers, contractors, governors, pupils and parents/carers (which must be in accessible language appropriate to these groups), which will be issued to whole school community, on entry to the school, annually and whenever changed, plus displayed in school.

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Overview

Aims

This policy aims to promote a whole school approach to online safety by:

- Setting out expectations for all Reddal Hill Primary community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline).
- Helping safeguarding and senior leadership teams to have a better understanding and awareness of all elements of online safeguarding through effective collaboration and communication with technical colleagues (e.g. for filtering and monitoring), curriculum leads (e.g. RSHE) and beyond.
- Helping all stakeholders to recognise that online/digital behaviour standards (including social media activity) must be upheld beyond the confines of the school gates and school day, regardless of device or platform, and that the same standards of behaviour apply online and offline.

- Facilitating the safe, responsible, respectful and positive use of technology to support teaching & learning, increase attainment and prepare children and young people for the risks and opportunities of today's and tomorrow's digital world, to survive and thrive online
- Helping school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
 - for the protection and benefit of the children and young people in their care, and
 - for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice
 - for the benefit of the school, supporting the school ethos, aims and objectives, and protecting the reputation of the school and profession
- Establishing clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as Behaviour Policy or Anti-Bullying Policy)

Further Help and Support

Internal school channels should always be followed first for reporting and support, as documented in school policy documents, especially in response to incidents, which should be reported in line with your Child Protection & Safeguarding Policy. The DSL will handle referrals to local authority multi-agency safeguarding hubs (MASH) and normally the headteacher will handle referrals to the LA designated officer (LADO). The local authority, academy trust or third-party support organisations you work with may also have advisors to offer general support.

Beyond this, reporting.lgfl.net has a list of curated links to external support and helplines for both pupils and staff, including the Professionals' Online-Safety Helpline from the UK Safer Internet Centre and the NSPCC Report Abuse Helpline for sexual harassment or abuse, as well as hotlines for hate crime, terrorism and fraud which might be useful to share with parents, and anonymous support for children and young people. Training is also available via safetraining.lgfl.net

Scope

This policy applies to all members of the Reddal Hill community (including teaching, supply and support staff, governors, volunteers, contractors, students/pupils, parents/carers, visitors and community users) who have access to our digital technology, networks and systems, whether on-site or remotely, and at any time, or who use technology in their school role.

Roles and responsibilities

This school is a community, and all members have a duty to behave respectfully online and offline, to use technology for teaching and learning and to prepare for life after school, and to immediately report any concerns or inappropriate behaviour, to protect staff, pupils, families and the reputation of the school. We learn together, make honest mistakes together and support each other in a world that is online and offline at the same time.

Depending on their role, all members of the school community should **read the relevant section in Annex A of this document** that describes individual roles and responsibilities. Please note there is one for All Staff which must be read even by those who have a named role in another section. There are also pupil, governor, etc role descriptions in the annex.

In 2025, it is vital that all members understand their responsibilities and those of others when it comes to filtering and monitoring. All staff have a key role to play in feeding back on potential issues.

Education and curriculum

Despite the risks associated with being online, Reddal Hill Primary School recognises the opportunities and benefits to children too. Technology is a fundamental part of adult life and so developing the competencies to understand and use it, are critical to children's later positive outcomes. The choice to use technology in school will always be driven by pedagogy and inclusion.

It is important that schools establish a carefully sequenced curriculum for online safety that develops competencies (as well as knowledge about risks) and builds on what pupils have already learned and identifies subject content that is appropriate for their stage of development.

As well as teaching about the underpinning knowledge and behaviours that can help pupils navigate the online world safely and confidently regardless of the device, platform or app, [Teaching Online Safety in Schools](#) recommends embedding teaching about online safety and harms through a whole school approach and provides an understanding of these risks to help tailor teaching and support to the specific needs of pupils, including vulnerable pupils

RSHE guidance also recommends schools assess teaching to "identify where pupils need extra support or intervention [through] tests, written assignments or self-evaluations, to capture progress."

The following subjects have the clearest online safety links (see the relevant role descriptors above for more information):

- Relationships education, relationships and sex education (RSE) and health (also known as RSHE or PSHE) [Please be aware that during the 2025/6 school year this may be subject to significant changes of scope and content]
- Computing
- Citizenship

However, as stated in the role descriptors above, it is the role of all staff to identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils)

Whenever overseeing the use of technology (devices, the internet, generative AI tools, etc.) in school or setting as homework tasks, all staff should remind/encourage sensible use, monitor what pupils/students are doing and consider potential risks and the age appropriateness of tasks. This includes supporting them with search skills, reporting and accessing help, critical thinking (e.g. disinformation, misinformation, and conspiracy theories in line with KCSIE 2025), access to age-appropriate

materials and signposting, and legal issues such as copyright and data law. saferesources.lgfl.net has regularly updated theme-based resources, materials and signposting for teachers and parents.

At Reddal Hill, we recognise that online safety and broader digital resilience must be thread throughout the curriculum and that is why we are working to adopt the cross-curricular framework 'Education for a Connected World – 2020 edition' from UKCIS (the UK Council for Internet Safety).

Annual reviews of curriculum plans / schemes of work (including for SEND pupils) are used as an opportunity to follow this framework more closely in its key areas of Self-image and Identity, Online relationships, Online reputation, Online bullying, Managing online information, Health, Wellbeing and lifestyle, Privacy and security, and Copyright and ownership. At Reddal Hill we follow the Purple Mash Curriculum.

We communicate with parents and carers about how we support pupils with their online safety learning, including what their children are being asked to do online and the sites they will be asked to access by sharing curriculum information, adding appropriate information to newsletters, sharing online safety posters via ClassDojo and inviting parents to an online safety parent workshop.

Handling safeguarding concerns and incidents

It is vital that all staff recognise that online safety is a part of safeguarding and so concerns must be handled in the same way as any other safeguarding concern. Safeguarding is often referred to as a jigsaw puzzle, so all stakeholders should speak to the safeguarding lead with any concerns (no matter how small these seem) to contribute to the overall picture or highlight what might not yet be a problem.

Support staff will often have a unique insight and opportunity to find out about issues first in the playground, corridors, toilets and other communal areas outside the classroom.

School procedures for dealing with online safety will be mostly detailed in the following policies (primarily in the first key document):

Safeguarding and Child Protection Policy

- Sexual Harassment / Child-on-Child Abuse Policy (if separate)
- Anti-Bullying Policy
- Behaviour Policy (including school sanctions)
- Acceptable Use Policies
- Prevent Risk Assessment / Policy
- Data Protection Policy, agreements and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc)

- Cybersecurity

This school commits to take all reasonable precautions to ensure safeguarding pupils online, but recognises that incidents will occur both inside school and outside school (and that those from outside school will continue to impact pupils when they come into school or during extended periods away from school). All members of the school are encouraged to report issues swiftly to allow us to deal with them quickly and sensitively through the school's escalation processes.

Any suspected online risk or infringement should be reported to the online safety lead / designated safeguarding lead on the same day – where clearly urgent, it will be made by the end of the lesson.

Any concern/allegation about staff misuse is always referred directly to the Headteacher, unless the concern is about the Headteacher in which case the complaint is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer). Staff may also use the NSPCC Whistleblowing Helpline (you may want to display a poster with details of this / other helplines in the staff room – see [posters.lgfl.net](https://www.lgfl.net/posters) and [reporting.lgfl.net](https://www.lgfl.net/reporting)).

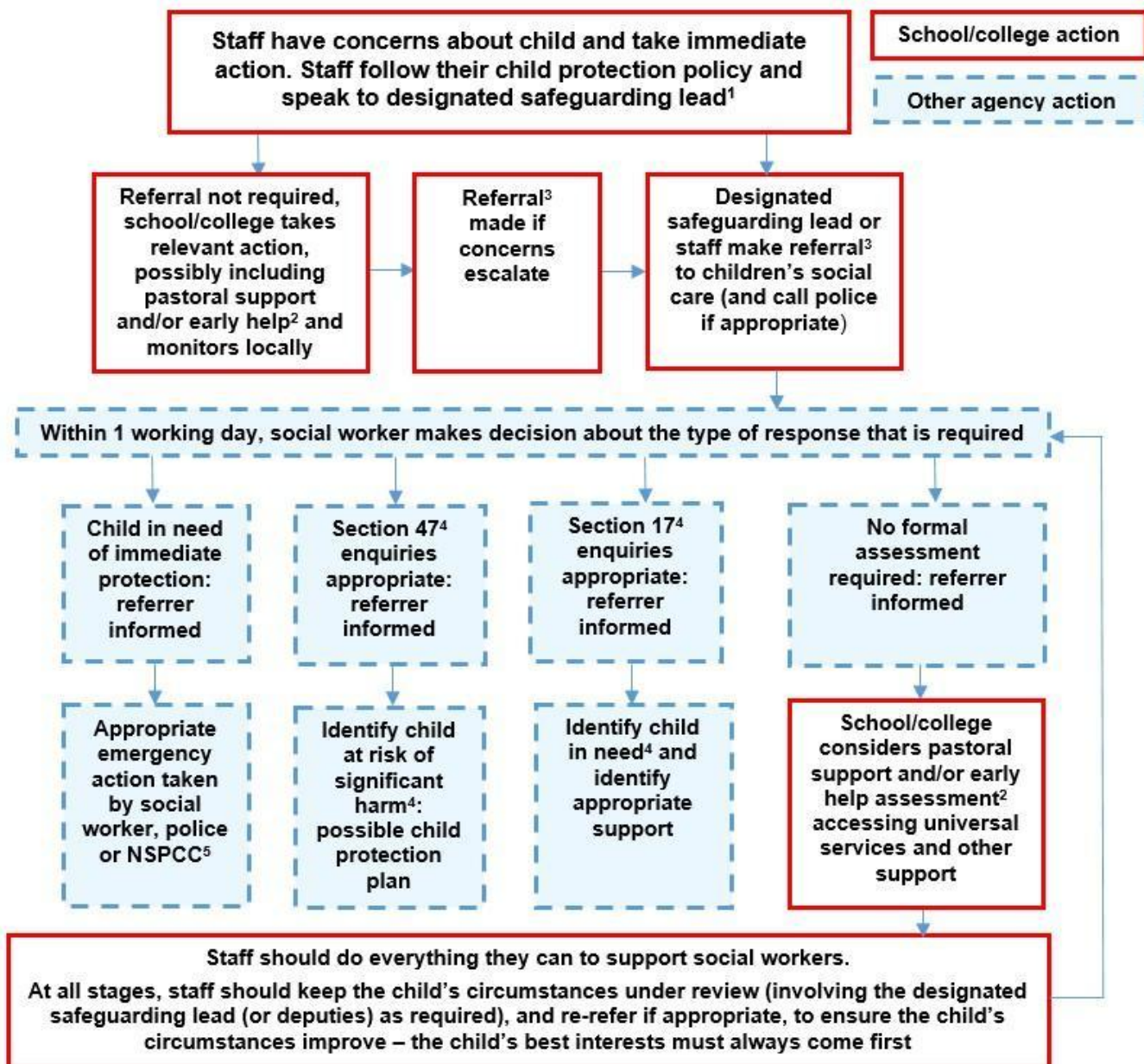
The school will actively seek support from other agencies as needed (i.e. the local authority, LGfL, UK Safer Internet Centre's Professionals' Online Safety Helpline (POSH), NCA CEOP, Prevent Officer, Police, IWF and Harmful Sexual Behaviour Support Service). The DfE guidance [Behaviour in Schools, advice for headteachers and school staff](#) September 2022 provides advice and related legal duties including support for pupils and powers of staff when responding to incidents – see pages 32-34 for guidance on child on child sexual violence and harassment, behaviour incidents online and mobile phones.

We will inform parents/carers of online-safety incidents involving their children, and the Police where staff or pupils engage in or are subject to behaviour which we consider is particularly concerning or breaks the law (procedures are in place for sexting and upskirting; see section below).

The school should evaluate whether reporting procedures are adequate for any future closures/lockdowns/isolation etc and make alternative provisions in advance where these might be needed.

Actions where there are concerns about a child

The following flow chart (it cannot be edited) is taken from page 22 of Keeping Children Safe in Education 2022 as the key education safeguarding document. As outlined previously, online safety concerns are no different to any other safeguarding concern.



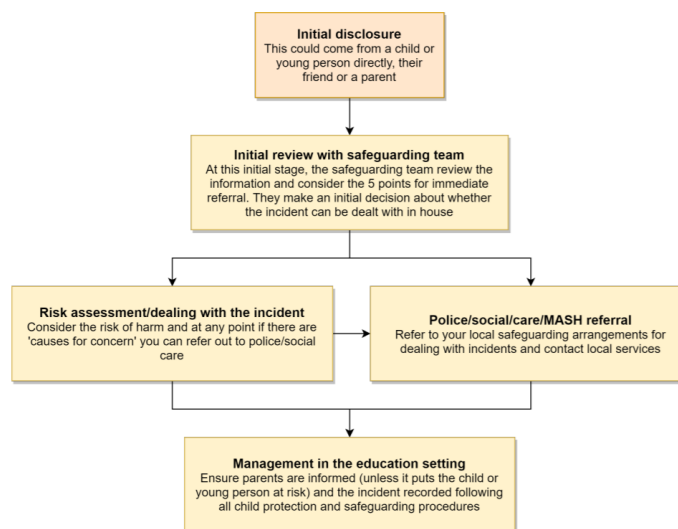
Sexting – sharing nudes and semi-nudes

All schools (regardless of phase) should refer to the UK Council for Internet Safety (UKCIS) guidance on sexting - now referred to as Sharing nudes and semi-nudes: advice for education settings to avoid unnecessary criminalisation of children. NB - where one of the parties is over 18, this is no longer sexting but child sexual abuse.

There is a one-page overview called Sharing nudes and semi-nudes: how to respond to an incident for all staff (not just classroom-based staff) to read, in recognition of the fact that it is mostly someone other than the designated safeguarding lead (DSL) or online safety lead to first become aware of an incident, and it is vital that the correct steps are taken. **Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL.**

It is important that everyone understands that whilst the sharing of nudes involving children is illegal, students should be encouraged and supported to talk to members of staff if they have made a mistake or had a problem in this area. The UKCIS guidance seeks to avoid unnecessary criminalisation of children.

The school DSL will in turn use the full guidance document, Sharing nudes and semi-nudes – advice for educational settings to decide next steps and whether other agencies need to be involved.



Consider the 5 points for immediate referral at initial review:

1. The incident involves an adult
2. There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
3. What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
4. The images involves sexual acts and any pupil in the images or videos is under 13
5. You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

It is important that everyone understands that whilst sexting is illegal, pupils/students can come and talk to members of staff if they have made a mistake or had a problem in this area.

The documents referenced above and materials to support teaching about sexting can be found at sexting.lgfl.net

Upskirting

It is important that everyone understands that upskirting (taking a photo of someone under their clothing, not necessarily a skirt) is now a criminal offence and constitutes a form of sexual harassment as highlighted in Keeping Children Safe in Education. As with other forms of child-on-child abuse pupils/students can come and talk to members of staff if they have made a mistake or had a problem in this area.

Bullying

Online bullying, including incidents that take place outside school or from home should be treated like any other form of bullying and the school bullying policy should be followed for online bullying, which may also be referred to as cyberbullying, including issues arising from banter. The school bullying policy highlights the importance not to treat online bullying separately to offline bullying and to recognise that much bullying will often have both online and offline elements.

It is important to be aware that in the past 12 months there has been an increase in anecdotal reports of fights being filmed and fake profiles being used to bully children in the name of others. When considering bullying, staff will be reminded of these issues.

Materials to support teaching about bullying and useful Department for Education guidance and case studies are at bullying.lgfl.net

Child-on-child sexual violence and sexual harassment

Any incident of sexual harassment or violence (online or offline) should be reported to the DSL who will follow the full guidance. Staff should work to foster a zero-tolerance culture and maintain an attitude of 'it could happen here'. The guidance stresses that schools must take all forms of sexual violence and harassment seriously, explaining how it exists on a continuum and that behaviours incorrectly viewed as 'low level' are treated seriously and not allowed to perpetuate. The document makes specific reference to behaviours such as bra-strap flicking and the careless use of language.

In the online environment, the recent proliferation of misogynistic content is particularly relevant when it comes to considering reasons for and how to combat this kind of behaviour.

Misuse of school technology (devices, systems, networks or platforms)

Clear and well communicated rules and procedures are essential to govern pupil and adult use of school networks, connections, internet connectivity and devices, cloud platforms and social media (both when on school site and outside of school).

These are defined in the relevant Acceptable Use Policy as well as in this document, for example in the sections relating to the professional and personal use of school platforms/networks/clouds, devices and other technology, as well as to BYOD (bring your own device) policy.

Where pupils contravene these rules, the school behaviour policy will be applied; where staff contravene these rules, action will be taken as outlined in the staff code of conduct/handbook.

It will be necessary to reinforce these as usual at the beginning of any school year but also to remind pupils that **the same applies for any home learning** that may take place in future periods of absence/ closure/quarantine etc.

Further to these steps, the school reserves the right to withdraw – temporarily or permanently – any or all access to such technology, or the right to bring devices onto school property.

The new responsibilities for filtering and monitoring, led by the DSL and following the new DfE standards, may mean that more such incidents will be discovered in the coming year but the school will do its best to remind pupils and staff of this increased scrutiny at the start of the year.

Social media incidents

See the social media section later in this document for rules and expectations of behaviour for children and adults in the Reddal Hill community. These are also governed by school Acceptable Use Policies.

Breaches will be dealt with in line with the school behaviour policy (for pupils) or code of conduct/handbook (for staff).

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community, Reddal Hill will request that the post be deleted and will expect this to be actioned promptly.

Where an offending post has been made by a third party, the school may report it to the platform it is hosted on, and may contact the Professionals' Online Safety Helpline, POSH, (run by the UK Safer Internet Centre) for support or help to accelerate this process.

Data protection and cybersecurity

All pupils, staff, governors, volunteers, contractors and parents are bound by the school's data protection and cybersecurity policy which can be found here. It is important to remember that there is a close relationship between both data protection and cybersecurity and a school's ability to effectively safeguard children. Schools are reminded of this in KCSiE which also refers to the DfE Standards of Cybersecurity for the first time in 2023.

Schools should remember that data protection does not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in *Data protection in schools, 2023*, "It's not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child." And in KCSiE 2024, "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of

information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.”

Appropriate filtering and monitoring

Keeping Children Safe in Education has long asked schools to ensure “appropriate” webfiltering and monitoring systems which keep children safe online but do not “overblock”.

Since KCSIE 2024, in recognition of the importance of these systems to keeping children safe, the designated safeguarding lead now has lead responsibility for filtering and monitoring (see page 1 for the DSL name and the named governor with responsibility for filtering and monitoring).

Schools are also asked to follow the new DfE filtering and monitoring standards, which require them to:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

As schools get to grips with these new standards, the challenge for DSLs and SLT is to better understand, review and drive the rationale behind decisions in this area. Tech teams and safeguarding teams will need to work much more closely together for this to be possible and technicians will be charged to carry out regular checks and feed back to DSL teams.

At our school we recognise that generative AI sites can pose data risks so staff are not allowed to enter child data and where they use them, they must be approved. For children and young people, we block the generative AI category and only allow specific sites. We know that what children input and what the tool outputs cannot be guaranteed as safe and inappropriate content can be generated, so we carefully monitor output and limit their use - also in line with DfE guidelines. Find out more at genaisafe.lgfl.net

ALL STAFF need to be aware of the changes and renewed emphasis and play their part in feeding back about areas of concern, potential for students to bypass systems and any potential overblocking. They can submit concerns at any point CPOMs, and will be asked for feedback at the time of the regular checks which will now take place.

Staff will be reminded of the systems in place and their responsibilities at induction and start of year safeguarding as well as via AUPs and regular training reminders in the light of the annual review and regular checks that will be carried out.

It is very important that schools understand the difference between filtering and monitoring, the meaning of overblocking and other terms, as well as how to get the best out of systems. There are guidance videos and flyers to help with this at <https://safefiltering.lgfl.net> and training is provided for all staff / safeguarding teams / technical teams as appropriate.

At Reddal Hill:

- Web filtering is provided by LGfL on school site.
- School devices used in the home are protected by Home Secure.
- Changes can be made by SIPS Education, Mr. Beard (SM), and Mrs. A Bashir Pugh.
- Overall responsibility is held by the DSL.
- Technical support and advice, setup and configuration are from SIPS Education.
- LGfL regularly monitor and maintain the filtering system.
- An annual review is carried out.
- Guidance on how the system is 'appropriate' is available at [appropriate.lgfl.net](https://www.lgfl.net)

According to the DfE standards, "a variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- Physically monitoring by staff watching screens of users.
- Live supervision by staff on a console with device management software.
- Network monitoring using log files of internet traffic and web access.
- Individual device monitoring through software or third-party services.

Monitoring is how we know what a child is always doing on a device and are alerted if anything concerning is typed.

We use the software called "SENSO" to monitor all our devices in school. Senior staff are alerted when a child or adult has typed something concerning into a device and a screenshot is taken of what was typed. This may be simply an inappropriate word, or serious. E.g., a child being worried about something at home, a sign they are struggling emotionally, or that they are interested in something concerning.

Children are taught to log onto a device using their own login, so that staff can be alerted to the individual child who have used the device for something concerning. The children are taught to have an awareness that they must be a responsible user of the devices in school and to log off again once they have finished their tasks.

If an alert comes through, a member of SMT will speak to the child about it and inform parents if necessary, so that this can be followed up at home. If the concern is related to safeguarding, we may contact external services for support.

At Reddal Hill, we use

Messaging/commenting systems (incl. email, learning platforms & more)

Authorised systems

- Pupils at this school communicate with each other and with staff using Purple Mash and using the class email.
- Staff at this school use the email system provided by Microsoft for all school emails. They never use a personal/private email account (or other messaging platform) to communicate with children or parents, or to colleagues when relating to school/child data, using a non-school-administered system. Staff are permitted to use this email system to communicate with other members of staff. Individual class emails are used
- Staff at this school use Class Dojo to communicate with parents.

Any systems above are centrally managed and administered by the school or authorised IT partner (i.e. they can be monitored/audited/viewed centrally; are not private or linked to private accounts). This is for the mutual protection and privacy of all staff, pupils and parents, supporting safeguarding best-practice, protecting children against abuse, staff against potential allegations and in line with UK data protection legislation.

Use of any new platform with communication facilities or any child login or storing school/child data must be approved in advance by the school and centrally managed.

Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member).

Where devices have multiple accounts for the same app, mistakes can happen, such as an email being sent from, or data being uploaded to the wrong account. If this a private account is used for communication, or to store data by mistake, the DSL/Headteacher/DPO (the circumstances of the incident will determine whose remit this is) should be informed immediately.

Behaviour / usage principles

- More detail for all the points below are given in the Social media section of this policy as well as the school's acceptable use agreements, behaviour policy and staff code of conduct.

- Appropriate behaviour is always expected, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff.
- Data protection principles will be always followed when it comes to all school communications, in line with the school Data Protection Policy and only using the authorised systems mentioned above.
- Parents and staff are allowed to use the class email system, but should be aware that all use is monitored, their emails may be read and the same rules of appropriate behaviour apply at all times. Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination (and will be dealt with according to the appropriate policy and procedure).

The Use of Artificial Intelligence (AI)

As Generative Artificial Intelligence (gen AI) continues to advance and influence the world we live in, its role in education is also evolving.

The integration of AI in schools can be transformative across these three key dimensions:

- **Learner Support:** AI can personalise learning experiences, provide real-time feedback, and identify areas where students may need additional help. This can enhance student engagement and improve learning outcomes.
- **Teacher Support:** AI can assist teachers by automating administrative tasks, providing insights into student performance, and offering resources for lesson planning. This allows teachers to focus more on instruction and student interaction.
- **School Operations:** AI can streamline operations such as scheduling, resource allocation, and communication. It can also enhance security and monitor facilities to ensure a safe learning environment.

Ensuring that AI is used safely, ethically, and responsibly is crucial. This includes protecting student data privacy, avoiding biases in AI algorithms and ensuring transparency in AI decision-making processes.

We realise that there are risks involved in the use of Gen AI services, but that these can be mitigated through our existing policies and procedures, amending these as necessary to address the risks.

We will educate staff and learners about the safe and ethical use of AI, preparing them for a future in which these technologies are likely to play an increasing role. The safeguarding of staff and learners will, as always, be at the forefront of our policy and practice.

Policy Statements

- The school acknowledges the potential benefits of the use of AI in an educational context - including enhancing learning and teaching, improving outcomes, improving administrative processes, reducing workload and preparing staff and learners for a future in which AI technology will be an integral part. Staff are encouraged to use AI based tools to support their work where appropriate, within the frameworks provided below and are required to be professionally responsible and accountable for this area of their work.
- We will comply with all relevant legislation and guidance, with reference to guidance contained in Keeping Children Safe in Education and UK GDPR
- We will provide relevant training for staff and governors in the advantages, use of and potential risks of AI. We will support staff in identifying training and development needs to enable relevant opportunities.
- We will seek to embed learning about AI as appropriate in our curriculum offer, including supporting learners to understand how gen AI works, its potential benefits, risks, and ethical and social impacts. The school recognises the importance of equipping learners with the knowledge, skills and strategies to engage responsibly with AI tools.
- As set out in the staff Acceptable Use agreement, staff will be supported to use AI tools responsibly, ensuring the protection of both personal and sensitive data. Staff should only input anonymised data to avoid the exposure of personally identifiable or sensitive information.
- Staff will always ensure AI tools used comply with UK GDPR and other data protection regulations. They must verify that tools meet data security standards before using them for work related to the school.
- Only those AI technologies approved by the school may be used. Staff should always use school-provided AI accounts for work purposes. These accounts are configured to comply with organisational security and oversight requirements, reducing the risk of data breaches.
- We will protect sensitive information. Staff must not input sensitive information, such as internal documents or strategic plans, into third-party AI tools unless explicitly vetted for that purpose. They must always recognise and safeguard sensitive data.
- The school will ensure that when AI is used, it will not infringe copyright or intellectual property conventions – care will be taken to avoid intellectual property, including that of the learners, being used to train generative AI models without appropriate consent.
- AI incidents must be reported promptly. Staff must report any incidents involving AI misuse, data breaches, or inappropriate outputs immediately to the relevant internal teams. Quick reporting helps mitigate risks and facilitates a prompt response.
- The school will audit all AI systems in use and assess their potential impact on staff, learners and the school's systems and procedures, creating an AI inventory listing all tools in use, their purpose and potential risks. (Risk assessment matrices are attached as an appendix)

- We are aware of the potential risk for discrimination and bias in the outputs from AI tools and have in place interventions and protocols to deal with any issues that may arise. When procuring and implementing AI systems, we will follow due care and diligence to prioritise fairness and safety.
- The school will support parents and carers in their understanding of the use of AI in the school (this could be through an "AI in our school guide")
- AI tools may be used to assist teachers in the assessment of learners' work, identification of areas for improvement and the provision of feedback. Teachers may also support learners to gain feedback on their own work using AI
- Maintain Transparency in AI-Generated Content. Staff should ensure that documents, emails, presentations, and other outputs influenced by AI include clear labels or notes indicating AI assistance. Clearly marking AI-generated content helps build trust and ensures that others are informed when AI has been used in communications or documents.
- We will prioritise human oversight. AI should assist, not replace, human decision-making. Staff must ensure that final judgments, particularly those affecting people, are made by humans and critically evaluate AI-generated outputs. They must ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing. This is especially important for external communication to avoid spreading misinformation.
- Recourse for improper use and disciplinary procedures. Improper use of AI tools, including breaches of data protection standards, misuse of sensitive information, or failure to adhere to this agreement, will be subject to disciplinary action as defined in Schools Model Disciplinary Policy.

A more detailed policy template can be found in the appendix, including a risk assessment matrix for the use of AI and an AI specific Staff Acceptable Use Agreement.

Online storage or learning platforms

All the principles outlined above also apply to any system to which you log in online to conduct school business, whether it is to simply store files or data (an online 'drive') or collaborate, learn, teach, etc.

For all these, it is important to consider data protection and cybersecurity before always adopting such a platform or service and when using it. Reddal Hill has a clear cybersecurity and data protection policy which staff, governors and volunteers must always follow. (<https://rb.gy/2p5rih> - Data Protection Policy)

School website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. The Headteacher and Governors have delegated the day-to-day responsibility of updating the content of the website and ensuring compliance with DfE stipulations to all staff.

The site is managed by / hosted by Primary Site Website Designers.

Where staff submit information for the website, they are asked to remember that schools have the same duty as any person or organisation to respect and uphold copyright law – schools have been fined thousands of pounds for copyright breaches. Sources must always be credited, and material only used with permission. There are many open-access libraries of public-domain images/sounds etc that can be used. Finding something on Google or YouTube does not mean that copyright has been respected. If in doubt, check with SMT

Digital images and video

When a pupil/student joins the school, parents/carers are asked if they give consent for their child's image to be captured in photographs or videos, for what purpose (beyond internal assessment, which does not require express consent) and for how long. Parents answer as follows:

- For displays around the school
- For the newsletter
- For use in paper-based school marketing
- For online prospectus or websites
- For social media
- For a specific high-profile image for display or publication

Whenever a photo or video is taken/made, the member of staff taking it will check the latest database before using it for any purpose.

Any pupils shown in public facing materials are never identified with more than first name (and photo file names/tags do not include full names to avoid accidentally sharing them).

All staff are governed by their contract of employment and the school's Acceptable Use Policy, which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. At Reddal Hill, no member of staff will ever use their personal phone to capture photos or videos of pupils.

Photos are stored on the school's shared drive or year group cameras in line with the retention schedule of the school Data Protection Policy. Any concerns about the nature of these images will be reported to the DSL

Staff and parents are reminded annually about the importance of not sharing without permission, due to reasons of child protection (e.g. looked-after children often have restrictions for their own protection), data protection, religious or cultural reasons,

or simply for reasons of personal privacy. Further detail on this subject and a sample letter to parents for taking photos or videos at school events can be found at parentfilming.lgfl.net

We encourage young people to think about their online reputation and digital footprint, so we should be good adult role models by not oversharing (or providing embarrassment in later life – and it is not for us to judge what is embarrassing or not).

Pupils are taught about how images can be manipulated in their online safety education programme and taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children

Pupils are advised to be very careful about placing any personal photos on social media. They are taught to understand the need to maintain privacy settings so as not to make public, personal information.

Pupils are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location. We teach them about the need to keep their data secure and what to do if they / or a friend are subject to bullying or abuse.

Social media

Our SM presence

Reddal Hill works on the principle that if we don't manage our social media reputation, someone else will.

Online Reputation Management (ORM) is about understanding and managing our digital footprint (everything that can be seen or read about the school online). Few parents will apply for a school place without first Googling the school, and the Ofsted pre-inspection check includes monitoring what is being said online.

Negative coverage almost always causes some level of disruption. Up to half of all cases dealt with by the Professionals Online Safety Helpline (POSH: helpline@saferrinternet.org.uk) involve schools' (and staff members') online reputation.

Accordingly, we manage and monitor our social media footprint carefully to know what is being said about the school and to respond to criticism and praise in a fair, responsible manner.

Staff, pupils' and parents' SM presence

Social media (including all apps, sites and games that allow sharing and interaction between users) is a fact of modern life, and as a school, we accept that many parents, staff and pupils will use it. However, as stated in the acceptable use policies which all members of the school community sign, we expect everybody to behave in a positive manner, engaging respectfully with the school and each other on social media, in the same way as they would face to face.

This positive behaviour can be summarised as not making any posts which are or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which might bring the school or (particularly for staff) teaching profession into disrepute. This applies both to public pages and to private posts, e.g. parent chats, pages or groups.

If parents have a concern about the school, we urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, the school complaints procedure should be followed. Sharing complaints on social media is unlikely to help resolve the matter, but can cause upset to staff, pupils and parents, also undermining staff morale and the reputation of the school (which is important for the pupils we serve).

Many social media platforms have a minimum age of 13 (note that WhatsApp is 16+), but the school regularly deals with issues arising on social media involving pupils/students under the age of 13. We ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use. It is worth noting that Online Harms regulation is likely to require more stringent age verification measures over the coming years.

However, the school must strike a difficult balance of not encouraging underage use at the same time as needing to acknowledge reality in order to best help our pupils/students to avoid or cope with issues if they arise. Online safety lessons will look at social media and other online behaviour, how to be a good friend online and how to report bullying, misuse, intimidation or abuse. However, children will often learn most from the models of behaviour they see and experience, which will often be from adults.

Parents can best support this by talking to their children about the apps, sites and games they use (you don't need to know them – ask your child to explain it to you), with whom, for how long, and when (late at night / in bedrooms is not helpful for a good night's sleep and productive teaching and learning at school the next day).

does not have. We. We ask.

ClassDojo and email are the official electronic communication channel between parents and the school. Social media, including chat apps such as WhatsApp, are not appropriate for school use. Pupils are not allowed to be 'friends' with or make a friend request to any staff, governors, volunteers and contractors or otherwise communicate via social media.

Pupils are discouraged from 'following' staff, governor, volunteer or contractor public accounts (e.g. following a staff member with a public Instagram account) as laid out in the AUPs. However, we accept that this can be hard to control (but this highlights the need for staff to remain professional in their private lives). In the reverse situation, however, staff must not follow such public student accounts.

Exceptions may be made, e.g. for pre-existing family links, but these must be approved by the Headteacher and should be declared upon entry of the pupil or staff member to the school.

Any attempt to do so may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member).

Staff are reminded that they are obliged not to bring the school or profession into disrepute and the easiest way to avoid this is to have the strictest privacy settings and avoid inappropriate sharing and oversharing online. They should never discuss the school or its stakeholders on social media and be careful that their personal opinions might not be attributed to the school, trust or local authority, bringing the school into disrepute.

The serious consequences of inappropriate behaviour on social media are underlined by the fact that there has been a significant number of Prohibition Orders issued by the Teacher Regulation Agency to teaching staff that involved misuse of social media/technology.

All members of the school community are reminded that particularly in the context of social media, it is important to comply with the school policy on Digital images and video permission is sought before uploading photographs, videos or any other information about other people.

The statements of the Acceptable Use Policies (AUPs) which all members of the school community have signed are also relevant to social media activity, as is the school's Data Protection Policy.

Device usage

AUPs remind those with access to school devices about rules on the misuse of school technology – devices used at home should be used just like if they were in full view of a teacher or colleague. Please read the following in conjunction with those AUPs and the sections of this document which impact upon device usage, e.g. copyright, data protection, social media, misuse of technology, and digital images and video.

Personal devices including wearable technology and bring your own device (BYOD)

- **Pupils** are allowed to bring mobile phones into school for emergency use only but will be locked away in the pupil's classroom during the school day and returned to the pupil at home time. Important messages and phone calls to or from parents can be made at the school office, which will also pass on messages from parents to pupils in emergencies.
- **All staff who work directly with children** should lock their mobile phone away, and only use them in private staff areas during school hours. See also the 'Digital images and video' section of this document and the school data protection cybersecurity policies. Child/staff data should never be downloaded onto a private phone. If a staff member is expecting an important personal call when teaching or otherwise on duty, they may leave their phone with the school office to answer on their behalf or ask for the message to be left with the school office.
- **Volunteers, contractors, governors** should leave their phones in their pockets and turned off. Under no circumstances should they be used in the presence of children or to take photographs or videos. If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the headteacher should be sought (the headteacher may choose to delegate this) and this should be done in the presence of a member staff.

- **Parents** are asked to leave their phones in their pockets and turned off when they are on site. They should ask permission before taking any photos, e.g. of displays in corridors or classrooms, and avoid capturing other children. When at school events, please refer to the Digital images and video section of this document on page. Parents are asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office.

Use of school devices

Staff and pupils are expected to follow the terms of the school acceptable use policies for appropriate use and behaviour when on school devices, whether on site or at home.

School devices are not to be used in any way which contravenes AUPs, behaviour policy / staff code of conduct.

Wi-Fi is accessible to staff for school-related internet use and limited personal use within the framework of the acceptable use policy. All such use is monitored.

School devices for staff or students are restricted to the apps/software installed by the school, whether for use at home or school, and may be used for learning and reasonable as well as appropriate personal use.

All and any usage of devices and/or systems and platforms may be tracked.

Trips / events away from school

For school trips/events away from school, teachers will be issued a school duty phone and this number used for any authorised or emergency communications with pupils/students and parents. Any deviation from this policy (e.g. by mistake or because the school phone will not work) will be notified immediately to the Headteacher. Teachers using their personal phone in an emergency will ensure that the number is hidden to avoid a parent or student accessing a teacher's private phone number.

Searching and confiscation

In line with the DfE guidance '[Searching, screening and confiscation: advice for schools](#)', the Headteacher and staff authorised by them have a statutory power to search pupils/property on school premises. This includes the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material, including but not exclusive to sexual images, pornography, violence or bullying.

Full details of the school's search procedures are available in the school Behaviour Policy.

Appendix I – Roles

Please read the relevant roles and responsibilities section from the following pages.

All school staff must read the “All Staff” section as well as any other relevant to specialist roles

Roles:

- All Staff
- Headteacher/Principal
- Designated Safeguarding Lead
- Governing Body, led by Online Safety / Safeguarding Link Governor
- PSHE / RSHE Lead/s
- Computing Lead
- Subject / aspect leaders
- Network Manager/technician
- Data Protection Officer (DPO)
- Volunteers and contractors (including tutor)
- Pupils
- Parents/carers
- External groups including parent associations

All staff

All staff should sign and follow the staff acceptable use policy in conjunction with this policy, the school’s main safeguarding policy, the code of conduct/handbook and relevant parts of Keeping Children Safe in Education to support a whole-school safeguarding approach.

This includes reporting any concerns, no matter how small, to the designated safety lead as named in the AUP, maintaining an awareness of current online safety issues (see the start of this document for issues in 2023) and guidance (such as KCSiE), modelling safe, responsible and professional behaviours in their own use of technology at school and beyond and avoiding scaring, victim-blaming language.

Staff should also be aware of the DfE standards and relevant changes to filtering and monitoring and play their part in feeding back about overblocking, gaps in provision or pupils bypassing protections. All staff are also responsible for the physical monitoring of pupils’ online devices during any session/class they are working within.

Key responsibilities:

- Foster a culture of safeguarding where online-safety is fully integrated into whole-school safeguarding
- Oversee and support the activities of the designated safeguarding lead team and ensure they work technical colleagues to complete an online safety audit in line with KCSIE (including technology in use in the school)
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and Local Safeguarding Children Partnership support and guidance
- Ensure ALL staff undergo safeguarding training (including online-safety) at induction and with regular updates and that they agree and adhere to policies and procedures.
- Ensure ALL governors and trustees undergo safeguarding and child protection training and updates (including online-safety) to provide strategic challenge and oversight into policy and practice and that governors are regularly updated on the nature and effectiveness of the school's arrangements.
- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including remote systems are implemented according to child-safety first principles
- Better understand, review and drive the rationale behind decisions in filtering and monitoring as per the new DfE standards—through regular liaison with technical colleagues and the DSL— in particular understand what is blocked or allowed for whom, when, and how as per KCSIE.
 - In 2023/4 this will involve starting regular checks and annual reviews, upskilling the DSL and appointing a filtering and monitoring governor
- Liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information
- Support safeguarding leads and technical staff as they review protections for pupils in the home and remote-learning procedures, rules and safeguards.
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information

- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
- Ensure the school website meets statutory requirements.

Designated Safeguarding Lead / Online Safety Lead – Mrs. A Bashir Pugh / Mrs. T. Whitehurst

Key responsibilities (remember the DSL can delegate certain online-safety duties but not the overall responsibility; this assertion and all quotes below are from Keeping Children Safe in Education):

- The DSL should “take **lead responsibility** for safeguarding and child protection (**including online safety and understanding the filtering and monitoring** systems and processes in place).
- Ensure “An effective whole school approach to online safety as per KCSIE.
- Ensure the school is complying with the DfE’s standards on Filtering and Monitoring.
- As part of this, DSLs will work with technical teams to carry out reviews and checks on filtering and monitoring, to compile the relevant documentation and ensure that safeguarding and technology work together. This will include a decision on relevant YouTube mode and preferred search engine/s etc
- Where online-safety duties are delegated and in areas of the curriculum where the DSL is not directly responsible, but which cover areas of online safety (e.g. RSHE), ensure there is regular review and open communication and that the DSL’s clear overarching responsibility for online safety is not compromised or messaging to pupils confused
- Ensure ALL staff and supply staff undergo safeguarding and child protection training (including online-safety) at induction and that this is regularly updated.
 - This must include filtering and monitoring and help them to understand their roles.
 - All staff must read KCSIE Part 1 and all those working with children also Annex B – translations are available in 13 community languages at [kcsie.translate.lgfl.net](https://www.kcsie.translate.lgfl.net) (the condensed Annex A can be provided instead to staff who do not directly work with children if this is better)
 - Cascade knowledge of risks and opportunities throughout the organisation.
- Ensure that ALL governors and trustees undergo safeguarding and child protection training (including online-safety) at induction to enable them to provide strategic challenge and oversight into policy and practice and that this is regularly updated.
- Take day-to-day responsibility for safeguarding issues and be aware of the potential for serious child protection concerns.

- Be mindful of using appropriate language and terminology around children when managing concerns, including avoiding victim-blaming language.
- Remind staff of safeguarding considerations as part of a review of remote learning procedures and technology, including that the same principles of online-safety and behaviour apply.
- Work closely with SLT, staff and technical colleagues to complete an online safety audit (including technology in use in the school)
- Work with the headteacher, DPO and governors to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Stay up to date with the latest trends in online safeguarding and “undertake Prevent awareness training.” – see [safetraining.lgfl.net](https://www.lgfl.net/safetraining) and [prevent.lgfl.net](https://www.lgfl.net/prevent)
- Review and update this policy, other online safety documents (e.g. Acceptable Use Policies) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others) and submit for review to the governors/trustees.
- Receive regular updates in online-safety issues and legislation, be aware of local and school trends – see [safeblog.lgfl.net](https://www.lgfl.net/safeblog) for examples or sign up to the [LGfL safeguarding newsletter](https://www.lgfl.net/safeguarding-newsletter)
- Ensure that online-safety education is embedded across the curriculum in line with the statutory RSHE guidance (e.g. by use of the updated UKCIS framework [Education for a Connected World – 2020 edition](https://www.ukcise.org/education-for-a-connected-world-2020-edition)) and beyond, in wider school life
- Promote an awareness of and commitment to online-safety throughout the school community, with a strong focus on parents, including hard-to-reach parents – dedicated resources at [parentsafe.lgfl.net](https://www.lgfl.net/parentsafe)
- Communicate regularly with SLT and the safeguarding governor/committee to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring work and have been functioning/helping.
- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident.
- Ensure adequate provision for staff to flag issues when not in school and for pupils to disclose issues when off site, especially when in isolation/quarantine, e.g. a [survey to facilitate disclosures](#) and an online form on the school home page about ‘something that worrying me’ that gets mailed securely to the DSL inbox

- Ensure staff adopt a zero-tolerance, whole school approach to all forms of child-on-child abuse, and don't dismiss it as banter (including bullying).
- Pay particular attention to **online tutors**, both those engaged by the school as part of the DfE scheme who can be asked to sign the contractor AUP and those hired by parents.

Governing Body led by Online Safety / Safeguarding Link Governor – Mr. C Harris

Key responsibilities (quotes are taken from Keeping Children Safe in Education)

- Approve this policy and strategy and subsequently review its effectiveness, e.g. by asking the questions in the helpful document from the UK Council for Child Internet Safety (UKCIS) [Online safety in schools and colleges: Questions from the Governing Board](#)
- Undergo (and signpost all other governors and Trustees to attend) safeguarding and child protection training (including online safety) at induction to provide strategic challenge and into policy and practice, ensuring this is regularly updated.
- Ensure that all staff also receive appropriate safeguarding and child protection (including online) training at induction and that this is updated.
- Appoint a filtering and monitoring governor to work closely with the DSL on the new filtering and monitoring standards. Support the school in encouraging parents and the wider community to become engaged in online safety activities
- Have regular strategic reviews with the online-safety coordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings
- Work with the DPO, DSL and headteacher to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Check all school staff have read Part 1 of KCSIE; SLT and all working directly with children have read Annex B
- Ensure that all staff undergo safeguarding and child protection training (including online safety and now also reminders about filtering and monitoring
- "Ensure that children are taught about safeguarding, including online safety [...] as part of providing a broad and balanced curriculum [...] Consider a whole school or college approach to online safety [with] a clear policy on the use of mobile technology."

PSHE / RSHE Lead/s – Mrs. L Baker PSHE Lead / Mrs. T Whitehurst (Curriculum Lead for Computing)

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online as well as raising awareness of the risks and challenges from recent trends in self-generative artificial intelligence, financial extortion and sharing intimate pictures online into the PSHE / Relationships education, relationships and sex education (RSE) and health education curriculum. "This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age-appropriate way that is relevant to their pupils' lives."
- Focus on the underpinning knowledge and behaviours outlined in [Teaching Online Safety in Schools](#) in an age appropriate way to help pupils to navigate the online world safely and confidently regardless of their device, platform or app.
- Assess teaching to "identify where pupils need extra support or intervention [through] tests, written assignments or self-evaluations, to capture progress", to complement the computing curriculum.
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSHE.
- Note that an RSHE policy should be included on the school website.
- Work closely with the Computing subject leader to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach

Computing Lead – Mrs. T. Whitehurst

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum
- Work closely with the RSHE lead to avoid overlap but ensure a complementary whole-school approach
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements

Subject / aspect leaders

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Look for opportunities to embed online safety in your subject or aspect, especially as part of the RSHE curriculum, and model positive attitudes and approaches to staff and pupils alike
- Consider how the UKCIS framework Education for a Connected World and Teaching Online Safety in Schools can be applied in your context
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Ensure subject specific action plans also have an online-safety element

Network Manager/other technical support roles – SIPS Education

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Collaborate regularly with the DSL and leadership team to help them make key strategic decisions around the safeguarding elements of technology.
- Note that KCSIE changes expect a great understanding of technology and its role in safeguarding when it comes to filtering and monitoring and in 2023/4 you will be required to support safeguarding teams to understand and manage these systems and carry out regular reviews and annual checks.
- Support DSLs and SLT to carry out an annual online safety audit as now recommended in KCSIE. This should also include a review of technology, including filtering and monitoring systems (what is allowed, blocked and why and how 'over blocking' is avoided as per KCSIE) to support their role as per the new DfE standards, protections for pupils in the home and remote learning.
- Keep up to date with the school's online safety policy and technical information to effectively carry out their online safety role and to inform and update others as relevant
- Work closely with the designated safeguarding lead / online safety lead / data protection officer / LGfL nominated contact / RSHE lead to ensure that school systems and networks reflect school policy and there are no conflicts between educational messages and practice.

- Ensure the above stakeholders understand the consequences of existing services and of any changes to these systems (especially in terms of access to personal and sensitive records / data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms etc)
- Maintain up-to-date documentation of the school's online security and technical procedures
- To report online-safety related issues that come to their attention in line with school policy
- Manage the school's systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption and backup for data, including disaster recovery plans, and auditable access controls.
- Ensure the data protection policy and cybersecurity policy are up to date, easy to follow and practicable
- Monitor the use of school technology, online platforms and social media presence. Any misuse/attempted misuse is identified and reported in line with school policy
- Work with the Headteacher to ensure the school website meets statutory DfE requirements.

Data Protection Officer (DPO) – Mrs. S Maxwell and Mrs. A Bashir-Pugh

Key responsibilities:

Alongside those of other staff, provide data protection expertise and training and support the DP and cybersecurity policy and compliance with those and legislation and ensure that the policies conform with each other and with this policy.

Not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in *Data protection in schools, 2024*, "It's not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child." And in KCSIE 2024, "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children."

Note that retention schedules for safeguarding records may be required to be set as 'Very long-term need (until pupil is aged 25 or older)'. However, some local authorities require record retention until 25 for all pupil records. An example of an LA safeguarding record retention policy can be read at safepolicies.lgfl.net, but you should check the rules in your area.

Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited

Volunteers and contractors (including tutor)

Key responsibilities:

- Read, understand, sign and adhere to an acceptable use policy (AUP)

- Report any concerns, no matter how small, to the designated safety lead
- Maintain an awareness of current online safety issues and guidance
- Model safe, responsible and professional behaviours in their own use of technology at school and as part of remote teaching or any online communications
- Note that as per AUP agreement a contractor will never attempt to arrange any meeting, **including tutoring session**, without the full prior knowledge and approval of the school, and will never do so directly with a pupil. The same applies to any private/direct communication with a pupil.

Pupils

Key responsibilities:

Read, understand, sign and adhere to the pupil acceptable use policy.

Parents/carers

Key responsibilities:

- Read, sign and adhere to the school's parental acceptable use policy (AUP), read the pupil AUP and encourage their children to follow it

External groups including parent associations

Key responsibilities:

- Any external individual/organisation will sign an acceptable use policy prior to using technology or the internet within school
- Support the school in promoting online safety and data protection.

Model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other partners.

Appendix 2 – Risk Assessment Matrix for Schools Implementing AI

The following risk assessment matrix is intended to help schools identify, evaluate, and mitigate risks associated with implementing Artificial Intelligence (AI) in educational processes.

The matrix considers potential risks across various domains, including data protection, ethical considerations, and operational integrity. There is a particular focus on safeguarding and wellbeing issues, highlighting potential risks to student welfare and offers strategies to mitigate these risks effectively. Schools should amend the content of the matrix as necessary and consider the risk profile that is relevant to their own circumstances

Risk Assessment Matrix

Risk Area	Risk Description	Likelihood (Low/Med/High)	Impact (Low/Med/High)	Risk Level (Low/Med/High)	Mitigation Measures
Data Protection and Privacy Breaches	Unauthorised access to sensitive data or personal information, leading to safeguarding concerns and commercial risk.	Low	High	High	Implement strong encryption, regular audits, and GDPR-compliant data management policies and conduct regular privacy audits.
Cyberbullying	Increased potential for bullying through AI-mediated communication tools.	Low	Low	Low	Monitor AI communication tools, implement clear reporting mechanisms, and provide student support.
Over-reliance on AI	Over-reliance on AI tools reducing interpersonal interactions among students. Reduction in teacher autonomy and critical decision-making by overusing AI tools.	Low	Medium	High	Encourage collaborative learning activities and balance AI use with social engagement. Define clear boundaries for AI use and regularly review its impact on pedagogy.
Emotional Manipulation	AI systems unintentionally affecting student mental health through curated content.	Low	High	Low	Monitor AI-generated content, involve mental health professionals, and promote media literacy.
Inappropriate Content or Conduct	AI exposing learners to harmful or unsuitable materials / behaviour	Low	High	Low	Conduct rigorous testing of AI tools, apply effective filtering and monitoring and ensure human oversight.
Mental Health Impacts	Overuse of AI tools causing stress, anxiety, or dependency in learners.	Low	High	Low	Monitor usage patterns, provide mental health resources, and set expectations on use of AI systems.
Bias and Discrimination	AI systems propagating biases that impact student wellbeing or inclusion. AI models producing discriminatory or biased outcomes.	Low	High	Low	Regularly audit AI algorithms for bias and provide inclusive media literacy education and training.
Misuse of AI	Learners using AI tools for harmful, unethical or illegal purposes (e.g. notification).	Low	High	Low	Educate learners on responsible and appropriate AI use and establish clear usage policies.
Misinformation	Creation or spread of harmful or misleading AI-generated content.	Low	High	Low	Educate staff and learners to verify AI outputs and establish

					clear policies for verifying content authenticity.
Digital Divide	Inequitable access to AI tools among learners from diverse demographic groups.	Low	High	Low	Provide equitable access to AI resources and ensure alternative solutions are available.
AI Ethics Awareness	Lack of awareness among staff and learners about ethical implications of AI.	Low	High	Low	Provide training and education on AI ethics and its responsible usage. Establish an 'Ethics in AI' group.
Data Accuracy	AI systems generating inaccurate or misleading recommendations.	Low	High	Low	Regularly validate AI outputs and involve human oversight in decision-making.
Legal Compliance	Non-compliance with laws regarding AI usage and learner data.	Low	High	Low	Understand legal requirements. Conduct legal reviews and consult experts on AI-related regulations.
Cyber-Security	Increased use of AI tools in cyberattacks targeting school systems and data.	Low	High	High	Strengthen cybersecurity protocols and educate staff and learners on safe online practices.