# The Federation of St Martin's and Seabrook CEP Schools Online Safety Policy

# **Key Details**

Designated Safeguarding Lead (s): Mrs E Carter, Mrs S James, Mr J Carter

Named governor with lead responsibility: Louise Timmins

Date written/updated: March 2024

Date agreed and ratified by governing body: March 2024

Date of next review: March 2025

This policy will be reviewed <u>at least</u> annually. It will also be revised following any changes to technology use, online safety concerns and/or updates to national and local guidance or procedures.

# 1. Policy Aims and Scope

- This policy has been written by The Federation of St Martin's and Seabrook CEP Schools involving staff, pupils and parents/carers, building on Kent County Councils Education Safeguarding Services policy template, with specialist advice and input as required. It takes into account the DfE statutory guidance 'Keeping Children Safe in Education', Early Years and Foundation Stage (if applicable to the school) 'Working Together to Safeguard Children' and our local Safeguarding Children Multiagency Partnership procedures.
  - Local contact Kent schools can access specific advice via the Education Safeguarding Service Folkestone & Hythe 03301 651 340.
  - LADO Team contact number: 03000 410 888 If your call is urgent i.e., a child is in immediate danger and you cannot be connected to the team, call the Integrated Front Door on 03000 411 111 Email: kentchildrenslado@kent.gov.uk
- We recognise that online safety is an essential part of safeguarding and acknowledge our duty to ensure that all pupils and staff are protected from potential harmful and inappropriate online material and/or behaviour. This policy sets out our whole school approach to online safety which will empower, protect and educate our pupils and staff in their use of technology and establishes the mechanisms in place to identify, intervene in, and escalate any concerns where appropriate.
- The Federation of St Martin's and Seabrook CEP Schools understands that breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - o **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
  - conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, for example, consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.
  - o **commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- The Federation of St Martin's and Seabrook CEP Schools recognises that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online.
- This policy applies to pupils, parents/carers and all staff, including the governing body, leadership team, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for, or provide services on behalf of the school (collectively referred to as "staff" in this policy).
- The Federation of St Martin's and Seabrook CEP Schools identifies that the internet and technology, including computers, tablets, mobile phones, smart watches, games consoles and social media, is an important part of everyday life, and presents positive and exciting opportunities, as well as challenges and risks. This policy applies to all access to and use of technology, both on and off-site.

- Staff The Federation of St Martin's and Seabrook CEP Schools recognise that children may not feel
  ready or know how to tell someone that they are being abused, exploited, or neglected online, and/or
  they may not recognise their experiences as being abusive or harmful. This should not prevent staff
  from having professional curiosity and speaking to a DSL if they have any online safety concerns
  about a child.
- This policy links with several other policies, practices and action plans, including but not limited to:
  - Anti-bullying policy
  - Acceptable Use Policies (AUP)
  - Code of conduct policy
  - Behaviour policy
  - o Child protection policy
  - Confidentiality policy
  - Personal Social and Health Education (PSHE), Citizenship and Relationships and Sex Education (RSE)
  - Data protection
  - Cameras and image use policy
  - Mobile and smart technology
  - Social media

# 2. Responding to Emerging Risks

- The Federation of St Martin's and Seabrook CEP Schools recognises that the internet is a constantly changing environment with new apps, devices, websites and material emerging at a rapid pace.
- We will:
  - carry out an annual review of our online safety approaches which will be supported by an annual risk assessment which considers and reflects the specific risks our pupils face.
  - o regularly review the methods used to identify, assess and minimise online risks.
  - examine emerging technologies for educational benefit and undertake appropriate risk assessments before their use is permitted.
  - ensure that appropriate filtering and monitoring is in place and take all reasonable precautions to ensure that internet access is appropriate.
  - recognise that due to the global and connected nature of the internet, it is not possible to guarantee that unsuitable material cannot be accessed via our systems, and as such identify clear procedures to follow if breaches or concerns arise.

# 3. Policy monitoring and review

- Technology evolves and changes rapidly. The Federation of St Martin's and Seabrook CEP Schools
  will review this policy at least annually. The policy will be revised following any national or local policy
  updates, any local concerns and/or any changes to our technical infrastructure.
- We will regularly monitor internet use taking place via our provided devices and systems and evaluate
  online safety mechanisms to ensure that this policy is consistently applied. Any issues identified will
  be incorporated into our action planning.

- To ensure they have oversight of online safety, the Executive Headteacher will be informed of online safety concerns, as appropriate.
- The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.
- All members of the community will be made aware of how our school will monitor policy compliance: for example, AUPs, staff training, classroom management.

# 4. Roles and Responsibilities

- The governing body have a strategic leadership responsibility for our school's online safeguarding arrangements; they will ensure that they comply with their duties under legislation and will ensure the policies, procedures and training in our school is effective and comply with the law at all times. Mrs E Carter Executive Headteacher will ensure that the online safety policies and procedures, adopted by our governing bodies and proprietors, are understood, and followed by all staff.
- The Designated Safeguarding Lead (DSL) Mrs E Carter, Executive Headteacher, Mrs S James, Head
  of School, Mr J Carter, Head of School has overall responsibility for the day-to-day oversight of
  safeguarding and child protection systems, including online safety and understanding the filtering and
  monitoring systems and processes in place. Whilst the activities of the DSL may be delegated to the
  deputies, the ultimate lead responsibility for online safety remains with the DSL and this responsibility
  will not be delegated.
- Whilst the DSL is recognised as holding overall lead responsibility for online safety, however The
  Federation of St Martin's and Seabrook CEP Schools recognises that all members of the community
  have important roles and responsibilities to play with regards to online safety.

# 4.1 Leadership and management

- The leadership and management team will:
  - Create a whole school culture that incorporates online safety throughout.
  - Ensure that online safety is viewed as a safeguarding issue and that practice is in line with national and local recommendations and requirements.
  - o Implement appropriate and up-to-date policies which address the acceptable use of technology, child-on-child abuse, use of social media and mobile technology.
  - Work with the DSL and Primary Technologies to ensure that suitable and appropriate filtering and monitoring systems are in place but hold overall responsibility for procuring our filtering and monitoring systems, documenting decisions on what is blocked or allowed and why, reviewing the effectiveness of our provision and overseeing any reports.
  - Support the DSL and any deputies by ensuring they have enough time and resources to carry out their responsibilities.
  - Ensure robust reporting channels are in place regarding online safety concerns.
  - Undertake appropriate risk assessments regarding the safe use of technology on site.
  - Audit and evaluate online safety practice to identify strengths and areas for improvement. Ensure that staff, pupils and parents/carers are proactively engaged in activities which promote online safety.
  - Support staff to ensure that online safety is embedded within a progressive whole school curriculum which enables all pupils to develop an appropriate understanding of online safety.

# 4.2 The Designated Safeguarding Lead (DSL):

- The leadership and management team will:
  - Act as a named point of contact on all online safeguarding issues.
  - Liaise with other members of staff, such as pastoral support staff, IT technicians, network managers and the SENCO on matters of online safety as appropriate.
  - o Ensure referrals are made to relevant external partner agencies, as appropriate.
  - Work alongside deputy DSLs to ensure online safety is recognised as part of our safeguarding responsibilities, and that a coordinated whole school approach is implemented.
  - Taking lead responsibility for overseeing and acting on any concerns identified by our filtering and monitoring systems.
  - Access regular and appropriate training and support to ensure they understand the unique risks associated with online safety and have the relevant and up-to-date knowledge required to keep pupils safe online, including the additional risks that pupils with Special Educational Needs and Disabilities (SEND) face online.
  - Ensure all members of staff receive regular, up-to-date and appropriate online safety training and information as part of their induction and child protection training.
  - Keep up to date with current research, legislation and trends regarding online safety and communicate this with the community, as appropriate.
  - Work with staff to coordinate participation in local and national events to promote positive online behaviour, such as Safer Internet Day.
  - Ensure that online safety is promoted to parents/carers and the wider community through a variety of channels and approaches.
  - Maintain records of online safety concerns as well as actions taken, as part of the schools safeguarding recording mechanisms.
  - Monitor online safety incidents to identify gaps and trends and use this data to update the education response and school policies and procedures.
  - o Report online safety concerns, as appropriate, to the senior leadership team and Governing Body.
  - Work with the leadership team to review and update online safety policies on a regular basis (at least annually) with stakeholder input.
  - Meet regularly with the governor with a lead responsibility for safeguarding.

#### 4.3 Members of staff

- It is the responsibility of all members of staff to:
  - Contribute to the development of our online safety policies.
  - o Read and adhere to our online safety policy and acceptable use of technology policies.
  - Take responsibility for the security of IT systems and the electronic data they use or have access to.
  - Model good practice when using technology with pupils.
  - Maintain a professional level of conduct in their personal use of technology, both on and off site.
  - o Embed online safety education in curriculum delivery wherever possible.

- Have an awareness of a range of online safety issues and how they may be experienced by the pupils in their care.
- Identify online safety concerns and take appropriate action by following our safeguarding policies and procedures.
- Know when and how to escalate online safety issues, including reporting to the DSL and signposting pupils and parents/carers to appropriate support, internally and externally.
- o Take personal responsibility for professional development in this area.

#### 4.4 IT Service Providers

- It is the responsibility of Primary Technologies who are managing our technical environment to:
  - Provide technical support and perspective to the DSL and leadership team in the development and implementation of our online safety policies and procedures, including appropriate filtering and monitoring systems.
  - Support the leadership team and DSL to procure systems, identify risk, carry out reviews and carry out checks to our filtering and monitoring systems.
    - Whilst responsibility for the procurement and implementation of appropriate filtering and monitoring is held by the leadership team and responsibility for acting on safeguarding concerns is led by the DSL; technical staff will ensure appropriate technical support and access to our filtering and monitoring systems is given to the DSL to enable them to take appropriate safeguarding action when required.
  - Implement appropriate security measures including as directed by the leadership team to ensure that the schools IT infrastructure is secure and not open to misuse or malicious attack, whilst allowing learning opportunities to be maximised.

# 4.5 Pupils

- It is the responsibility of pupils (at a level that is appropriate to their individual age and ability) to:
  - Engage in age/ability appropriate online safety education.
  - Contribute to the development of online safety policies.
  - o Read and adhere to the acceptable use of technology and behaviour policies.
  - o Respect the feelings and rights of others, on and offline.
  - o Take an appropriate level of responsibility for keeping themselves and others safe online.
  - Seek help from a trusted adult, if they are concerned about anything, they or others experience online.

#### 4.6 Parents/carers

- It is the responsibility of parents and carers to:
  - Read our Acceptable Use of technology policies and encourage their child(ren) to adhere to them.
  - Support our online safety approaches by discussing online safety issues with their child(ren) and reinforcing appropriate and safe online behaviours at home.
  - Role model safe and appropriate use of technology and social media and abide by the homeschool agreement and/or acceptable use of technology policies.

- Seek help and support from the school or other appropriate agencies if they or their child(ren) encounter online issues.
- o Contribute to the development of our online safety policies.
- Use our systems, such as learning platforms and other IT resources, safely and appropriately.
- Take responsibility for their own awareness in relation to the risks and opportunities posed by the new and emerging technologies that their child(ren) access and use at home.

# 5. Education and Engagement Approaches

# 5.1 Education and engagement with pupils

- The Federation of St Martin's and Seabrook CEP Schools will establish and embed a whole school
  culture and will empower our pupils to acquire the knowledge needed to use the technology in a safe,
  considered and respectful way, and develop their resilience so they can manage and respond to
  online risks.
- We and will raise awareness and promote safe and responsible internet use amongst pupils by:
  - ensuring our curriculum and whole school approach is developed in line with the UK Council
    for Internet Safety (UKCIS) '<u>Education for a Connected World Framework</u>' and DfE '<u>Teaching</u>
    online safety in school' guidance.
  - ensuring online safety is addressed in Relationships Education, Relationships and Sex Education, Health Education, Citizenship and Computing programmes of study.
  - reinforcing online safety principles in other curriculum subjects and whenever technology or the internet is used on site.
  - o implementing appropriate peer education approaches.
  - creating a safe environment in which all pupils feel comfortable to say what they feel, without fear of getting into trouble and/or being judged for talking about something which happened to them online.
  - involving the DSL as part of planning for online safety lessons or activities, so they can advise
    on any known safeguarding cases, and ensure support is in place for any pupils who may be
    impacted by the content.
  - making informed decisions to ensure that any educational resources used are appropriate for our pupils.
  - using external visitors, where appropriate, to complement and support our internal online safety education approaches. Please refer to the UKCIS '<u>Using External Visitors to Support</u> <u>Online Safety Education: Guidance for Educational Schools</u>' guidance.
  - o providing online safety education as part of the transition programme across the key stages and/or when moving between establishments.
  - rewarding positive use of technology.
- The Federation of St Martin's and Seabrook CEP Schools will support pupils to understand and follow our Acceptable Use policies in a way which suits their age and ability by:
  - o sharing our acceptable use policies with them in accessible and appropriate ways.
  - o displaying acceptable use posters in all rooms with internet access.
  - o informing pupils that network and internet use will be monitored for safety and security purposes, and in accordance with legislation.

- seeking pupils voice when writing and developing online safety policies and practices, including curriculum development and implementation.
- The Federation of St Martin's and Seabrook CEP Schools will ensure pupils develop the underpinning knowledge and behaviours needed to navigate the online world safely, in a way which suits their age and ability by:
  - ensuring age and/or ability appropriate education regarding safe and responsible use precedes internet access.
  - o enabling them to understand what acceptable and unacceptable online behaviour looks like.
  - teaching pupils to evaluate what they see online and recognise techniques used for persuasion, so they can make effective judgements about if what they see is true, valid or acceptable.
  - educating them in the effective use of the internet to research, including the skills of knowledge location, retrieval and evaluation.
  - preparing them to identify possible online risks and make informed decisions about how to act and respond.
  - ensuring they know how and when to seek support if they are concerned or upset by something they see or experience online.

# 5.2 Vulnerable pupils and those who are potentially at greater risk of harm

- The Federation of St Martin's and Seabrook CEP Schools recognises that any pupils can be vulnerable online, and vulnerability can fluctuate depending on age, developmental stage and personal circumstances. However, there are some pupils for example, looked after children, child who are care leavers, children who are adopted, children who are, or who are perceived to be, lesbian, gay, bi, or trans (LGBT), and those with special educational needs or disabilities (SEND), who may be more susceptible or may have less support in staying safe online.
- The Federation of St Martin's and Seabrook CEP Schools will ensure that differentiated and appropriate online safety education, access and support is provided to all pupils who require additional or targeted education and/or support.
- Staff at The Federation of St Martin's and Seabrook CEP Schools will seek input from specialist staff as appropriate, including the DSL, SENCO, Designated Teacher to ensure that the policy and curriculum is appropriate to our community's needs.

# 5.3 Training and engagement with staff

- We will:
  - provide and discuss the online safety policy and procedures, including our acceptable use policy, with all members of staff, including governors as part of induction.
  - o provide up-to-date and appropriate training for all staff, including governors, which is integrated, aligned and considered as part of our overarching safeguarding approach. This will be achieved in their provision, for example as part of existing annual safeguarding and child protection training/updates or within separate or specific online safety sessions.

- ensure our training for governors equips them with the knowledge to provide strategic challenge to test and assure themselves that our online safety policies and procedures in place in are effective and support the delivery of a robust whole school approach.
- ensure that online safety training provided to all staff is regularly updated. This will be achieved, for example, annually.
- ensure our training covers the potential risks posed to pupils (content, contact and conduct) as well as our professional practice expectations.
- build on existing expertise, by providing opportunities for staff to contribute to and shape our online safety approaches.
- ensure staff are aware that our IT systems are monitored, and that activity can be traced to individual users. Staff will be reminded to behave professionally and in accordance with our policies when accessing our systems and devices.
- ensure staff are aware that their online conduct, including personal use of social media, can have an impact on their professional role and reputation.
- o highlight useful educational resources and tools which staff could use with pupils.
- ensure all members of staff are aware of the procedures to follow regarding online safety concerns involving pupils, colleagues or other members of the community.

# 5.4 Awareness and engagement with parents and carers

- The Federation of St Martin's and Seabrook CEP Schools recognises that parents and carers have an essential role to play in enabling our pupils to become safe and responsible users of the internet and associated technologies.
- We will ensure parents and carers understand and are aware of:
  - the systems used at school to filter and monitor their child's online use by 'providing information in our home-school agreement/AUP'.
  - what their children are being asked to do online, including the sites they will asked to access and be clear who from the school (if anyone) their child is going to be interacting with online by 'providing information in our home-school agreement/AUP'.
- We will build a partnership approach and reinforce the important of online safety through regular contact and communication with parents and carers by:
  - providing information and guidance on online safety in a variety of formats. 'This will include offering specific online safety awareness training and highlighting online safety at other events such as parent evenings, transition events, fetes and sports days.
  - drawing their attention to our online safety policy and expectations in our newsletters and other external communication (such as letters and social media channels) as well as in our prospectus and on our website.
  - requesting parents and carers read online safety information as part of joining our community, for example, within our home school agreement.
  - o requiring them to read our acceptable use of technology policies and discuss the implications with their children.

# 6. Safer Use of Technology

#### 6.1 Classroom use

- The Federation of St Martin's and Seabrook CEP Schools uses a wide range of technology. This
  includes access to:
  - Computers, laptops, tablets
  - o Internet, which may include search engines and educational websites
  - o Learning platforms, remote learning platform/tools and intranet
  - o Email
  - o Games consoles and other games-based technologies
  - o Digital cameras, webcams and video cameras.
- All school owned devices will be used in accordance with our acceptable use of technology policies and with appropriate safety and security measures in place.
- Members of staff will always evaluate websites, tools and apps fully before use in the classroom or recommending for use at home.
- The school will use appropriate search tools as identified following an informed risk assessment.
   Tools for staff and pupils to use include <u>SWGfL Squiggle</u> and <u>Dorling Kindersley Find Out</u>. If schools allow Pupils to use search tools such as Google or Bing, they should clearly identify what precautions have been taken to reduce risks and how pupils and staff are expected to respond to inappropriate search results.
- Use of video sharing platforms will be in accordance with our acceptable use of technology policies, following an informed risk assessment and with appropriate safety and security measures in place.
   This includes:
  - o This list includes use of video sharing platforms, for example, YouTube, Vimeo.
- We will ensure that the use of internet-derived materials by staff and pupils complies with copyright law and acknowledge the source of information.
- Supervision of internet access and technology use will be appropriate to pupil's age and ability. This
  includes:
  - Early Years Foundation Stage and Key Stage 1
    - Access to the internet will be by adult demonstration, with occasional directly supervised access to specific and approved online materials, which supports the learning outcomes planned for the pupils age and ability.
  - Key Stage 2
    - Pupils will use age-appropriate search engines and online tools.
    - Pupils will be directed by the teacher to online materials and resources which support the learning outcomes planned for the pupils age and ability.
  - Key Stage 3, 4, 5
    - Pupils will use age-appropriate search engines and online tools.

 Pupils will be appropriately supervised when using technology, according to their ability and understanding.

# 6.2 Managing internet access

- All users will read and agree and/or acknowledge our acceptable use policy, appropriate to their age, understanding and role, before being given access to our computer system, IT resources or the internet.
- We will maintain a record of users who are granted access to our devices and systems.

# 6.3 Managing personal data online

- Personal data will be recorded, processed, transferred and made available online in accordance with UK General Data Protection Regulations (UK GDPR) and Data Protection legislation.
  - Full information can be found in our information security policy which can be accessed on the school website, staff shared area.

# 6.4 Information security and access management

- We take appropriate steps to ensure necessary security protection procedures are in place, in order to safeguard our systems, staff and pupils.
- Further information about technical environment safety and security can be found in list separate technical policies or procedures that contain other relevant information, but includes:
  - Virus protection being updated regularly.
  - Encryption for personal data sent over the Internet or taken off site (such as via portable media storage) or access via appropriate secure remote access systems.
  - Not using portable media without specific permission; portable media will be checked by an anti-virus /malware scan before use.
  - Not downloading unapproved software to work devices or opening unfamiliar email attachments.
  - Preventing, as far as possible, access to websites or tools which could compromise our systems, including anonymous browsing and other filtering bypass tools.
  - Checking files held on our network, as required and when deemed necessary by leadership staff.
  - The appropriate use of user logins and passwords to access our network and user logins and passwords will be enforced for all users. To support the school in implementing appropriate monitoring and ensuring that a prompt response to any safeguarding concerns is taken, it is recommended that individual logins are in place for all but the youngest or most vulnerable pupils. For example, this may not be appropriate for Early Years and Foundation Stage children or some Pupils with SEND.
  - o All users are expected to log off or lock their screens/devices if systems are unattended.
- We will review the effectiveness of our security approaches and procedures periodically in order to keep up with evolving cyber-crime technologies.

## 6.5 Managing the safety of our website

- We will ensure that information posted on our website meets the requirements as identified by the DfF.
- We will ensure that our school website complies with guidelines for publications, including accessibility, data protection, respect for intellectual property rights, privacy policies and copyright.
- Staff or pupils personal information will not be published on our website; the contact details on the website will be our school address, email and telephone number.
- The administrator account for our website will be secured with an appropriately strong password.
- We will post appropriate information about safeguarding, including online safety, on our website for members of the community.

## 6.6 Publishing images and videos online

 We will ensure that all images and videos shared online are used in accordance with the associated policies, including (but not limited to) the cameras and image use, data security, acceptable use policies, codes of conduct/behaviour, social media and use of personal devices and mobile phones policies.

# 6.7 Managing email

- Access to our email systems will always take place in accordance with data protection legislation and in line with other policies, including confidentiality, acceptable use of technology policies and the code of conduct/behaviour policy.
- The forwarding of any chain messages/emails is not permitted.
- Spam or junk mail will be blocked and reported to the email provider.
- Any electronic communication which contains sensitive or personal information will only be sent using secure and encrypted email.
- School email addresses and other official contact details will not be used to set up personal social media accounts.
- Members of the community will immediately report offensive communication to Liz Carter, Executive Headteacher and Primary Technologies.
- Excessive social email use can interfere with teaching and learning and will be restricted; access to external personal email accounts may be blocked on site.
- We will have a dedicated email for reporting wellbeing and pastoral issues. This inbox will be managed by designated and trained staff.

#### 6.7.1 Staff email

- All members of staff:
  - o are provided with an email address to use for all official communication; the use of personal email addresses by staff for any official business is not permitted.
  - o are encouraged to have an appropriate work life balance when responding to email, especially if communication is taking place between staff, pupils and parents.

#### 6.7.2 Pupils email

- Pupils will:
  - use a provided email account for educational purposes.
  - agree an Acceptable Use Policy and will receive education regarding safe and appropriate email etiquette before access is permitted.
- Whole-class or group email addresses will be used for communication outside of the school.

# 6.9 Management of applications (apps) used to record progress

- We use Horizons, Phonics Tracker to track pupil progress and share appropriate information with parents and carers.
- The Executive Headteacher will ensure that the use of tracking systems is appropriately risk assessed prior to use, and that use takes place in accordance with data protection legislation, including the General Data Protection Regulations (GDPR) and Data Protection legislation.
- To safeguard pupil data:
  - only school issued devices will be used for apps that record and store pupils personal details, attainment or photographs.
  - personal staff mobile phones or devices will not be used to access or upload content to any apps which record and store pupils personal details, attainment or images.
  - devices will be appropriately encrypted if taken off site, to reduce the risk of a data security breach, in the event of loss or theft.
  - all users will be advised regarding safety measures, such as using strong passwords and logging out of systems.
  - o parents and carers will be informed of the expectations regarding safe and appropriate use, prior to being given access; for example, not sharing passwords or images.

# 6.10 Management of remote learning

#### Where children are asked to learn online at home in response to a full or partial closure:

The Federation of St Martin's and Seabrook CEP Schools will ensure any remote sharing of
information, communication and use of online learning tools and systems will be in line with privacy
and data protection requirements.

- All communication with pupils and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and/or agreed systems: Zoom.
  - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and pupils will engage with remote teaching and learning in line with existing behaviour principles as set out in our behaviour policy/code of conduct and Acceptable Use Policies.
- Staff and Pupils will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP)
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. The Federation of St Martin's and Seabrook CEP Schools will continue to be clear who from the school their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

Additional guidance for DSLs and SLT regarding remote learning is available in KCSIE, <u>Safeguarding</u> and remote education during coronavirus (COVID-19) and The Education People: <u>Remote Learning</u> Guidance for SLT

# 7. Appropriate Filtering and Monitoring on School Devices and Networks

The appropriateness of filters and monitoring systems are a matter for <u>individual</u> schools; decisions about what is appropriate will be informed by the risk assessment required by the Prevent Duty, and will depend on the IT systems in place as well as the school risk profile, which includes: the age range/ability of children, the number of children, those who are potentially at greater risk of harm and how often they access devices and IT systems. The <u>UK Safer Internet Centre</u> has published guidance as to what "appropriate" filtering and monitoring might look like; DSLs and SLT should ensure they are familiar with this guidance and its implications.

To support schools to meet this duty, the Department for Education has published <u>filtering and monitoring</u> standards which set out that schools should:

- 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.

Schools may already be addressing this content within other policies, for example your Child Protection or ICT/IT policies; if so, schools may decide that this section can be reduced and cross-referenced. We

recommend that if this is the case, DSLs and leaders ensure that the content within this section is sufficiently addressed.

- The Federation of St Martin's and Seabrook CEP Schools will do all we reasonably can to limit children's exposure to online harms through school provided devices and networks and in line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place.
- When implementing appropriate filtering and monitoring, The Federation of St Martin's and Seabrook CEP Schools will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one
  part of our approach to online safety and we recognise that we cannot rely on filtering and monitoring
  alone to safeguard our pupils; effective safeguarding practice, robust policies, appropriate
  classroom/behaviour management and regular education/training about safe and responsible use is
  essential and expected.
- Pupils will use appropriate search tools, apps and online resources as identified by staff, following an
  informed risk assessment for example, using a child friendly search engine, using child friendly tools.
- Internet use will be supervised by staff as appropriate to pupils age, ability and potential risk of harm:
  - KS1, pupils will be directly supervised by a member of staff, students identified as being at potentially greater risk of harm will always be directly supervised by an adult etc.

# 7.1 Responsibilities for filtering and monitoring

- Our governing body has overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed, and that the leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- Mrs E Carter a member of the senior leadership team and Mrs L Timmins governor, are responsible
  for ensuring that our school has met the DfE <u>Filtering and monitoring standards</u> for schools and
  colleges.
- Our senior leadership team are responsible for:
  - procuring our filtering and monitoring systems.
  - documenting decisions on what is blocked or allowed and why.
  - · reviewing the effectiveness of our provision.
  - · overseeing reports.
  - ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
  - ensuring the DSL and IT service providers have sufficient time and support to manage their filtering and monitoring responsibilities.
- The DSL has lead responsibility for overseeing and acting on:

- any filtering and monitoring reports.
- any child protection or safeguarding concerns identified.
- · checks to filtering and monitoring system.
- The IT service providers have technical responsibility for:
  - maintaining filtering and monitoring systems.
  - providing filtering and monitoring reports.
  - completing technical actions identified following any concerns or checks to systems.
  - working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.
- All members of staff are provided with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of our induction process, and in our child protection staff training.
- All staff, pupils and parents/carers have a responsibility to follow this policy to report and record any filtering or monitoring concerns.

# 7.2 Decision making and reviewing our filtering and monitoring provision

- When procuring and/or making decisions about our filtering and monitoring provision, our senior leadership team works closely with the DSL and Primary Technologies.. Decisions have been recorded and informed by an approach which ensures our systems meet our schools' specific needs and circumstances, including but not limited to our pupil risk profile and specific technology use.
- Any changes to the filtering and monitoring approaches will be assessed by staff with safeguarding, educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.
- Our school undertakes an at least annual review of our filtering and monitoring systems to ensure we
  understand the changing needs and potential risks posed to our community.

A formal review of your filtering and monitoring systems should be done as a minimum annually, and revisited if a safeguarding risk is identified, if there is a change in working practice (such as remote access or 'Bring Your Own Device' (BYOD)), or any new technology use is introduced. The review should be conducted by members of the senior leadership team, the DSL, and IT staff/IT service provider and involve the governor with responsibility for safeguarding. The results should be recorded for reference and made available to those entitled to inspect that information. Please access the DfE <u>filtering and monitoring standards</u> for further advice and information.

In addition, our school undertakes regular checks on our filtering and monitoring systems, which are
logged and recorded, to ensure our approaches are effective and can provide assurance to the
governing body that we are meeting our safeguarding obligations.

- These checks are achieved by:
- These checks are achieved by: Termly checks are undertaken by a DSL, checks are undertaken with two members of staff present (it may be helpful to list who e.g. a DSL and a member of IT or SLT), checks are undertaken in a location where confidentiality can be achieved, during working hours, when pupils are not present (e.g. SLT office), checks are logged/recorded, any technical concerns are flagged to the Primary Technologies and safeguarding concerns are actioned by the DSL.in line with this policy.

Checks to your filtering and monitoring provision will be completed and recorded as part of our filtering and monitoring review process. Checks will be undertaken from both a safeguarding and IT perspective. Access from the DfE <u>filtering and monitoring standards</u> for further advice and information.

# 7.3 Appropriate filtering

Schools should list specific details of how their appropriate filtering is established and achieved in their setting; for example, which filtering systems/approaches are in place and why these decisions have been made. Leaders and DSLs should access the <a href="UK Safer Internet Centre guidance">UK Safer Internet Centre guidance</a> and the <a href="DfE filtering and monitoring standards">DfE filtering and monitoring standards</a> for further information about appropriate monitoring approaches and what they entail.

No filtering system can be 100% effective; schools need to understand the coverage of their filtering system, any limitations it has, and mitigate accordingly to minimise harm and meet their statutory requirements as identified in KCSIE and the Prevent duty.

- The Federation of St Martin's and Seabrook CEP Schools education broadband connectivity is provided through Primary Technologies and The Federation of St Martin's and Seabrook CEP Schools uses Watchguard.
- Primary Technologies is a member of <u>Internet Watch Foundation</u> (IWF). Leaders should check to
  ensure this is the case.
- Primary Technologies/ Watchguard has signed up to Counter-Terrorism Internet Referral Unit list (CTIRU) Leaders should check to ensure this is the case.
- Watchguard is blocking access to illegal content including child sexual abuse material (CSAM).
- Watchguard blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking, gambling, piracy and copyright theft, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material.
- We filter internet use on all school owned, or provided, internet enabled devices and networks. This is achieved by:
- Our filtering system is operational, up to date and is applied to all users, including guest accounts, all school owned devices and networks, and all devices using the school broadband connection.

- We work with Primary Technologies to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.
- If there is failure in the software or abuse of the system, for example if pupils or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:
  - Turn off monitor/screen, report the concern immediately to a member of staff, report the URL of the site to Primary Technologies.
- Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our child protection, acceptable use, allegations against staff and behaviour policies.
- Parents/carers will be informed of filtering breaches involving their child.
- Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported as soon as it is identified to the appropriate agencies, including but not limited to the <u>Internet Watch Foundation</u> (where there are concerns about child sexual abuse material), the police (either via 101 or 999 if an emergency or <u>NCA-CEOP</u>) or Children's Social Care.
- If staff are teaching topics which could create unusual activity on the filtering logs, or if staff perceive
  there to be unreasonable restrictions affecting teaching, learning or administration, they will report this
  to the DSL and/or leadership team.

# 7.4 Appropriate monitoring

- We will appropriately monitor internet use on all school provided devices and networks. This is achieved by:
- This will be achieved, for example, physical monitoring (supervision), monitoring internet and web access (reviewing logfile information) and/or active/pro-active technology monitoring services. This should explain what monitoring is in place on all school provided devices and systems, including offsite access.
  - This section should include any specific monitoring approaches required for mobile devices such as tablets and eReaders and any guest access to Wi-Fi as the approaches for these systems may differ
  - All users will be informed that use of our devices and networks can/will be monitored and that all
    monitoring is in line with data protection, human rights and privacy legislation.
- If a concern is identified via our monitoring approaches:
  - Where the concern relates to pupils, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
  - Where the concern relates to staff, it will be reported to the Executive Headteacher (or chair of governors if the concern relates to the Executive Headteacher), in line with our staff behaviour/allegations policy.

Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be
reported as soon as possible to the appropriate agencies; including but not limited to, the emergency
services via 999, the Police via 101 or <u>NCA-CEOP</u>, the LADO or Children's Social Care.

#### 10.1 Concerns about pupil online behaviour and/or welfare

- The Federation of St Martin's and Seabrook CEP Schools recognises that an initial disclosure to a
  trusted adult may only be the first incident reported, rather than representative of a singular incident
  and that trauma can impact memory, so children may not be able to recall all details or timeline of
  abuse. All staff will be aware certain children may face additional barriers to telling someone, for
  example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- All concerns about pupils will be responded to and recorded in line with our child protection policy:
  - The DSL will be informed of all online safety concerns involving safeguarding or child protection risks in line with our child protection policy.
  - The DSL will ensure that online safety concerns are escalated and reported to relevant partner agencies in line with local policies and procedures.
- Abuse that occurs online and/or offsite will not be dismissed or downplayed; concerns will be treated
  equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour,
  child protection, online safety.
- The Federation of St Martin's and Seabrook CEP Schools recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils that avoids alarming or distressing them.
- Appropriate sanctions and/or pastoral/welfare support will be implemented and/or offered to pupils as appropriate. Civil or legal action will be taken if necessary.
- We will inform parents/carers of online safety incidents or concerns involving their child, as and when required.

#### 10.2 Concerns about staff online behaviour and/or welfare

- Any complaint about staff misuse will be managed in accordance with our allegations against staff policy/staff code of conduct/behaviour policy.
- Any allegations regarding a member of staff's online conduct will be discussed with the LADO (Local Authority Designated Officer).

LADO Team contact number: 03000 410 888 If your call is urgent i.e., a child is in immediate danger and you cannot be connected to the team, call the Integrated Front Door on 03000 411 111 Email: kentchildrenslado@kent.gov.uk

 Where appropriate, welfare support will be offered, and where necessary, disciplinary, civil and/or legal action will be taken in accordance with our staff code of conduct.

# 10.3 Concerns about parent/carer online behaviour and/or welfare

- Concerns regarding parents/carers behaviour and/or welfare online will be reported to the Executive Headteacher and/or DSL and dealt with in line with existing policies, including but not limited to child protection, anti-bullying, complaints, allegations against staff, home-school agreements, acceptable use of technology and behaviour policy.
- Where appropriate, welfare support will be offered, and where necessary, civil and/or legal action may be taken.

# 8. Procedures for responding to specific online concerns

#### 8.1 Online child-on-child abuse

- The Federation of St Martin's and Seabrook CEP Schools recognises that whilst risks can be posed by unknown individuals or adults online, pupils can also abuse their peers; all online child-on-child abuse concerns will be responded to in line with our child protection and behaviour policies.
- We recognise that online child-on-child abuse can take many forms, including but not limited to:
  - o bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - o abuse in intimate personal relationships between peers
  - physical abuse, this may include an online element which facilitates, threatens and/or encourages physical abuse
  - sexual violence and sexual harassment, which may include an online element which facilitates, threatens and/or encourages sexual violence
  - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as 'sexting' or 'youth produced sexual imagery')
  - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - o initiation/hazing type violence and rituals.
- The Federation of St Martin's and Seabrook CEP Schools adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh", "part of growing up" or "boys being boys"; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.
- The Federation of St Martin's and Seabrook CEP Schools believes that all staff have a role to play in challenging inappropriate online behaviours between children. Staff recognise that some online childon-child abuse issues may be affected by gender, age, ability and culture of those involved.

- The Federation of St Martin's and Seabrook CEP Schools recognises that even if there are no
  reported cases of online child-on-child abuse, such abuse is still likely to be taking place and it may
  be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or
  deputy) about any concerns regarding online child-on-child abuse.
- Concerns about child-on-child abuse taking place online offsite will be responded to as part of a partnership approach with pupils and parents/carers; concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies. Note: section 89(5) of the Education and Inspections Act 2006 gives headteachers a statutory power to discipline pupils for poor behaviour outside of the school premises, for example, when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable. This legislation is for schools only and is not applicable to independent schools.
- The Federation of St Martin's and Seabrook CEP Schools want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of online child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated policies, including child protection, anti-bullying and behaviour. Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

#### 11.1.1 Child on child online sexual violence and sexual harassment

Headteachers and DSLs may find it helpful to access Childnet's online sexual harassment guidance: www.childnet.com/resources/step-up-speak-up/guidance-and-training-for-schools-and-professionals

- When responding to concerns relating to online child on child sexual violence or harassment, The
  Federation of St Martin's and Seabrook CEP Schools will follow the guidance outlined in Part Five of
  KCSIE.
- Online sexual violence and sexual harassment exists on a continuum and may overlap with offline behaviours; it is never acceptable. Abuse that occurs online will not be downplayed and will be treated equally seriously.
- All victims of online sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting online sexual violence or sexual harassment or be made to feel ashamed for making a report.
- The Federation of St Martin's and Seabrook CEP Schools recognises that sexual violence and sexual harassment between children can take place online. Examples may include:
  - o consensual and non-consensual sharing of nude and semi-nude images and videos
  - o sharing of unwanted explicit content
  - 'upskirting' (which is a criminal offence and typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm)
  - sexualised online bullying
  - o unwanted sexual comments and messages, including, on social media
  - o sexual exploitation, coercion and threats.

- The Federation of St Martin's and Seabrook CEP Schools recognises that sexual violence and sexual
  harassment occurring online (either in isolation or in connection to face to face incidents) can
  introduce a number of complex factors. These include the potential for the incident to take place
  across a number of social media platforms and services, and for things to move from platform to
  platform online.
- The Federation of St Martin's and Seabrook CEP Schools will respond to concerns regarding online sexual violence and sexual harassment between children, regardless of whether the incident took place on our premises or using our equipment.
- The Federation of St Martin's and Seabrook CEP Schools will ensure that all members of the
  community are made aware of the potential social, psychological and criminal consequences of online
  sexual violence and sexual harassment and the support available, by implementing a range of age
  and ability appropriate educational methods as part of our curriculum.
- When there has been a report of online sexual violence or harassment, the DSL will make an
  immediate risk and needs assessment which will be considered on a case-by-case basis which
  explores how best to support and protect the victim and the alleged perpetrator, and any other
  children involved/impacted.
  - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
  - Reports will initially be managed internally by the DSL, and where necessary will be referred to Children's Social Care and/or the police. The local contact details as appropriate Folkestone & Hythe 03301 651 340
  - The decision making and required action taken will vary on a case by case basis but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, or staff, and any other related issues or wider context.
  - o If content is contained on pupils personal devices, they will be managed in accordance with the DfE 'searching screening and confiscation' advice.
- Following an immediate risk assessment, the school will:
  - provide the necessary safeguards and support for all pupils involved, such as implementing safety plans, offering advice on blocking, reporting and removing online content, and providing appropriate counselling/pastoral support.
  - inform parents/carers for all children involved about the incident and how it is being managed and provide support and signposting, as appropriate, unless to do so would place a child at risk of significant harm.
  - if the concern involves children and young people at a different educational school, the DSL will work in partnership with other DSLs to ensure appropriate safeguarding action is taken in the wider local community.
    - If a criminal offence has been committed, the DSL will discuss this with the police first to ensure that investigations are not compromised.
  - review the handling of any incidents to ensure that best practice was implemented, and policies/procedures are appropriate.

The Federation of St Martin's and Seabrook CEP Schools recognises that internet brings the potential
for the impact of any concerns to extend further than the local community, and for a victim or alleged
perpetrator to become marginalised and excluded by online communities. The Federation of St
Martin's and Seabrook CEP Schools also recognises the potential for repeat victimisation in the future
if abusive content continues to exist somewhere online.

#### 11.1.2 Nude or semi-nude image sharing

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex. The UKCIS 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing, and should be read and understood by DSLs working will all age groups, not just older pupils/students.

- The Federation of St Martin's and Seabrook CEP Schools recognises that consensual and nonconsensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") is a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- This policy defines sharing nude or semi-nude image sharing as when a person under the age of 18:
  - creates and/or shares nude and/or semi-nude imagery (photos or videos) of themselves with a peer(s) under the age of 18.
  - shares nude and/or semi-nude imagery created by another person under the age of 18 with a peer(s) under the age of 18.
  - o possesses nude and/or semi-nude imagery created by another person under the age of 18.
- When made aware of concerns regarding nude and/or semi-nude imagery, The Federation of St Martin's and Seabrook CEP Schools will follow the advice as set out in the non-statutory UKCIS guidance: <u>'Sharing nudes and semi-nudes: advice for education settings working with children and young people'</u>
- The Federation of St Martin's and Seabrook CEP Schools will ensure that all members of the
  community are made aware of the potential social, psychological and criminal consequences of
  creating or sharing nude or semi-nude images and sources of support, by implementing preventative
  approaches, via a range of age and ability appropriate educational methods. This links to curriculum
  policies such as RSE and resources as appropriate.
- We will respond to concerns regarding nude or semi-nude image sharing, regardless of whether the incident took place on site or using school provided or personal equipment.
- When made aware of concerns involving consensual and non-consensual sharing of nudes and seminude images and/or videos by children, staff are advised to:
  - Report any concerns to the DSL immediately.
  - Never view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.

- Not delete the imagery or ask the child to delete it.
- Not say or do anything to blame or shame any children involved.
- Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
- Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- If made aware of an incident involving nude or semi-nude imagery, DSLs will:
  - act in accordance with our child protection policies and the relevant local procedures and in line with the <u>UKCIS</u> guidance.
  - carry out a risk assessment in line with the <u>UKCIS</u> guidance which considers the age and vulnerability of pupils involved, including the possibility of carrying out relevant checks with other agencies.
  - o a referral will be made to Children's Social Care and/or the police immediately if:
    - the incident involves an adult (over 18).
    - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
    - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
    - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
  - The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
  - If DSLs are unsure how to proceed, advice will be sought from the local authority.
    - local contact details Kent schools can access specific advice via the Education Safeguarding Service. Folkestone & Hythe 03301 651 340
  - Store any devices securely:
    - If content is contained on pupils personal devices, they will be managed in accordance with the DfE 'searching screening and confiscation' advice.
    - If a potentially indecent image has been taken or shared on our network or devices, we will act to block access to all users and isolate the image.
  - o inform parents/carers about the incident and how it is being managed and provide support and signposting, as appropriate, unless to do so would place a child at risk of significant harm.
  - provide the necessary safeguards and support for pupils, such as offering counselling or pastoral support.
  - implement sanctions where necessary and appropriate in accordance with our behaviour policy but taking care not to further traumatise victims where possible.
  - o consider the deletion of images in accordance with the <u>UKCIS</u> guidance.
    - Images will only be deleted once the DSL has confirmed that other agencies do not need to be involved and are sure that to do so would not place a child at risk or compromise an investigation.
    - Pupils will be supported in accessing the Childline 'Report Remove' tool where necessary: Report Remove Tool for nude images.
  - o review the handling of any incidents to ensure that best practice was implemented; the leadership team will also review and update any management procedures, where necessary.

#### We will not:

- view any imagery, unless there is no other option, or there is a clear safeguarding need or reason to do so. Note, DSLS should follow <u>'Sharing nudes and semi-nudes: advice for</u> <u>education settings working with children and young people'</u> If it is deemed necessary, the imagery will only be viewed where possible by the DSL in line with the national <u>UKCIS</u> <u>quidance</u>, and any decision making will be clearly documented.
- send, share, save or make copies of content suspected to be an indecent image/video of a child and will not allow or request pupils to do so.

#### 11.1.3 Cyberbullying

- Cyberbullying, along with all other forms of bullying, will not be tolerated at The Federation of St Martin's and Seabrook CEP Schools.
- Full details of how we will respond to cyberbullying are set out in our anti-bullying policy.

# 11.2 Online child abuse and exploitation

- The Federation of St Martin's and Seabrook CEP Schools recognises online abuse and exploitation, including sexual abuse and sexual or criminal exploitation, as a safeguarding issue and all concerns will be reported to and dealt with by the DSL, in line with our child protection policy.
- The Federation of St Martin's and Seabrook CEP Schools will ensure that all members of the
  community are aware of online child abuse and sexual or criminal exploitation, including the possible
  grooming approaches which may be employed by offenders to target pupils, and understand how to
  respond to concerns.
- We will implement preventative approaches for online child abuse and exploitation via a range of age and ability appropriate education for pupils, staff and parents/carers through policies such as RSE/PSHE.
- We will ensure that all members of the community are aware of the support available regarding online child abuse and exploitation, both locally and nationally.
- If made aware of an incident involving online child abuse and/or exploitation, we will:
  - act in accordance with our child protection policies and the relevant local safeguarding children partnership procedures.
  - o store any devices containing evidence securely:
    - If content is contained on pupils personal devices, they will be managed in accordance with the DfE 'searching screening and confiscation' advice.
    - If any evidence is stored on our network or devices, we will act to block access to other users and isolate the content.
  - o if appropriate, make a referral to Children's Social Work Service and inform the police via 101, or 999 if a pupil is at immediate risk.
    - Local contact details Kent schools can access specific advice via the Education Safeguarding Service Folkestone & Hythe 03301 651 340
  - carry out a risk assessment which considers any vulnerabilities of pupils involved, including carrying out relevant checks with other agencies.

- o inform parents/carers about the incident and how it is being managed and provide support and signposting, as appropriate.
- provide the necessary safeguards and support for pupils, such as, offering counselling or pastoral support.
- o review the handling of any incidents to ensure that best practice is implemented; leadership team will review and update any management procedures, where necessary.
- We will respond to concerns regarding online abuse and exploitation, regardless of whether the incident took place on our premises or using school provided or personal equipment.
  - Where possible and appropriate, pupils will be involved in decision making. If appropriate, they
    will be empowered to report concerns themselves with support, for example if the concern
    relates to online sexual abuse via the National Crime Agency CEOP Command (NCA-CEOP):
    www.ceop.police.uk/safety-centre/
- If we are unclear whether a criminal offence has been committed, the DSL will obtain advice immediately through the Local Authority and/or police.
  - Local contact Kent schools can access specific advice via the Education Safeguarding Service Folkestone & Hythe 03301 651 340.
- We will ensure that the NCA-CEOP reporting tools are visible and available to pupils and other members of our community. This can be accessed, for example, on the school website.
- If made aware of intelligence or information which may relate to child sexual exploitation (on or offline), it will be passed through to the police by the DSL.
- If members of the public or pupils at other schools or settings are believed to have been targeted, the DSL, will seek advice from the police and/or the Local Authority before sharing specific information to ensure that potential investigations are not compromised.
- Local contact Kent schools can access specific advice via the Education Safeguarding Service Folkestone & Hythe 03301 651 340.

# 11.3 Indecent Images of Children (IIOC)

- The Federation of St Martin's and Seabrook CEP Schools will ensure that all members of the community are made aware of the possible consequences of accessing Indecent Images of Children (IIOC) as appropriate.
- We will respond to concerns regarding IIOC on our equipment and/or personal equipment, even if access took place off site.
- We will seek to prevent accidental access to IIOC by using an Internet Service Provider (ISP) which subscribes to the Internet Watch Foundation (IWF) block list and by implementing appropriate filtering, firewalls and anti-spam software.
- If we are unclear if a criminal offence has been committed, the DSL will obtain advice immediately through the police and/or the Local Authority.

- Local contact Kent schools can access specific advice via the Education Safeguarding Service Folkestone & Hythe 03301 651 340.
- If made aware of IIOC, we will:
  - act in accordance with our child protection policy and the relevant local safeguarding children partnership procedures.
  - Local contact Kent schools can access specific advice via the Education Safeguarding Service
    Folkestone & Hythe 03301 651 340.store any devices involved securely, until advice has been
    sought. If content is contained on pupils personal devices, they will be managed in
    accordance with the DfE 'searching screening and confiscation' advice. This guidance applies
    to schools only.
  - o immediately inform appropriate organisations, such as the IWF and police.
- If made aware that a member of staff or a pupil has been exposed to indecent images of children, we will:
  - o ensure that the DSL is informed.
  - o ensure that the URLs (webpage addresses), which contain the suspect images, are reported to the IWF via www.iwf.org.uk and/or police.
  - inform the police as appropriate, for example if images have been deliberately sent to or shared by pupils.
  - o report concerns as appropriate to parents and carers.
- If made aware that indecent images of children have been found on school provided devices, we will:
  - ensure that the DSL is informed.
  - ensure that the URLs (webpage addresses), which contain the suspect images, are reported to the IWF via <a href="https://www.iwf.org.uk">www.iwf.org.uk</a>.
  - o inform the police via 101 or 999 if there is an immediate risk of harm, and any other agencies, as appropriate.
  - o only store copies of images (securely, where no one else has access to them and delete all other copies) following a written request from the police.
  - o report concerns, as appropriate to parents/carers.
- If made aware that a member of staff is in possession of indecent images of children, we will:
  - ensure that the Executive Headteacher is informed in line with our managing allegations against staff policy.
  - inform the LADO and other relevant organisations, such as the police in accordance with our managing allegations against staff policy.
  - o quarantine any involved school provided devices until police advice has been sought.

#### 11.4 Online hate

 Online hate content, directed towards or posted by specific members of the community will not be tolerated at The Federation of St Martin's and Seabrook CEP Schools and will be responded to in line with existing policies, including child protection, anti-bullying and behaviour.

- All members of the community will be advised to report online hate in accordance with relevant policies and procedures.
- The police will be contacted if a criminal offence is suspected.
- If we are unclear on how to respond, or whether a criminal offence has been committed, the DSL will obtain advice through the Local Authority and/or the police.

Local contact Kent schools can access specific advice via the Education Safeguarding Service Folkestone & Hythe 03301 651 340.

#### 11.5 Online radicalisation and extremism

- As per section 7 of this policy, we will take all reasonable precautions to ensure that pupils and staff are safe from terrorist and extremist material when accessing the internet on site.
- If we are concerned that a child or adult may be at risk of radicalisation online, the DSL will be informed immediately, and action will be taken in line with our child protection policy.
- If we are concerned that a member of staff may be at risk of radicalisation online, the Executive Headteacher will be informed immediately, and action will be taken in line with our child protection, staff code of conduct and/or allegations policies.

# 11.6 Cybercrime

- The Federation of St Martin's and Seabrook CEP Schools recognises that children with particular skills and interests in computing and technology may inadvertently or deliberately stray into 'cyberenabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the <u>Cyber Choices</u> programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with our child protection policy and other appropriate policies.

# 9. Useful Links

#### **Links for Schools**

UK Council for Internet Safety (UKCIS): <a href="www.gov.uk/government/organisations/uk-council-for-internet-safety">www.gov.uk/government/organisations/uk-council-for-internet-safety</a>

- UK Safer Internet Centre: <u>www.saferinternet.org.uk</u>
- South West Grid for Learning (SWGfL): 360 Safe Self-Review tool for schools <u>www.360safe.org.uk</u>
- London Grid for Learning: https://lgfl.net/safeguarding
- Childnet: www.childnet.com
  - Step Up Speak Up Online Sexual Harassment Guidance: <a href="www.childnet.com/resources/step-up-speak-up/guidance-and-training-for-schools-and-professionals">www.childnet.com/resources/step-up-speak-up/guidance-and-training-for-schools-and-professionals</a>
  - o Cyberbullying Guidance: <a href="https://www.childnet.com/resources/cyberbullying-guidance-for-schools">www.childnet.com/resources/cyberbullying-guidance-for-schools</a>
- PSHE Association: <u>www.pshe-association.org.uk</u>
- National Education Network (NEN): www.nen.gov.uk
- National Cyber Security Centre (NCSC): <u>www.ncsc.gov.uk</u>
- Educate against hate: https://educateagainsthate.com
- NCA-CEOP Education Resources: <u>www.thinkuknow.co.uk</u>
- Safer Recruitment Consortium: www.saferrecruitmentconsortium.org

#### **Reporting Helplines**

- NCA-CEOP Safety Centre: <a href="www.ceop.police.uk/Safety-Centre">www.ceop.police.uk/Safety-Centre</a>
- Internet Watch Foundation (IWF): <u>www.iwf.org.uk</u>
- ChildLine: www.childline.org.uk
  - Report Remove Tool for nude images: <u>www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online</u>
- Stop it now! <u>www.stopitnow.org.uk</u>
- The Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Action Fraud: www.actionfraud.police.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Revenge Porn Helpline: https://revengepornhelpline.org.uk
- Professional Online Safety Helpline: <a href="https://www.saferinternet.org.uk/about/helpline">www.saferinternet.org.uk/about/helpline</a>

#### Support for children and parents/carers

- Internet Matters: <u>www.internetmatters.org</u>
- Childnet: <u>www.childnet.com</u>
- NSPCC: <u>www.nspcc.org.uk/onlinesafety</u>
- Parents Protect: www.parentsprotect.co.uk
- NCA-CEOP Child and Parent Resources: www.thinkuknow.co.uk
- Parent Zone: https://parentzone.org.uk
- Get Safe Online: <a href="www.getsafeonline.org">www.getsafeonline.org</a>
- Common Sense Media: <u>www.commonsensemedia.org</u>