# STOW-on-the-WOLD PRIMARY SCHOOL

heart hand mind

# Online Safety

# Policy

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| **Approved By:** | **Full Governing Board** | **Date: 13th October 2026** |
| **Last Reviewed on:** | **13th October 2025** | **Next review due by: 13th October 2026** |
| **Signature:** T.A. Bartlett | | **Signature:** |
| **Chair of Governors** | | **Headteacher** |

SWGfL
Safe, Secure, Online

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## Scope of the Online Safety Policy

This Online Safety Policy sets out how Stow on the Wold Primary School will safeguard members of our community online, in line with statutory guidance and best practice. The school is aware of the wider statutory requirements that informs this policy.

This policy applies to all members of the school community who access or use school digital systems, including staff, learners, governors, volunteers, parents/carers, visitors and community

users. It applies to use of school systems both on and off site, and to the use of personal devices on the school site (where permitted).

Where online safety concerns or incidents occur outside school and are known to the school, Stow on the Wold Primary School will respond in line with this policy and related procedures, including the school's Safeguarding, Behaviour and Anti-Bullying policies. Where appropriate, parents/carers will be informed of incidents involving inappropriate online behaviour that take place out of school.

## Policy development, monitoring and review

This policy has been developed by the Curriculum Committee drawing on the expertise and responsibilities across the school. Membership includes:

- Headteacher / Senior leaders
- Designated Safeguarding Lead (DSL)
- Online Safety Lead (OSL)
- Staff (including teaching, support and technical staff)
- Governors
- Parents/carers
- Community users (where relevant)

Consultation with the wider school community has taken place through a range of formal and informal opportunities to ensure the policy is understood, workable and proportionate.

## Schedule for approval, monitoring and review

Approved by the Governing Body on: 8 June 2026

Monitored by: Curriculum Committee

Monitoring frequency: Bi annually- October and June

Policy review cycle: reviewed annually, or sooner in response to significant technological developments, emerging risks, or incidents.

Next planned review date: October 2026

Escalation following serious incidents: the school will inform relevant external agencies as appropriate

Monitoring the impact of the policy

The school will evaluate the effectiveness of this policy using evidence such as:

- Logs of reported online safety incidents
- Filtering and monitoring records
- Internal network activity monitoring data
- Surveys/questionnaires (as appropriate) of: Learners, Parents/carers, Staff

## Policy and leadership

## Responsibilities

Online safety is a shared responsibility. All members of the school community are expected to model safe, responsible behaviour, report concerns promptly and learn from incidents and good practice. The roles below clarify accountability.

### Headteacher and senior leaders

Senior leaders set the culture and ensure that systems are effective. In line with KCSIE, the DSL holds day-to-day lead responsibility.

Senior leaders will:

- Ensure the school meets its safeguarding duty of care, including online safety.
- Know and apply procedures for serious allegations involving staff (Headteacher plus at least one senior leader).
- Ensure that the DSL/OSL, IT provider/technical staff and relevant colleagues are trained and able to fulfil their roles.
- Put in place appropriate oversight and support for internal monitoring activity.
- Establish and receive regular online safety reports and act on emerging risks and themes.
- Work with governors, the DSL and IT provider on filtering and monitoring.

### Governors

Governors approve the Online Safety Policy and challenge its effectiveness, in line with KCSIE expectations.

The governing body will nominate an Online Safety Governor who will:

- Meet regularly with the DSL/OSL.
- Receive anonymised incident and monitoring summaries.
- Check delivery of key commitments (e.g., education, reporting, staff training).
- Through regular review, assess the effectiveness of filtering and monitoring with SLT, DSL and IT provider, in line with DfE standards.
- Report to the relevant governor group/committee: Curriculum

- Undertake basic cyber security awareness training and support school cyber security oversight.
- Participate in the Online Safety Group (where in place).

Governors also support parent/carer and community engagement in online safety.

### Designated Safeguarding Lead (DSL)

KCSIE states the DSL leads safeguarding and child protection, including online safety, and understands filtering and monitoring systems and processes.

The DSL will:

- Lead safeguarding, including online safety, with clear responsibilities in their job description.
- Maintain up-to-date knowledge of online risks, filtering/monitoring and cyber security.
- Coordinate and record online safety concerns and incidents, escalating and referring in line with safeguarding procedures.
- Liaise with SLT, the Online Safety Governor, the IT provider and relevant external partners as required.
- Review anonymised incident patterns and filtering/monitoring information, confirming at least annual checks.
- Report regularly to SLT and drive continuous improvement across relevant policies and practice, using evidence (e.g. incident data, monitoring, self-review such as 360 safe).
- Ensure appropriate support for learners with SEND.

### Online Safety Lead (OSL)

The OSL will:

- Lead the Online Safety Group and support the DSL day to day.
- Lead development and review of online safety documentation.
- Coordinate awareness, staff confidence and reporting readiness through appropriate training
- Work with curriculum leads to map, embed and evaluate online safety education.
- Liaise with IT and pastoral/support teams.
- Maintain current knowledge of risks across content, contact, conduct and commerce.

### Curriculum Leads

Curriculum leads will work with the DSL/OSL to deliver a planned online safety programme (e.g. ProjectEVOLVE) through appropriate channels, e.g. Computing, PSHE/RSE, other curriculum areas, assemblies/pastoral provision and national initiatives e.g. Safer Internet Day.

### Teaching and Support Staff

All staff are expected to uphold professional standards online and contribute to a strong safeguarding culture.

Staff will:

- Follow the Online Safety Policy, Safeguarding/Child Protection Policy, Technical Security Policy and sign/comply with the Staff AUA.
- Maintain professional boundaries (including online/remote learning).
- Supervise learner use of technology and follow procedures for online safety issues
- Embed online safety where appropriate; teach research skills, copyright and plagiarism awareness.
- Challenge harmful online behaviour and report concerns promptly.
- Use only school-approved digital services and AI tools; protect data, apply UK GDPR, and verify AI outputs for accuracy/bias before use.
- Complete induction and annual training, with updates as needed; contribute to improvement by sharing learning and concerns.

### IT service provider / technical staff

The IT provider supports leaders and the DSL to meet DfE filtering, monitoring and technical standards. Where services are outsourced, the school remains accountable.

The IT provider will:

- Maintain secure infrastructure and managed user access.
- Implement, maintain and update filtering and monitoring; provide reports; act on alerts and concerns.
- Support procurement, risk identification, reviews and checks with SLT/DSL.
- Monitor systems for misuse and report concerns promptly to the headteacher
- Follow the school's Online Safety and Technical Security policies and keep technical knowledge current.

### Learners

Learners will:

- Follow the Learner AUA and Online Safety Policy (including personal devices where permitted).
- Report concerns and know how to get help.
- Use technology responsibly, respecting others and their copyright and intellectual property.
- Use AI responsibly: protect original work, check accuracy and avoid plagiarism.
- Understand that out-of-school behaviour may be addressed where it affects the school community.

### Parents and carers

Parents/carers are key partners in reinforcing safe online behaviour.

The school will:

- Publish the Online Safety Policy and share the learner AUA
- Provide guidance on the responsible use of online technologies and seek permissions for digital services/images where required.
- Share updates through meetings, newsletters, online channels and campaigns.

Parents/carers will be encouraged to reinforce key messages and support safe use of personal devices (where permitted in school).

### Community users

Community users accessing school systems or platforms will sign a Community User AUA before access is provided. The school welcomes partnership working and shares good practice where appropriate.

## Online Safety Curriculum Committee

The Online Safety Group provides strategic oversight of online safety, monitors implementation and impact of the Online Safety Policy, and ensures online safety is embedded across safeguarding, curriculum and technical practice. In some schools it may sit within a wider safeguarding or digital strategy group.

### Membership

- DSL, OSL, Senior Leader(s)
- Online Safety Governor
- IT/technical representative (internal or provider)
- Staff representatives (teaching/support)
- Learner representative(s)
- Parent/carer representative(s)
- Community/external partner (where relevant)

### Core responsibilities

The group supports the DSL/OSL to:

- Draft, review and monitor the Online Safety Policy and related documents.
- Oversee filtering and monitoring, including requests for change.

- Map and review online safety education for breadth, progression and relevance.
- Review anonymised incident data and technical logs to identify trends and emerging risks.
- Gather feedback from learners, staff and parents/carers and turn this into improvement actions.
- Promote learner voice, peer support and awareness activity.
- Track and evidence improvement actions (e.g. 360 safe).

### Governance and impact

- Operates to agreed Terms of Reference (membership, frequency, reporting lines), reviewed annually.
- Coordinates with Safeguarding, Behaviour, Curriculum, Digital Strategy and Learner Voice as needed.
- Reports key themes, actions and impact to SLT and governors, and shares appropriate summaries with the wider community.

## Policy

## Online Safety Policy

The Online Safety Policy is part of the school safeguarding framework and should be read alongside Safeguarding/Child Protection, Behaviour, Anti-Bullying and Data Protection policies.

### What the policy does

- Defines responsibilities for online safety.
- Sets expectations for safe, professional and ethical use of technology (including AI).
- Sets out reporting, recording and response procedures for online safety incidents.
- Supports compliance with KCSIE, DfE Technical Standards and UK GDPR.
- Promotes learners' digital competence and critical understanding.

### Implementation, monitoring and review

- Developed through the Online Safety Group and reviewed at least annually, and sooner if risks/technology change.
- Monitored by the DSL/OSL and governors using anonymised incident trends, filtering/monitoring reports and education review activity (e.g. 360 safe, ProjectEVOLVE).
- Findings inform improvement planning and staff training priorities.

### Communication and accessibility

- Shared at staff induction and reinforced through training.
- Communicated to learners and parents/carers through AUAs and awareness activity.

- Published on the school website.

## Acceptable use

Acceptable use is defined through the Online Safety Policy and a suite of Acceptable Use Agreements (AUAs) *(see appendices).* AUAs matter most when they are understood, reinforced and followed—not simply signed.

### Reinforcement

- staff and learner induction/handbooks
- on-screen reminders (e.g. splash screens), digital signage
- posters in areas where technology is used
- curriculum and awareness sessions
- communications with parents/carers
- school website
- peer support / learner-led activity

Schools should agree what is acceptable/unacceptable for their context (age, setting and systems) and record this in the tables below.

| User actions | | Acceptable | Acceptable at certain times | Acceptable for nominated users | Unacceptable | Unacceptable & illegal |
|---|---|---|---|---|---|---|
| Users must not use online services (apps, games, sites) to create, share, download, upload, transfer or communicate material or comments that are: | Any illegal activity, for example:<br>• Child sexual abuse imagery (CSAM)*<br>• Child sexual abuse/exploitation and grooming<br>• Terrorism-related content<br>• Encouraging, promoting or assisting suicide/self-harm<br>• Sexual image offences (including intimate image abuse/revenge porn and extreme pornography)<br>• Incitement to, or threats of, violence<br>• Hate crime<br>• Public order offences (including harassment and stalking)<br>• Drug-related offences<br>• Weapons/firearms offences | | | | | X |

| User actions | | Acceptable | Acceptable at certain times | Acceptable for nominated users | Unacceptable | Unacceptable & illegal |
|---|---|---|---|---|---|---|
| | • Fraud and financial crime (including money laundering)<br>• *Note: follow UKSIC and UKCIS guidance when responding to self-generated intimate images (SGII).* | | | | | |
| Users must not attempt or support cybercrime (Computer Misuse Act 1990), including: | • Misusing someone else's username/ID or password to access data, software or systems without authorisation<br>• Gaining unauthorised access to school networks, data or files (including bypassing security controls)<br>• Creating, introducing or spreading malware (viruses, ransomware, harmful scripts)<br>• Phishing, credential theft, or attempting to capture passwords or personal data<br>• Revealing, copying or publishing confidential information (e.g., personal/financial data, databases, access codes)<br>• Disabling, impairing or disrupting network/services (e.g., denial of service)<br>• Using penetration-testing tools without explicit permission<br>*Note: schools should decide whether incidents are dealt with internally or reported to police. Serious or repeat offences should be reported. The National Crime Agency provides routes to divert young people away from cybercrime* and into positive pathways. | | | | | X |
| Unacceptable (not illegal) under school policies, for example: | Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs) | | | X | X | |
| | Promoting discrimination, harassment or hateful content | | | | X | |

| User actions | | Acceptable | Acceptable at certain times | Acceptable for nominated users | Unacceptable | Unacceptable & illegal |
|---|---|---|---|---|---|---|
| | Using school systems to run a private business or make unauthorised financial gain | | | | X | |
| | Using tools/services to bypass filtering, monitoring or other safeguards (e.g., VPN/proxy, anonymisers, alternative DNS) | | | | X | |
| | Infringing copyright or intellectual property (including via AI tools, stream ripping or unauthorised copying/sharing) | | | | X | |
| | Unfair usage (downloading/uploading large files that hinders others in their use of the internet) | | | X | X | |
| | Sharing content that is offensive, undermines the school's ethos, breaches integrity, or brings the school into disrepute | | | | X | |

| Consider the following activities when used for non-educational purposes.<br>Add or amend items to reflect current technology, age restrictions and your school's device policy. | Staff and other adults | | | | Learners | | | |
|---|---|---|---|---|---|---|---|---|
| | Not allowed | Allowed | Allowed at certain times | Allowed for selected staff | Not allowed | Allowed | Allowed at certain times | Allowed with staff oversight |
| Online gaming and in-game chat/voice (*e.g. Roblox, Fortnite, Minecraft*) | X | | | | X | | | |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Online shopping and digital commerce (*including in-app purchases, marketplaces, subscriptions)* | | | X | | X | | | |
| Cloud storage and file sharing (*e.g., Google Drive, OneDrive, Dropbox, WeTransfer; P2P/torrents*) | | | X | | X | | | |
| Social media and user-generated platforms *(e.g. TikTok, Instagram, Snapchat, X, Reddit) and other age-restricted services* | X | | | | X | | | |
| Messaging, chat and voice *(e.g., WhatsApp, iMessage, Snapchat, Discord, Teams personal accounts)* | | X | | | X | | | |
| Streaming entertainment/media (video, music, podcasts) *e.g. Netflix, Disney+, Spotify* | | | X | | X | | | |
| Video platforms and livestreaming *(e.g. YouTube, Twitch, TikTok LIVE, Instagram Live)* | | | X | | X | | | |
| Personal mobile phones and smart devices on site *(phones, smartwatches, earbuds)* | | X | | | X | | | |
| Mobile phones used for learning (teacher-directed and supervised) | | | X | | X | | | |
| Mobile phones used during social time/breaks (where permitted) including device-free approaches | | X | | | X | | | |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Taking photos/video/audio on devices (including sharing, location data and consent) | | X | | | X | | | |
| Other personal devices *(e.g., tablets, handheld consoles, VR headsets, wearables)* | | X | | | X | | | |
| Personal email accounts on site or on the school network/Wi-Fi *(e.g., Gmail, Outlook.com)* | | | X | | X | | | |
| School email used for personal communication (non-work/non-learning) | | | X | | X | | | |
| Unapproved AI tools/services *(generative AI chatbots and image/video tools, AI companions, browser extensions)* | | | X | | X | | | |

## Acceptable/Unacceptable Actions

| User actions | | Acceptable | Acceptable at certain times | Acceptable for nominated | Unacceptable | Unacceptable and illegal |
|---|---|---|---|---|---|---|
| Users shall not access online content (including apps, games, sites) to make, post, download, upload, | **Any illegal activity for example:**<br>• Child sexual abuse imagery*<br>• Child sexual abuse/exploitation/grooming<br>• Terrorism<br>• Encouraging or assisting suicide | | | | | X |

| User actions | | Acceptable | Acceptable at certain times | Acceptable for nominated | Unacceptable | Unacceptable and illegal |
|---|---|---|---|---|---|---|
| data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to: | • Offences relating to sexual images i.e., revenge and extreme pornography<br>• Incitement to and threats of violence<br>• Hate crime<br>• Public order offences - harassment and stalking<br>• Drug-related offences<br>• Weapons / firearms offences<br>• Fraud and financial crime including money laundering<br><br>N.B. Schools should refer to guidance about dealing with self-generated images/sexting – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges | | | | | |
| Users shall not undertake activities that might be classed as cyber-crime under the Computer Misuse Act (1990) | • Using another individual's username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised)<br>• Gaining unauthorised access to school networks, data and files, through the use of computers/devices<br>• Creating or propagating computer viruses or other harmful files<br>• Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords)<br>• Disable/Impair/Disrupt network functionality through the use of computers/devices<br>• Using penetration testing equipment (without relevant permission)<br><br>N.B. Schools will need to decide whether these should be dealt with internally or by the police. Serious or repeat offences should be reported to the police. The National Crime Agency has a remit to prevent learners becoming involved in cyber-crime and harness their activity in positive ways– further information here | | | | | X |

| User actions | | Acceptable | Acceptable at certain times | Acceptable for nominated | Unacceptable | Unacceptable and illegal |
|---|---|---|---|---|---|---|
| Users shall not undertake activities that are not illegal but are classed as unacceptable in school policies: | Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs) | | | X | X | |
| | Promotion of any kind of discrimination | | | | X | |
| | Using school systems to run a private business | | | | X | |
| | Using systems, applications, websites or other mechanisms that bypass the filtering/monitoring or other safeguards employed by the school | | | | X | |
| | Infringing copyright and intellectual property (including through the use of AI services) | | | | X | |
| | Unfair usage (downloading/uploading large files that hinders others in their use of the internet) | | | X | X | |
| | Any other information which may be offensive to others or breaches the integrity of the ethos of the school or brings the school into disrepute | | | | X | |

| Consideration should be given for the following activities when undertaken for non-educational purposes:<br><br>Schools may wish to add further activities to this list. | Staff and other adults | | | | Learners | | | |
|---|---|---|---|---|---|---|---|---|
| | Not allowed | Allowed | Allowed at certain times | Allowed for selected staff | Not allowed | Allowed | Allowed at certain times | Allowed with staff permission/awareness |
| Online gaming | | | | | | | | |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Online shopping/commerce | | | | | | | | |
| File sharing | | | | | | | | |
| Online Communication platforms / messaging | | | | | | | | |
| Entertainment streaming e.g. Netflix, Disney+ | | | | | | | | |
| Use of video broadcasting, e.g. YouTube, Twitch, TikTok | | | | | | | | |
| Mobile phones may be brought to school | | | | | | | | |
| Use of mobile phones for learning at school | | | | | | | | |
| Use of mobile phones in social time at school | | | | | | | | |
| Taking photos on mobile phones/cameras | | | | | | | | |
| Use of other personal devices, e.g. tablets, gaming devices | | | | | | | | |
| Use of personal e-mail in school, or on school network/wi-fi | | | | | | | | |
| Use of school e-mail for personal e-mails | | | | | | | | |
| Use of AI services that have not been approved by the school | | | | | | | | |

# Reporting and responding

## Introduction

The school is committed to creating a culture where all members of the community feel confident, safe, and supported in reporting online safety concerns. In line with *Keeping Children Safe in Education (KCSIE)*, the school recognises that online risks may occur in school or outside school and

may affect children in any setting. Reporting routes must therefore be clear, accessible, inclusive, and consistently understood by all.

The school recognises national findings, including the Ofsted *Review of Sexual Abuse in Schools and Colleges* (2021), which highlight that children may not always feel able to report. The school assumes that harmful online behaviours may be occurring, even where none have been disclosed, and responds by maintaining strong systems for reporting, analysing, and addressing concerns.

### Reporting Concerns

The school will ensure that:

- Clear, accessible reporting routes are in place for all members of the school community, including pupils, staff, governors, parents/carers, and volunteers.
- Reporting processes are fully aligned with safeguarding procedures, including the child protection, whistleblowing, managing allegations and complaints policies.
- Multiple reporting options are available, such as speaking with the Designated Safeguarding Lead (DSL), online or anonymous reporting tools (e.g., Whisper), email contact, or in-person disclosures.
- Reporting routes are well publicised through induction, assemblies, posters, the school website, and digital platforms.
- All users understand that any online safety concern must be reported, including those relating to harmful or illegal behaviour, sexual harassment, bullying, discrimination, grooming, or self-generated sexual imagery.

### Responding to Concerns

The school will ensure that:

- Reports are acknowledged and responded to promptly, considering the safety and wellbeing of the person reporting.
- The DSL, Online Safety Lead, and senior leaders have the training and skills needed to recognise, assess, and manage online safety risks.
- Where a report indicates possible illegal activity or serious harm, it is escalated immediately through safeguarding procedures. Examples include (but are not limited to):
    - Child sexual abuse material (CSAM)
    - Non-consensual or self-generated images
    - Grooming, exploitation, or sexual harassment
    - Terrorism or extremism
    - Hate crime, fraud, extortion, stalking
    - Cyber offences under the Computer Misuse Act
    - Sale of illegal substances or goods
- Where concerns do not involve suspected illegal activity, devices may be checked using a safe, controlled, and documented process involving senior staff and a designated review device.
- AI-supported monitoring systems, where used, are subject to human oversight to ensure contextual understanding.

- Users who report concerns receive reassurance, appropriate support, and feedback on the outcome.

### Recording and Monitoring

The school will:

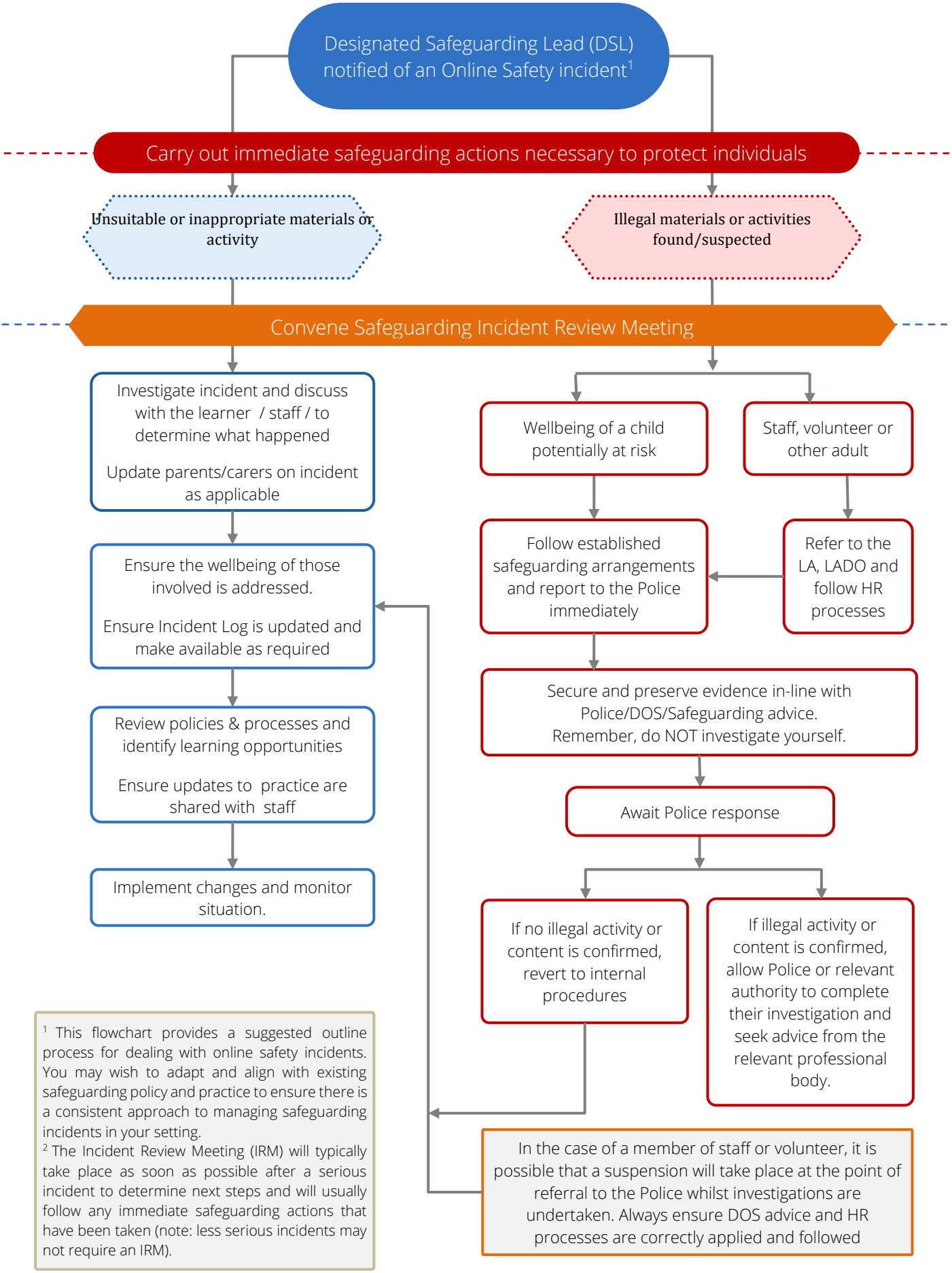
- Maintain a secure and confidential record of all incidents, including actions, decisions, and follow-up.
- Ensure reports are audited and analysed regularly to identify emerging trends, patterns of concern, and the effectiveness of responses.
- Provide anonymised summaries of trends and learning to:
    - The Online Safety Group
    - Senior leaders
    - Governors (via safeguarding reports)
    - *Staff*
    - *Learners, where appropriate*
    - *Parents/carers through general communications*
    - *Local safeguarding partners where relevant*

### External Support and Escalation

The school will work with appropriate external agencies when required, including:

- Local Authority safeguarding teams
- Local Authority Designated Officer (LADO)
- Police / CEOP
- Local Safeguarding Partnership guidance (e.g., harmful sexual behaviour support)
- *UK Safer Internet Centre's Professionals Online Safety Helpline*
- *Reporting Harmful Content service*

The school will make the flowchart below available to staff to support the decision-making process for dealing with online safety incidents. It was updated in January 2025. There is little change to the content, but the flowchart has been re-designed to make it easier for schools to edit. Schools are recommended to replace previous versions with this.




[1] This flowchart provides a suggested outline process for dealing with online safety incidents. You may wish to adapt and align with existing safeguarding policy and practice to ensure there is a consistent approach to managing safeguarding incidents in your setting.

[2] The Incident Review Meeting (IRM) will typically take place as soon as possible after a serious incident to determine next steps and will usually follow any immediate safeguarding actions that have been taken (note: less serious incidents may not require an IRM).

# Responding to Learner Actions

| Incidents | Refer to class teacher/tutor | Refer to DSL / OSL | Refer to SLT | Refer to Police/Social Services | Refer to IT Services Provider | Inform parents/carers | Issue a warning / intervention | Remove device / network /internet / access rights | Further sanction, in line with behaviour policy |
|---|---|---|---|---|---|---|---|---|---|
| **Accessing illegal material** (or attempting to), as defined in the earlier "Unsuitable/Inappropriate Activities" section. | | X | X | X | | | | | |
| **Unauthorised access to the school network**, including using another person's account or sharing usernames/passwords. | | | | | | | | | |
| **Damaging, corrupting or deleting** another user's data. | | | | | | | | | |
| **Sending offensive, harassing or bullying** emails, texts or messages. | | | | | | | | | |
| **Unauthorised downloading/uploading**, file sharing or distribution of files. | | | | | | | | | |
| **Bypassing filtering** (e.g. proxy sites, VPNs or similar tools). | | | | | | | | | |
| **Failing to report accidental access** to offensive or pornographic material | | | | | | | | | |
| **Deliberately accessing** offensive or pornographic material (or attempting to) | | | | | | | | | |
| **Sharing or receiving content** that breaches copyright or data protection law. | | | | | | | | | |
| **Unauthorised use of devices**, including taking photos/videos or audio recordings. | | | | | | | | | |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Unauthorised use of online services** (apps, websites or platforms). | | | | | | | | | |
| **Any online behaviour that could bring the school into disrepute** or undermines the school's ethos. | | | | | | | | | |
| **Repeated breaches** of these rules following previous warnings or sanctions. | | | | | | | | | |

# Responding to Staff Actions

| Incidents | Refer to line manager | Refer to SLT / Headteacher | Refer to MAT / LA | Refer to Police / LADO | Refer to IT Services Provider | Issue a warning | Further Disciplinary action in line with Behaviour Policy |
|---|---|---|---|---|---|---|---|
| **Accessing illegal material** (or attempting to), as defined in the earlier "Unsuitable/Inappropriate Activities" section. | | X | X | X | | | |
| **Breaching data protection or cyber-security requirements**, including network security rules. | | | | | | | |
| **Accessing offensive or pornographic material** (or attempting to). | | | | | | | |
| **Damaging systems or data,** including corrupting/deleting others' data or deliberately damaging hardware/software. | | | | | | | |
| **Bypassing filtering controls** (e.g. proxy sites, VPNs or similar methods). | | | | | | | |
| **Unauthorised downloading, uploading** or file sharing. | | | | | | | |
| **Breaching copyright, licensing or intellectual property**, including misuse of AI systems. | | | | | | | |
| **Unauthorised account/network access,** including sharing passwords, using another person's account, or allowing others access. | | | | | | | |
| **Sending offensive, harassing or bullying** emails, texts or messages. | | | | | | | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Use of personal email/social media/messaging** to communicate with learners or parents/carers. | | | | | | | |
| **Inappropriate personal use of school technology**, including personal email and social media use during work time/using school systems. | | | | | | | |
| **Mishandling personal data**, including storing, displaying or transferring it insecurely. | | | | | | | |
| **Any action that undermines professional conduct** or a staff member's professional standing. | | | | | | | |
| **Actions which could bring the school into disrepute** or breach the integrity or the ethos of the school. | | | | | | | |
| **Failing to report incidents**, whether accidental or deliberate. | | | | | | | |
| **Repeated breaches** following previous warnings or sanctions. | | | | | | | |

## Use of Artificial Intelligence (AI)

*A more detailed AI policy template (*Appendix C7*) is available, including an **AI risk assessment matrix** and an **AI-specific Staff Acceptable Use Agreement**.*

Generative AI (Gen AI) is developing rapidly and its use in education is increasing. In schools, AI is typically used in three areas: learner support, teacher support, and school operations. All use must be safe, ethical and responsible.

We recognise that Gen AI can introduce risks. These risks can be reduced through our existing safeguarding, data protection and technical security arrangements, and by updating procedures where needed. Safeguarding of learners and staff remains central to our approach.

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### Policy statements

The school will:

- Support appropriate use of AI to enhance learning and teaching, improve outcomes, streamline administration and reduce workload. Staff remain professionally responsible and accountable for any work supported by AI.
- Comply with relevant law and guidance, including Keeping Children Safe in Education (KCSIE) and UK GDPR.
- Provide training and guidance for staff and governors on the benefits, risks and safe use of AI, and identify further development needs.
- Teach about AI through the curriculum where appropriate, helping learners understand how Gen AI works, its benefits and limitations, and its ethical and social impacts.

### Safe use, data protection and security

The school will:

- Protect personal and sensitive data. Staff must not enter personally identifiable or sensitive information into AI tools. Where AI is used, staff should use anonymised data only.
- Require UK GDPR compliance. Staff must ensure any AI tool used meets data protection and security requirements before use.
- Approve tools and accounts. Only school-approved AI tools may be used for schoolwork, and staff should use school-provided AI accounts where available to support oversight and reduce risk.
- Safeguard sensitive information. Internal documents, strategic plans or other sensitive material must not be entered into third-party AI tools unless the tool and purpose have been explicitly approved.

### Quality, fairness and integrity

The school will:

- Maintain human oversight. AI may support work but must not replace professional judgement—especially in decisions that affect people. AI outputs must be checked for accuracy before sharing or publishing.
- Promote transparency. Where AI has materially supported an output (e.g. documents, presentations, communications), staff should make this clear where appropriate.
- Address bias and discrimination. We recognise AI outputs may reflect bias. The school will use appropriate safeguards, review processes and procurement checks to prioritise fairness and safety.
- Protect copyright and intellectual property. The school will take steps to avoid copyright infringement and protect the intellectual property of staff and learners, including ensuring learners' work is not used to train AI systems without appropriate consent.

### Reporting, monitoring and accountability

The school will:

- Require prompt reporting of AI-related concerns, including misuse, data incidents or inappropriate outputs
- Maintain an inventory of AI tools in use, with purposes and risks recorded, and carry out regular review using the risk assessment matrices in Appendix C7.
- Engage parents/carers with clear information about how AI is used in school (e.g. an "AI in our school" guide).

### Use in assessment and feedback

AI tools may be used to support teachers with assessment processes (e.g. identifying areas for improvement and drafting feedback), and to support learners in improving their work. Teachers remain responsible for outcomes and must ensure accuracy, fairness and appropriate use.

### Misuse and disciplinary action

Improper use of AI—including breaches of this policy, data protection failures, misuse of sensitive information, or failure to follow agreed processes—may result in action under the school's Staff Disciplinary Policy.

## Education

## Online Safety Education Programme

Online safety education is a core part of the school's safeguarding approach and sits alongside effective technical controls (including filtering and monitoring). In line with KCSIE, online safety is a running and interrelated theme reflected across relevant policies and the curriculum.

The school delivers a planned, progressive and inclusive programme of online safety education for all learners, aligned to nationally recognised guidance and frameworks (including DfE "Teaching Online Safety in Schools", UKCIS "Education for a Connected World", and resources such as SWGfL ProjectEVOLVE). Learning is age-appropriate, builds on prior learning, is matched to need, and is taught through existing curriculum areas (including RSHE/RSE, Health Education, Computing and Citizenship), with assessment and clear intended outcomes.

### The programme develops learners' ability to:

- recognise and manage online risks, including harmful content, contact, conduct and commerce risks;
- understand consent, sexual harassment and sexual violence (including online), supported by safe opportunities for discussion;

- think critically about what they see online, including how to check reliability and accuracy and the role of AI-generated content;
- respect copyright and intellectual property, including when using online material and AI tools;
- understand and follow the learner acceptable use agreement, and act within moral and legal boundaries (including awareness of the Computer Misuse Act 1990).

Where internet use is planned, learners are guided to appropriate resources and supported if unsuitable content is encountered. Where open searching is permitted, staff supervise and remain vigilant. Filtering may be temporarily adjusted for legitimate curriculum research, with auditable approval and clear rationale.

Learner voice is actively used to strengthen the school's approach through feedback, learner representation (e.g. on an Online Safety Group), and opportunities such as digital leaders, peer mentoring, campaigns, and contribution to acceptable use and community-facing online safety activities.

## Staff

In line with DfE Keeping Children Safe in Education (KCSIE), all staff and volunteers receive safeguarding and child protection training, including online safety, at induction and through regular updates (at least annually). Online safety training is integrated into the school's whole-school safeguarding approach, wider staff development and curriculum planning.

- All staff will receive online safety training and understand their responsibilities under this policy. Training will include (select/delete as appropriate):
- A planned programme of online safety, data protection and cybersecurity training for all staff, regularly updated and reinforced. Staff training needs will be reviewed periodically to ensure provision remains relevant and effective.
- Online safety training for all new staff as part of induction, ensuring understanding of the Online Safety Policy and Acceptable Use Agreements, including classroom management, professional conduct, online reputation and modelling positive online behaviour.
- Regular updates for the Designated Safeguarding Lead and Online Safety Lead (or other nominated staff) through external training and review of relevant guidance (e.g. UK Safer Internet Centre, SWGfL, MAT, Local Authority or other appropriate organisations).
- Support for staff knowledge-building and consistent practice through structured professional learning resources (e.g. ProjectEVOLVE EDU) and, where appropriate, enhanced pathways (e.g. ProjectEVOLVE SAFEGUARDING).

- Regular review of this Online Safety Policy and updates through staff meetings, team briefings and/or INSET.
- Targeted advice, guidance and training from the DSL/OSL (or nominated staff) to individuals as required.

## Governors

Governors should take part in online safety training and awareness activity. This is particularly important for governors serving on committees with responsibility for safeguarding, online safety, technology or health and safety.

Training and updates may be provided through (select/delete as appropriate):

- Attendance at training offered by the Local Authority, MAT or other relevant organisations (e.g. SWGfL).
- Participation in school training and information sessions (for example, staff briefings or parent events). This may include attendance at assemblies or lessons where appropriate.
- Regular update meetings with the DSL and/or Online Safety Lead to review key themes, incidents and current priorities.

Enhanced training will be provided for (at least) the Online Safety Governor. This will include:

- Basic cyber security awareness training.
- Training to understand the school's filtering and monitoring provision, enabling effective participation in required checks and reviews.

## External Stakeholders

Families, the wider community and external agencies play a vital role in supporting the online safety education and wellbeing of learners. The school recognises that parents and carers may have limited awareness of online risks, and that many external bodies can enhance the school's safeguarding approach. The school therefore works actively to build strong partnerships, share key messages, and ensure that families and the wider community are equipped to help keep children safe online.

The following principles underpin the school's engagement with external stakeholders:

## Working with Parents and Carers

The school will support parents and carers to understand online risks, build confidence, and reinforce safe online behaviours at home. This includes:

- Regular communication and awareness-raising about online safety issues, curriculum content, and reporting routes.
- Providing information through newsletters, the school website, learning platforms, and digital communication tools.
- Offering opportunities such as parent/carer workshops, information events, or drop-ins focused on online safety.
- Involving learners in sharing online safety messages with parents/carers, including contributing to information events.
- Signposting parents and carers to trusted national resources (e.g. UK Safer Internet Centre, Internet Matters, Childnet, SWGfL).
- Promoting and participating in key national events such as Safer Internet Day.
- Ensuring parents and carers understand acceptable use expectations and relevant school policies related to online safety.

## Wider Community and Agencies

The school recognises the value of working with external organisations to strengthen local online safety awareness and provision. This may include:

- Sharing online safety information, resources or updates with community groups, extended family members and the wider community.
- Providing or supporting family learning opportunities on digital technologies and safe online behaviours.
- Using the school website or social media channels to offer online safety content suitable for the broader community.
- Collaborating with early years settings, childminders, youth and sports groups, libraries, voluntary organisations or other local agencies.
- Drawing on the expertise of external agencies (e.g. UK Safer Internet Centre, CEOP, Local Safeguarding Partnerships, Prevent teams, police and health professionals).
- Participating in shared activities with other schools or settings, including transition projects and multi-school events.
- Supporting external groups to review and improve their own online safety practice, including through recommended tools such as 360 Early Years or 360 Groups.

# Technology

### Purpose

The school recognises that effective filtering, monitoring, technical security, cyber security and data protection are essential to safeguarding children and protecting the wider school community. These measures support safe and responsible use of technology while enabling effective teaching, learning and administration.

Detailed arrangements are set out in the Appendix C1 - Filtering and Monitoring Policy Template and Appendix C2 - Technical Security Policy Template.

## Filtering and Monitoring

The school has appropriate filtering and monitoring systems in place to help protect users from illegal, inappropriate and harmful online content and activity, in line with statutory guidance. (e.g., DfE Technical Standards, KCSIE) and best practice guidance (e.g., UKSIC Appropriate Filtering and Monitoring)

### The school ensures that:

- filtering and monitoring arrangements are safeguarding-led, proportionate and regularly reviewed
- filtering blocks illegal content and provides age-appropriate and role-appropriate access
- monitoring supports the rapid identification of safeguarding concerns and enables timely intervention
- all school-owned devices are subject to filtering and monitoring, including when used off-site
- staff and learners understand that filtering and monitoring are in place, why they are needed, and how concerns are escalated
- Where the use of personal devices is allowed, users understand that their use may be filtered and monitored by the school.

### Oversight and Review

- Senior leaders, the Designated Safeguarding Lead (DSL), technical staff and governors have clear roles and responsibilities
- filtering and monitoring effectiveness is reviewed at least annually, and following significant changes or incidents. (e.g., using Testfiltering)
- log reports provide actionable information for safeguarding decisions.
- no system is relied upon in isolation; reporting routes and professional judgement remain central

Further detail is provided in the Appendix C1 - Filtering and Monitoring Policy Template

## Technical Security

The school takes steps to ensure that its technical infrastructure is secure, reliable and well managed and meets its statutory requirements.

The school ensures that:

- access to systems and data is controlled through appropriate authentication and permissions
- devices, networks and systems are protected through secure configuration, patching and malware protection
- backups and recovery arrangements are in place to reduce the impact of system failure or attack
- incidents and weaknesses are reported, recorded and used to inform improvement
- responsibilities for technical security are clearly defined and supported by appropriate expertise
- systems are regularly reviewed and tested, meet statutory requirements and address emerging threats.

Further detail is provided in the Appendix C2 - Technical Security Policy Template.

## Cyber Security

The school recognises cyber security as a leadership and governance responsibility and takes steps to reduce the risk and impact of cyber incidents.

The school ensures that:

- a cyber security approach is in place to prevent, detect, respond to and recover from cyber threats
- senior leaders and governors understand cyber risks and receive appropriate assurance
- staff and learners are educated/trained to recognise and report cyber security concerns
- business continuity and incident response arrangements are maintained and reviewed
- cyber security arrangements are kept under regular review and updated in line with emerging risks.

Further detail is provided in the Appendix C3 – Cyber Security Policy Template.

## Data Protection

The school is committed to protecting personal data and complying with data protection legislation.

### The school ensures that:

- personal data is processed lawfully, fairly and transparently
- a Data Protection Officer (DPO) is appointed and appropriate governance arrangements are in place
- all staff receive regular training to ensure they are aware of their responsibilities and can respond appropriately to data protection incidents.
- systems are in place to respond effectively to Freedom of Information and Subject Access Requests
- Data Protection Impact Assessments have been conducted on existing and planned use of software and systems.
- privacy notices explain how data is used and how individual rights can be exercised
- data is stored, shared and disposed of securely
- data breaches are reported and managed in line with legal requirements
- data protection is embedded across safeguarding, teaching, learning and administration.

Further detail is provided in the Appendix C4 – Data Protection Policy Template.

### Review

Arrangements for filtering, monitoring, technical/cyber security and data protection are reviewed regularly and updated to reflect:

- changes in technology
- emerging safeguarding risks
- national guidance and statutory expectations

## Technology Practice

### Purpose

The school recognises that the safe and responsible day-to-day use of technology plays a vital role in safeguarding children, supporting learning, and protecting the school community. Clear expectations, consistent practice and informed users help reduce risk while enabling positive and purposeful use of digital technologies.

This approach supports the safeguarding duties set out in *Keeping Children Safe in Education*, emphasising safeguarding and whole-school responsibility, including the requirement to address online safety through policy, practice and education.

Detailed arrangements are set out in the Appendix C2 - Technical Security Policy Template and Appendix C6 – Public Online Communications Policy Template

## Device Management

The school manages the use of digital devices in a way that supports safeguarding, learning and responsible behaviour. This reflects KCSIE's requirement for a clear mobile / smart technology policy and explicitly links device use to behaviour, safeguarding and education

The school ensures that:

- expectations for the use of school-owned and personal devices are clearly defined and communicated
- device use is consistent with safeguarding, behaviour, data protection and acceptable use policies
- appropriate technical and procedural controls are in place to support safe use
- staff, learners and visitors have been trained/educated/informed and understand their responsibilities when using devices on school premises or systems
- education on the safe and responsible use of devices forms part of the school's online safety education

Decisions about device use are informed by risk assessment and reviewed regularly.

## Digital Content

The school recognises that digital content (images, video and any other multi-modal digital media) can enrich learning and communication when used responsibly. It directly supports KCSIE expectations around sexual imagery, sharing of images, consent and coercion. It also reinforces lawful management of digital content as part of safeguarding and embeds education and prevention alongside policy.

The school ensures that:

- clear expectations are in place for the creation, use, storage and sharing of digital content
- consent, privacy and safeguarding considerations are applied consistently
- staff and learners are trained/educated to understand their responsibilities when creating or sharing digital content
- personal data and images are handled securely and lawfully
- policy and practice are reviewed in the light of emerging technologies and risks.

## Public Online Communications

The school uses public online communications to inform, celebrate success and engage with the wider community, while managing associated risks. It supports KCSIE expectations around professional boundaries and staff conduct online, addresses reputational and safeguarding risk from public platforms while reinforcing parental engagement and transparency.

### The school ensures that:

- public online communications are appropriate, accurate and well-managed
- public communications from or regarding the school are monitored and addressed where appropriate
- published content complies with safeguarding, data protection and statutory requirements
- to reduce the risk of illegal manipulation of publicly available images of staff and learners, the school has procedures in place to control how those images are shared online. (guidance is available from UKSIC)

- online safety information is shared with parents, carers and the wider community
- clear processes exist for managing school online accounts
- staff understand expectations around professional conduct and online behaviour

### Review

Technology practice is reviewed regularly to reflect:

- changes in technology and online behaviour
- emerging safeguarding risks
- feedback from staff, learners and parents
- national guidance and statutory expectations

## Outcomes

The impact of the Online Safety Policy and practice is evaluated regularly using evidence such as online safety incident logs, behaviour and bullying records, and surveys of staff, learners and parents/carers. Evaluating student outcomes as part of their online safety should be defined and evaluated as part of the school's assessment processes (e.g. using ProjectEVOLVE Knowledge Maps assessment and tracking). Findings are reported to relevant groups and used to strengthen practice.

This process ensures that:

- Evidence from audits and reviews is discussed through balanced professional debate, alongside the impact of preventative work (education, awareness and training).
- Clear reporting routes are in place so patterns, themes and outcomes are shared regularly with senior leaders and governors.
- Parents/carers are informed of key patterns and learning through the school's online safety communication and awareness activity.
- Online safety and related policies and procedures are updated in response to evidence and emerging risks.
- Learning and evidence of impact are shared, where appropriate, with other schools, agencies and local authorities to support a consistent local approach to online safety

## List of appendices

Copies of the more detailed template policies and agreements, contained in the appendix, can be found in the links and resources section of the relevant aspects in the 360safe self-review tool and online on the SWGfL website. The appendices are as follows:

A2 - Learner Acceptable Use Agreement Template – KS2
A3 - Learner Acceptable Use Agreement Template – for younger learners (EY/KS1)
A4 - Parent/Carer Acceptable Use Agreement Template
A5 - Staff (and Volunteer) Acceptable Use Policy Agreement Template
A6 - Community Users Acceptable Use Agreement Template
A7 – Online Safety Policy Statement Template
A8 - Harmful Sexual Behaviour Policy Template
A9 - Computer Misuse and Cyber Choices Policy Template
A10 - Responding to incidents of misuse – flow chart
A11 - Record of reviewing devices/internet sites (responding to incidents of misuse)
A12 - Reporting Log
B1 - Training Needs Audit Log
C1 – Filtering and Monitoring Policy Template
C2 - Technical Security Policy Template (including Technical Security and Device Management
C4 - Data Protection Policy Template
C5 - Electronic Devices - Searching Screening and Confiscation Policy Template
C6 – Public Online Communications Policy Template
C7 – Use of Artificial Intelligence (AI) in Schools Policy Template

# Appendix A2 - Acceptable Use Agreement Template – for KS2 Learners

## This acceptable use agreement is intended:

- to ensure that learners will have good access to devices and online content, be responsible users and stay safe while using digital technologies for educational, personal and recreational use
- to help learners understand good online behaviours that they can use in school, but also outside school
- to protect school devices and networks from accidental or deliberate misuse that could put the security of the systems and users at risk.

## Acceptable Use Agreement

I agree to use the school's digital systems safely and responsibly to protect me, other learners and the school.

### Keeping Safe Online

- The school will check how I use devices and the internet to keep everyone safe.
- I will keep my usernames and passwords private and tell a trusted adult if someone else knows them.
- I will be careful when talking to people online and will only talk to people I know and trust.
- I will not share personal information like my name, address, or photos without asking a trusted adult.
- I will only take or share images of myself, or others, when fully dressed.
- If I see or hear something online that worries or upsets me, I will tell a trusted adult straight away.
- I will only meet people I have spoken to online if a trusted adult is with me.

### Using Computers and the Internet Sensibly

- I will only use devices, apps and sites that I am allowed to, and will check if I am unsure.
- I will always ask permission and check with a trusted adult before using someone else's work or pictures.
- I will make sure the information I find online is true by checking carefully.
- I will only use apps or tools, like AI, that my teacher has said are OK, and I will ask for help if I'm unsure.
- I will not copy or use music, videos, or games unless I have permission.
- I will tell a trusted adult about any damage to devices or if anything else goes wrong.
- I will check with trusted adults before clicking on any unexpected messages or links (even if these look as though they are from people that I already know).

## Being Respectful and Responsible

- I will treat others kindly online, just as I do in real life.
- I will make good choices about what I share online to protect myself and others.
- I will spend a healthy amount of time using devices and make time for other activities too.
- I will always think about how my behaviour online could affect me, my friends, and my school.

## What Happens If I Break These Rules?

- If I don't follow these rules, my teacher may stop me from using computers or devices, speak to my parents, or take other actions to help me make better choices in the future.

By following these rules, I can enjoy using technology safely and responsibly.

I have read and understand the above and agree to follow these guidelines when:

- I use the school systems and devices (both in and out of school)
- I use my own devices in the school (when allowed) e.g. mobile phones, gaming devices USB devices, cameras etc.
- I am out of school and involved in any online behaviour that might affect the school or other members of the school.

Name of Learner: ..... Group/Class: .....

Signed: ..... Date: .....

**Parent/Carer Countersignature** (optional)

# Appendix A3 - Acceptable Use Agreement Template – for younger learners (EY/KS1)

## Our Technology Rules

I will follow these rules to use computers, tablets and the internet safely at school. These rules help us all stay safe and have fun using computers and tablets at school!

## Staying Safe

- My teacher will watch what I do on computers, tablets and the internet to keep me safe.
- I will keep my passwords secret and tell my teacher if I need help.
- I understand that people online are not always who they say they are. I will only talk to people online if my teacher or a trusted adult says it's OK.
- I will not share my name, address, or pictures without asking my teacher or a trusted adult first.
- If I see something that makes me feel worried or upset, I will tell my teacher or a trusted adult straight away.
- I will only use apps, games or websites my teacher says are safe.

## Using Technology Kindly

- I will be kind when using technology, just like I am in real life.
- I will take care of the computers and tablets I use.
- I will only look at things my teacher says are OK.

## Making Good Choices

- I will ask my teacher before I use someone else's pictures or work.
- I will take breaks from screens and do other fun things too.
- I know that I can say no / please stop to anyone online who makes me feel sad, uncomfortable, embarrassed or upset.
- I will ask for help from a trusted adult if I am not sure what to do or if I think I may have done something wrong.

## What Happens If I Forget the Rules

- If I forget the rules, my teacher will help me learn to make better choices next time.

Signed (child): .....

Signed (parent): .....

# Appendix A4 - Parent/Carer Acceptable Use Agreement Template

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies provide powerful tools, which open new opportunities for everyone. They can stimulate discussion, promote creativity, and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This acceptable use policy is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that parents and carers are aware of the importance of online safety and are involved in the education and guidance of young people with regard to their on-line behaviour.

The school will try to ensure that learners have good access to digital technologies to enhance their learning and will, in return, expect the learners to agree to be responsible users. A copy of the learner acceptable use agreement is attached to this permission form, so that parents/carers will be aware of the school expectations of the young people in their care.
Parents are requested to sign the permission form below to show their support of the school in this important aspect of the school's work.

Permission Form

Parent/Carers Name: .....

Learner Name: .....

As the parent/carer of the above learners, I give permission for my son/daughter to have access to the digital technologies at school.

I understand that the school has discussed the acceptable use agreement with my son/daughter and that they have received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet – both in and out of school.

I understand that the school will take every reasonable precaution, including monitoring and filtering systems, to ensure that young people will be safe when they use the internet and systems. I also understand that the school cannot ultimately be held responsible for the nature and content of materials accessed on the internet and using devices.

I understand that my son's/daughter's activity on the systems will be monitored and that the school will contact me if they have concerns about any possible breaches of the acceptable use agreement.

I will encourage my child to adopt safe use of digital technologies at home and will inform the school if I have concerns over my child's online safety.

Signed: .....

Date: .....

## Use of Digital/Video Images

The use of digital/video images plays an important part in learning activities. Learners and members of staff may record evidence of activities in lessons and out of school. These images may then be used in presentations in subsequent lessons. Images may also be used to celebrate success through their publication in newsletters, on the school website and occasionally in the public media. Where an image is publicly shared by any means, only your child's first name/initials will be used. The school will comply with the Data Protection Act and request parent's/carer's permission before taking images of members of the school. We will also ensure that when images are published that the young people cannot be identified by the use of their names.In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other learners in the digital/video images.Parents/carers are requested to sign the permission form below to allow the school to take and use images of their children and for the parents/carers to agree.

## Digital/Video Images Permission Form

Parent/Carers Name:..... Learner Name:.....

| | |
|---|---|
| As the parent/carer of the above learner, I agree to the school taking digital/video images of my child/children. | Yes/No |
| I agree to these images being used: | |
| • to support learning activities. | Yes/No |
| • in publicity that reasonably celebrates success and promotes the work of the school. | Yes/No |
| Insert statements here that explicitly detail where images are published by the schools | Yes/No |
| I agree that if I take digital or video images at, or of school events which include images of children, other than my own, I will abide by these guidelines in my use of these images. | Yes/No |

Signed: .....

Date: .....

# Appendix A5 - Staff (and Volunteer) Acceptable Use Agreement Template

## School Policy

Digital technologies have become integral to the lives of everyone, including children and young people , both within schools and in their lives outside school. The internet and digital technologies are powerful tools, which can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. They also bring opportunities for staff to be more creative and productive in their work. The school has the right to protect itself and its systems and all users should have an entitlement to safe access to the internet and digital technologies at all times.

## This acceptable use policy is intended to ensure:

- that staff and volunteers will be responsible users and stay safe while online and using digital technologies for educational, personal and recreational use
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk
- that staff are protected from potential risk in their use of technology in their everyday work.

The school will try to ensure that staff and volunteers will have good access to digital technology to enhance their work, to enhance learning opportunities and will, in return, expect staff and volunteers to agree to be responsible users.

## Acceptable Use Policy Agreement

I understand that I must use school systems in a responsible way, to minimise the risk to the safety, privacy or security of the school community and its systems. I acknowledge the potential of digital technologies for enhancing learning and will endeavour to integrate them in a way that aligns with the school's policy, ethos and values.

## For my professional and personal safety:

- I understand that the school will monitor my use of school devices and digital technology systems
- I understand that the rules set out in this agreement also apply to use of these devices and technologies out of school, and to the transfer of personal / sensitive data (digital or paper based) out of the school
- I understand that the school devices and digital technology systems are primarily intended for educational use and that I will only use them for personal or recreational use within relevant school policies. .
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password.
- I will store my passwords securely and in line with the school's relevant security policy.

- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.

I will be professional in my communications and actions when using digital technologies and systems:

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner. I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and/or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital/video images, and taking account of parental permissions. I will not use my personal equipment to record these images, unless I have permission to do so. Where these images are published (e.g. on the school website) it will not be possible to identify by name, or other personal information, those who are featured.
- I will only use social networking sites in the school in accordance with school policies.
- I will only communicate with learners and parents/carers using official school systems. Any such communication will be professional in tone and manner.
- I will not engage in any online activity that may compromise my professional responsibilities.

The school has the responsibility to provide safe and secure access to technologies and ensure the smooth running of the school:

- I will abide by all relevant guidance and legislation (e.g., Keeping Children Safe in Education / UK GDPR)
- I will ensure that I am aware of cyber-security risks and that I will not respond to any communications that might put my / school data or systems at risk from attack
- When using AI systems in my professional role I will use these responsibly and:
  - will only use AI technologies approved by the school
  - will be aware of the risks of bias and discrimination, critically evaluating the outputs of AI systems for such risks
  - to protect personal and sensitive data, I will ensure that I have explicit authorisation when uploading sensitive school-related information into AI systems
  - will take care not to 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.
  - ensure that documents, emails, presentations, and other outputs influenced by AI include clear labels or notes indicating AI assistance
  - critically evaluate AI-generated outputs to ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing

- will use generative AI tools responsibly to create authentic and beneficial content, ensuring respect for individuals' identity and well-being

- When I use my personal mobile devices in school, I will follow the rules set out by the school, in the same way as if I was using school equipment. I will ensure that any such devices are protected by up to date anti-virus / anti-malware software and are free from viruses.
- When communicating in a professional capacity, I will only use technology and systems sanctioned by the school.
- I will not use personal accounts on school systems.
- I will exercise informed safe and secure practice when accessing links to content from outside of my organisation to reduce the risk of cyber security threats.
- I will ensure that my data is regularly backed up, in accordance with relevant school policies.
- I will not access illegal, inappropriate or harmful content on school systems.
- I will not bypass any filtering or security systems that are used to prevent access to such content.
- I will not install or attempt to install unauthorised programmes of any type on a school device , nor will I try to alter device settings, unless this is allowed in school policies
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in the school Data Security Policy (or other relevant policy). Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper based documents containing personal data must be held in lockable storage.
- I understand that the data protection policy requires that any staff or learner data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by school policy to disclose such information to an appropriate authority.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.

**When using digital technologies in my professional capacity or for school sanctioned personal use:**

- I will ensure that I have appropriate permissions to use the original work of others in my own work and will reflect this with appropriate acknowledgements, particularly where AI has been used to generate content
- Where content is protected by copyright, I will not download or distribute copies (including music and videos).

I understand that I am responsible for my actions in and out of the school:

- I understand that this acceptable use agreement applies to my use of digital technologies related to my professional responsibilities , within or outside of the school.
- I will ensure my use of technologies and platforms is in line with the school's agreed codes of conduct.
- I understand that if I fail to comply with this acceptable use agreement, I could be subject to disciplinary action. This could include (schools should amend this section to provide relevant sanctions as per their behaviour policies) a warning, a suspension, referral to Governors and/or the Local Authority / Trust in the event of illegal activities, the involvement of the Police.

I have read and understand the above and agree to use the school digital technology systems (both in and out of the school) and my own devices (in the school and when carrying out communications related to the school) within these guidelines.

Staff/Volunteer Name: .....

Signed: .....

Date: .....

# Appendix A6 - Acceptable Use Agreement for Community Users Template

### This acceptable use agreement is intended to ensure:

- that community users of school digital technologies will be responsible users and stay safe while using these systems and devices
- that school systems, devices and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that users are protected from potential harm in their use of these systems and devices

### Acceptable Use Agreement

I understand that I must use school systems and devices in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems, devices and other users. This agreement will also apply to any personal devices that I bring into the school:

- I understand that my use of school systems and devices will be monitored
- I will not use a personal device that I have brought into school for any activity that would be inappropriate in a school setting.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, terrorist and extremist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.
- I will not access, copy, remove or otherwise alter any other user's files, without permission.
- I will ensure that if I take and/or publish images of others I will only do so with their permission. I will not use my personal equipment to record these images, without permission. If images are published it will not be possible to identify by name, or other personal information, those who are featured.
- I will not publish or share any information I have obtained whilst in the school on any personal website, social networking site or through any other means, unless I have permission from the school.
- I will not, without permission, make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a school device, nor will I try to alter computer settings, unless I have permission to do so.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will immediately report any damage or faults involving equipment or software, whatever the cause.
- I will ensure that I have permission to use the original work of others in my own work

- Where work is protected by copyright, I will not download or distribute copies (including music and videos).
- I understand that if I fail to comply with this acceptable use agreement, the school has the right to remove my access to school systems/devices

I have read and understand the above and agree to use the school systems (both in and out of school) and my own devices (in school and when carrying out communications related to the school) within these guidelines.

Name: ..... Signed: ..... Date: .....

# Appendix A7 - Online Safety Policy Statement

We want every user to be safe, confident and supported when using technology - whether learning in school, at home, or in the wider community. Online safety is part of safeguarding and wellbeing. It is not "just an IT issue": it is about people, relationships, behaviour, learning, and protection.

Our online safety strategy is built around four outcomes-focused areas that strengthen day-to-day practice:

- Leadership and policy that make expectations clear
- Education that builds skills, resilience and positive behaviour
- Technology that protects users and supports safe learning
- Impact review that proves what's working and what we will improve

## Leadership and policy: clarity, consistency and accountability

- When leadership is strong, online safety becomes part of "how we do things here"—not a one-off initiative.

### Clear responsibilities

- We make sure roles are defined and understood across senior leaders, the Designated Safety Lead, an Online Safety Lead, governors/trustees and technical staff/providers. This ensures safeguarding decisions and technical safeguards work together.
- What this improves: decisions are quicker, concerns are escalated correctly, and actions don't get "lost" between teams.
- Benefit for users: children and adults get safer, more consistent support.

### A joined-up Online Safety Group

- We involve the right voices—leaders, staff, governors, and (where appropriate) learners and families—to keep online safety responsive to real experiences and emerging risks.
- What this improves: shared ownership and a whole-school approach.
- Benefit for users: safer practice is reinforced across school and home.

### A policy that is understood and used

- Our online safety policy is aligned with safeguarding expectations and linked to related policies so that staff and families can see one clear, consistent approach.
- What this improves: fewer grey areas and more confident decision-making.
- Benefit for users: clear boundaries and predictable responses.

### Acceptable use expectations that protect everyone

- We set out simple, age-appropriate expectations for learners and clear professional expectations for staff, so everyone understands what safe and respectful use looks like.
- What this improves: behaviour, consistency, and fairness.

- Benefit for users: safer online spaces and fewer harmful incidents.

### Reporting and responding that leads to action

- We promote a culture where people feel able to speak up, and we respond consistently, recording concerns, acting promptly, and learning from patterns and new risks.
- What this improves: early identification and effective safeguarding intervention.
- Benefit for users: children get help sooner; everyone feels listened to and protected.

## Education: confident learners and informed adults

- We teach online safety to build knowledge, skills, attitudes and resilience—so learners can enjoy the benefits of technology while managing risks.

### Planned learning for learners

- Online safety education is progressive, inclusive and revisited regularly. We use learner voice to shape what we teach and to keep it relevant.
- What this improves: safer choices, healthier online behaviour, and confident help-seeking.
- Benefit for users: learners become better prepared for real-life online challenges.

### Staff training that supports safeguarding practice

- All staff receive induction and ongoing updates so they can spot concerns, respond appropriately, and model safe practice. Key roles receive enhanced training to lead and make informed decisions.
- What this improves: confidence and consistency across the workforce.
- Benefit for users: concerns are handled calmly, correctly and promptly.

### Governors trained to provide challenge and support

- Governors/trustees understand their duties and can ask the right questions about policy, training, curriculum, filtering/monitoring, and cyber security.
- What this improves: accountability and sustained improvement.
- Benefit for users: online safety stays a priority over time, not just after incidents.

### Strong partnerships with families and agencies

- We communicate practical guidance to families and work with relevant partners. We also share effective practice beyond our school where it supports safer communities.
- What this improves: joined-up messages and earlier support.
- Benefit for users: children experience consistent expectations across school and home.

## Technology: protection that enables learning

- We use proportionate technical controls to reduce exposure to harm while supporting teaching and learning.

### Effective filtering

- Filtering reduces the risk of access to harmful and illegal content and is reviewed to ensure it stays fit for purpose.
- Benefit for users: safer browsing and research.

### Safeguarding-led monitoring

- Monitoring helps identify concerns early and supports timely intervention, handled with appropriate governance and data protection.
- Benefit for users: timely intervention when risk is emerging.

### Secure systems and cyber resilience

- We protect networks, devices and accounts, and we prepare for threats like phishing and ransomware—so learning is not disrupted and users are protected.
- Benefit for users: safer services, fewer incidents, faster recovery.

### Data protection that builds trust

- We handle personal and sensitive information carefully and lawfully, with clear processes and accountability.
- Benefit for users: privacy is respected and risks from misuse are reduced.

### Safe day-to-day practice

- We manage devices consistently (including expectations around personal devices where relevant), apply safeguarding and consent to digital content, and communicate responsibly through our public channels.
- Benefit for users: fewer avoidable mistakes and a safer, more responsible digital culture.

## Impact: proving what works and improving what doesn't

- We regularly review how well our policies and practice are working, what the evidence tells us, and what we will improve next. This keeps our approach current, targeted and effective.

### How to raise a concern or get help

If something online worries you, we want to know.

- Learners: talk to a trusted adult, your tutor/class teacher, or the safeguarding team.
- Parents/carers: contact [DSL name / safeguarding email/phone].
- Staff: follow safeguarding procedures and record concerns promptly.

### Our commitment

We will keep strengthening leadership, education, technology and impact review so that technology at [School name] is used safely, respectfully and positively—and so our community can be confident that online safeguarding is robust, consistent, and always improving.

# Appendix A8 - Harmful Sexual Behaviour Policy

## Purpose

The school recognises that harmful sexual behaviour may be happening but not reported and that it increasingly occurs online involving image sharing, coercion, exploitation and anonymous abuse.

The purpose of this policy is to set out the school's approach to preventing, identifying and responding to Harmful Sexual Behaviour (HSB), sexual harassment and sexual violence between children.

This policy forms part of the school's safeguarding framework and should be read alongside other relevant policies.

The school adopts a zero-tolerance approach to harmful sexual behaviour in line with national safeguarding guidance (see list below)

## Scope

This policy applies to:

- All learners, staff, volunteers and governors
- Behaviour occurring within and outside school where it impacts the school community

## Legislative and National Context

This policy reflects national guidance including:

- Keeping Children Safe in Education (KCSIE)
- Working Together to Safeguard Children (DfE)
- Violence Against Women and Girls (VAWG) strategy (UK Government)
- Ofsted Review of Sexual Abuse in Schools and Colleges.
- Sharing Nudes and Semi-Nudes: Advice for Education Settings

## Roles and Responsibilities

- Governors provide strategic oversight, ensure annual review of this policy and monitor safeguarding trends.
- Senior Leaders promote a culture of respect and equality and ensure consistent implementation and staff training.
- The Designated Safeguarding Lead (DSL) leads responses to incidents, ensures safeguarding procedures are followed, completes risk assessments and liaises with external agencies.
- All staff must challenge inappropriate behaviour, report concerns immediately to the DSL and respond to disclosures in a calm and supportive manner.

## Policy Statement

The school will ensure that:

- A whole-school safeguarding approach is taken to preventing harmful sexual behaviour
- All reports are taken seriously and responded to promptly
- Victims are supported, believed and protected
- Children displaying harmful behaviour receive appropriate safeguarding and educational support
- Incidents are managed in line with safeguarding and statutory procedures
- Patterns and trends are monitored to inform prevention strategies

## Prevention and Education

The school will ensure that:

- High-quality Relationships and Sex Education (RSE) is delivered
- Learners are taught about consent, respectful relationships and healthy boundaries
- Online safety education addresses digital sexual abuse, coercion and image-based harm
- Sexist language, misogyny and harmful gender stereotypes are actively challenged
- Learners are encouraged to be positive bystanders and report issues they see
- Reporting systems are accessible, appropriate and clearly communicated

## Reporting and Responding

The school will ensure that:

- Multiple reporting routes are available and understood
- All incidents are recorded securely in line with safeguarding and data security procedures
- Risk assessments are completed where appropriate
- The safety and wellbeing of those affected is prioritised
- External specialist agencies are involved where required
- Criminal matters are referred to the police where appropriate

## Support and Risk Management

The school will ensure that:

- Victims receive appropriate pastoral and safeguarding support
- Children displaying harmful behaviour receive proportionate and educational intervention
- Risk assessments are dynamic and regularly reviewed
- Supervision and safety planning are proportionate and protective

## Online Harmful Sexual Behaviour

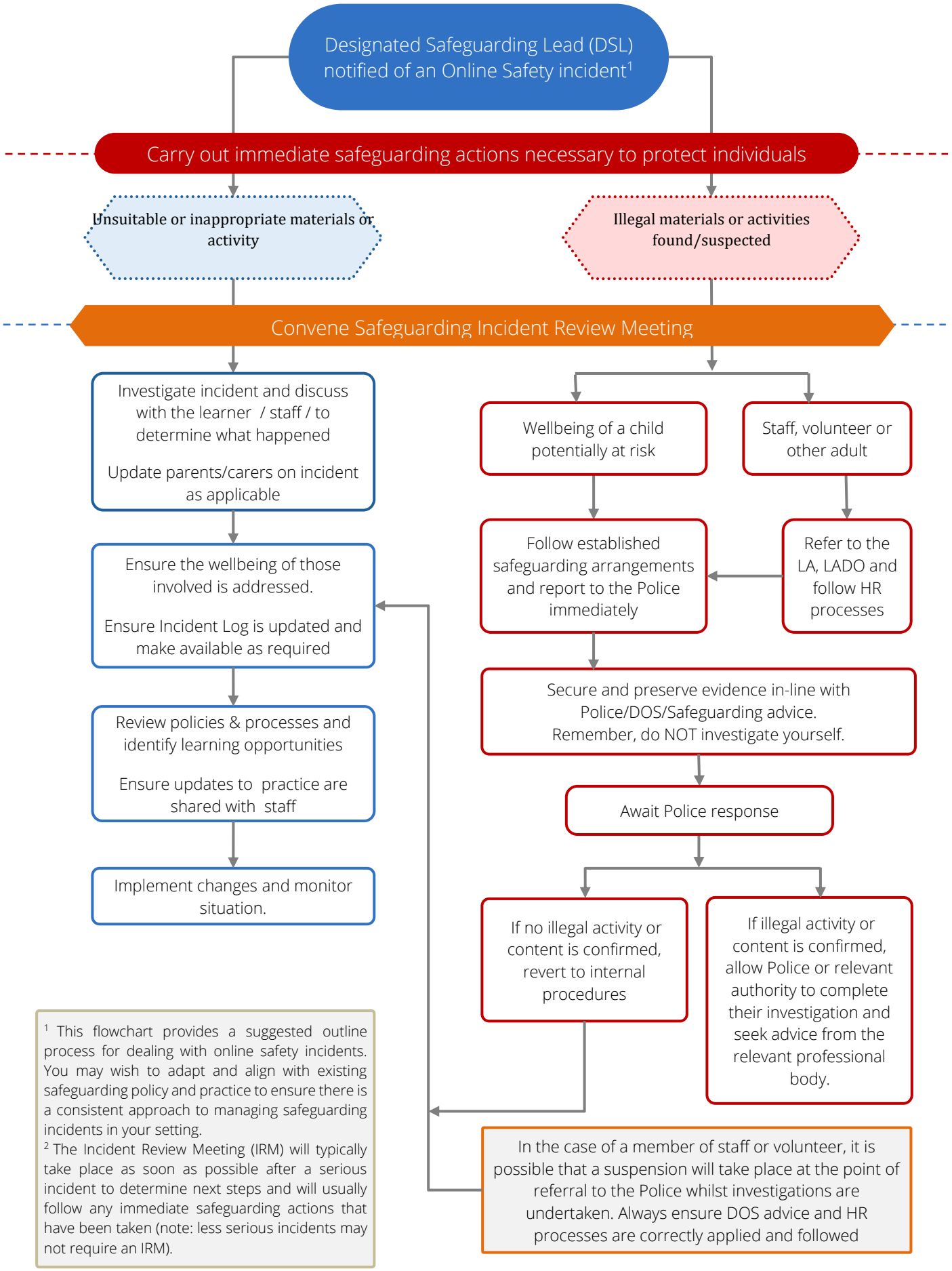
Online incidents will be managed in line with DfE guidance and may involve specialist reporting services where appropriate.

### Training and Review

The school will ensure that:

- DSLs receive specialist safeguarding training
- All staff receive regular safeguarding updates
- Governors receive appropriate oversight training
- This policy is reviewed annually and updated in response to legislative changes or emerging risks

## Appendix A10 Responding to incidents of misuse – flow chart




[1] This flowchart provides a suggested outline process for dealing with online safety incidents. You may wish to adapt and align with existing safeguarding policy and practice to ensure there is a consistent approach to managing safeguarding incidents in your setting.

[2] The Incident Review Meeting (IRM) will typically take place as soon as possible after a serious incident to determine next steps and will usually follow any immediate safeguarding actions that have been taken (note: less serious incidents may not require an IRM).

# Appendix A12 - Reporting Log

Group: .....

| Date | Time | Incident | Action Taken | | Incident Reported By | Signature |
|---|---|---|---|---|---|---|
| | | | What? | By Whom? | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

# Appendix B1 - Training Needs Audit Log

Group: .....

| Relevant training the last 12 months | Identified Training Need | To be met by | Cost | Review Date |
|---|---|---|---|---|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

# Appendix C1 – Filtering and Monitoring Policy Template

## Purpose

The purpose of this policy is to ensure that appropriate filtering and monitoring systems are in place to safeguard learners and staff from harmful or illegal online content, while enabling safe and effective teaching, learning and professional practice. Filtering and monitoring form part of the school's wider safeguarding responsibilities and are implemented in line with Keeping Children Safe in Education (KCSIE) and the DfE Filtering and Monitoring and Technical Standards.

## Scope

This policy applies to:

- All users of the school's IT systems
- All school-owned devices
- Any device accessing the school's network or internet connection
- Filtering and monitoring provided through third-party or managed services

## Roles and Responsibilities

- Governors provide strategic oversight and assurance that filtering and monitoring standards are met.
- Senior leaders ensure appropriate systems are in place, reviewed and resourced.
- The DSL leads safeguarding responses arising from filtering or monitoring alerts.
- The IT service provider maintains systems and provides reports as agreed.
- All staff report concerns relating to access, alerts or system effectiveness.

## Policy Statement

The school will ensure that:

- Internet access is filtered to block illegal, harmful and inappropriate content
- Monitoring systems are in place to identify safeguarding concerns and enable timely intervention
- Filtering and monitoring are proportionate, transparent and risk-based
- Roles and responsibilities are clearly defined and understood
- Provision is reviewed regularly and improved in response to risk, practice and guidance

Filtering and monitoring are recognised as supporting safeguarding, not replacing education, supervision or professional judgement.

## Filtering

The school will ensure that filtering systems:

- Block access to illegal content, including child sexual abuse material, terrorist material and other unlawful content
- Manage inappropriate and/or harmful content (including search terms and results). These may include:
    - Gambling
    - Hate speech/discrimination
    - Harmful content
    - Mis/Disinformation
    - Piracy and copyright theft
    - Pornography
    - Self-harm and eating disorders
    - Violence against women and girls
- Are age-appropriate and suitable for an educational environment
- Are applied consistently to all users, devices and internet connections, including backup connections
- Allow the identification of individual users and devices in the event of breaches of the filtering policy
- No user should be able to deactivate or bypass systems that filter illegal content.
- Prevent circumvention through VPNs, proxy services or similar technologies
- Support differentiated access for different user groups (e.g. staff and learners)
- Are reviewed regularly to avoid inappropriate over-blocking that may restrict teaching and learning

The school understands the capabilities and limitations of the system and potential impact on implementation and policy is understood.

The school will use recognised tools and guidance to assure the effectiveness of filtering provision e.g., testfiltering.com

## Monitoring

The school will ensure that monitoring:

- Enables the identification of safeguarding concerns in a timely manner
- Uses a combination of physical supervision, manual checks and technical systems as appropriate
- Generates alerts that can be prioritised and acted upon by trained staff
- Is subject to human review and professional judgement
- Is clearly communicated to users through policy and acceptable use agreements

Monitoring should be proportionate to the school's risk profile and should not create a culture of surveillance.

### Review and Training

Filtering and monitoring provision should be reviewed at least annually and whenever risks or technologies change. Staff, governors and those with specific responsibilities will receive appropriate training.

# Appendix C2 - Technical Security Template Policy

(including Access, Device and Incident Management)

## Purpose

This policy sets out how the school protects its technical infrastructure, systems and devices to ensure a secure and resilient digital environment. It supports safeguarding, data protection and business continuity and aligns with the DfE Technical Standards

## Scope

This policy applies to:

- Staff, learners and governors
- Suppliers of third-party services and solutions
- School networks, servers and cloud systems
- School-owned devices
- User accounts and access controls
- Device configuration and management, including personal devices where permitted

## Policy Statement

The school will ensure that its technical systems are managed in a way that:

- Protects users and data from unauthorised access or misuse
- Supports safe and reliable access to digital services
- Enables detection, response and recovery from technical incidents
- Is proportionate to risk and regularly reviewed

## Access Control and Authentication

The school will ensure that:

- All users have unique accounts with appropriate access rights
- New user rights are allocated as part of induction
- Access is removed promptly when users leave the school
- Passwords and authentication methods reflect NCSC and DfE guidance
- Multi-factor authentication is used for sensitive systems where appropriate
- Administrator access is restricted and monitored
- System administrators and those with global/ confidential data system access use a physical security device in addition to MFA to access systems.

## System Security and Maintenance

The school will ensure that:

- Systems and software are licensed, supported and kept up to date

- Security patches are applied promptly
- Anti-virus and malware protection is in place across all systems
- Backups are taken regularly, stored securely (both locally and offsite, with rotation) and regularly tested
- Physical access to infrastructure is controlled

### Device Management

The school will ensure that:

- Clear expectations exist for the use of school-owned and personal devices
- School devices are configured securely and managed appropriately, with regular/ automatic patches and updates
- Where personal devices are permitted, expectations are clearly defined and risk-assessed
- Acceptable Use Agreements reference responsible device use
- Users receive guidance on safe and appropriate device use

### Supplier Management

The school will ensure that:

- Provision of third-party services and solutions are adequately contracted and regularly reviewed
- Suppliers can demonstrate adherence to school policy and alignment with the DfE Technical Standards

### Incident Management

Technical incidents will be logged, escalated and reviewed. Serious incidents will be managed in line with safeguarding and business continuity procedures.

### Review and Training

Technical security arrangements will be reviewed regularly. Staff with specific responsibilities will receive appropriate training, and users will be educated on their responsibilities.

# Appendix C3 - Cyber Security Policy Template

### Purpose

This policy sets out how the school prevents, detects, responds to and recovers from cyber threats. It supports the school's duty of care to protect users and data and aligns with the DfE Cyber Security Standards, National Cyber Security Centre (NCSC) guidance and NCSC Cyber Essentials

### Scope

This policy applies to:

- Cyber threats including phishing, ransomware, malware and unauthorised access
- Staff, learners and governors
- Suppliers of third-party services and solutions
- Technical systems and cloud services
- Incident response and business continuity

### Policy Statement

The school will take a proactive, risk-based approach to cyber security to:

- Reduce the likelihood and impact of cyber incidents
- Ensure timely and effective response to threats
- Build awareness and resilience across the school community

### Cyber Security Strategy

The school will maintain a cyber security strategy that:

- Is supported by senior leaders and governors
- Is informed by risk assessment and incident learning
- Is reviewed regularly in line with emerging threats
- Is inclusive of all services and solutions, including those from third-party suppliers

### Supplier Management

The school will ensure that suppliers:

- Can demonstrate adherence to school policy and alignment with the DfE Cyber Security Standards
- Are familiar with school incident response plan and able to respond effectively

### Awareness and Education

The school will ensure that:

- Staff receive regular cyber awareness training
- Learners receive age-appropriate education on cyber risks
- Governors understand their oversight responsibilities

### Incident Response

The school will maintain a clear cyber incident response plan that:

- Defines roles and escalation routes
- Supported by an effective communications strategy
- Supports safeguarding and business continuity
- Is tested periodically through simulations or exercises
- Ensures incidents are recorded and reviewed

### External Assurance

Where appropriate, the school will engage external expertise to assess cyber resilience and will work towards recognised standards or certifications.

### Review

Cyber security arrangements will be reviewed annually, or sooner if required by incidents, guidance or changes in technology. Lessons learned from managing incidents should inform improvements to the strategy.

# Appendix C4 - Data Security Policy Template

## Purpose

The purpose of this policy is to ensure that personal and sensitive data is handled securely, lawfully and transparently, in line with UK data protection legislation and statutory guidance. The policy supports safeguarding, privacy, and trust across the school community and forms part of the school's wider approach to online safety and information security.

## Scope

This policy applies to:

- All personal data processed by the school
- All staff, volunteers, governors and contractors
- Data subjects including staff, learners and parents/carers
- All digital and paper-based records
- All third parties processing data on behalf of the school

## Legislative Context

The school complies with all applicable data protection legislation, including:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act
- Relevant guidance from the Information Commissioner's Office (ICO)

## Policy Statement

The school recognises its role as a Data Controller and is committed to ensuring that personal data is:

- Processed lawfully, fairly and transparently
- Collected for specified and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Retained only for as long as necessary
- Secured against unauthorised access, loss or misuse

Data security is recognised as a safeguarding responsibility and is embedded across leadership, governance and daily practice.

## Governance and Roles

### Data Protection Officer (DPO)

The school will appoint a Data Protection Officer (internal or external) who:

- Provides independent advice and monitoring of compliance
- Supports Data Protection Impact Assessments (DPIAs)
- Acts as the point of contact with the ICO
- Reports directly to senior leadership and governors

The DPO operates independently and is supported with appropriate time, access and resources.

### Governors

Governors:

- Approve and review data protection policies
- Provide strategic oversight of compliance and risk
- Ensure adequate resources are allocated
- Receive reports on data breaches, audits and risks

### Senior Leaders and Staff

Senior leaders ensure that:

- Data protection is embedded into systems and culture
- Staff receive appropriate training
- Procedures are implemented consistently
- Data breaches are managed in line with school policy and in accordance with ICO guidance

All staff and governors are responsible for handling personal data securely and reporting concerns or incidents promptly.

### Lawful Processing and Transparency

The school will:

- Identify and document lawful bases for processing personal data
- Apply additional conditions for processing special category data
- Maintain clear and accessible Privacy Notices for learners, parents/carers, staff and governors

- Ensure data subjects understand their rights
- Ensure consent is considered and established with data subjects and used only where appropriate and never as a default where a public task or legal obligation applies.

### Records, Mapping and Risk Management

The school will maintain:

- A Record of Processing Activities (RoPA)
- A data asset register, including third-party and cloud services
- Clear retention and disposal schedules
- Data Protection Impact Assessments (DPIAs) for new or high-risk processing

Data protection is considered at the design stage of any new system or process ("data protection by design and default").

### Data Security and Access Controls

The school will ensure that:

- Access to personal data is role-based and restricted
- User accounts are protected by strong authentication
- Devices accessing personal data are secured and encrypted where appropriate
- Personal data is stored only on approved systems
- Cloud services meet UK data protection and security requirements
- Third-party contracts include appropriate data processing clauses
- Paper records are stored securely and disposed of appropriately.

### Data Sharing and Transfer

Personal data will only be shared:

- Where there is a lawful basis
- With appropriate safeguards in place
- Using secure transfer methods
- With approved third parties

Additional care is taken when data is accessed remotely or transferred off-site.

### Data Subject Rights

The school will uphold all data subject rights, including:

- Right to be informed
- Right of access (Subject Access Requests)
- Right to rectification
- Right to erasure (where applicable)
- Right to restrict or object to processing

Procedures are in place to manage requests within statutory timescales.

### Data Breaches and Incident Management

The school will:

- Maintain clear procedures for reporting and managing data breaches
- Assess the risk to individuals' rights and freedoms
- Notify the ICO within 72 hours where required
- Record all breaches and near-misses
- Use learning from incidents to improve practice

Data breaches are treated as serious incidents and may also trigger safeguarding procedures where appropriate.

### Training and Awareness

The school will ensure that:

- All staff and governors receive regular data protection training
- New staff receive training as part of induction
- Targeted training is provided where roles require it
- Learners are taught about privacy and data protection as part of the curriculum, in an age-appropriate way

### Monitoring and Review

This policy will be:

- Reviewed at least annually
- Updated in response to changes in legislation, guidance or risk
- Supported by audits and compliance checks

### Status

This Data Security Policy should be read alongside the school's:

- Safeguarding and Child Protection Policy

- Online Safety Policy
- Technical Security Policy
- Cyber Security Policy
- Records Management and Retention Policy

# Appendix C5 – Electronic Devices: Searching, Screening and Confiscation Policy Template

### Purpose

The purpose of this policy is to set out the school's lawful and proportionate approach to searching, screening and confiscating electronic devices and examining or deleting data from those devices.

This policy supports the school's safeguarding responsibilities and must be read alongside the Behaviour Policy, Child Protection and Safeguarding Policy, Online Safety Policy, Filtering and Monitoring Policy, Technical Security Policy and Data Security Policy.

This policy reflects Keeping Children Safe in Education KCSIE), DfE Searching, Screening and Confiscation guidance, DfE Behaviour in Schools guidance and relevant statutory legislation.

### Scope

This policy applies to:

- All learners
- All authorised staff
- All electronic devices in a learner's possession
- Devices on school premises or used in connection with school activities
- Behaviour occurring both on and off site where it impacts safeguarding or discipline

### Policy Statement

The school will ensure that:

- Searches are lawful, proportionate and necessary
- Safeguarding considerations are prioritised
- Devices are only searched where there are reasonable grounds
- Deletion of data is undertaken only where there is a lawful and justifiable reason
- Criminal matters are referred to the police
- Incidents are recorded securely
- Staff are appropriately trained

### Authorised Staff

- The Headteacher will authorise in writing those staff permitted to conduct searches, examine devices and delete data.

- Authorised staff will receive appropriate training including safeguarding, legal thresholds and digital evidence handling.
- Staff cannot be required to undertake searches.

### Screening

Where screening measures are used, they will:

- Be clearly communicated to learners and parents
- Be proportionate and risk-based
- Be implemented consistently
- Support a calm, safe and orderly environment

### Searching for Electronic Devices

Electronic devices may be searched with consent or without consent where permitted by legislation. Force will not be used to search for items banned under school rules.

Searches will:

- Be conducted by authorised staff
- Be carried out privately where possible
- Involve removal of outer clothing only
- Not extend to intimate searches

### Examination of Electronic Devices

- Staff may examine data where there is a good reason to do so, including where data poses a safeguarding risk or relates to a potential breach of school rules.
- Examination will extend only as far as reasonably necessary to establish the facts.
- Where indecent images of a child are suspected, staff must not intentionally view the image and must refer immediately to the DSL.
- Where material may constitute a criminal offence, the device will be handed to the police.

### Deletion of Data

- Data may only be deleted where there is a safeguarding reason and the material is not required as evidence.
- Deletion decisions must be proportionate and recorded.
- Material that may constitute criminal evidence must not be deleted.

## Safeguarding Response

All incidents involving device searches will:

- Be referred to the DSL
- Be recorded in safeguarding systems
- Trigger a risk assessment where appropriate
- Involve parents/carers unless doing so would increase risk

## Care of Confiscated Devices

The school will ensure secure storage of confiscated devices, documentation of chain of custody and appropriate return procedures.

## Training

The school will ensure that:

- Authorised staff receive specialist training
- DSLs understand legal thresholds
- All staff are aware of reporting expectations
- Governors understand oversight responsibilities

## Monitoring and Review

The school will maintain records of searches and data deletion, review trends and update this policy annually or in response to national guidance.

# Appendix C6 – Public Online Communications Policy Template

## Purpose

The purpose of this policy is to set out how the school manages public online communications in order to reduce risk, promote safeguarding and online safety, celebrate success and communicate effectively with the wider school community.

Public online communications include the school website, newsletters, learning platforms, public messaging systems and official social media accounts.

This policy supports the Online Safety, Filtering and Monitoring, Technical Security, Cyber Security and Data Security policies and reflects Keeping Children Safe in Education (KCSIE), UKSIC guidance Best Practices for Managing Images and Videos on School Websites, DfE statutory publication requirements (Maintained schools) and (Academies).

## Scope

This policy applies to:

- All staff and governors
- All public online communications representing the school
- Official school accounts and platforms
- Personal accounts where they directly reference or represent the school
- School content published at any time, from any location or online platform

## Policy Statement

The school will ensure that:

- Public online communications are accurate, lawful and appropriate
- Safeguarding considerations are prioritised
- Personal data is protected in line with the Data Security Policy
- Images and video are published only in line with consent procedures
- Copyright and intellectual property are respected
- Communications reflect professional standards
- Public references to the school are monitored appropriately

## Roles and Responsibilities

- Governors provide strategic oversight and ensure compliance with statutory publication requirements.

- Senior leaders approve official accounts and oversee monitoring and moderation processes.
- Account administrators maintain secure access, monitor content regularly and ensure policy compliance.
- All staff must follow this policy, maintain professional standards and report concerns.

### Creation of Public Online Accounts

- New public online accounts may only be created following approval by senior leadership.
- Proposals must define purpose, audience, responsible staff members and monitoring arrangements.
- At least two authorised staff members must have access to any official public account.

### Monitoring and Moderation

The school will ensure that:

- Public communications are monitored regularly
- Comments are reviewed and moderated appropriately
- Harmful or inappropriate content is removed
- Serious incidents are recorded and escalated where necessary

### Professional Standards

All public communications must:

- Be respectful and professional
- Avoid discriminatory, offensive or defamatory content
- Protect confidentiality
- Avoid internal grievance discussions
- Avoid disclosure of sensitive information

### Use of Images and Media

The school will ensure that:

- Appropriate consent is obtained
- Images are appropriate and dignified
- Learners are not identified unnecessarily
- Images are removed where consent is withdrawn
- To reduce the risk of illegal manipulation of publicly available images of staff and learners, the school has procedures in place to control how those images are

shared online. (n.b., UKSIC guidance Best Practices for Managing Images and Videos on School Websites)

### Personal Use and Association with the School

Staff may use personal social media accounts; however:

- Where referencing the school, appropriate disclaimers must be used
- Personal use must not impact professional standards nor school reputation
- Staff must not engage with current learners via personal accounts
- Excessive or inappropriate use during working hours may result in disciplinary action

### Handling Complaints and Abuse

Where negative comments are made online:

- The school will respond proportionately
- Abusive content should be challenged and removed
- Parents'/carers' complaints should be directed to formal complaints procedures
- Serious matters may be escalated to senior leaders or external agencies

### Training and Awareness

The school will ensure that:

- Staff responsible for public accounts receive guidance and training
- Governors understand oversight responsibilities
- The wider community is informed of expected standards

### Review and Continuous Improvement

This policy will be reviewed annually and updated in response to legislative changes, national guidance or emerging risks.

# Appendix C7 - School Online Safety Policy Template – Artificial Intelligence in Schools

## Introduction

The South West Grid for Learning Trust (SWGfL) is a charity that has been at the forefront of supporting schools with online safety and security for 20 years and is recognised as a world leader in online safety innovation

The integration of Artificial Intelligence (AI) in UK schools has evolved significantly over recent years, reflecting both technological advances and the educational community's response to the opportunities and challenges it presents.

A consensus is emerging about the benefits of AI to enhance personalised learning and streamline administrative tasks, while also raising concerns around data privacy, ethical use, and the preparedness of teachers to effectively integrate AI tools into classrooms.

This ongoing dialogue reflects the recognition of AI's transformative potential in education, balanced with a need for careful implementation to protect learner welfare and promote equitable outcomes. These considerations are shaping a pathway for embedding AI in schools, focusing on teacher training, ethical guidelines, and fostering digital competency among students.

## How to Use this Template

This document has been created as a template for school leaders to assist them in creating their own AI Policy.

Within this template, sections which include information or guidance are shown in BLUE. It is anticipated that school would remove these sections from their completed policy document, though this will be a decision for the group that produces the policy.

*Where sections in the template are written in ITALICS it is anticipated that schools would wish to consider whether to include that section or statement in their completed policy.*

Where sections are highlighted in BOLD, it is suggested that these should be an essential part of a school/academy policy.

## Legislative Background and Key Documents

The UK Online Safety Act 2023 is designed to make the internet safer, particularly for children and vulnerable users, by regulating online content and holding tech companies accountable for harmful material. It is still yet to be fully understood where there may be gaps in regulation to protect children and young people from possible harm caused by AI. Ofcom is the online safety regulator in the UK and is responsible for publishing codes of practice and guidance on how companies can comply with their duties.

There is currently little in the way of specific legislation regarding the use of AI in schools, but guidance has been developed and is being regularly updated as the technology evolves. Schools may wish to consult the following:

- AI Roadmap - GOV.UK
- DfE Using AI in education settings: support materials
- National AI Strategy - GOV.UK
- Ofcom's 2024 Online Nation Report
- EU Artificial Intelligence Act 2024 - Useful high-level 4-point summary of considerations
- UNESCO AI Competency Framework for Students (Guidance)
- UNESCO AI Competency Framework for Staff (Guidance)
- Responsible AI Toolkit - GOV.UK
- Data protection in schools - Artificial intelligence (AI) and data protection in schools - Guidance - GOV.UK
- Understanding AI for school – Tips for School Leaders - ASCL, NAHT, CST, and others
- SWGfL – Artificial Intelligence and Online Safety
- Welsh Government - Generative AI – Hwb guidance - Resources, guidance and information for education practitioners, learners, and families on generative AI.
- Welsh Government - Generative AI: keeping learners safe online

## Context

AI represents a transformative leap in technology, enabling machines to create text, images, audio, and video with remarkable accuracy and creativity. Emerging from advancements in machine learning, particularly deep learning, generative models such as GPT (Generative Pre-trained Transformer) and DALL·E leverage vast datasets to understand and produce content that mimics human expression. Initially text-focused, these models have evolved to

become multi-modal, integrating and processing various types of input, such as text and images, to generate cohesive outputs.

Since the debut of early systems like OpenAI's GPT-2 in 2019, the field has rapidly advanced, unlocking opportunities in education while raising critical considerations around ethics, data privacy, and equitable access.

According to Ofcom's 2024 Online Nation Report more than half of children have used generative AI tools in the past year. Teenagers aged 13-15 are more likely to use AI (66%) than those aged 8-12 (46%) and combining both age groups, over half (53%) have made use of AI to support with homework tasks. There is a broad range of purposes for children using AI including finding information, creating images/videos, seeking advice and summarising text, with the most popular tool among 8-15s being ChatGPT (37%) followed by Snapchat My AI (30%).

Schools must now navigate this landscape thoughtfully, crafting policies that harness the benefits of AI while prioritising staff and learners' safety, security and well-being. .

## Policy on the use of Artificial Intelligence in Schools

### Statement of intent

Artificial Intelligence (AI) technology is already widely used in commercial environments and is gaining greater use in education. We recognise that the technology has many benefits and the potential to enhance outcomes and educational experiences, with the opportunity to support staff in reducing workload.

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

We will educate staff and learners about safe and ethical use of AI, preparing them for a future in which AI 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.

### Related policies

This policy should be read in conjunction with other school policies:

- Data Protection Policy
- Staff Discipline policies and codes of conduct
- Behaviour policy
- Anti-bullying policy
- Online safety policy
- Acceptable Use Agreements
- Curriculum Policies
- Add any other polices that may be relevant

## Policy Statements

- The school acknowledges the benefits of the use of AI in an educational context - including enhancing teaching and learning and 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 Learners Safe
- 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 ensure that, within our education programmes, learners understand the ethics and use of AI and the potential benefits and risks of its use. The school recognises the importance of equipping learners with the knowledge, skills and strategies to engage responsibly with AI tools.
- As set out in acceptable use agreements, the school will use AI responsibly and with awareness of data sensitivity. Where used, staff should use AI tools responsibly, ensuring the protection of both personal and sensitive data. Staff should only input anonymized data to avoid the exposure of personally identifiable or sensitive information.
- Staff should 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 recognize 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 learner's work and identify areas for improvement. Teachers may also support learners to gain feedback on their own work using AI. Use of these tools should be purposeful, considered and with a clear focus on ensuring impact and understanding and mitigating risk*
- *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 Staff Disciplinary Policy.

## Responsibilities

### Headteacher and Senior Leaders

Are responsible for the strategic planning of how AI will be used in the school, establishing AI policies and procedures and ensuring that all staff receive relevant training and have a clear understanding of these.

### Designated Safeguarding Person (DSP) / Online Safety Lead

Our Designated Safeguarding Person / Online Safety Lead has responsibility for online safety in the school. They are expected to have knowledge of AI and its safeguarding implications and an in-depth working knowledge of key guidance. We ensure that they receive appropriate specialist training, commensurate with their role and that ongoing training is provided for all school staff.

### Data Protection Officer

The DPO will be responsible for providing advice and guidance about data protection obligations in relation to the use of AI, including related Data Protection Impact Assessments (DPIAs).

### Technical Staff

Technical staff / IT Leads will be responsible for technical support and guidance, with particular regard to cyber-security and the effectiveness of filtering and monitoring systems

### Staff

It is the responsibility of all staff to have read and understood this policy and associated Acceptable Use Agreements. All staff must report any incidents or suspected incidents concerning the use of AI in line with school policy. All staff will challenge any inappropriate behaviour. Staff have a duty to ensure that:

- the school environment is safe
- sensitive and confidential data / information is secure
- that their actions do not put the reputation of the school at risk and that
- learners understand their responsibilities

### Governors/Trustees

We ensure that our Trust Board / governing body has a good understanding of how AI is used in a school context and potential benefits and risks of its use. They receive regular training and updates, enabling them to support the school and challenge where necessary.

This may include evaluation of the use of AI in the curriculum, administration and communications, ensuring that risks relating to these issues are identified, that reporting routes are available, and that risks are effectively mitigated. (Schools may wish to add here any specific Trust / Governor committee that will take lead responsibility e.g., Risk and Audit Committee)

### Parents/carers

We work hard to engage parents and carers by:

- *regular in school sessions*
- *sharing newsletters*
- *sharing information online e.g., website, social media*
- *providing curriculum information*

Our parents and carers are made aware of how AI is used in school and receive guidance on both good practice in its use and the risks of misuse that may affect their childrens' learning or safety. They are encouraged to report any concerns to the school and are made aware that all incidents will be handled with care and sensitivity.

### Vulnerable groups

We recognise that vulnerable learners are more likely to be at risk from the misuse of AI (both in their own use or through the actions of others). We ensure that vulnerable learners are offered appropriate support to allow them to gain full benefit of the use of AI, while being aware of the potential risks.

Children are considered to be vulnerable data subjects and therefore any process involving their personal data is likely to be "high risk". If an AI/ automated process is used to make significant decisions about people, this is likely to trigger the need for a Data Protection Impact Assessment (DPIA).

## Reporting

Our reporting systems are well promoted, easily understood and easily accessible for staff, learners and parents/carers to confidently report issues and concerns, knowing these will be treated seriously. All reports will be dealt with swiftly and sensitively and outcomes shared where appropriate. We also respond to anonymous reports, or reports made by third parties.

### Responding to an incident or disclosure

Our response is always based on sound safeguarding principles and follows school safeguarding and disciplinary processes. It is calm, considered and appropriate and puts the learner at the centre of all decisions made.

- All AI incidents (including data breaches and/or inappropriate outputs) must be reported promptly to the relevant internal teams. Effective reporting helps mitigate risks and facilitates a prompt response.
- Where relevant / required incidents will be reported to external agencies e.g., Police, LADO, DPO, ICO.
- All AI related incidents will be recorded through the school's normal recording systems

In the case of misuse of AI by staff, the normal staff disciplinary processes will be followed.

## Risk assessment

It is key that our approach to managing risk aligns with, and complements, our broader safeguarding approach.

The school understands that despite many positive benefits in the use of AI, there are some risks that will need to be identified and managed, including:

- Legal, commercial, security and ethical risks
- Data Protection
- Cyber Security
- Fraud
- Safeguarding and well-being
- Duty of care

## Education

Our school's educational approach seeks to develop knowledge and understanding of emerging digital technologies, including AI.

This policy outlines our commitment to integrating Artificial Intelligence (AI) responsibly and effectively within our school environment. We will use AI responsibly, safely and purposefully to support these aims:

- Enhance academic outcomes: Improve educational experiences and performance for pupils.
- Support teachers: Assist in managing workloads more efficiently and effectively.

- Educate on AI use: Promote safe, responsible, and ethical AI practices among staff and learners.
- Develop AI literacy: Incorporate AI as a teaching tool to build AI skills and understanding.
- Prepare for the future: Equip staff and pupils for a future where AI is integral.
- Promote educational equity: Use AI to address learning gaps and provide personalised support.

Our school's approach is to deliver this knowledge and understanding wherever it is relevant within the curriculum. This will include:

- Computing
- PHSE
- Cross curricular programmes
- Discrete subjects (to be defined)

Our approach is given the time it deserves and is authentic i.e., based on current issues nationally, locally and within our sschool's risk profile. It is shaped and evaluated by learners and other members of the school community to ensure that it is dynamic, evolving and based on need. We do this through:

- *Learner assessment*
- *Critical evaluation of emerging trends and research findings*
- *Surveys*
- *Focus groups*
- *Parental engagement*
- *Staff consultation*
- *Engaging with learners*
- *Staff training*

The following resources are used:

- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (including updated AI reference)
- ProjectEVOLVE - https://projectevolve.co.uk
- UKCIS DSIT "Education for a Connected World"
- Welsh Government - Generative AI – Hwb guidance - Resources, guidance and information for education practitioners, learners, and families on generative AI.

## Training

As AI becomes an integral part of modern education, it is essential for staff to be trained in its effective use. Training equips educators with the knowledge and skills to integrate AI tools responsibly into teaching, learning, and administrative processes. It ensures that AI is used to enhance educational outcomes, streamline workloads, and promote equity while safeguarding ethical practices and data privacy. By fostering AI literacy, staff can confidently prepare pupils for a future where AI is a key driver of innovation and opportunity.

- We will provide comprehensive training to all staff on the effective, responsible, and ethical use of AI technologies in education, ensuring these tools enhance teaching, learning, and administrative processes.
- We will integrate AI-related risks and safeguards into annual safeguarding training, aligning with statutory guidance, including "Keeping Learners Safe."
- We will ensure all staff are equipped with the knowledge and skills to confidently integrate AI into their professional practice and to prepare pupils for a future shaped by AI-driven innovation and opportunities.
- We will train staff to identify, assess, and mitigate risks associated with AI technologies, including issues such as biased algorithms, privacy breaches, and harmful content.
- We will train staff on robust data protection practices, ensuring compliance with UK GDPR and other relevant regulations while using AI systems.
- We will promote ethical practices in the use of AI, ensuring that these technologies contribute to equity, fairness, and inclusivity in education.
- We will empower educators to teach learners about the safe and ethical use of AI, cultivating a culture of awareness, resilience, and informed decision-making in the digital age.
- We will train staff to use AI responsibly as a tool to monitor and address online risks, reinforcing our commitment to a safe learning environment.

# Appendix C6a - Risk Assessment Matrix for Schools Implementing AI

## Introduction

## 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. | | | | 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. | | | | 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. | | | | 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 | | | | Monitor AI-generated content, involve mental health professionals, and |

| | | | | | |
|---|---|---|---|---|---|
| | through curated content. | | | | promote media literacy. |
| **Inappropriate Content or Conduct** | AI exposing learners to harmful or unsuitable materials / behaviour | | | | 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. | | | | 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. | | | | 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. nudification). | | | | Educate learners on responsible and appropriate AI use and establish clear usage policies. |
| **Misinformation** | Creation or spread of harmful or misleading AI-generated content. | | | | 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. | | | | 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. | | | | 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. | | | | Regularly validate AI outputs and involve human oversight in decision-making. |
| **Legal Compliance** | Non-compliance with laws regarding AI usage and learner data. | | | | 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. | | | | Strengthen cybersecurity protocols and educate staff and learners on safe online practices. |

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## Likelihood and Impact Definitions

- Likelihood: The likelihood that the identified risk will occur.
    - Low: Unlikely to occur under normal circumstances.

- Medium: Possible occurrence based on past trends or vulnerabilities.
- High: Likely to occur without intervention.

- Impact: The severity of impact should the risk materialise.
  - Low: Minimal disruption with limited consequences.
  - Medium: Moderate disruption affecting key processes.
  - High: Significant disruption with severe consequences.

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## Appendix C6b – Staff Use of AI Acceptable Use Agreement

### School Policy

Emerging technologies, including Artificial Intelligence (AI), are increasingly integrated into educational settings and the lives of staff and learners. These technologies have immense potential to enhance creativity, promote personalized learning, and improve operational efficiency. However, their use also presents risks that require clear policies and practices to ensure safety, security, and ethical application.

This acceptable use policy aims to ensure:

- Staff and volunteers are responsible users of AI and emerging technologies, prioritising safety and ethical considerations.
- School systems and users are protected from misuse or harm resulting from the use of AI.
- Staff have a clear understanding of their responsibilities when engaging with AI and emerging technologies in professional and personal contexts.

### Acceptable Use Policy Agreement

I understand that I must use AI and emerging technologies responsibly to minimise the risk to the safety, privacy, or security of the school community and its systems. I acknowledge the potential of these technologies for enhancing learning and will endeavour to integrate them in a way that aligns with the school's policy, ethos and values.

For my professional and personal safety:

- I understand that the school will monitor my use of AI tools and technologies.
- I will only use AI tools and technologies for purposes authorized by the school and will ensure compliance with data protection laws (e.g. UK GDPR) when handling personal data.
- I will ensure that any sensitive or personally identifiable information about staff, students, or parents/carers is only entered into AI systems that have explicit approval and robust security measures in place.
- I will report any AI-related incidents or anomalies that could indicate misuse, bias, or harm to the appropriate person immediately.

In my communications and actions:

- I will respect copyright, intellectual property, and ethical standards when uploading content to prompt AI output.
- I will critically evaluate the outputs of AI systems to avoid spreading misinformation or biased content and will ensure that all AI-assisted decisions are made with appropriate human oversight.
- I will communicate professionally and responsibly when using AI systems.
- I will ensure transparency through appropriate attribution where AI has been used.

When engaging with learners:

- I will support learners on the safe, ethical, appropriate and effective use of AI.
- I will use AI tools to engage with learners in ways that uphold and enhance their privacy, wellbeing, and trust.

When using the school's systems and resources:

- I will use AI systems in compliance with established security measures and access protocols.
- I will ensure that any AI applications used in teaching or administration are vetted and comply with the school's policies.
- I will ensure generative AI tools are not used to impersonate others or create deceptive or harmful content.

When handling data:

- I will ensure compliance with the school's data protection policies when using AI for data analysis or reporting.
- I will ensure I have explicit authorisation when uploading sensitive school-related information into generative AI systems.

Responsibility and Accountability:

- I will use generative AI tools responsibly to create authentic and beneficial content, ensuring respect for individuals' identities and well-being.
- I understand that misuse of AI or emerging technologies could lead to disciplinary actions, including warnings, suspension, or referral to the appropriate authorities.
- I acknowledge that this agreement applies to all AI-related activities within and outside of school premises that are connected to my professional responsibilities.

# Legislation

Schools should be aware of the legislative framework under which this online safety policy template and guidance has been produced. It is important to note that in general terms an action that is illegal if committed offline is also illegal if committed online.

It is recommended that legal advice is sought in the advent of an online safety issue or situation.

A useful summary of relevant legislation can be found at: Report Harmful Content: Laws about harmful behaviours

### Computer Misuse Act 1990

This Act makes it an offence to:

- Erase or amend data or programs without authority;
- Obtain unauthorised access to a computer;
- "Eavesdrop" on a computer;
- Make unauthorised use of computer time or facilities;
- Maliciously corrupt or erase data or programs;
- Deny access to authorised users.

Schools may wish to view the National Crime Agency website which includes information about the Cyber Choices programme. Each region in England (& Wales) has a Regional Organised Crime Unit (ROCU) Cyber-Prevent team that works with schools to encourage young people to make positive use of their cyber skills. There is a useful summary of the Act on the NCA site.

### Data Protection Act 1998

This protects the rights and privacy of individual's data. To comply with the law, information about individuals must be collected and used fairly, stored safely and securely and not disclosed to any third party unlawfully. The Act states that person data must be:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate.
- Not kept longer than necessary.
- Processed in accordance with the data subject's rights.
- Secure.

- Not transferred to other countries without adequate protection.

### The Data Protection Act 2018:

**Updates the 1998 Act, incorporates the General Data Protection Regulations (GDPR) and aims to:**

- Facilitate the secure transfer of information within the European Union.
- Prevent people or organisations from holding and using inaccurate information on individuals. This applies to information regarding both private lives or business.
- Give the public confidence about how businesses can use their personal information.
- Provide data subjects with the legal right to check the information businesses hold about them. They can also request for the data controller to destroy it.
- Give data subjects greater control over how data controllers handle their data.
- Place emphasis on accountability. This requires businesses to have processes in place that demonstrate how they're securely handling data.
- Require firms to keep people's personal data safe and secure. Data controllers must ensure that it is not misused.
- Require the data user or holder to register with the Information Commissioner.

**All data subjects have the right to:**

- Receive clear information about what you will use their data for.
- Access their own personal information.
- Request for their data to be revised if out of date or erased. These are known as the right to rectification and the right to erasure
- Request information about the reasoning behind any automated decisions, such as if computer software denies them access to a loan.
- Prevent or query about the automated processing of their personal data.

### Freedom of Information Act 2000

The Freedom of Information Act gives individuals the right to request information held by public authorities. All public authorities and companies wholly owned by public authorities have obligations under the Freedom of Information Act. When responding to requests, they have to follow a number of set procedures.

### Communications Act 2003

Sending by means of the Internet a message or other matter that is grossly offensive or of an indecent, obscene or menacing character; or sending a false message by means of or persistently making use of the Internet for the purpose of causing annoyance, inconvenience or needless anxiety is guilty of an offence liable, on conviction, to imprisonment. This wording is important because an offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

### Malicious Communications Act 1988

It is an offence to send an indecent, offensive, or threatening letter, electronic communication or other article to another person.

### Regulation of Investigatory Powers Act 2000

It is an offence for any person to intentionally and without lawful authority intercept any communication. Monitoring or keeping a record of any form of electronic communications is permitted, in order to:

- Establish the facts;
- Ascertain compliance with regulatory or self-regulatory practices or procedures;
- Demonstrate standards, which are or ought to be achieved by persons using the system;
- Investigate or detect unauthorised use of the communications system;
- Prevent or detect crime or in the interests of national security;
- Ensure the effective operation of the system.
- Monitoring but not recording is also permissible in order to:
- Ascertain whether the communication is business or personal;
- Protect or support help line staff.
- The school reserves the right to monitor its systems and communications in line with its rights under this act.

### Trade Marks Act 1994

This provides protection for Registered Trade Marks, which can be any symbol (words, shapes or images) that are associated with a particular set of goods or services. Registered Trade Marks must not be used without permission. This can also arise from using a Mark that is confusingly similar to an existing Mark.

### Copyright, Designs and Patents Act 1988

It is an offence to copy all, or a substantial part of a copyright work. There are, however, certain limited user permissions, such as fair dealing, which means under certain circumstances permission is not needed to copy small amounts for non-commercial research or private study. The Act also provides for Moral Rights, whereby authors can sue if their name is not included in a work they wrote, or if the work has been amended in such a way as to impugn their reputation. Copyright covers materials in print and electronic form, and includes words, images, and sounds, moving images, TV broadcasts and other media (e.g. YouTube).

### Telecommunications Act 1984

It is an offence to send a message or other matter that is grossly offensive or of an indecent, obscene or menacing character. It is also an offence to send a message that is intended to cause annoyance, inconvenience or needless anxiety to another that the sender knows to be false.

### Criminal Justice & Public Order Act 1994

This defines a criminal offence of intentional harassment, which covers all forms of harassment, including sexual. A person is guilty of an offence if, with intent to cause a person harassment, alarm or distress, they:

- Use threatening, abusive or insulting words or behaviour, or disorderly behaviour; or
- Display any writing, sign or other visible representation, which is threatening, abusive or insulting, thereby causing that or another person harassment, alarm or distress.

### Racial and Religious Hatred Act 2006

This Act makes it a criminal offence to threaten people because of their faith, or to stir up religious hatred by displaying, publishing or distributing written material which is threatening. Other laws already protect people from threats based on their race, nationality or ethnic background.

### Protection from Harassment Act 1997

A person must not pursue a course of conduct, which amounts to harassment of another, and which he knows or ought to know amounts to harassment of the other. A person whose course of conduct causes another to fear, on at least two occasions, that violence will be used against him is guilty of an offence if he knows or ought to know that his course of conduct will cause the other so to fear on each of those occasions.

### Protection of Children Act 1978

It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is anyone under the age of 18. Viewing an indecent image of a child on your computer means that you have made a digital image. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence may face up to 10 years in prison

### Sexual Offences Act 2003

A grooming offence is committed if you are over 18 and have communicated with a child under 16 at least twice (including by phone or using the Internet) it is an offence to meet them or travel to meet them anywhere in the world with the intention of committing a sexual offence. Causing a child under 16 to watch a sexual act is illegal, including looking at images such as videos, photos or webcams, for your own gratification. It is also an offence for a person in a position of trust to engage in sexual activity with any person under 18, with whom they are in a position of trust. (Typically, teachers, social workers, health professionals, connexions staff fall in this category of trust). Any sexual intercourse with a child under the age of 13 commits the offence of rape.

### Public Order Act 1986

This Act makes it a criminal offence to stir up racial hatred by displaying, publishing or distributing written material which is threatening. Like the Racial and Religious Hatred Act 2006 it also makes the possession of inflammatory material with a view of releasing it a criminal offence. Children, Families and Education Directorate page 38 April 2007.

### Obscene Publications Act 1959 and 1964

Publishing an "obscene" article is a criminal offence. Publishing includes electronic transmission.

### Human Rights Act 1998

This does not deal with any particular issue specifically or any discrete subject area within the law. It is a type of "higher law", affecting all other laws. In the school context, human rights to be aware of include:

- The right to a fair trial
- The right to respect for private and family life, home and correspondence
- Freedom of thought, conscience and religion
- Freedom of expression
- Freedom of assembly
- Prohibition of discrimination
- The right to education

These rights are not absolute. The school is obliged to respect these rights and freedoms, balancing them against those rights, duties and obligations, which arise from other relevant legislation.

### The Education and Inspections Act 2006

Empowers Headteachers, to such extent as is reasonable, to regulate the behaviour of learners when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour.

### The Education and Inspections Act 2011

Extended the powers included in the 2006 Act and gave permission for Headteachers (and nominated staff) to search for electronic devices. It also provides powers to search for data on those devices and to delete data

### The Protection of Freedoms Act 2012

Requires schools to seek permission from a parent/carer to use Biometric systems

### The School Information Regulations 2012

Requires schools to publish certain information on its website:

https://www.gov.uk/guidance/what-maintained-schools-must-publish-online

https://www.gov.uk/guidance/what-academies-free-schools-and-colleges-should-publish-online

### Serious Crime Act 2015

Introduced new offence of sexual communication with a child. Also created new offences and orders around gang crime (including CSE)

### Criminal Justice and Courts Act 2015

Revenge porn – as it is now commonly known – involves the distribution of private and personal explicit images or video footage of an individual without their consent, with the intention of causing them embarrassment and distress. Often revenge porn is used maliciously to shame ex-partners. Revenge porn was made a specific offence in the Criminal Justice and Courts Act 2015. The Act specifies that if you are accused of revenge porn and found guilty of the criminal offence, you could be prosecuted and face a sentence of up to two years in prison.

For further guidance or support please contact the Revenge Porn Helpline

## Online Safety Act 2023

The Online Safety Act 2023 is a new set of laws that protects children and adults online. It puts a range of new duties on social media companies and search services, making them more responsible for their users' safety on their platforms. The Act will give providers new duties to implement systems and processes to reduce risks their services are used for illegal activity, and to take down illegal content when it does appear.

Ofcom is the independent regulator of Online Safety. It will set out steps providers can take to fulfil their safety duties in codes of practice. It has a broad range of powers to assess and enforce providers' compliance with the framework.

# Links to other organisations or documents

The following links may help those who are developing or reviewing a school online safety policy and creating their online safety provision:

### UK Safer Internet Centre

Safer Internet Centre – https://www.saferinternet.org.uk/
South West Grid for Learning - https://swgfl.org.uk/products-services/online-safety/
Childnet – http://www.childnet-int.org/
Professionals Online Safety Helpline - http://www.saferinternet.org.uk/about/helpline
Revenge Porn Helpline - https://revengepornhelpline.org.uk/
Internet Watch Foundation - https://www.iwf.org.uk/
Report Harmful Content - https://reportharmfulcontent.com/
Harmful Sexual Support Service

### CEOP

CEOP - http://ceop.police.uk/
ThinkUKnow - https://www.thinkuknow.co.uk/

### Others

Kent – Online Safety Resources page
INSAFE/Better Internet for Kids - https://www.betterinternetforkids.eu/
UK Council for Internet Safety (UKCIS) - https://www.gov.uk/government/organisations/uk-council-for-internet-safety

### Tools / Resources for Schools / other organisations

Whisper Anonymous Reporting Tool - https://swgfl.org.uk/products/whisper/
360 Degree Safe – Online Safety self-review tool – https://360safe.org.uk/
SWGfL Test filtering - http://testfiltering.com/
SWGfL 360 Groups – online safety self review tool for organisations working with children
SWGfL 360 Early Years - online safety self review tool for early years organisations
Childline – Report / Remove
SWGfL- Assisted Monitoring
SWGfL – Resources for Education
DfE Using AI in education settings: support materials

## Bullying/Online-bullying/Sexting/Sexual Harassment

Enable – European Anti Bullying programme and resources (UK coordination/participation through SWGfL & Diana Awards) - http://enable.eun.org/

Scottish Anti-Bullying Service, Respectme - http://www.respectme.org.uk/

Childnet – Cyberbullying guidance and practical PSHE toolkit:
http://www.childnet.com/our-projects/cyberbullying-guidance-and-practical-toolkit

Childnet – Project deSHAME – Online Sexual Harrassment

UKSIC – Sexting Resources

Ditch the Label – Online Bullying Charity

Diana Award – Anti-Bullying Campaign

## Social Networking

UKSIC - Safety Features on Social Networks

Children's Commissioner, TES and Schillings – Young peoples' rights on social media

## Curriculum

SWGfL Evolve - https://projectevolve.co.uk

SWGfL - ProjectEvolveEdu

UKCCIS – Education for a connected world framework

Department for Education: Teaching Online Safety in Schools

Teach Today – www.teachtoday.eu/

## Data Protection

DfE – Data Protection in schools toolkit

ICO Guides for Organisations

ICO Guidance on taking photos in schools

## Professional Standards/Staff Training

DfE – Keeping Children Safe in Education

DfE - Safer Working Practice for Adults who Work with Children and Young People

UK Safer Internet Centre Professionals Online Safety Helpline

SWGfL – Online Safety Training

## Infrastructure/Technical Support/Cyber-security

DfE – Technical Standards for Schools and Colleges

UKSIC – Appropriate Filtering and Monitoring

SWGfL Safety & Security Resources

SWGfL - Cyber Security in Schools.

NCA – Guide to the Computer Misuse Act

SWGfL- Assisted Monitoring

Secure Schools – Cyber Security

### Working with parents and carers

Childnet Webpages for Parents & Carers
Get Safe Online - resources for parents
Teach Today - resources for parents workshops/education
Internet Matters

### Prevent

Prevent Duty Guidance
Childnet – Trust Me

### Research

Ofcom – Childrens Media Habits
Ofsted: Review of sexual abuse in schools and colleges

Further links can be found at the end of the UKCIS Education for a Connected World Framework