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Statutory:	Policy provided centrally for adoption by schools with minimal amendment to the core text. Changes are allowed to the text where indicated

Online Safety Policy

St Frideswide CE Primary School and The Pod Nursery

Approved by:	**Education Quality Standards & Safeguarding**
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1. Aims

Our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and LGB members
- Identify and support groups of pupils that are potentially at greater risk of harm online than others
- Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

The 4 key categories of risk

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

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

2. Legislation and guidance

This policy is based on the Department for Education's (DfE's) statutory safeguarding guidance, Keeping Children Safe in Education, and its advice for schools on:

- Teaching online safety in schools
- Preventing and tackling bullying and cyber-bullying: advice for headteachers and school staff
- Relationships and sex education
- Searching, screening and confiscation
- Relationships and sex education (RSE) and health education
- Working together to safeguard children - GOV.UK

It also refers to the DfE's guidance on protecting children from radicalisation.

It reflects existing legislation, including but not limited to the Education Act 1996 (as amended), the Education and Inspections Act 2006 and the Equality Act 2010. In addition, it reflects the Education Act 2011, which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on pupils' electronic devices where they believe there is a 'good reason' to do so.

The policy also takes into account the National Curriculum computing programmes of study.

This policy complies with our funding agreement and articles of association.

3. Roles and responsibilities

3.1 The Trust Board

The Trust Board has responsibility for approving this policy and delegates responsibility for implementation and monitoring to each Local Governing Body (LGB)

3.2 The Local Governing Body (LGB)

The LGB has overall responsibility for monitoring this policy and holding the headteacher to account for its implementation.

The LGB monitors that the school ensures it operates in line with local multi-agency safeguarding arrangements and that online harm is considered alongside offline harm, recognising that children may experience multiple, overlapping risks.

The LGB will make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.

The LGB will also make sure all staff receive regular online safety updates (via email, e-bulletins and staff meetings), as required and at least annually, to ensure they are continually provided with the relevant skills and knowledge to effectively safeguard children.

The LGB will co-ordinate regular meetings with appropriate staff to discuss online safety, requirements for training, and monitor online safety logs as provided by the designated safeguarding lead (DSL).

The LGB will make sure that the school teaches pupils how to keep themselves and others safe, including online.

The LGB will make sure that the school has appropriate filtering and monitoring systems in place on school devices and school networks, and will regularly review their effectiveness. The board will review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers what needs to be done to support the school in meeting the standards, which include:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems › Reviewing filtering and monitoring provisions at least annually
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning
- Having effective monitoring strategies in place that meet the school's safeguarding needs within the safeguarding LGB member role

All LGB members will:

- Make sure they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet. See ICT and Internet Acceptable Use Policy
- Make sure that online safety is a running and interrelated theme when devising and implementing the whole-school or college approach to safeguarding and related policies and/or procedures
- Make sure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable

3.3 The headteacher

The headteacher is responsible for making sure that staff understand this policy, and that it is being implemented consistently throughout the school. They will ensure that all systems and procedures are shared with all stakeholders including parents and carers.

3.4 The designated safeguarding lead (DSL)

Details of the school's designated safeguarding lead (DSL) and deputy(ies)are set out in our child protection and safeguarding policy, as well as relevant job descriptions.

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

- Supporting the headteacher in making sure that staff understand this policy and that it is being implemented consistently throughout the school
- Working with the headteacher and LGB to review this policy annually and make sure the procedures and implementation are updated and reviewed regularly
- Taking the lead on understanding the filtering and monitoring systems and processes in place on school devices and school networks
- Providing the LGB with assurance that filtering and monitoring systems are working effectively and reviewed regularly
- Working with the ICT manager to make sure the appropriate systems and processes are in place Working with the headteacher, ICT manager and other staff, as necessary, to address any online
- safety issues or incidents
- Managing all online safety issues and incidents in line with the school's child protection policy
- Ensure that any concerns involving AI-generated content, including sexually explicit deepfake images or videos, must be treated as child-on-child abuse and managed in line with child protection procedures and multi-agency safeguarding arrangements.
- Responding to safeguarding concerns identified by filtering and monitoring
- Making sure that any online safety incidents are logged and dealt with appropriately in line with this policy

- Making sure that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the headteacher and/or LGB Undertaking annual risk assessments that consider and reflect the risks pupils face
- Providing regular safeguarding and child protection updates, including online safety, to all staff, at least annually, in order to continue to provide them with relevant skills and knowledge to safeguard effectively
- Audit online safety and technology across the school

The DSL in conjunction with the ICT support provider is responsible for:

- Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems on school devices and school networks, which are reviewed and updated at least annually to assess effectiveness and make sure pupils are kept safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material.
- Filtering and monitoring systems will be reviewed to consider access to AI-enabled platforms and tools, where appropriate, balancing educational value with safeguarding risk. The DSL, in conjunction with ICT support, will ensure that systems support the early identification of harmful or inappropriate AI-generated content and that concerns are escalated through safeguarding procedures.
- Making sure that the school's ICT systems are secure and protected against viruses and malware, and
- that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring the school's ICT systems on regular basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Making sure that any online safety incidents are logged and dealt with appropriately in line with this policy
- Making sure that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

This list is not intended to be exhaustive.

3.5 All staff and volunteers

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

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet, and ensuring that pupils follow the school's terms on acceptable use
- Knowing that the DSL is responsible for the filtering and monitoring systems and processes, and being aware of how to report any incidents of those systems or processes failing
- Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy
- Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline, and maintaining an attitude of 'it could happen here'

This list is not intended to be exhaustive.

4. Educating pupils about online safety

Pupils will be taught about online safety as part of the curriculum. Online safety education explicitly addresses online misogyny, coercion, financial exploitation, AI-generated harm and the blurred boundaries between online and offline abuse.

All schools have to teach:

- Relationships education and health education in primary schools

In **Key Stage (KS) 1**, pupils will be taught to:

- Use technology safely and respectfully, keeping personal information private
- Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies

Pupils in **Key Stage (KS) 2** will be taught to:

- Use technology safely, respectfully and responsibly
- Recognise acceptable and unacceptable behaviour
- Identify a range of ways to report concerns about content and contact
- Be discerning in evaluating digital content

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

- That the internet can be a negative place where online abuse, trolling, bullying and harassment can take place, which can have a negative impact on mental health
- That people sometimes behave differently online, including by pretending to be someone they are not That the same principles apply to online relationships as to face-to-face relationships, including the
- importance of respect for others, including when we are anonymous
- The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them
- How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met
- How information and data are shared and used online
- How to be a discerning consumer of information online including understanding that information, including that from search engines, is ranked, selected and targeted
- What sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know
- The benefits of rationing time spent online, the risks of excessive time spent on electronic devices and the impact of positive and negative content online on their own and others' mental and physical wellbeing
- Why social media, computer games and online gaming have age restrictions and how to manage common difficulties encountered online
- How to consider the effect of their online actions on others and know how to recognise and display respectful behaviour online and the importance of keeping personal information private
- Where and how to report concerns and get support with issues online

Details of the school's online safety curriculum can be found on the school website or can be obtained on request.

5. Educating parents/carers about online safety

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

The school will let parents/carers know:

- What systems the school uses to filter and monitor online use
- What their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child will be interacting with online

If parents/carers have any queries or concerns in relation to online safety, these should be raised in the first instance with the headteacher and/or the DSL.

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

6. Cyber-bullying

6.1 Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of 1 person or group by another person or group, where the relationship involves an imbalance of power. (See also the school behaviour policy.)

6.2 Preventing and addressing cyber-bullying

To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The school will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be.

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

All staff, LGB members and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training (see section 11 for more detail).

The school also sends information/leaflets on cyber-bullying to parents/carers so they are aware of the signs, how to report it and how they can support children who may be affected.

In relation to a specific incident of cyber-bullying, the school will follow the processes set out in the school behaviour policy. Where illegal, inappropriate or harmful material has been spread among pupils, the school will use all reasonable endeavours to ensure the incident is contained.

The DSL will report the incident and provide the relevant material to the police as soon as is reasonably practicable, if they have reasonable grounds to suspect that possessing that material is illegal. They will also work with external services if it is deemed necessary to do so.

6.3 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

ODST and our school recognise that AI has many uses to help pupils learn, but may also have the potential to be used to bully others. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real. This includes deepfake pornography: pornographic content created using AI to include someone’s likeness.

Our school will treat any use of AI to bully pupils very seriously, in line with our behaviour policy.

AI-generated abuse, including deepfake imagery (particularly sexually explicit material), is recognised as a form of abuse. Any such incidents will be treated as safeguarding concerns and may involve police or external agencies.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out a risk assessment where new AI tools are being used by the school, and where existing AI tools are used in cases which may pose a risk to all individuals that may be affected by it, including, but not limited to, pupils and staff.
ensure they comply with the above and restrict access through filtering systems where appropriate.

AI must not be used to create, manipulate or distribute content involving real people without their knowledge or consent, including images, audio or video. The use of AI to impersonate others, generate abusive, sexual, misleading or humiliating content, or to cause harm is not permitted and will be treated as a serious safeguarding concern.

Uploading images, recordings, personal data or identifiable information of pupils, staff or others into AI tools without lawful basis or consent may create safeguarding and data protection risks. The school recognises that information shared with AI platforms may be stored, processed or reused beyond the user's control.

10. How the school will respond to issues of misuse

Where a pupil misuses the school's ICT systems or internet, we will follow the procedures set out in our policies on behaviour and ICT and acceptable use. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the school's ICT systems or the internet, or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with the staff disciplinary procedures alongside the staff code of conduct. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The school will consider whether incidents that involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

Where incidents involve AI-generated content, particularly where there is potential harm, exploitation, coercion or abuse, the school will prioritise safeguarding responses over disciplinary sanctions. Decisions will be proportionate and victim-centred, ensuring that victims are supported and protected, while any subsequent behaviour management or disciplinary action considers the age, intent and understanding of those involved.

11. Training

11.1 Staff, LGB members and volunteers

All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues, including cyber-bullying and the risks of online radicalisation.

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

By way of this training, all staff will be made aware that:

- Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse
- Children can abuse their peers online through:
    - Abusive, threatening, harassing and misogynistic messages
    - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
    - Sharing of abusive images and pornography, to those who don't want to receive such content
- Physical abuse, sexual violence and initiation/hazing type violence can all contain an online element
- Training includes emerging risks such as AI-generated abuse, financial exploitation, misogyny and contextual safeguarding, ensuring staff understand how online harm links to wider safeguarding concerns.

Training will also help staff:

- Develop better awareness to assist in spotting the signs and symptoms of online abuse
- Develop the ability to ensure pupils can recognise dangers and risks in online activity and can weigh up the risks
- Develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term

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

LGB members will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

More information about safeguarding training is set out in our child protection and safeguarding policy.

11.2 Pupils

All pupils will receive age-appropriate training on safe internet use, including:

- Methods that hackers use to trick people into disclosing personal information
- Password security
- Social engineering
- The risks of removable storage devices (e.g. USBs)
- Multi-factor authentication
- How to report a cyber incident or attack
- How to report a personal data breach

Pupils will also receive age-appropriate training on safeguarding issues such as cyberbullying and the risks of online radicalisation.

12. Monitoring arrangements

The DSL logs behaviour and safeguarding issues related to online safety.

This policy will be reviewed annually by the ODST trust board and school leaders. At every review, the policy will be shared with the LGB.

Given the rapid development and accessibility of AI technologies, risks related to AI-generated content and misuse will be reviewed regularly as part of the school's safeguarding and online safety risk assessment. The policy will be updated where necessary to reflect emerging risks, national guidance and local safeguarding priorities.

13. Links with other policies

This online safety policy is linked to our:

- Child protection and safeguarding policy
- Behaviour policy
- Staff disciplinary procedures
- Data protection policy and privacy notices
- ICT and internet acceptable use policy