



Holy Trinity CE (VA) Primary School

Policy name: **Online Safety Policy**

Author: **Jonathan Wood**

Governor committee: **n/a**

Approved by: **Headteacher**

Date Approved: **18.01.2024**

Review date: **17.01.2026**

1. Aims

Our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- 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
- 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](#) – remove if not applicable, see section 4]
- [Searching, screening and confiscation](#)

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.

3. Roles and responsibilities

3.1 The governing board

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

The governing board will make sure 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 governing board will also make sure staff receive regular online safety updates (via email 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 governing board 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 leads (DSLs).

The governing board should ensure children are taught how to keep themselves and others safe, including keeping safe online.

The governing board must ensure 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 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 their safeguarding needs.

The governor who oversees online safety is the Chair of Governors.

All governors will:

- Ensure they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the school's IT systems and the internet (appendix 1)
- Ensure that online safety is a running and interrelated theme while devising and implementing their whole-school or college approach to safeguarding and related policies and/or procedures
- Ensure 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

3.2 The headteacher

The headteacher is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school.

3.3 The designated safeguarding leads (DSL)

Details of the school's designated safeguarding leads (DSL) are set out in our safeguarding policy, as well as relevant job descriptions.

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

- Supporting the headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school
- Working with the headteacher and governing board to review this policy annually and ensure 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
- Working with Mint Support to make sure the appropriate systems and processes are in place

- Working with the headteacher, Mint Support 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 safeguarding policy
- Ensuring that any online safety incidents are logged on CPOMS and dealt with appropriately in line with this policy and our behaviour / anti bullying policies
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school anti-bullying / behaviour policy
- Updating and delivering staff training on online safety (appendix 4 contains a self-audit for staff on online safety training needs)
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the headteacher and/or governing board
- 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

3.4 Mint Support

Mint Support 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 ensure pupils are kept safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
- Ensuring that the school's IT 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 IT systems on a weekly basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are referred to a DSL

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 (appendix 1), and ensuring that pupils follow the school's terms on acceptable use (appendix 2)
- Knowing that the DSLs are responsible for the filtering and monitoring systems and processes, and being aware of how to report any incidents of those systems or processes failing by reporting to a DSL
- Following the correct procedures by asking Mint Support via a DSL to whitelist particular URLs if they need to bypass the filtering and monitoring systems for educational purposes
- Working with the DSLs to ensure that any online safety incidents are logged on CPOMS and dealt with appropriately in line with this policy and our behaviour / anti bullying policies
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school anti-bullying / 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'

3.6 Parents/carers

Parents/carers are expected to:

- Notify a member of staff or the headteacher of any concerns or queries regarding this policy
- Ensure their child has read, understood and agreed to the terms on acceptable use of the school's IT systems and internet (appendix 2)

Parents/carers can seek further guidance on keeping children safe online from the following organisations and websites:

- What are the issues? – [UK Safer Internet Centre](#)
- Hot topics – [Childnet](#)
- Parent resource sheet – [Childnet](#)

3.7 Visitors and members of the community

Visitors and members of the community who use the school's IT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use (appendix 1).

4. Educating pupils about online safety

Pupils will be taught about online safety as part of the curriculum:

All schools have to teach:

- [Relationships education and health education](#) in primary schools
- [Relationships and sex education and health education](#) in secondary 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

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

- 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 online, 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 is shared and used online
- 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 safe use of social media and the internet will also be covered in other subjects where relevant.

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.

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 and social media. This policy will also be shared with parents/carers.

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 anti-bullying 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. Cyber-bullying awareness forms part of our online safety curriculum.

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, governors and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training.

The school also provides information 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 anti-bullying 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 DSLs 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 Examining electronic devices

The headteacher, and any member of staff authorised to do so by the headteacher can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or pupils, and/or
- Is evidence in relation to an offence

Before a search, if the authorised staff member is satisfied that they have reasonable grounds for suspecting any of the above, they will also:

- Make an assessment of how urgent the search is, and consider the risk to other pupils and staff.
- Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it
- Seek the pupil's co-operation

Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so.

When deciding whether there is a 'good reason' to examine data or files on an electronic device, the staff member should reasonably suspect that the device has, or could be used to:

- Cause harm, and/or
- Undermine the safe environment of the school or disrupt teaching, and/or
- Commit an offence

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response.

When deciding if there is a good reason to erase data or files from a device, staff members will consider if the material may constitute evidence relating to a suspected offence. In these instances, they will not delete the material, and the device will be handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if:

- They reasonably suspect that its continued existence is likely to cause harm to any person, and/or
- The pupil and/or the parent/carer refuses to delete the material themselves

If a staff member **suspects** a device **may** contain an indecent image of a child (also known as a nude or semi-nude image), they will:

- **Not** view the image
- Confiscate the device and report the incident to the DSL immediately, who will decide what to do next. The DSL will make the decision in line with the DfE's latest guidance on [screening, searching and confiscation](#) and the UK Council for Internet Safety (UKCIS) guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

Any searching of pupils will be carried out in line with:

- The DfE's latest guidance on [searching, screening and confiscation](#)
- UKCIS guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

Any complaints about searching for or deleting inappropriate images or files on pupils' electronic devices will be dealt with through the school complaints procedure.

6.4 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 Bard.

Holy Trinity recognises 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.

Holy Trinity will treat any use of AI to bully pupils in line with our anti-bullying / behaviour policy.

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.

7. Acceptable use of the internet in school

All pupils, parents/carers, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of the school's IT systems and the internet (appendices 1 & 2). Visitors will be expected to read and agree to the school's terms on acceptable use if relevant.

Use of the school's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role.

We will monitor the websites visited by pupils, staff, volunteers, governors and visitors (where relevant) to ensure they comply with the above and restrict access through filtering systems where appropriate.

More information is set out in the acceptable use agreements in appendices 1 and 2.

8. Pupils using mobile devices in school

Pupils in years 5 & 6 who walk to and from school without their parents are permitted to bring mobile phones to school with the written/verbal permission of their parents. In these situation pupils should not use mobile phones on the school premises. All pupil mobile phones should be 'banked' in the place provided in year 5 & 6 classrooms. The phone can be retrieved at the end of the day. The phone is stored at the owner's risk and school will accept no responsibility for replacing lost, stolen or damaged phones.

9. Staff using work devices outside school

All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- › Keeping the device password-protected
- › Making sure the device locks if left inactive for a period of time
- › Not sharing the device among family or friends
- › Keeping operating systems up to date by always installing the latest updates

Staff members must not use the device in any way that would violate the school's terms of acceptable use, as set out in appendix 1.

Work devices must be used solely for work activities.

If staff have any concerns over the security of their device, they must seek advice from Mint Support or a DSL.

10. How the school will respond to issues of misuse

Where a pupil misuses the school's IT systems or internet, we will follow the procedures set out in our behaviour policy and acceptable use agreement. 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 policy. 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.

11. Training

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.

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 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 DSLs 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.

Governors 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.

12. Recording incidents

Behaviour and safeguarding issues relating to online safety are logged on CPOMS.

13. Monitoring & filtering

Our broadband is provided by Exa who provide a filtering system called Surf Protect that blocks internet access to harmful sites and inappropriate content. Exa and Surf Protect meet the filtering requirements set out for the DfE and KCSIE.

Our monitoring system is Provided by Senso and this alerts the DSL team if any user searches for or uses inappropriate language on our school network.

This policy is reviewed every 2 years

Date of approval: January 2024

Date of review: January 2026

Appendix 1: Staff, Governor and Visitor acceptable use agreement

Staff, Governor and Visitor ICT Acceptable Use Agreement

IT and the related technologies such as email, the internet and mobile devices are an expected part of our daily working life in school. This agreement is to help ensure that all staff are aware of their professional responsibilities when using any form of IT and to help keep staff, governors and visitors safe. All staff are expected to sign this policy confirming their undertaking to adhere to its contents at all times. Any concerns or clarification should be discussed with the Online Safety Lead or DSL.

- I will ensure that all electronic communications with pupils and staff are compatible with my professional role
- I will not disclose any passwords provided to me by the school or other related authorities
- I will not give out my own personal details, such as mobile phone number or personal e-mail address, to pupils or parents
- I will only use my approved school email facility for any communications with pupils, parents and other school related activities, not a personal e-mail account
- I will ensure that all personal data is kept secure and is used appropriately
- I will report any accidental access to inappropriate materials immediately to the Headteacher
- I will not browse, download, upload or distribute any material that could be considered offensive, illegal or discriminatory on school equipment or on the school premises
- Images of pupils and / or staff will only be taken, stored and used for professional purposes in line with data protection policy and with written consent of the parent/carer
- I understand that all my use of the Internet and other related technologies can be monitored and logged and can be made available to the Headteacher
- I will respect copyright and intellectual property rights
- I will ensure that my online activity, both in school and outside school, will not bring my professional role into disrepute
- I will ignore all contact from pupils and parents on my personal social media
- I will not discuss school matters on social media/websites
- I will support and promote the school's Online Safety Policy and help pupils to be safe and responsible in their use of IT and related technologies
- I will not connect any personal device to the school Wi-Fi
- I will not use USB drives in school
- I will only use my mobile phone when children are not present
- I will not take any sensitive data off the premises and will only use VPN to remotely log in to the server
- I will ensure my laptop and/or ipad have passwords with short sleep settings
- I will not install software on a school device without permission of the Headteacher
- I will not set up online accounts using pupil details without permission of the Headteacher

Internet Safety Rules

1 I WILL NEVER USE COMPUTERS OR PHONES TO BE MEAN TO OTHER PEOPLE.

2 I WILL TELL AN ADULT IF I SEE OR HEAR SOMETHING I DON'T LIKE.

3 I WILL BE CAREFUL WITH WHAT INFORMATION I SHARE ON THE INTERNET.

4 I WILL NEVER PUT ANY RUDE WORDS, PHOTOS OR VIDEOS ON THE INTERNET.

5 I WILL KEEP MY PASSWORDS AND LOGIN DETAILS SECRET.

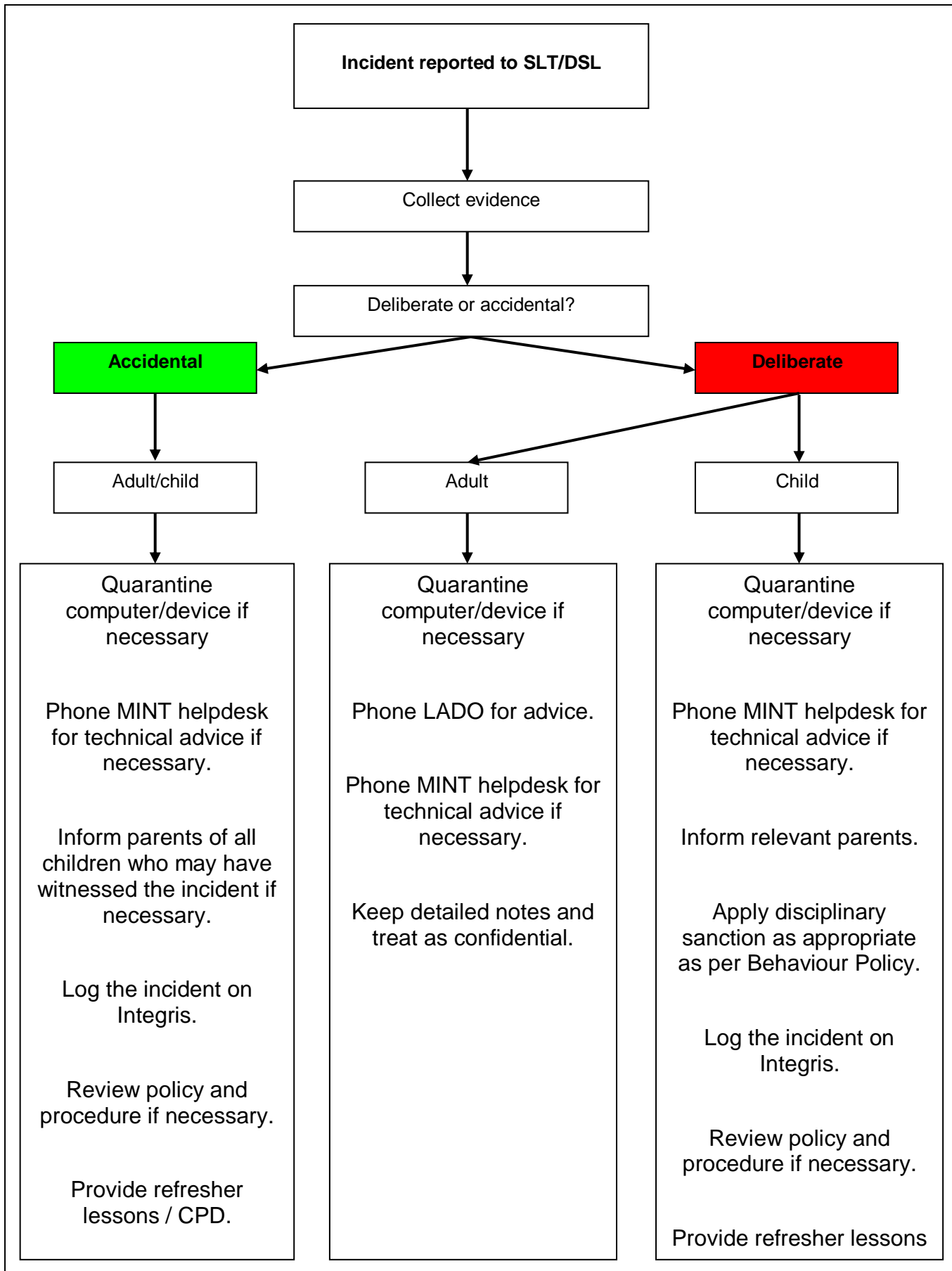
6 I WILL ONLY TALK TO PEOPLE I DEFINITELY KNOW ON THE INTERNET.



I UNDERSTAND AND AGREE TO OUR RULES

Name Class.....

Appendix 3: Online Safety Incident Flowchart



Appendix 4: Online safety training needs – self-audit for staff

ONLINE SAFETY TRAINING NEEDS AUDIT	
Name of staff member/volunteer:	Date:
Question	Yes/No (add comments if necessary)
Do you know the name of the person who has lead responsibility for online safety in school?	
Are you aware of the ways pupils can abuse their peers online?	
Do you know what you must do if a pupil approaches you with a concern or issue?	
Are you familiar with the school's acceptable use agreement for staff, volunteers, governors and visitors?	
Are you familiar with the school's acceptable use agreement for pupils?	
Are you familiar with the filtering and monitoring systems on the school's devices and networks?	
Do you understand your role and responsibilities in relation to filtering and monitoring?	
Do you keep your passwords secure?	
Are you familiar with the school's approach to tackling cyber-bullying?	
Are there any areas of online safety in which you would like training/further training?	