MERRYLANDS
PRIMARY SCHOOL AND NURSERY

Online Safety Policy

Approved by: **Date:**

Last reviewed on:

Next review due by:

Introduction

Key people/dates

Merrylands Primary School and Nursery	Designated Safeguarding Lead (DSL) team	Mrs R Robinson
	Online-safety lead (if different)	
	Curriculum lead	Mrs G Pryer
	Online-safety / safeguarding link governor	Mrs J Melanaphy
	PSHE/RSHE lead	Mrs C Christie
	Network manager / other technical support	Mr L Wheatley
	GDPR Officer	Mrs L Perry
	Date this policy was reviewed on	January 2021
	Date of next review	January 2022

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach, and collaboration between key school leads. Accordingly, this policy is written in line with 'Keeping Children Safe in Education' 2020 (KCSIE), 'Teaching Online Safety in Schools' 2019, statutory RSHE guidance 2019 and other statutory documents. It complements existing and forthcoming subjects including Health, Relationships and Sex Education, Citizenship and Computing and is designed to sit alongside the school's statutory Safeguarding Policy. Any issues and concerns with online safety must follow the school's safeguarding and child protection procedures.

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

- posted on the school website
- available on the internal staff network/drive
- available in paper format in the staffroom
- part of school induction pack for all new staff (including temporary, supply and non-classroom-based staff)
- integral to safeguarding updates and training for all staff (especially in September refreshers)
- AUPs issued to whole school community, on entry to the school
- reviews of this online-safety policy will include input from staff, pupils and other stakeholders, helping to ensure further engagement

Aims

This Policy aims to

- set out expectations for all Merrylands Primary School and Nursery community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline)

- help all stakeholders to recognise that online/digital behaviour standards (including social media activity) must be upheld beyond the confines of the school gates and school day, and regardless of device or platform
- facilitate the safe, responsible and respectful use of technology to support teaching and learning, increase attainment and prepare children and young people for the risks and opportunities of the current and future digital world, to survive and thrive online
- help school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world
    - for the protection and benefit of the children and young people in their care
    - for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice
    - for the benefit of the school, supporting the school ethos, aims and objectives, and protecting the reputation of the school and profession
- establish clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as Behaviour Policy or Anti-Bullying Policy)

Further Help and Support

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

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

Scope

This policy applies to all members of the Merrylands Primary School and Nursery community (including teaching and support staff, supply teachers and tutors engaged under the DfE National Tutoring Programme, governors, volunteers, contractors, pupils, parents/carers, visitors, and community users) who have access to our digital technology, networks, and systems, whether on-site or remotely, and at any time, or who use technology in their school role.

Roles and responsibilities

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

Headteacher

Key responsibilities

- support safeguarding leads and technical staff as they review protections for pupils in the home and remote-learning procedures, rules, and safeguards (see coronavirus.lgfl.net/safeguarding for an addendum to policies and an infographic overview of safeguarding considerations for remote teaching technology)
- foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding

- oversee the activities of the designated safeguarding lead and ensure that the DSL responsibilities listed in the section below are being followed and fully supported
- ensure that policies and procedures are followed by all staff
- undertake training in offline and online safeguarding, in accordance with statutory guidance and relevant local safeguarding partnerships
- liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information

take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information

- ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including cloud systems are implemented according to child-safety first principles
- be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles
- understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident
- ensure suitable risk assessments are undertaken so the curriculum meets the needs of pupils, including the risk of children being radicalised
- ensure that there is a system in place to monitor and support staff (e.g. network manager) who carry out internal technical online-safety procedures
- ensure governors are regularly updated on the nature and effectiveness of the school's arrangements for online safety
- ensure the school website meets statutory requirements (see appendices for website audit document)

Designated Safeguarding Lead/Online Safety Lead/Curriculum Lead

Key responsibilities *(the DSL can delegate certain online safety duties, e.g. to the online-safety coordinator, but not the overall responsibility; this assertion and all quotes below are from Keeping Children Safe in Education 2020)*

- the designated safeguarding lead should take lead responsibility for safeguarding and child protection including online safety and this lead responsibility should not be delegated
- work with the Headteacher and technical staff to review protections for pupils in the home and remote-learning procedures, rules, and safeguards (see coronavirus.lgfl.net/safeguarding for an addendum to policies and an infographic overview of safeguarding considerations for remote teaching technology)
- where the online-safety coordinator is not the named DSL or deputy DSL, ensure there is regular review and open communication between these roles and that the DSL's clear overarching responsibility for online safety is not compromised
- ensure an effective approach to online safety which empowers the school to protect and educate the whole school in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate
- liaise with staff (especially pastoral support staff, IT Technicians, and SENCOs, or the named person with oversight for SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- take day-to-day responsibility for online safety issues and be aware of the potential for serious child protection concerns
- remind staff of safeguarding considerations as part of a review of remote learning procedures and technology, including that the same principles of online safety and behaviour apply

- work with the Headteacher, DPO and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- stay up to date with the latest trends in online safeguarding and undertake Prevent awareness training
- review and update this policy, other online safety documents (eg Acceptable Use Policies) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others) and submit for review to the governors/trustees
- receive regular updates in online safety issues and legislation, be aware of local and school trends
- ensure that online safety education is embedded across the curriculum in line with the statutory RSHE guidance
- promote an awareness of and commitment to online safety throughout the school community, with a strong focus on parents, who are often appreciative of school support in this area, but also including hard-to-reach parents
- communicate regularly with SLT and the designated safeguarding and online safety governor to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring work and have been functioning/helping
- ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident
- ensure adequate provision for staff to flag issues when not in school and for pupils to disclose issues when off site, especially when in isolation/quarantine/lockdown, eg a safe, simple, online form on the school home page about 'something that is worrying me' that gets mailed securely
- oversee and discuss appropriate filtering and monitoring with governors whether physical or technical and ensure staff are aware
- ensure the 2018 DfE guidance on sexual violence and harassment is followed throughout the school and that staff adopt a zero-tolerance approach to this, as well as to bullying
- facilitate training and advice for all staff, including supply teachers
    - all staff must read KCSIE Part 1 and all those working with children Annex A
    - it would also be advisable for all staff to be aware of Annex C (online safety)
    - cascade knowledge of risks and opportunities throughout the organisation
- ensure online tutors, whether engaged by the school as part of the DfE scheme or those hired by parents, are asked to sign the contractor AUP

Governing Body, led by Online Safety/Safeguarding Link Governor

Key responsibilities *(quotes taken from Keeping Children Safe in Education 2020)*

- approve this policy and strategy and subsequently review its effectiveness, eg by asking the questions in the helpful document from the UK Council for Child Internet Safety (UKCIS) Online safety in schools and colleges: Questions from the Governing Board
- ask about how the school has reviewed protection for pupils in the home and remote-learning procedures, rules, and safeguards (see addendum to policies and an infographic overview of safeguarding considerations for remote teaching technology)
- ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of DSL with lead responsibility for safeguarding and child protection (including online safety) with the appropriate status and authority, time, funding, training, resources, and support
- support the school in encouraging parents and the wider community to become engaged in online safety activities
- have regular strategic reviews with the online-safety co-ordinator/DSL and incorporate online safety into standing discussions of safeguarding at governor meetings
- where the online-safety coordinator is not the named DSL or deputy DSL, ensure that there is regular review and open communication between these roles and that the DSL's clear overarching responsibility for online safety is not compromised

- work with the DPO, DSL and Headteacher to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- check all school staff have read Part 1 of KCSIE; SLT and all those working directly with children have read Annex A; check that Annex C on Online Safety reflects practice in your school
- ensure that all staff undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated in line with advice from the local three safeguarding partners integrated, aligned, and considered as part of the overarching safeguarding approach
- ensure appropriate filters and appropriate monitoring systems are in place but be careful that over blocking does not lead to unreasonable restrictions as to what children can be taught regarding online teaching and safeguarding
- ensure that children are taught about safeguarding, including online safety as part of providing a broad and balanced curriculum. Consider a whole school approach to online safety with a clear policy on the use of mobile technology

All staff

Key responsibilities

- pay particular attention to safeguarding provisions for home-learning and remote-teaching technologies
- recognise that RSHE will be introduced in this academic year and that it is a whole-school subject requiring the support of all staff; online safety has become core to this new subject
- understand that online safety is a core part of safeguarding; as such it is part of everyone's job – never think that someone else will pick it up
- know who the Designated Safeguarding Lead (DSL)
- read Part 1, Annex A and Annex C of Keeping Children Safe in Education (whilst Part 1 is statutory for all staff, Annex A for SLT and those working directly with children, it is good practice for all staff to read all three sections)
- read and follow this policy in conjunction with the school's main safeguarding policy
- record online-safety incidents in the same way as any safeguarding incident and report in accordance with school procedures
- understand that safeguarding is often referred to as a jigsaw puzzle – you may have discovered the missing piece so do not keep anything to yourself
- sign and follow the staff Code of Conduct
- notify the DSL if policy does not reflect practice in your school and follow escalation procedures if concerns are not promptly acted upon
- identify opportunities to thread online safety through all school activities as part of a whole school approach in line with the RSHE curriculum, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils)
- whenever overseeing the use of technology in school or for homework or remote teaching, encourage and talk about appropriate behaviour and how to get help and consider potential risks and the age-appropriateness of websites (find out what appropriate filtering and monitoring systems are in place)
- when supporting pupils remotely, be mindful of additional safeguarding considerations – refer to the 20 Safeguarding Principles for Remote Lessons infographic which applies to all online learning
- carefully supervise and guide pupils when engaged in learning activities involving online technology, supporting them with search skills, critical thinking, age-appropriate materials and signposting, and legal issues such as copyright and GDPR
- always be aware of security best-practice, including password hygiene and phishing strategies
- prepare and check all online source and resources before using
- encourage pupils to follow their acceptable use policy at home as well as at school, remind them about it and enforce school sanctions
- notify the DSL of new trends and issues before they become a problem

- take a zero-tolerance approach to bullying and low-level sexual harassment
- be aware that you are often most likely to see or overhear online-safety issues (particularly relating to bullying and sexual harassment and violence) in the playground, corridors, toilets, and other communal areas outside the classroom – let the DSL know
- receive regular updates from the DSL and have a healthy curiosity for online safeguarding issues
- model safe, responsible, and professional behaviours in their own use of technology. This includes outside the school hours and site, and on social media, in all aspects upholding the reputation of the school and of the professional reputation of all staff. More guidance on this point can be found in the Online Reputation guidance for schools.

PSHE/RSHE Lead

Key responsibilities as listed in the 'all staff' section, plus

- embed consent, mental wellbeing, healthy relationships and staying safe online into the PSHE/Relationships education, relationships, and sex education (RSE) and health education curriculum. This will include being taught what positive, healthy, and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age-appropriate way that is relevant to pupils' lives
- ensure the PHSE/RSHE curriculum complements the computing curriculum, which covers the principles of online safety at all key stages, with progression in the content to reflect the different and escalating risks that pupils face. This includes how to use technology safely, responsibly, respectfully, and securely, and where to go for help and support when they have concerns about content or contact on the internet or other online technologies
- work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE/RSHE
- work closely with the curriculum lead to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach

Computing Lead

Key responsibilities as listed in the 'all staff' section, plus

- oversee the delivery of the online safety element of the computing curriculum in accordance with the national curriculum
- work closely with the curriculum lead to avoid overlap but ensure a complementary whole school approach
- work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within computing
- collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements
- monitor the use of school technology, online platforms, and social media presence and that any misuse/attempted misuse is identified and reported in line with school policy

Subject Leaders

Key responsibilities as listed in the 'all staff' section, plus

- look for opportunities to embed online safety in your subject or aspect, especially as part of the new RSHE curriculum, and model positive attitudes and approaches to staff and pupils alike
- work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within computing
- ensure subject specific action plans also have an online safety element

Network Manager/Technician

Key responsibilities as listed in the 'all staff' section, plus

- support the Headteacher and DSL team as they review protection for pupils in the home and remote-learning procedures, rules, and safeguards
- keep up to date with the school's online safety policy and technical information to effectively carry out their online safety role and to inform and update others as relevant
- liaise with the curriculum lead to ensure the school IT system complements the delivery of the online safety curriculum and vice versa and ensure no conflicts between educational messages and practice
- work closely with the designated DSL/GDPR Officer/CoConnect nominated contact to ensure that school systems and networks reflect school policy

- ensure the above stakeholders understand the consequences of existing services and of any changes to these systems (especially in terms of access to personal and sensitive records/data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms etc)
- support and advise on the implementation of appropriate filtering and monitoring as decided by the DSL and senior leadership team
- maintain up-to-date documentation of the school's online security and technical procedures
- to report online-safety related issues that come to their attention in line with school policy
- manage the school's systems, networks, and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption, and backup for data, including disaster recovery plans, and auditable access controls

Data Protection Officer (GDPO)

Key responsibilities

- be aware that of references to the relationship between data protection and safeguarding in key Department for Education documents 'Keeping Children Safe in Education' and 'Data protection: a toolkit for schools' (August 2018), especially this quote from the latter document:

GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2,18; Schedule 8, 4). When Designated Safeguarding Leads in schools are considering whether, or not, to share safeguarding information (especially with other agencies) it is considered best practice for them to record who they are sharing that information with and for what reason. If they have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file. All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children

The same document states that the retention schedule for safeguarding records may be required to be set as 'very long-term need (until pupil is aged 25 or older)'. Work with the DSL, Headteacher and governors to ensure frameworks are in place for the protection of data and of safeguarding information sharing as outlined above. Ensure that all access to safeguarding data is limited as appropriate, and monitored and audited.

CoConnect

Key responsibilities

- to ensure all services are managed on behalf of the school in line with school policies, following data handling procedures as relevant
- work closely with the DSL and GDPO to ensure they understand who the nominated contacts are, what they can do and what data access they have, as well as the implications of all existing services and changes to settings that you might request – e.g. for YouTube restricted mode, internet filtering settings, firewall port changes, pupil email settings, and sharing settings for any cloud services such as Microsoft Office 365 and Google G Suite
- ensure the GDPO is aware of the GDPR information on the relationship between the school and CoConnect

Volunteers and contractors (including tutor)

Key responsibilities

- read, understand, sign, and adhere to the school's acceptable use policy (AUP)
- report any concerns, no matter how small, to the designated safety lead as named in the AUP
- maintain an awareness of current online safety issues and guidance

- model safe, responsible, and professional behaviours in their own use of technology at school and as part of remote teaching or any online communications
- note that as per AUP agreement a contractor will never attempt to arrange any meeting, including tutoring session, without the full prior knowledge and approval of the school, and will never do so directly with a pupil. The same applies to any private/direct communication with a pupil

Pupils

Key responsibilities

- read, understand, sign and adhere to the Pupil Acceptable Use Policy
- treat home learning during any isolation/quarantine or bubble/school lockdown in the same way as regular learning in school and behave as if a teacher or parent were watching the screen
- avoid any private communication or use of personal logins/systems to communicate with or arrange meetings with school staff
- understand the importance of reporting abuse, misuse or access to inappropriate materials, including any concerns about a member of school staff or supply teacher or online tutor
- know what action to take if they or someone they know feels worried or vulnerable when using online technology, at school, home or anywhere else
- to understand the importance of adopting safe and responsible behaviours and good online safety practice when using digital technologies outside of school and realise that the school's acceptable use policies cover actions out of school, including on social media
- remember the rules on the misuse of school technology – devices and logins used at home should be used just like if they were in full view of a teacher
- understand the benefits/opportunities and risks/dangers of the online world and know who to talk to at school or outside school if there are problems

Parents/carers

Key responsibilities

- read, sign and promote the school's parental acceptable use policy (AUP) and read the pupil AUP and encourage their children to follow it
- consult with the school if they have any concerns about their child's and others' use of technology
- promote positive online safety and model safe, responsible and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers
- encourage children to engage fully in home-learning during any period of isolation/quarantine or bubble/school closure and flag any concerns
- support the child during remote learning to avoid video calls in a bedroom if possible and if not, to ensure the child is fully dressed and not in bed, with the camera pointing away from beds/bedding/personal information etc. and the background blurred or changed where possible
- if organising private online tuition, remain in the room if possible, ensure the child knows tutors should not arrange new sessions directly with the child or attempt to communicate privately

External groups including parent associations

Key responsibilities

- any external individual/organisation will sign an Acceptable Use Policy prior to using technology or the internet within school
- support the school in promoting online safety and data protection
- model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers

Education and curriculum

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

- relationships education, relationships, and sex education (RSE) and health (also known as RSHE or PSHE)
- computing
- citizenship

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

Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc) in school or setting as homework tasks, all staff should encourage sensible use, monitor what pupils/students are doing and consider potential dangers and the age appropriateness of websites.

Equally, all staff should carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular, extended school activities if relevant and remote teaching), supporting them with search skills, critical thinking (e.g. fake news), age-appropriate materials and signposting, and legal issues such as copyright and data law.

Annual reviews of curriculum plans/schemes of work (including for SEND pupils) are used as an opportunity to follow this framework more closely in its key areas of self-image and identity, online relationships, online reputation, online bullying, managing online information, health, wellbeing and lifestyle, privacy and security, and copyright and ownership.

Handling online-safety concerns and incidents

It is vital that all staff recognise that online safety is a part of safeguarding as well as being a curriculum strand of computing, PSHE/RSHE and citizenship.

General concerns must be handled in the same way as any other safeguarding concern; safeguarding is often referred to as a jigsaw puzzle, so all stakeholders should err on the side of talking to the online-safety lead/designated safeguarding lead to contribute to the overall picture or highlight what might not yet be a problem.

Support staff will often have a unique insight and opportunity to find out about issues first in the playground, corridors, toilets, and other communal areas outside the classroom (particularly relating to bullying and sexual harassment and violence).

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

- Safeguarding and Child Protection Policy
- Anti-Bullying Policy
- Behaviour Policy (including school sanctions)
- Acceptable Use Policies
- Data Protection Policy, agreements, and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc)

This school commits to take all reasonable precautions to ensure online safety but recognises that incidents will occur both inside school and outside school and that those from outside school will continue to impact on pupils when they come into school or during extended periods away from school. All members of the school are

encouraged to report issues swiftly to allow us to deal with them quickly and sensitively through the school's escalation processes.

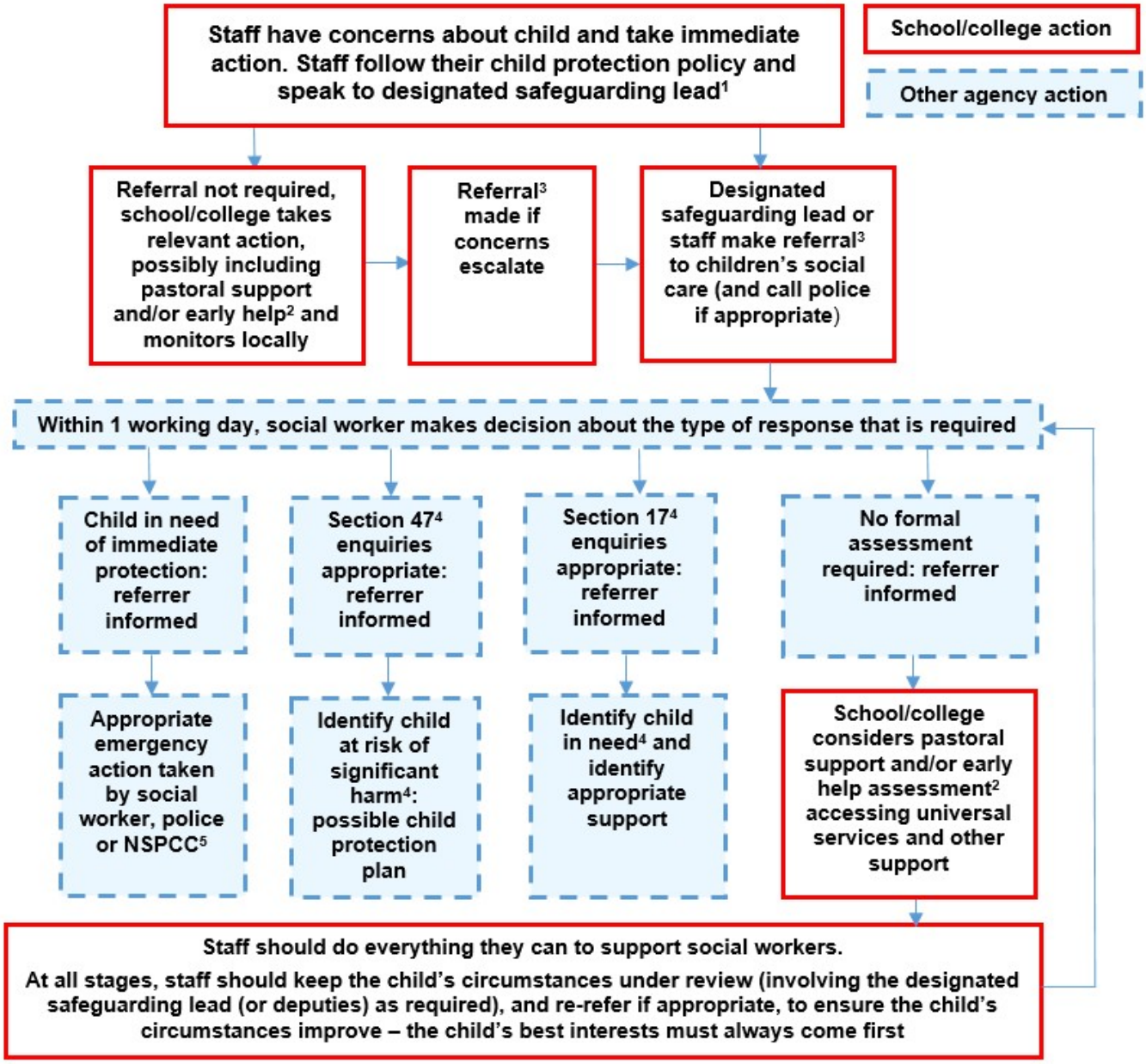
Any suspected online risk or infringement must be reported to the designated safeguarding lead on the same day – where clearly urgent, it will be made by the end of the lesson.

Any concern/allegation about staff misuse must be referred directly to the Headteacher unless the concern is about the Headteacher in which case the complaint is referred to the CEO and the LADO (Local Authority's Designated Officer). Staff may also use the NSPCC Whistleblowing Helpline.
The school will actively seek support from other agencies as needed (i.e. the local authority, LGfL, UK Safer Internet Centre's Professionals' Online Safety Helpline, NCA CEOP, Prevent Officer, Police, IWF). We will inform parents/carers of online-safety incidents involving their children, and the Police where staff or pupils engage in or are subject to behaviour which we consider particularly disturbing or breaks the law (procedures are in place for sexting and up skirting; see section below).

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

Actions where there are concerns about a child

The following flow chart is taken from page 13 of Keeping Children Safe in Education 2020 as the key education safeguarding document. As outlined previously, online safety concerns are no different to any other safeguarding concern.


Staff have concerns about child and take immediate action. Staff follow their child protection policy and speak to designated safeguarding lead[1]
School/college action
Other agency action
Referral not required, school/college takes relevant action, possibly including pastoral support and/or early help[2] and monitors locally
Referral[3] made if concerns escalate
Designated safeguarding lead or staff make referral[3] to children's social care (and call police if appropriate)
Within 1 working day, social worker makes decision about the type of response that is required
Child in need of immediate protection: referrer informed
Section 47[4] enquiries appropriate: referrer informed
Section 17[4] enquiries appropriate: referrer informed
No formal assessment required: referrer informed
Appropriate emergency action taken by social worker, police or NSPCC[5]
Identify child at risk of significant harm[4]: possible child protection plan
Identify child in need[4] and identify appropriate support
School/college considers pastoral support and/or early help assessment[2] accessing universal services and other support
Staff should do everything they can to support social workers.
At all stages, staff should keep the child's circumstances under review (involving the designated safeguarding lead (or deputies) as required), and re-refer if appropriate, to ensure the child's circumstances improve – the child's best interests must always come first

Sexting

All schools (regardless of phase) should refer to the UK Council for Internet Safety (UKCIS) guidance on sexting (also referred to as 'youth produced sexual imagery') in schools. NB - where one of the parties is over 18, this is no longer sexting but child sexual abuse.

There is a one-page overview called Sexting; how to respond to an incident for all staff (not just classroom-based staff) to read, in recognition of the fact that it is mostly someone other than the designated safeguarding lead (DSL) to first become aware of an incident, and it is vital that the correct steps are taken. Staff other than the DSL must not attempt to view, share, or delete the image or ask anyone else to do so, but to go straight to the DSL. The school DSL will in turn use the full guidance document, Sexting in Schools and Colleges to decide next steps and whether other agencies need to be involved.

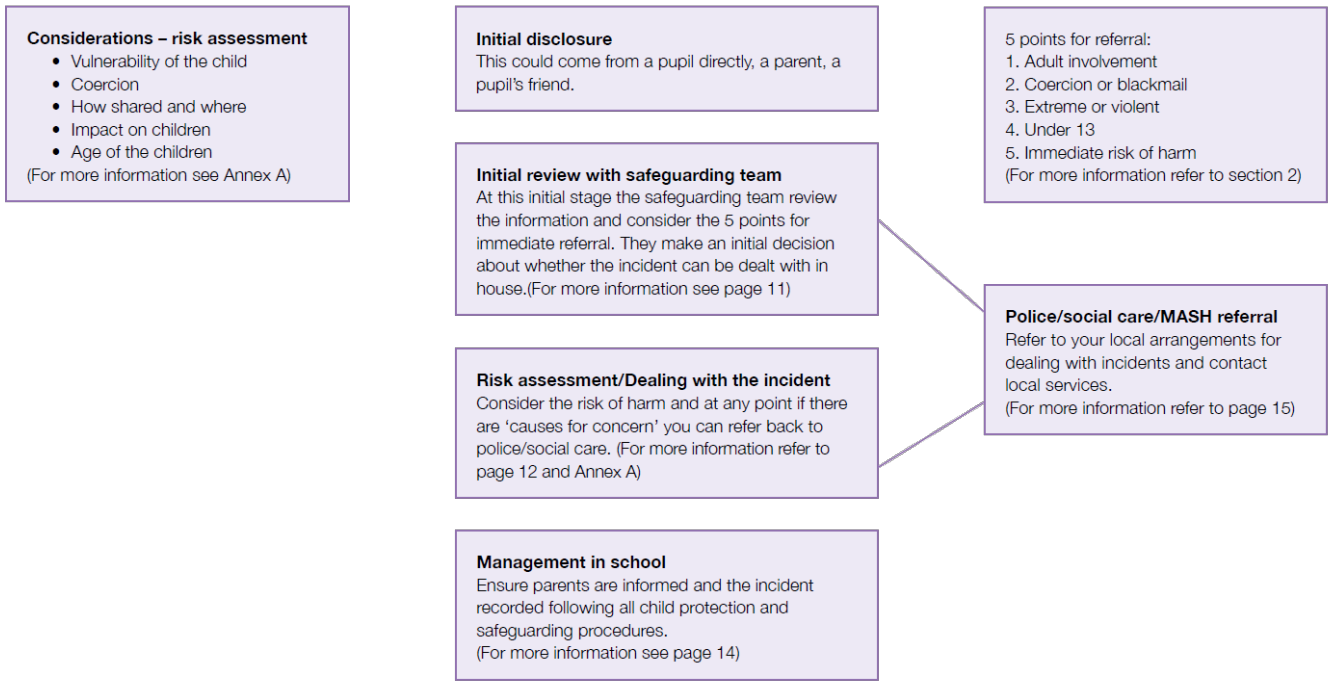
It is important that everyone understands that whilst sexting is illegal, pupils can come and talk to members of staff if they have made a mistake or had a problem in this area.

Up skirting

It is important that everyone understands that up skirting (taking a photo of someone under their clothing, not necessarily a skirt) is now a criminal offence, as highlighted in Keeping Children Safe in Education and that pupils can come and talk to members of staff if they have made a mistake or had a problem in this area.

Annex G

Flowchart for responding to incidents



Bullying

Online bullying should be treated like any other form of bullying and the school Anti Bullying Policy should be followed for online bullying, which may also be referred to as cyberbullying, including issues arising from banter.

Sexual violence and harassment

DfE guidance on sexual violence and harassment is referenced in Keeping Children Safe in Education and a document in its own right. It would be useful for all staff to be aware of this guidance: paragraphs 45-49 cover the immediate response to a report and confidentiality which is highly relevant for all staff; the case studies section provides a helpful overview of some of the issues which may arise.

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

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

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

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

Where pupils contravene these rules, the school Behaviour Policy will be applied; where staff contravene these rules, action will be taken as outlined in the Staff Code of Conduct.

It will be necessary to reinforce these as usual at the beginning of any school year but also to remind pupils that the same applies for any home learning that may take place in future periods of closure/quarantine etc. Further to these steps, the school reserves the right to withdraw – temporarily or permanently – any or all access to such technology, or the right to bring devices onto school property.

Social media incidents

See the social media section later in this document for rules and expectations of behaviour for children and adults in the Merrylands Primary School and Nursery community. These are governed by the school Acceptable Use Policies.

Breaches will be dealt with in line with the school Behaviour Policy (for pupils) or Code of Conduct (for staff).

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

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

Data protection and data security

There are references to the relationship between data protection and safeguarding in key Department for Education documents 'Keeping Children Safe in Education' and 'Data protection: a toolkit for schools' (August 2018), which the DPO and DSL will seek to apply. This quote from the latter document is useful for all staff – note the red and purple highlights:

GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2,18; Schedule 8, 4) When Designated Safeguarding Leads in schools are considering whether, or not, to share safeguarding information (especially with other agencies) it is considered best practice for them to record who they are sharing that information with and for what reason. If they have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file. All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children.

All pupils, staff, governors, volunteers, contractors, and parents are bound by the school's Data Protection Policy and agreements.

Rigorous controls on the Trust network, USO sign-on for technical services, firewalls and filtering all support data protection. The following data security products are also used to protect the integrity of data, which in turn supports data protection: Sophos Anti-Virus, Sophos Anti-Phish, Sophos InterceptX, Sophos Server Advance, Malware Bytes, Egress, Meraki Mobile Device Management and CloudReady/NeverWare.

The headteacher, data protection officer and governors work together to ensure a GDPR-compliant framework for storing data, but which ensures that child protection is always put first and data-protection processes support careful and legal sharing of information.

Staff are reminded that all safeguarding data is highly sensitive and should always be treated with the strictest confidentiality, and only shared via approved channels to colleagues or agencies with appropriate permissions. The use of Egress and/or Essex County Council secure system to encrypt all non-internal emails is compulsory for sharing pupil data. If this is not possible, the DPO and DSL should be informed in advance.

Appropriate filtering and monitoring

Keeping Children Safe in Education obliges schools to ensure appropriate filters and appropriate monitoring systems are in place and not be able to access harmful or inappropriate material but at the same time be careful that 'over blocking' does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

At this school, the internet connection is provided by CoConnect. This means we have a dedicated and secure, school safe connection that is protected with firewalls and multiple layers of security, including a web filtering system, which is made specifically to protect children in schools. You can read more about why this system is appropriate on the UK Safer Internet Centre's appropriate filtering submission pages.

There are three types of appropriate monitoring identified by the Safer Internet Centre. These are:

1. physical monitoring (adult supervision in the classroom, at all times)
2. internet and web access
3. active/Pro-active technology monitoring services

At Merrylands Primary School and Nursery we have decided that Smoothwall is appropriate because this is the software managed by our broadband provider CoConnect. At home, school devices are filtered and monitored when on home WiFi connections.

When pupils log into any school system on a personal device, activity may also be monitored eg if G Suite is used and a filtering extension applied, this will apply when logging into a home Chromebook but also when logging into a Chrome profile on a Windows laptop.

Electronic communications

Please read this section alongside references to pupil-staff communications in the overall school Safeguarding Policy, and in conjunction with the Data Protection Policy. This section only covers electronic communications, but the same principles of transparency, appropriate conduct and audit trail apply.

Email

- pupils at this school use SeeSaw/Google Classroom to communicate with their teacher
- staff at this school use Microsoft Outlook for all school emails

General principles for email use are as follows:

- email is the chat functionality of Google Classroom and the Seesaw Homework submission tool and is the only means of electronic communication to be used between staff and pupils/staff and parents (in both directions). Use of a different platform must be approved in advance by GDPR Officer/Headteacher in advance. Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member)
- email may only be sent using the email systems above. There should be no circumstances where a private email is used; if this happens by mistake, the DSL/Headteacher/GDPRO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately
- staff or pupil personal data should never be sent/shared/stored on email
    - if data needs to be shared with external agencies, email encryption powered by Office 365 is available
    - internally staff should use the school network platform used for storing this data, e.g. cloud-based MIS, school-run Office365 and G Suite, etc]
- appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff
- pupils and staff are NOT allowed to use the email system for personal use and should be aware that all use is monitored, their emails may be read, and the same rules of appropriate behaviour always apply. Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination.

See also the social media section of this Policy.

School website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. The school website is managed by Tech Speed Solutions.

Where other staff submit information for the website, they are asked to remember

- the school has the same duty as any person or organisation to respect and uphold copyright. Sources must always be credited, and material only used with permission. If in doubt, check with Tech Speed Solutions. There are many open-access libraries of high-quality public-domain images that can be used
- where pupil work, images or videos are published on the website, their identities are protected, and full names are not published and when images are saved the file name does not include a pupil's full name

Cloud platforms

For online safety, basic rules of good password hygiene ('treat your password like your toothbrush –never share it with anyone!'), expert administration and training can help to keep staff and pupils safe, and to avoid incidents. The GDPR Officer analyse and document systems and procedures before they are implemented, and regularly review them. The following principles apply

- the GDPRO approves new cloud systems, what may or may not be stored in them and by whom.
- regular training ensures all staff understand sharing functionality and this is audited to ensure that pupil data is not shared by mistake. Open access or widely shared folders are clearly marked as such
- pupils and staff are only given access and/or sharing rights when they can demonstrate an understanding of what data may be stored and how it can be seen
- two-factor authentication is used for access to staff or pupil data
- pupil images/videos are only made public with parental permission
- only school-approved platforms are used by students or staff to store pupil work
- all stakeholders understand the difference between consumer and education products (e.g. a private Gmail account or Google Drive and those belonging to a managed educational domain)

Digital images and video

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

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

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

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

All staff are governed by their Contract of Employment and the school's Acceptable Use Policy, which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. At Merrylands Primary School and Nursery members of staff are allocated a class IPOD which should be used to capture photos and videos of pupils. Occasionally personal phones may be used to capture photos or videos of pupils (with permission from the Headteacher), but these will be appropriate, linked to school activities, taken without secrecy and not in a one-to-one situation, and always moved to school storage as soon as possible, after which they are deleted from personal devices or cloud services.

Photos are stored on the school network in line with the retention schedule of the school Data Protection Policy. Staff and parents/carers are reminded about the importance of not sharing without permission, due to reasons of child protection (e.g. looked-after children often have restrictions for their own protection), data protection, religious or cultural reasons, or simply for reasons of personal privacy.

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

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

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

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

Social media

Merrylands Primary School and Nursery SM presence

Merrylands Primary School and Nursery works on the principle that if we do not manage our social media reputation, someone else will.

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

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

Accordingly, we manage and monitor our social media footprint carefully to know what is being said about the school and to respond to criticism and praise in a fair, responsible manner even though there are no official/active social media accounts.

Staff, pupils', and parents' SM presence

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

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

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

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

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

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

ParentMail is the official electronic communication channels between parents/carers and the school, and between staff and pupils.

Pupils are not allowed* to be 'friends' with or make a friend request** to any staff, governors, volunteers and contractors or otherwise communicate via social media.

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

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

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

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

The serious consequences of inappropriate behaviour on social media are underlined by the fact that of the 131 Prohibition Orders issued to staff in 2017, 73 involved social media/technology (and 27 of the 66 orders by August 2018).

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

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

Device usage

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

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

- pupils in Year 5 and 6 pupils can bring mobile phones in for emergency use only when walking to and from school. Parental consent must be given, and the mobile phones stored securely during the school day
- all staff who work directly with children should leave their mobile phones on silent and only use them in private staff areas during school hours. See also the Digital images and video section and Data protection and data security section. Child/staff data should never be downloaded onto a private

phone. If a staff member is expecting an important personal call when teaching or otherwise on duty, they must seek permission from a member of SLT

- volunteers, contractors, governors should leave their phones in their pockets and turned off. Under no circumstances should they be used in the presence of children or to take photographs or videos. If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the Headteacher should be sought (the Headteacher may choose to delegate this) and this should be done in the presence of a member of staff
- parents should ask permission before taking any photos, e.g. of displays in corridors or classrooms and avoid capturing other children. When at school events, please refer to the Digital images and video section of this document. Parents are asked not to call pupils on their mobile phones during the school day, urgent messages can be passed via the school office

Network/internet access on school devices

- pupils are not allowed networked file access via personal devices. However, they can access the school wireless internet network for school-related internet use/limited personal use within the framework of the Acceptable Use Policy. All such use is monitored
- home devices from the DfE scheme are issued to some pupils. These are restricted to the apps/software installed by the school and may be used for learning and reasonable and appropriate personal use at home, but all usage may be tracked. The devices are filtered and monitored when on home WiFi connections
- all staff who work directly with children should leave their mobile phones on silent and only use them in private staff areas during school hours. See also the Digital images and video section and Data protection and data security section. Child/staff data should never be downloaded onto a private phone
- volunteers, contractors, governors can access the guest wireless network but have no access to networked files/drives, subject to the Acceptable Use Policy.
- parents/carers have no access to the school network or wireless internet on personal devices.

Trips/events away from school

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

Searching and confiscation

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

Appendices

- Safeguarding Incident log (CPOMS)
- Safeguarding and Child Protection Policy
- Behaviour Policy / Anti-Bullying Policy
- Staff Code of Conduct
- Acceptable Use Policies (AUPs) for:
    - Pupils Reception / KS1 / KS2
    - Staff, Volunteers Governors & Contractors
    - Parents
- Form to parents about filming/photographing/streaming school events
- Online-Safety Questions from the Governing Board (UKCIS)
- Safer working practice for those working with children and young people in education (Safer Recruitment Consortium)
- Working together to safeguard children (DfE)
- Searching, screening and confiscation advice (DfE)
- Sexual violence and sexual harassment between children in schools and colleges (DfE advice)
- Sexting guidance from UKCIS
    - Overview for all staff
    - Full guidance for school DSLs
- Prevent Duty Guidance for Schools (DfE and Home Office documents)
- Data protection and data security advice, procedures etc
- Preventing and tackling bullying (DfE)
- Cyber bullying: advice for headteachers and school staff (DfE)
- RAG (red-amber-green) audits for statutory requirements of school websites