



# Willingdon

## COMMUNITY SCHOOL

### Willingdon Community School Online Safety Policy

#### Key Details

Designated Safeguarding Lead(s): Ali Walters

Named Governor with lead responsibility: Brett Levett

Date agreed and ratified by Governing Body: September 2023

Date of next review: September 2024

This policy will be reviewed at least annually. It will also be revised following any concerns and/or updates to national and local guidance or procedure

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# Online Safety Policy

## 1. Policy Aims

- This online safety policy has been adapted by Willingdon Community School involving staff, students, governors and parents/carers, building on the East Sussex County Council/The Education People online safety policy template, with specialist advice and input as required.
- It takes account of the DfE statutory guidance Keeping Children Safe in Education 2023 and the East Sussex Safeguarding Children Partnership procedures.
- The purpose of this online safety policy is to:
  - Safeguard and protect all members of our community online.
  - Identify approaches to educate and raise awareness of online safety throughout the community.
  - Enable all staff to work safely and responsibly, to role model positive behaviour online and to manage professional standards and practice when using technology.
  - Identify clear procedures to use when responding to online safety concerns.
- We identify that the issues classified within online safety are considerable, but can be broadly categorised into four areas of risk:
  - **Content:** being exposed to illegal, inappropriate or harmful material
  - **Contact:** being subjected to harmful online interaction with other users
  - **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
  - **Commerce/ Contract:** risks such as online gambling, inappropriate advertising, phishing and or financial scams and sextortion (online sexual coercion and extortion of children).

## 2. Policy Scope

- We believe that online safety is an essential part of safeguarding and acknowledges its duty to ensure that all students and staff are protected from potential harm online.
- We identify that the internet and associated devices, such as computers, tablets, mobile phones, smart watches and games consoles, are an important part of everyday life.
- We believe that students should be empowered to build resilience and to develop strategies to manage and respond to risk online.
- This policy applies to all staff including the governing body, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for, or provide services on behalf of the setting (collectively referred to as “staff” in this policy) as well as students, parents and carers.
- This policy applies to all access to the internet and use of technology, including personal devices, or where students, staff or other individuals have been provided with setting issued devices for use off-site, such as a work laptops, tablets or mobile phones.
- The Education and Inspections Act 2006 empowers Headteachers/Principals to such extent as is reasonable to regulate the behaviour of students when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. E.g.

online bullying or online safety incidents which may take place outside of the school but is linked to member of the school. The Behaviour in Schools guidance (2022) further reinforces this stating: *Maintained schools and academies' behaviour policies should set out what the school will do in response to non-criminal poor behaviour and bullying which occurs off the school premises or online and which is witnessed by a staff member or reported to the school,*

- In this respect the school will deal with such incidents within this policy and associated behaviour and anti-bullying policies to such extent as is reasonable and will, where known, inform parents/carers of incidents of inappropriate online safety behaviour that has taken place out of school. Action can only be taken over issues covered by the published Behaviour Policy

## 2.1 Links with other policies and practices

- This policy links with several other policies (but not limited to):
  - Anti-bullying policy
  - Acceptable Use Agreements (AUA) and the Code of Conduct/Staff behaviour policy
  - Behaviour for Learning policy
  - Safeguarding and Child protection policy
  - Curriculum policies, such as: (PSHE), Citizenship and Relationships and Sex Education (RSE)
  - GDPR
  - Remote Learning Policy

This policy should also be read in conjunction with the school Vision Statement and Ethos of the School as detailed below.

### ***We are Willingdon***

We are a united, vibrant community which demonstrates personal excellence in all that we do. Learning at Willingdon transforms lives by igniting curiosity and expecting the very best from staff and students alike. We value opportunities, aiming for success today to prepare for challenges and opportunities tomorrow. We are respectful, honest and courteous to empower each other on our unique learning journeys. We look after ourselves and each other, and show empathy, respect and compassion to all people and our environment along the way. We encourage tolerance, resilience and reflection, which in turn allows everyone to make progress every lesson. We work together as a harmonious community to be the very best versions of ourselves.

### ***This makes us Willingdon***

### ***Ethos***

At Willingdon Community School, we aim to develop, in all our students, key values which we consider contribute to the achievement of what we refer to as, Personal Excellence.

***Ambition***

To strive to do your best on all occasions. Take on new challenges and challenge yourself to reach the highest possible standards and be personally successful.

***Respect***

To respect and value all members of our community, recognising and celebrating our differences. Respect ourselves, valuing what we can each bring to our community.

***Compassion***

Understand the needs of others and support those who sometimes need our help. Contribute to charitable work which supports those less well-off in the world.

***Courtesy***

Be well mannered in all situations, displaying the basic courtesies that we all value. Greet those you work with regularly; be particularly welcoming and polite to visitors and show appreciation for those who support and work closely with you.

***Honesty***

Always be honest, even when it may appear difficult. Be honest to yourself - know your strengths and your weaknesses.

**2.2 Online safety in community activities, after-school clubs and tuition**

- When our school hires out or lets school facilities/premises to organisations or individuals (e.g. community groups, sports associations and service provider to run community or extra-curricular activities), we ensure that appropriate arrangements are in place to keep children safe.
- We seek assurances that where services or activities are provided separately by another body (not under direct supervision or management of our school staff) there are appropriate safeguarding and child protection policies and procedures in place (including online safety) and will inspect these as necessary. This applies regardless of whether or not the children who are attending these services are on our school roll.
- Safeguarding arrangements are clearly detailed in any transfer of control agreement (i.e. lease or hire agreement).
- The DfE has published [Keeping Children Safe during community activities, after-school clubs and tuition](#) for organisations and individuals who provide these activities for children and young people and this document contains a section on online safety which makes clear that the provider should have an online safety policy or acceptable use policies in place as well as appropriate filtering and monitoring. A staff behaviour policy should also include information on

relationships and communications between children (and parents) and staff/volunteers, including the use of social media.

### 3. Monitoring and Review

- Technology in this area evolves and changes rapidly; We will review this policy at least annually
  - The policy will also be revised following any national or local policy requirements, any child protection concerns or any changes to the technical infrastructure
- We will regularly monitor internet use and evaluate online safety mechanisms to ensure that this policy is consistently applied.
- To ensure they have oversight of online safety, the headteacher will be informed of online safety concerns, as appropriate.
- The named governor for safeguarding (Jo Saunders) will report on a regular basis to the governing body on online safety practice and incidents, including outcomes.
- Any issues identified via monitoring will be incorporated into our action planning.

### 4. Roles and Responsibilities

- The Designated Safeguarding Lead (DSL) Ali Walters, Deputy Headteacher has lead responsibility for online safety.
  - Whilst activities of the designated safeguarding lead may be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL.
- We recognise that all members of the community have important roles and responsibilities to play with regards to online safety.
- The digital and technology standards in schools guidance states that the governing body should identify and assign a member of the leadership team and a governor to be responsible for ensuring these standards are met. The governor responsible for this is the Safeguarding Link governor.
- **The ICT manager also has a lead role in ensuring the online safety of the school community.**

#### 4.1 The leadership and management team and governors will:

- Ensure that online safety is viewed as a safeguarding issue and that practice is in line with national and local recommendations and requirements.
- Ensure that online safety is a running and interrelated theme whilst devising and implementing the whole school approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies (including the staff code of conduct and/or acceptable use policies) and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

- Ensure that they are doing all that they reasonably can to limit children’s exposures to risks from the school’s IT system and therefore have appropriate filtering and monitoring systems in place. They will have an awareness and understanding of the provisions in place and will work with technical staff to monitor the safety and security of our systems and networks.
- Ensure that all relevant staff have an awareness and understanding of the filtering and monitoring provisions in place and manage them effectively as well as knowing how to escalate concerns when identified.
- Ensure that they regularly review the effectiveness of filters and monitoring systems; as schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material (including when they are online at home).
- Ensure that the DfE’s filtering and monitoring standards for schools and colleges are being met: this will be supported through using the checklist attached to this policy.
  - Ensure that online safety is embedded within a progressive preventative curriculum, which enables all students to develop an age-appropriate understanding of online safety.
  - Recognise that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
  - Ensure that ALL members of staff receive regular, updated, and appropriate online safety training which is integrated, aligned and considered as part of the whole school or college safeguarding approach and know how to escalate concerns when identified.
- Support the DSL and any deputies by ensuring they have the additional time, funding, training, resources and support they need to carry out the role effectively.
  - Ensure there are robust reporting channels for the community to access regarding online safety concerns, including internal, local and national support.
  - Audit and evaluate online safety practice, annually, to identify strengths and areas for improvement.
  - Ensure that appropriate risk assessments are undertaken regarding the safe use of technology that considers and reflects the risks our children face.
  - Communicate with parents regarding the importance of children being safe online, the systems being used in school and information regarding what their children are being asked to do online by the school.

#### **4.2 The Designated Safeguarding Lead (DSL) will:**

- be an appropriate senior member of staff from the school leadership team.
- Act as a named point of contact on all online safeguarding issues and liaise with other members of staff or other agencies, as appropriate.
- Work alongside deputy DSLs to ensure online safety is recognised as part of the settings safeguarding responsibilities and that a coordinated approach is implemented.



- Liaise with staff (especially pastoral support staff, school nurses, IT technicians, senior mental health leads and SENCOs) on matters of safeguarding that include online and digital safety.
- Access regular and appropriate training and support to ensure they understand the unique risks associated with online safety, including filtering and monitoring and have the relevant knowledge and up to date required to keep students safe online.
- Access regular and appropriate training and support to ensure they recognise the additional risks that students with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation.
- Keep up to date with current research, legislation and trends regarding online safety and communicate this with the community, as appropriate.
- Work with staff to coordinate participation in local and national events to promote positive online behaviour, such as Safer Internet Day.
- Ensure that online safety is promoted to parents, carers and the wider community, through a variety of channels and approaches.
- Maintain records of online safety concerns, as well as actions taken, as part of the settings safeguarding recording mechanisms.
- Monitor online safety incidents to identify gaps and trends, and use this data to update the education response, policies and procedures.
- Report online safety concerns to the SLT.
- Work with the leadership team to review and update online safety policies on a regular basis (at least annually) with stakeholder input, including from students.
- Meet termly with the governor with a lead responsibility for safeguarding *and* online safety.
- The triangulation meeting will also consider patterns of online safety issues to support the DSL and to work with the IT and RSHE leads to address issues in the curriculum.

#### **4.3 It is the responsibility of all members of staff to:**

- Be aware that technology is a significant component of many safeguarding and wellbeing issues and that children are at risk of abuse online as well as face to face and that in many cases abuse will take place concurrently via online channels and in daily life.
- Contribute to the development of online safety policies.
- Read and adhere to the online safety policy and acceptable use policies.
- Take responsibility for the security of setting systems and the data they use or have access to.
- Model good practice when using technology and maintain a professional level of conduct in their personal use of technology, both on and off site.
- Embed online safety education in curriculum delivery, wherever possible.
- Have an awareness of a range of online safety issues and how they may be experienced by the children in their care.
- Identify online safety concerns and take appropriate action by following the settings safeguarding policies and procedures.

- Proactively monitor the use of digital technologies, mobile devices, cameras etc in lessons and other school activities and consistently implement current policies with regard to these devices.
- Know when and how to escalate online safety issues, including signposting to appropriate support, internally and externally.
- Take personal responsibility for professional development in this area.
- Ensure that students are guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Reinforce the school's online safety messages when teaching lessons online.

#### **4.4 It is the responsibility of staff managing the technical environment to:**

- Provide technical support and perspective to the DSL and leadership team, especially in the development and implementation of appropriate online safety policies and procedures and compliance with DfE's filtering and monitoring standards for schools and colleges.
- Implement appropriate security measures to ensure that the settings IT infrastructure/system is secure and not open to misuse or malicious attack, whilst allowing learning opportunities to be maximised. This includes using 2 factor authentication where available, unique passwords, not allowing users to re-use passwords and changing passwords frequently. Our additional security measures include; web filtering, spam filtering, network firewall, anti-virus, end point encryption and ransomware protection and online back ups.
- Ensure that our filtering policy is applied and updated on a regular basis; responsibility for its implementation is shared with the leadership team.
- Report any filtering breaches to the DSL (or deputy DSLs) and leadership team, as well as, the settings Internet Service Provider or other services, as appropriate.
- Ensure that any safeguarding concerns, identified through monitoring or filtering breaches are reported to the DSL (or deputy DSLs), in accordance with the safeguarding procedures.

#### **4.5 It is the responsibility of students (at a level that is appropriate to their individual age and ability) to:**

- Engage in age appropriate online safety education opportunities provided by the school/setting.
- Contribute to the development of online safety policies.
- Read and adhere to Acceptable Use Policies.
- Understand the importance of good online safety practice out of school, and understand that this policy covers their actions outside of school if related to their membership of the school.
- Respect the feelings and rights of others both on and offline.
- Take responsibility for keeping themselves and others safe online.
- Seek help from a trusted adult or other support services, if there is a concern online, and support others that may be experiencing online safety issues.

#### **4.6 It is the responsibility of parents and carers to:**

- Read the Acceptable Use Policies and encourage their children to adhere to them.

- Support our online safety approaches by discussing online safety issues with their children and reinforcing appropriate and safe online behaviours at home.
- Role model safe and appropriate use of technology and social media.
- Abide by the Acceptable Use Policies.
- Identify changes in behaviour that could indicate that their child is at risk of harm online.
- Seek help and support from the setting, or other appropriate agencies, if they or their child encounter risk or concerns online.
- Contribute to the development of the online safety policies.
- Use our systems, such as learning platforms, and other network resources, safely and appropriately.
- Take responsibility for their own awareness in relation to the risks and opportunities posed by new and emerging technologies.

## 5. Education and Engagement Approaches

### 5.1 Education and engagement with students

- We will establish and embed a progressive online safety curriculum to raise awareness and promote safe and responsible online behaviour at school and at home amongst students by:
  - Ensuring education regarding safe and responsible use precedes internet access.
  - Including online safety in Relationship, Social, Health and Economic (RSHE), Relationships and Sex Education (RSE) and computing programmes of study. Online safety is also to be covered in each year of the KS3 IT/ Computing curriculum.
  - Reinforcing online safety messages whenever technology or the internet is in use.
  - Educating students in the effective use of the internet to research; including the skills of knowledge location, retrieval and evaluation. This should include the use of generative A.I. tools and services.
  - Teaching students to be critically aware of the materials they read and shown how to validate information before accepting its accuracy.
- Willingdon Community School will support students to read and understand the acceptable use policies in a way which suits their age and ability by:
  - Displaying acceptable use posters in all rooms with internet access.
  - Informing students that network and internet use will be monitored for safety and security purposes and in accordance with legislation.
  - Rewarding positive use of technology.
  - Implementing appropriate peer education approaches.
  - Providing online safety education and training as part of the transition programme across the key stages and when moving between establishments.
  - Using support, such as external visitors, where appropriate, to complement and support our internal online safety education approaches.

## 5.2 Vulnerable Students

- Willingdon Community School recognises that some students are more vulnerable online due to a range of factors. This may include, but is not limited to children in care, children with Special Educational Needs and Disabilities (SEND) or mental health needs, children with English as an additional language (EAL) and children experiencing trauma or loss.
- We recognise that children with cognitive difficulties may be unable to understand the difference between fact and fiction in online content and then may repeat the content/behaviours without understanding the consequences of doing so.
- Willingdon Community School will ensure that differentiated and ability appropriate online safety education, access and support is provided to vulnerable students.
- When implementing an appropriate online safety policy and curriculum Willingdon Community School will seek input from specialist staff as appropriate, including the SENCO, Designated Teacher for LAC and other appropriate staff.

## 5.3 Training and engagement with staff

We will:

- Provide and discuss the online safety policy and procedures with ALL members of staff as part of induction.
- Provide up-to-date and appropriate online safety training for all staff and governors on a regular basis, with at least annual updates. This will be done through stand-alone sessions or through drip feeding with small sessions/ daily bulletin reminders. We have also purchased some online training to support staff.
  - This will cover the potential risks posed to students (Content, Contact, Conduct and Commerce) as well as our professional practice expectations.
- Recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns and provide opportunities for staff to contribute to and shape online safety policies and procedures.
- Make staff aware that our IT systems are monitored, and that activity can be traced to individual users; staff will be reminded to behave professionally and in accordance with our policies when accessing our systems and devices.
- Make staff aware that their online conduct outside of the setting, including personal use of social media, could have an impact on their professional role and reputation.
- Highlight useful educational resources and tools which staff should use, according to the age and ability of the students.
- Ensure all members of staff are aware of the procedures to follow regarding online safety concerns affecting students, colleagues or other members of the community.

## 5.4 Awareness and engagement with parents and carers

- We recognise that parents and carers have an essential role to play in enabling children and young people to become safe and responsible users of the internet and associated technologies.
- We will build a partnership approach to online safety with parents and carers by:
  - Providing information and guidance on online safety in a variety of formats.

- This will include offering specific online safety awareness training and highlighting online safety at other events such as parent evenings, transition events, fetes and sports days.
- Drawing their attention to the online safety policy and expectations in newsletters, letters, our prospectus and on our website.
- Requesting that they read online safety information as part of joining our community, for example, within our home school agreement.
- Requiring them to read our acceptable use policies and discuss the implications with their children.
- Providing them with information about our approach to filtering and monitoring as well as information about the types of things that children will be doing online.

## 6. Responding to Online Safety Incidents and Concerns

- All members of the community will be made aware of the reporting procedure for online safety concerns, including breaches of filtering, youth produced sexual imagery (sharing of nudes or semi-nudes/sexting), cyberbullying and illegal content.
- All members of the community will be directed to the DSL or headteacher in such circumstances.
- All members of the community must respect confidentiality and the need to follow the official procedures for reporting concerns.
- We require staff, parents, carers and students to work in partnership to resolve online safety issues.
- After any investigations are completed, we will debrief, identify lessons learnt and implement any policy or curriculum changes as required.
- Safeguarding concerns and incidents, at level 3 or 4 on the Continuum of Need, should be reported to Single Point of Advice in line with East Sussex Safeguarding and Child Protection model policy.
- If we are unsure how to proceed with an incident or concern, the DSL (or deputies) will seek advice from the Standards and Learning Effectiveness Service Safeguarding Team.
- Where there is suspicion that illegal activity has occurred contact the Sussex Police using 101, or 999 if there is immediate danger or risk of harm.
- If an incident or concern needs to be passed beyond our community (for example if other local settings are involved or the public may be at risk), the DSL or headteacher will contact Sussex Police first to ensure that potential investigations are not compromised.

### 6.1 Concerns about Students' Welfare

- The DSL (or deputies) will be informed of any online safety incidents involving safeguarding or child protection concerns.
  - The DSL (or deputies) will record these issues in line with our child protection policy.

- The DSL (or deputies) will ensure that online safety concerns are escalated and reported to relevant agencies in line with the East Sussex Safeguarding Children Partnership thresholds and procedures.
- We will inform parents and carers of online safety incidents or concerns involving their child, as and when required.

## 6.2 Staff Misuse

- Any complaint about staff misuse will be referred to the headteacher, in accordance with the allegations policy.
- For any allegations regarding a member of staff's online conduct a consultation will be sort with the LADO (Local Authority Designated Officer).
- Appropriate action will be taken in accordance with our staff behaviour policy/code of conduct.

# 7. Procedures for Responding to Specific Online Incidents or Concerns

## 7.1 Online Sexual Violence and Sexual Harassment between Children

- Our setting has accessed and understood part 5 of Keeping Children Safe in Education September 2023.
- We recognise that sexual violence and sexual harassment between children can take place online and our staff will maintain an attitude of 'it could happen here'. Examples may include; non-consensual sharing of nudes and semi-nudes images and videos, sharing of unwanted explicit content, upskirting, sexualised online bullying, online coercion and threats, unwanted sexual comments and messages on social media, and online sexual exploitation.
  - Full details of how we will respond to concerns relating to sexual violence and sexual harassment between children can be found within our child protection and anti-bullying policy.
- We recognise that the internet brings the potential for the impact of any sexual violence and sexual harassment concerns to extend further than the local community, and for a victim or alleged perpetrator to become marginalised and excluded by online communities.
- We also recognise the potential for repeat victimisation in the future if abusive content continues to exist somewhere online.
- We will ensure that all members of the community are made aware of the potential social, psychological and criminal consequences of online sexual violence and sexual harassment between children by implementing a range of age and ability appropriate educational methods as part of our RSHE and RSE curriculum.
- We will ensure that all members of the community are aware of sources of support regarding online sexual violence and sexual harassment between children.
- We will respond to concerns regarding online sexual violence and sexual harassment between children, regardless of whether the incident took place on our premises or using our equipment.
- If made aware of online sexual violence and sexual harassment, we will:

- Immediately notify the DSL (or deputy) and act in accordance with our child protection and anti-bullying policies.
- If content is contained on students electronic devices, they will be managed in accordance with the DfE '[searching screening and confiscation](#)' advice.
- Provide the necessary safeguards and support for all students involved, such as offering specific advice on blocking, reporting and removing online content, as well as providing appropriate counselling/pastoral support.
- Implement appropriate sanctions in accordance with our behaviour for learning policy.
- Inform parents and carers, if appropriate, about the incident and how it is being managed.
- If appropriate, make a referral to partner agencies, such as Children's Social Care and/or the Police.
- If the concern involves children and young people at a different educational setting, work in partnership with other DSLs to ensure appropriate safeguarding action is taken in the wider local community.
  - If a criminal offence has been committed, the DSL (or deputy) will discuss this with Sussex Police first to ensure that investigations are not compromised.
- Review the handling of any incidents to ensure that best practice was implemented, and policies/procedures are appropriate.

## 7.2 Youth Produced Sexual Imagery ('Sharing nudes and semi nudes')

- We recognise youth produced sexual imagery (known as "sharing nudes and semi nudes") as a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- We will follow the advice as set out in the non-statutory UK Council for Internet Safety (UKCIS), [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- We will ensure that all members of the community are made aware of the potential social, psychological and criminal consequences of sharing nudes and semi nudes (or sexting) by implementing preventative approaches, via a range of age and ability appropriate educational methods. For example sharing information from National Online Safety.
- We will ensure that all members of the community are aware of sources of support regarding youth produced sexual imagery.
- We will respond to concerns regarding youth produced sexual imagery, regardless of whether the incident took place on/off site or using setting provided or personal equipment.
- We will not:
  - View any images suspected of being youth produced sexual imagery, unless there is
  - a clear need or reason to do so in order to safeguard the child or young person. If it is necessary to view the image(s) in order to safeguard the child or young person, the image will only be viewed by the DSL (or deputy DSL) and their justification for viewing the image will be clearly documented. - **in most cases, images or videos should not be**

**viewed.** The UKCIS/DSIT guidance [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) provides information on the steps to be taken if an image does need to be viewed.

- Send, share, save or make copies of content suspected to be an indecent image of a child (i.e. youth produced sexual imagery) and will not allow or request students to do so.
- If made aware of an incident involving the creation or distribution of youth produced sexual imagery, we will:
  - Act in accordance with our child protection policy.
  - Ensure the DSL (or deputy) responds in line with the UK Council for Internet Safety (UKCIS), [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#), guidance.
  - Store the device securely.
    - If an indecent image has been taken or shared on our network or devices, we will act to block access to all users and isolate the image.
  - Carry out a risk assessment which considers any vulnerability of students involved; including carrying out relevant checks with other agencies.
  - Inform parents and carers, if appropriate, about the incident and how it is being managed.
  - Make a referral to Children’s Social Care and/or the Police, as appropriate.
  - Provide the necessary safeguards and support for students, such as offering counselling or pastoral support. This will include signposting to services such as [report remove](#) and [take it down](#)
  - Implement appropriate sanctions in accordance with our behaviour policy but taking care not to further traumatise victims where possible.
  - Consider the deletion of images in accordance with the UK Council for Internet Safety (UKCIS), [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) guidance.
    - Images will only be deleted once the DSL has confirmed that other agencies do not need to be involved; and are sure that to do so would not place a child at risk or compromise an investigation.
  - Review the handling of any incidents to ensure that best practice was implemented; the leadership team will also review and update any management procedures, where necessary.

### **7.3 Online Child Sexual Abuse and Exploitation (including child criminal exploitation and County Lines)**

- We will ensure that all members of the community are aware of online child sexual abuse including exploitation and grooming, the consequences, possible approaches which may be employed by offenders to target children and how to respond to concerns.



- We recognise online child sexual abuse and exploitation (including criminal exploitation) as a safeguarding issue and, as such, all concerns will be reported to and dealt with by the DSL (or deputy).
- We will implement preventative approaches for online child sexual abuse and exploitation (including criminal exploitation) via a range of age and ability appropriate education for students, staff and parents/carers.
- We will ensure that all members of the community are aware of the support available regarding online child sexual abuse and exploitation (including criminal exploitation), both locally and nationally.
- We will ensure that the 'Click CEOP' report button is visible and available to students and other members of our community. This is on our website.
- If made aware of incident involving online child sexual abuse and exploitation (including criminal exploitation), we will:
  - Act in accordance with our child protection policies and the relevant East Sussex Safeguarding Child Partnership's procedures.
  - If appropriate, store any devices involved securely.
  - Make a referral to Children's Social Care (if required/ appropriate) and immediately inform the police via 101 (or 999 if a child is at immediate risk)
  - Carry out a risk assessment which considers any vulnerabilities of pupil(s) involved (including carrying out relevant checks with other agencies).
  - Inform parents/carers about the incident and how it is being managed.
  - Provide the necessary safeguards and support for students, such as, offering counselling or pastoral support.
  - Review the handling of any incidents to ensure that best practice is implemented; leadership team will review and update any management procedures, where necessary.
- We will respond to concerns regarding online child sexual abuse and exploitation (including criminal exploitation), regardless of whether the incident took place on our premises or using setting provided or personal equipment.
  - Where possible, students will be involved in decision making and if appropriate, will be empowered to report concerns such as via the Click CEOP report: [www.ceop.police.uk/safety-centre/](http://www.ceop.police.uk/safety-centre/)
- If we are unclear whether a criminal offence has been committed, the DSL (or deputy) will obtain advice immediately through the Police.
- If students at other settings are believed to have been targeted, the DSL (or deputy) will contact the Police.

#### **7.4 Indecent Images of Children (IIOC)**

- We will ensure that all members of the community are made aware of the possible consequences of accessing Indecent Images of Children (IIOC).
- We will respond to concerns regarding IIOC on our equipment and/or personal equipment, even if access took place off site.
- We will seek to prevent accidental access to IIOC by using an internet service provider (ISP) which implements appropriate filtering, firewalls and anti-spam software.

- If we are unclear if a criminal offence has been committed, the DSL (or deputy) will obtain advice immediately through the Police.
- If made aware of IIOC, we will:
  - Act in accordance with our child protection policy.
  - Store any devices involved securely.
  - Immediately inform appropriate organisations, such as the Internet Watch Foundation (IWF), Sussex police or the LADO.
- If made aware that a member of staff or a student has been inadvertently exposed to indecent images of children, we will:
  - Ensure that the DSL (or deputy DSL) is informed, who will investigate the incident.
  - Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via [www.iwf.org.uk](http://www.iwf.org.uk) .
  - Ensure that any copies that exist of the image, for example in emails, are deleted.
  - Report concerns, as appropriate to parents and carers.
- If made aware that indecent images of children have been found on the setting provided devices, we will:
  - Ensure that the DSL (or deputy DSL) and headteacher are informed.
  - Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via [www.iwf.org.uk](http://www.iwf.org.uk) .
  - Ensure that any copies that exist of the image, for example in emails, are deleted once directed to by the police.
  - Inform the police via 101 (999 if there is an immediate risk of harm) and children's social services (as appropriate).
  - Only store copies of images (securely, where no one else has access to them and delete all other copies) at the request of the police only.
  - Report concerns, as appropriate to parents and carers.
- If made aware that a member of staff is in possession of indecent images of children on setting provided devices, we will:
  - Ensure that the headteacher is informed in line with our managing allegations against staff policy.
  - Inform the Local Authority Designated Officer (LADO) and other relevant organisations in accordance with our managing allegations against staff policy.
  - Quarantine any devices until police advice has been sought.

## 7.5 Cyberbullying

- All staff will understand that children are capable of abusing their peers online. Cyberbullying, along with all other forms of bullying, will not be tolerated here.
- Full details of how we will respond to cyberbullying are set out in our anti-bullying policy.

## 7.6 Cybercrime

- We will ensure that all members of the community are aware that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.
- If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will consider referring into the Cyber Choices programme.
- We will seek advice from Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre.

## 7.7 Online Hate

- Online hate content, directed towards or posted by, specific members of the community will not be tolerated at our setting and will be responded to in line with existing policies, including anti-bullying and behaviour.
- All members of the community will be advised to report online hate in accordance with relevant policies and procedures.
- The Police will be contacted if a criminal offence is suspected.
- If we are unclear on how to respond, or whether a criminal offence has been committed, the DSL (or deputy DSL) will obtain advice through the Standards and Learning Effectiveness Service and/or Sussex Police.

## 7.8 Online Radicalisation and Extremism

- Willingdon Community School will ensure that all members of the community are made aware of the role of the internet as a tool for radicalisation.
- We will take all reasonable precautions to ensure that students and staff are safe from terrorist and extremist material when accessing the internet on site. Internet use is monitored through the Smoothwall and Visago systems with daily reporting of risk categories to the safeguarding team.
- If we are concerned that a child or parent/carer may be at risk of radicalisation online, the DSL (or deputy DSL) will be informed immediately, and action will be taken in line with our child protection policy.
- If we are concerned that a member of staff or governor may be at risk of radicalisation online, the headteacher will be informed immediately, and action will be taken in line with the child protection and allegations policies.

# 8. Safer Use of Technology

## 8.1 Classroom Use

- Willingdon Community School uses a wide range of technology. This includes access to:
  - Computers, laptops and other digital devices
  - Internet which may include search engines and educational websites
  - Email
  - Digital cameras, web cams and video cameras

- All setting owned devices will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- Members of staff will always evaluate websites, tools and apps fully before use in the classroom or recommending for use at home.
- The setting will use age appropriate search tools following an informed risk assessment, to identify which tool best suits the needs of our community.
- We will ensure that the use of internet-derived materials, by staff and students complies with copyright law and acknowledge the source of information.
- Supervision of students will be appropriate to their ability and understanding.

## 8.2 Managing Internet Access

- We will maintain a written record of users who are granted access to our devices and systems.
- All staff, students and visitors will read and sign an acceptable use policy before being given access to our computer system, IT resources or internet.

## 8.3 Filtering and Monitoring

- The school is compliant with the DfE's filtering and monitoring standards for schools and colleges. This is checked and reviewed at least annually using the checklist appended to this policy.

### 8.3.1 Decision Making

- Willingdon Community School governors and leaders have ensured that our setting has age and ability appropriate filtering and monitoring in place, to limit student's exposure to online risks.
- The governors and leaders are aware of the need to prevent "over blocking", as that may unreasonably restrict what can be taught, with regards to online activities and safeguarding.
- Our decision regarding filtering and monitoring has been informed by a risk assessment, considering our specific needs and circumstances and is reviewed at least annually by the DSL, IT service provider and the governor responsible for safeguarding/online safety. A review will also be carried out following the identification of a safeguarding risk or any changes in working practice such as remote access or Bring Your Own Device or if new technology is introduced. We follow the guidance outlined in the DfE filtering and monitoring standards when carrying out the review.
- Changes to the filtering and monitoring approach will be risk assessed by staff with educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.

- The leadership team will ensure that regular checks are made to ensure that the filtering and monitoring methods are effective and appropriate using the [Safer Internet Centre guidance](#) on appropriate filtering and appropriate monitoring.
- All members of staff are aware that they cannot rely on filtering and monitoring alone to safeguard students; effective classroom management and regular education about safe and responsible use is essential.

### 8.3.2 Filtering

- Education broadband connectivity is provided through BT.
- We use Smoothwall which blocks sites which can be categorised as: pornography, racial hatred, extremism, gaming and sites of an illegal nature. Our filtering provider is a member of the Internet Watch Foundation (IWF).
- The filtering system blocks all sites on the [Internet Watch Foundation](#) (IWF) list.
- The filtering system blocks all sites on the Counter Terrorism Internet Referral Unit (CTIRU) list.
- We work with BT and Smoothwall to ensure that our filtering policy is continually reviewed.
- If students discover unsuitable sites, they will be required to:
  - **Turn off monitor/screen and report the concern immediate to a member of staff.**
  - The member of staff will report the concern (including the URL of the site if possible) to the DSL (or deputies) and/or technical staff.
  - The breach will be recorded and escalated as appropriate.
  - Parents/carers will be informed of filtering breaches involving their child.
- Any material believed to be illegal will be reported immediately to the appropriate agencies, such as the IWF, Sussex Police or CEOP.

### 8.3.3 Monitoring

- We will appropriately monitor internet use on all setting owned or provided internet enabled devices and personal devices which connect to the school infrastructure/network. This is achieved by:
  - Use of our monitoring systems such as Smoothwall and Visago. Reports are sent to the Safeguarding and DOSP team to investigate
- If a concern is identified via monitoring approaches we will:
  - DoSP and/ or Safeguarding team will respond in line with the child protection policy.
- All users will be informed that use of our systems can be monitored and that all monitoring will be in line with data protection, human rights and privacy legislation.

## 8.4 Managing Personal Data Online

- Personal data will be recorded, processed, transferred and made available online in accordance with General Data Protection Regulations and Data Protection legislation.

## 8.5 Security and Management of Information Systems

- We adhere to and meet the [DfE cybersecurity standards](#)
- We take appropriate steps to ensure the security of our information systems, including: Further information is available in the DfE cybersecurity standards.  
<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges>
  - Protecting all devices on every network with a properly configured boundary or software firewall.
  - Keeping an up-to-date list of every device that is able to access the network and ensuring their security features are enabled, correctly configured and up to date.
  - Ensuring that accounts only have the access that they require to perform their role and should be authenticated to access data and services.
    - Virus protection being updated regularly.
    - Encryption for personal data sent over the Internet or taken off site (such as via portable media storage) or access via appropriate secure remote access systems.
    - Not using portable media without specific permission; portable media will be checked by an anti-virus /malware scan before use.
    - Not downloading unapproved software to work devices or opening unfamiliar email attachments.
    - Regularly checking files held on our network.
    - The appropriate use of user logins and passwords to access our network.
    - All users are expected to log off or lock their screens/devices if systems are unattended.

### 8.5.1 Password policy

- All members of staff will have their own unique username and private passwords to access our systems; members of staff are responsible for keeping their password private.
- All students are provided with their own unique username and private passwords to access our systems; students are responsible for keeping their password private.
- We require all users to:
  - Use strong passwords for access into our system.
  - Change their passwords twice a year
  - Always keep their password private; users must not share it with others or leave it where others can find it.
  - Not to login as another user at any time.

## 8.6 Managing the Safety of our Website

- We will ensure that information posted on our website meets the requirements as identified by the Department for Education (DfE).

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

## 8.7 Publishing Images and Videos Online

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

## 8.8 Managing Email

- Access to our email systems will always take place in accordance with data protection legislation and in line with other policies, including confidentiality, acceptable use policies and the code of conduct/behaviour policy.
  - The forwarding of any chain messages/emails is not permitted.
  - Spam or junk mail will be blocked and reported to the email provider.
  - Any electronic communication which contains sensitive or personal information will only be sent using secure and encrypted email.
  - Setting email addresses and other official contact details will not be used for setting up personal social media accounts.
- Members of the community will immediately inform Ali Walters DSL if they receive offensive communication, and this will be recorded in our safeguarding files/records.
- Excessive social email use can interfere with teaching and learning and will be restricted; access to external personal email accounts may be blocked on site.
- We have a dedicated email for reporting wellbeing and pastoral issues. This inbox will be managed by designated and trained staff. ([talk2us@willingdonschool.org.uk](mailto:talk2us@willingdonschool.org.uk)). We also have an inbox whereby students can report when they have had online abuse. ([Reportabuse@willingdonschool.org.uk](mailto:Reportabuse@willingdonschool.org.uk));

### 8.8.1 Staff email

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

### 8.8.2 Student email

- Students will use provided email accounts for educational purposes.
- Students will sign an acceptable use policy and will receive education regarding safe and appropriate email etiquette before access is permitted.

## 8.9 Live Stream Lessons for Remote Learning

- Live stream is a somewhat broad term and, in some cases, can refer to a platform where the teacher and the children are all linked into a video call/conference and see one another. In other cases, it may refer to a live broadcast, where only the teacher, or whoever is providing the content, is visible and the children are viewing the content, without being seen themselves. In the latter example, although not linked into the broadcast with their images, the children may be able to interact through a live chat function.
- When planning the use of live stream platforms within remote learning our school will:
  - Consider whether the technology is available to children/families and make alternative arrangements for provision where necessary.
  - Ensure that staff are trained to use the technology.
  - Ensure that children's behaviour/interactions are managed in line with the expectations of the school behaviour policy.
  - Risk assess the platform being used and consider whether there are functions, such as live chat, pupil's use of video camera, or the recording of the session, which need to be disabled or which require further measures to support their appropriate use.

The above points are relevant to live stream in its broadest sense. What follows next is more relevant, but not exclusively, to the use of platforms allowing two-way video interaction between all users.

- Two members of staff will be 'within the room' when conducting a live stream session with pupils. If the session is being run from school and both adults are there, then they can be physically within the same room. If one or both adults are working remotely then this means that two adults will need to be present within the video call, and they should both be there before the pupils dial in.
- The second member of staff is there to provide a safeguard for both the pupils and the teacher, so does not need to be a curriculum specialist.
- The second member of staff could act additionally as technical/behaviour support, in terms of monitoring pupils' interactions and ensuring they are not using chat or recording features if these cannot be disabled.
- It is the responsibility of the staff member to act as a moderator, raising any issues of suitability (dress, setting, behaviour etc.) with the child and/or parent immediately and ending the online interaction if necessary.
- Sessions will be planned and scheduled for during school hours.
- Parents will be contacted to advise that the session is taking place and they and the child should consent to abide to an acceptable use agreement covering issues such as not recording the session, not using the live chat feature, being appropriately dressed etc.
- Staff will use school devices and school contact numbers/emails for communications and running the session.
- Only live streaming platforms approved by SLT will be used.
- Staff will dress professionally and choose a neutral background for their video stream.
- Pupils should be dressed appropriately e.g. clothes they might wear for a non-uniform day, not pyjamas.
- Pupils should live stream from a suitable location within their household, not bedrooms.



- Staff behaviour and language will be entirely in line with the staff code of conduct.
- All other school policies/practices should be followed, notably the safeguarding and child protection policy so should there be any welfare concerns about the child these should be brought to the attention of the DSL without delay.

### **Live Stream from other providers**

- When directing students to any content from other providers, its suitability and appropriateness will be checked.
- Where that content may be live streamed, the safeguarding aspect of how that content is being delivered will be considered e.g. how children are able to interact, how is content and interactions being monitored/moderated etc?
- For one off live stream events, the content will be monitored by a member of staff along with the interactions/behaviour of the students taking part.
- When/if multiple sessions are being run at various times during the school day, school leaders will check that they are satisfied with the safeguarding policy of the provider(s) and, then, monitor some sessions to check they are in accordance with the policy.
- We are aware that our filtering and monitoring systems may not necessarily prevent inappropriate content from being shared in a live-streamed event as this is happening in real-time.

### **Using video calls for 1:1 sessions with children**

- The school may consider using 1:1 video call sessions to support interventions with children such as mental health support or counselling.
- These sessions will only be provided where they have been risk assessed and approved by SLT and parental consent given.
- Where the communication with an individual child does not require the confidentiality of a counselling session, there will be two adults involved; this will provide a safeguard for the adults and the children.
- These two adults will either be physically in the same room, with the second member of staff being referenced to the child so that they are aware, or, where staff are working remotely, they will both be within the virtual room of the meeting.
- In either case, both adults will be present before the child is admitted to the online session.

## **8.10 Management of Learning Platforms**

- Leaders and staff will regularly monitor the usage of the Learning Platform (LP), including message/communication tools and publishing facilities.
- Only current members of staff, students and parents will have access to the LP.
- When staff and/or students leave the setting, their account will be disabled or transferred to their new establishment.
- Students and staff will be advised about acceptable conduct and use when using the LP.
- All users will be mindful of copyright and will only upload appropriate content onto the LP.
- Any concerns about content on the LP will be recorded and dealt with in the following ways:

- The user will be asked to remove any material deemed to be inappropriate or offensive.
- If the user does not comply, the material will be removed by the site administrator.
- Access to the LP for the user may be suspended.
- The user will need to discuss the issues with a member of leadership before reinstatement.
- A student's parents/carers may be informed.
- If the content is illegal, we will respond in line with existing child protection procedures.
- Students may require editorial approval from a member of staff. This may be given to the student to fulfil a specific aim and may have a limited time frame.
- A visitor may be invited onto the LP by a member of the leadership; in this instance, there may be an agreed focus or a limited time slot.

### **8.11 Management of Applications (apps) used to Record Children's Progress (If used)**

- We use Arbor and Edulink to track students' progress and share appropriate information with parents and carers.
- The headteacher/ICT manager is ultimately responsible for the security of any data or images held of children. As such, they will ensure that the use of tracking systems is appropriately risk assessed prior to use, and that they are used in accordance with data protection legislation, including the General Data Protection Regulations (GDPR) and Data Protection legislation.
- To safeguard students' data:
  - Only student issued devices will be used for apps that record and store students' personal details, attainment or photographs.
  - Personal staff mobile phones or devices will not be used to access or upload content to any apps which record and store students' personal details, attainment or images.
  - Devices will be appropriately encrypted if taken off site, to reduce the risk of a data security breach, in the event of loss or theft.
  - All users will be advised regarding safety measures, such as using strong passwords and logging out of systems.
  - Parents and carers will be informed of the expectations regarding safe and appropriate use, prior to being given access; for example, not sharing passwords or images.

## **9. Social Media**

### **9.1 Expectations**

- The expectations regarding safe and responsible use of social media applies to all members of Willingdon Community School.
- The term social media may include (but is not limited to): blogs; wikis; social networking sites; forums; bulletin boards; online gaming; apps; video/photo sharing sites; chatrooms and instant messenger.

- All members of Willingdon Community School are expected to engage in social media in a positive, safe and responsible manner.
  - All members of Willingdon Community School are advised not to publish specific and detailed private thoughts, concerns, pictures or messages on any social media services, especially content that may be considered threatening, hurtful or defamatory to others or that could damage the reputation of the school or individual within it.
- We will control student and staff access to social media whilst using setting provided devices and systems on site.
  - The use of social media during setting hours for personal use is not permitted.
  - Inappropriate or excessive use of social media during setting hours or whilst using setting devices may result in disciplinary or legal action and/or removal of internet facilities.
- Concerns regarding the online conduct of any member of Willingdon Community School community on social media, should be reported to the DSL (or deputy) and will be managed in accordance with our anti-bullying, allegations against staff, behaviour and child protection policies.

## 9.2 Staff Personal Use of Social Media

- The safe and responsible use of social networking, social media and personal publishing sites will be discussed with all members of staff as part of staff induction and will be revisited and communicated via regular staff training opportunities.
- Safe and professional behaviour will be outlined for all members of staff (including volunteers) as part of our Code of Conduct/ Staff behaviour policy as part of Acceptable Use Policy.

### *Reputation*

- All members of staff are advised that their online conduct on social media can have an impact on their role and reputation within the setting.
  - Civil, legal or disciplinary action may be taken if staff are found to bring the profession or institution into disrepute, or if something is felt to have undermined confidence in their professional abilities.
- All members of staff are advised to safeguard themselves and their privacy when using social media sites. Advice will be provided to staff via staff training and by sharing appropriate guidance and resources on a regular basis. This will include (but is not limited to):
  - Setting the privacy levels of their personal sites.
  - Being aware of location sharing services.
  - Opting out of public listings on social networking sites.
  - Logging out of accounts after use.
  - Keeping passwords safe and confidential and using two factor authentication wherever possible.
  - Ensuring staff do not represent their personal views as that of the setting.

- Members of staff are encouraged not to identify themselves as employees of our setting on their personal social networking accounts; this is to prevent information on these sites from being linked with the setting, and to safeguard the privacy of staff members.
- All members of staff are encouraged to carefully consider the information, including text and images, they share and post online and to ensure that their social media use is compatible with their professional role and is in accordance our policies and the wider professional and legal framework.
- Information and content that staff members have access to as part of their employment, including photos and personal information about students and their family members or colleagues will not be shared or discussed on social media sites.
- Members of staff will notify the Leadership Team immediately if they consider that any content shared on social media sites conflicts with their role.

### *Communicating with students and parents and carers*

- Communication with children both in the 'real' world and through web based and telecommunication interactions should take place within explicit professional boundaries. This includes the use of computers, tablets, phones, texts, e-mails, instant messages, social media such as Facebook and Twitter, chat rooms, forums, blogs, websites, gaming sites, digital cameras, videos, web cams and other hand-held devices. (Given the ever-changing world of technology it should be noted that this list gives examples only and is not exhaustive.) Staff should not request or respond to any personal information from children. They should ensure that their communications are open and transparent and avoid any communication which could be interpreted as 'grooming behaviour'.
- Staff should not give out any personal contact details.
- On school trips, staff should have a school mobile phone rather than having to rely on their own device.
- Staff should not accept friend requests from pupils, past or present. If a member of staff feels that this is necessary, they should first seek guidance from the DSL or a senior leader. If ongoing contact with learners is required once they have left the setting, members of staff will be expected to use existing alumni networks or use official setting provided communication tools.
- Any pre-existing relationships or exceptions that may compromise this, will be discussed with DSL (or deputies) and/or the headteacher (see *Staff Behaviour Policy/ Code of Conduct for further information*)
- Staff will not use personal social media accounts to contact students or parents, nor should any contact be accepted, except in circumstances whereby prior approval has been given by the headteacher/manager.
- Any communication from students and parents received on personal social media accounts will be reported to the DSL (or deputies).

## **9.3 Students' Personal Use of Social Media**

- Safe and appropriate use of social media will be taught to students as part of an embedded and progressive education approach, via age appropriate sites and resources.

- We are aware that many popular social media sites state that they are not for children under the age of 13, (or 16 for WhatsApp), therefore we will not create accounts specifically for students under this age.
- Any concerns regarding students use of social media will be dealt with in accordance with existing policies, including anti-bullying, behaviour and Acceptable Use Policies.
  - Concerns will be shared with parents/carers as appropriate, particularly when concerning underage use of social media sites, games or tools and the sharing of inappropriate images or messages that may be considered threatening, hurtful or defamatory to others.
- Students will be advised:
  - To consider the benefits and risks of sharing personal details on social media sites which could identify them and/or their location.
  - To only approve and invite known friends on social media sites and to deny access to others by making profiles private.
  - Not to meet any online friends without a parent/carer or other responsible adult's permission and only when a trusted adult is present.
  - To use safe passwords and two factor authentication where possible.
  - To use social media sites which are appropriate for their age and abilities.
  - How to block and report unwanted communications.
  - How to report concerns both within the setting and externally.
  - To remove a social media conversation thread if they are the administrator of such a thread that may have been used in an inappropriate way such as with threatening, hurtful or defamatory content.

## 9.4 Official Use of Social Media

Willingdon Community School official social media channels are a twitter account [WillingdonSchool@WillingdonCS](#) and a facebook page:

- The official use of social media sites only takes place with clear educational or community engagement objectives, with specific intended outcomes.
  - The official use of social media as a communication tool has been formally risk assessed and approved by the Headteacher.
  - Leadership staff have access to account information and login details for our social media channels, in case of emergency, such as staff absence.
- Official social media channels have been set up as distinct and dedicated social media sites or accounts for educational or engagement purposes only.
  - Staff use setting provided email addresses to register for and manage any official social media channels.
  - Official social media sites are suitably protected and linked to our website.
  - Public communications on behalf of the setting will, where appropriate and possible, be read and agreed by at least one other colleague.
- Official social media use will be conducted in line with existing policies, including: anti-bullying, image/camera use, data protection, confidentiality and child protection.

- All communication on official social media platforms will be clear, transparent and open to scrutiny.
- Parents/carers and students will be informed of any official social media use, along with expectations for safe use and action taken to safeguard the community.
  - Only social media tools which have been risk assessed and approved as suitable for educational purposes will be used.
  - Any official social media activity involving students will be moderated if possible.
- Parents and carers will be informed of any official social media use with students; written parental consent will be obtained, as required.
- We will ensure that any official social media use does not exclude members of the community who are unable or unwilling to use social media channels.

### *Staff expectations*

- Members of staff who follow and/or like our official social media channels will be advised to use dedicated professional accounts, where possible, to avoid blurring professional boundaries.
- If members of staff are participating in online social media activity as part of their capacity as an employee of the setting, they will:
  - Sign our social media acceptable use policy.
  - Always be professional and aware they are an ambassador for the setting.
  - Disclose their official role but make it clear that they do not necessarily speak on behalf of the setting.
  - Always be responsible, credible, fair and honest, and consider how the information being published could be perceived or shared.
  - Always act within the legal frameworks they would adhere to within the workplace, including: libel, defamation, confidentiality, copyright, data protection and equalities laws.
  - Ensure that they have appropriate consent from both pupils and parents before sharing images on the official social media channel.
  - Not disclose information, make commitments or engage in activities on behalf of the setting, unless they are authorised to do so.
  - Not engage with any direct or private messaging with current, or past, students, parents and carers.
  - Inform their line manager, the DSL (or deputies) and/or the headteacher of any concerns, such as criticism, inappropriate content or contact from students.

## **10. Use of Personal Devices and Mobile Phones**

- We recognise that personal communication through mobile technologies is an accepted part of everyday life for pupils, staff and parents/carers, but technologies need to be used safely and appropriately within the setting.

### **10.1 Expectations**

- All use of personal devices (including but not limited to; tablets, games consoles and ‘smart’ watches) and mobile phones will take place in accordance with the law and other appropriate policies, such as anti-bullying, behaviour and child protection.
- Electronic devices of any kind that are brought onto site are the responsibility of the user.
  - All members of Willingdon Community School community are advised to take steps to protect their mobile phones or devices from loss, theft or damage; we accept no responsibility for the loss, theft or damage of such items on our premises.
  - All members of Willingdon Community School community are advised to use passwords/pin numbers to ensure that unauthorised calls or actions cannot be made on their phones or devices; passwords and pin numbers should be kept confidential and mobile phones and personal devices should not be shared.
- Mobile phones and personal devices are not permitted to be used in specific areas within the site such as changing rooms and student toilets.
- The sending of abusive or inappropriate messages or content via mobile phones or personal devices is forbidden by any member of the community; any breaches will be dealt with as part of our behaviour policy.
- All members of Willingdon Community School are advised to ensure that their mobile phones and personal devices do not contain any content which may be offensive, derogatory or would otherwise contravene our behaviour or child protection policies.

## **10.2 Staff Use of Personal Devices and Mobile Phones**

- Members of staff will ensure that use of personal phones and devices takes place in accordance with the law, as well as, relevant policy and procedures, such as: confidentiality, child protection, data security and acceptable use.
- Staff will be advised to:
  - Keep mobile phones and personal devices in a safe and secure place during lesson time.
  - Keep mobile phones and personal devices switched off or switched to ‘silent’ mode during lesson times.
  - Ensure that Bluetooth or other forms of communication (such as ‘airdrop’) are hidden or disabled when in the school/setting.
  - Ensure that any content brought onto site via mobile phones and personal devices are compatible with their professional role and expectations.
- Members of staff are not permitted to use their own personal phones or devices for contacting pupils or parents and carers. Unless permission is sought with exceptional circumstances and the staff number hidden.
  - Any pre-existing relationships, which could undermine this, will be discussed with the DSL (or deputies) and/or headteacher.
- Staff will not use personal devices:
  - To take photos or videos of students and will only use work-provided equipment for this purpose.
  - Directly with students and will only use work-provided equipment during lessons or educational activities.
- If a member of staff breaches our policy, action will be taken in line with our code of conduct/staff behaviour and allegations policy

- If a member of staff is thought to have illegal content saved or stored on a mobile phone or personal device or have committed a criminal offence, the police will be contacted.

### 10.3 Students' Use of Personal Devices and Mobile Phones

- Students will be educated regarding the safe and appropriate use of personal devices and mobile phones and will be made aware of boundaries and consequences.
- Willingdon Community School expects students' personal devices and mobile phones to be switched off and out of sight during the school day.
- If a student needs to contact his/her parents or carers they will be allowed to use a setting phone or use their own mobile during break and lunch only which is supervised by staff.
  - Parents are advised to contact their child via the setting office; exceptions may be permitted on a case-by-case basis, as approved by the headteacher.
- Mobile phones or personal devices will not be used by students during lessons or formal educational time unless as part of an approved and directed curriculum-based activity with consent from a member of staff.
  - The use of personal mobile phones or devices for a specific education purpose does not mean that blanket use is permitted.
  - If members of staff have an educational reason to allow students to use their mobile phones or personal devices as part of an educational activity, it will only take place when approved by the Senior Leadership Team.
- Mobile phones and personal devices (including smart watches) must not be taken into examinations.
  - Students found in possession of a mobile phone or personal device during an exam will be reported to the appropriate examining body. This may result in the withdrawal from either that examination or all examinations.
- If a student breaches the policy, the phone or device will be confiscated and will be held in a secure place.
  - Staff may confiscate a student's mobile phone or device if they believe it is being used to contravene our behaviour or bullying policy or could contain youth produced sexual imagery (sexting).
  - Searches of mobile phone or personal devices will only be carried out in accordance with our policy. [www.gov.uk/government/publications/searching-screening-and-confiscation](http://www.gov.uk/government/publications/searching-screening-and-confiscation))
  - Students' mobile phones or devices may be searched by a member of the leadership team, with the consent of the student or a parent/ carer. Content may be deleted or requested to be deleted, if it contravenes our policies. [www.gov.uk/government/publications/searching-screening-and-confiscation](http://www.gov.uk/government/publications/searching-screening-and-confiscation))
  - Mobile phones and devices that have been confiscated will be released to parents or carers.
  - If there is suspicion that material on a student's personal device or mobile phone may be illegal or may provide evidence relating to a criminal offence, the device will be handed over to the police for further investigation.



## 10.4 Visitors' Use of Personal Devices and Mobile Phones

- Parents/carers and visitors (including volunteers and contractors) must use their mobile phones and personal devices in accordance with our acceptable use policy and other associated policies, such as: anti-bullying, behaviour, child protection and image use.
- We will ensure appropriate signage and information is displayed and provided to inform parents, carers and visitors of expectations of use.
- Members of staff are expected to challenge visitors if they have concerns and will always inform the DSL (or deputies) or headteacher of any breaches our policy.

## 10.5 Officially provided mobile phones and devices

- Members of staff will be issued with a work phone number and email address, where contact with students or parents/ carers is required.
- Setting mobile phones and devices will be suitably protected via a passcode/password/pin and must only be accessed or used by members of staff.
- Setting mobile phones and devices will always be used in accordance with the acceptable use policy and other relevant policies.

## 11. Useful Links for Educational Settings

### East Sussex Support and Guidance:

- East Sussex County Council Early Years Support & Intervention Team
  - Call: 01323 463026
  - Email: [childcare.support@eastsussex.gov.uk](mailto:childcare.support@eastsussex.gov.uk)
- If you are concerned about a child in East Sussex contact SPOA (Single Point of Advice) on 01323 464222 or [0-19.SPOA@eastsussex.gov.uk](mailto:0-19.SPOA@eastsussex.gov.uk)
- Standards and Learning Effectiveness Service (SLES):  
[SLES.Safeguarding@eastsussex.gov.uk](mailto:SLES.Safeguarding@eastsussex.gov.uk)

### East Sussex Support and Guidance for Educational Settings

- <https://czone.eastsussex.gov.uk/safeguarding/>

### East Sussex Safeguarding Children Partnership

- [www.sussexchildprotection.procedures.org.uk/](http://www.sussexchildprotection.procedures.org.uk/)

### Sussex Police:

- [www.sussex.police.uk](http://www.sussex.police.uk)

For non-urgent Police contact 101

If you think the child is in immediate danger, you should call the police on 999.

## National Links and Resources for Educational Settings

- CEOP:
  - [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
  - [www.ceop.police.uk](http://www.ceop.police.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)
  - <https://www.childnet.com/what-we-do/our-projects/thrive-online/>
  - <https://www.childnet.com/resources/connect-with-respect-send/>
- Project Evolve: <https://projectevolve.co.uk/>
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Lucy Faithfull Foundation: [www.lucyfaithfull.org](http://www.lucyfaithfull.org)
- NSPCC: [www.nspcc.org.uk/onlinesafety](http://www.nspcc.org.uk/onlinesafety)
  - ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
  - Net Aware: [Net-Aware](http://Net-Aware)
- The Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
  - Professional Online Safety Helpline: [www.saferinternet.org.uk/about/helpline](http://www.saferinternet.org.uk/about/helpline)
- 360 Safe Self-Review tool for schools: [www.360safe.org.uk](http://www.360safe.org.uk)
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)
- Online Safety Toolkit: [Online Safety - Czone \(eastsussex.gov.uk\)](http://Online Safety - Czone (eastsussex.gov.uk))

## National Links and Resources for Professionals/Parents/Carers

**There is a wealth of information available to support schools and parents/carers to keep children safe online. See Keeping Children Safe in Education 2023 Part 2 for more resources.**

## Disclaimer

The original template for this model policy was created by the Education People on behalf of East Sussex County Council in 2016. Copyright of these materials is held by The Education People; this must be acknowledged when the template is used.

## Appendix 1

## Meeting digital technology standards in schools

## Filtering and monitoring standards

| <u>Task/responsibility</u>  | <u>Notes</u> |
|---|--------------|
| <i>You should identify and assign roles and responsibilities to manage your filtering and monitoring systems</i>  |              |
| <b>Responsibility:</b> Gov<br><br><b>Task:</b> Identify and assign a member of the SLT to be responsible for ensuring that the standards are met                |              |
| <b>Responsibility:</b> Gov<br><br><b>Task:</b> Identify and assign a governor to be responsible for ensuring that the standards are met                         |              |
| <b>Responsibility:</b> Gov<br><br><b>Task:</b> Identify and assign the roles and responsibilities of staff and third parties (incl. external service providers) |              |
| <b>Responsibility:</b> Gov<br><br><b>Task:</b> Is it possible to make “prompt” changes to provision?  |              |
| <b>Responsibility:</b> SLT with support from DSL and ITSP<br><br><b>Task:</b> Procuring filtering and monitoring systems  |              |
| <b>Responsibility:</b> SLT<br><br><b>Task:</b> Document decisions about what is blocked or allowed and why  |              |
| <b>Responsibility:</b> SLT<br><br><b>Task:</b> Review the effectiveness of your provision (and provide evidence)  |              |
| <b>Responsibility:</b> SLT<br><br><b>Task:</b> Oversee reports  |              |

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| <p><b>Responsibility:</b> SLT</p> <p><b>Task:</b> All staff have received appropriate and up to date training and understand their role</p>                    |  |
| <p><b>Responsibility:</b> SLT</p> <p><b>Task:</b> All staff follow policies and procedures and processes around online safety and filtering and monitoring</p> |  |
| <p><b>Responsibility:</b> SLT</p> <p><b>Task:</b> All staff act on reports and concerns</p>  |  |
| <p><b>Responsibility:</b> DSL</p> <p><b>Task:</b> Oversee and act on filtering and monitoring reports</p>  |  |
| <p><b>Responsibility:</b> DSL</p> <p><b>Task:</b> Oversee and act on safeguarding concerns</p>   |  |
| <p><b>Responsibility:</b> DSL</p> <p><b>Task:</b> Oversee and act on checks to monitoring systems</p>  |  |
| <p><b>Responsibility:</b> ITSP</p> <p><b>Task:</b> Maintain filtering and monitoring systems</p>   |  |
| <p><b>Responsibility:</b> ITSP</p> <p><b>Task:</b> Provide filtering and monitoring reports</p>  |  |
| <p><b>Responsibility:</b> ITSP</p> <p><b>Task:</b> Complete actions following concerns or checks to systems</p>  |  |

| <u>Task/responsibility</u>  | <u>Notes</u> |
|---|--------------|
| <b><i>You should review your filtering and monitoring provision at least annually</i></b>   |              |
| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> Carry out reviews of the filtering and monitoring provision at least annually</p>   |              |
| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> Carry out checks which are informed by the review to ensure systems are working</p> |              |

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| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> Understand the risk profile of pupils – incl. those in vulnerable groups, age, SEND, EAL</p>  |   |
| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> What does the filtering system block/allow and why?</p>   |   |
| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> Are there any outside safeguarding influences that should be considered (e.g. county lines)</p>   | Ensure that this is relevant to your school or setting. |
| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> Are there any relevant safeguarding reports that could/should impact on filtering and monitoring?</p>   |   |
| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> How digitally resilient are pupils?</p>   |   |
| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> What does the RHSE and PSHE curricula cover and how might this impact on filtering?</p>   |   |
| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> How are devices used within school? (e.g. BYOD)</p>   |   |
| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> What related safeguarding and technology policies are in place?</p>   |   |
| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> What checks are in place – how are resulting actions handled?</p> <p><i>Checks should be undertaken from a safeguarding <b>and</b> an IT perspective</i></p>  |   |
| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> How often are checks carried out, what is checked?</p> <p><i>Filtering should be tested – log what is done and the results that are obtained – make changes as a result. Different devices should be used when carrying out checks in order to get a good overview of what is or is not accessible.</i></p> |   |
| <p><b>Responsibility:</b> Joint</p> <p><b>Task:</b> How does monitoring work?</p>   |   |

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| <i>How often are reports received – are these in real time – what thresholds are in place – are these fit for purpose?</i>  |  |
| <b>Responsibility:</b> Joint<br><br><b>Task:</b> Does filtering and monitoring work on new devices? Is this checked before they are given to staff/pupils?  |  |
| <b>Responsibility:</b> Joint<br><br><b>Task:</b> Review blocklists and modify in line with any changes to safeguarding risks  |  |
| <b>Responsibility:</b> Joint<br><br><b>Task:</b> Check your system using the SWGfL testing tool to see that it is blocking access to illegal child sexual abuse material, unlawful terrorist content, adult content |  |

| <u>Task/responsibility</u>   | <u>Notes</u> |
|--|--------------|
| <b><i>Your filtering system should block harmful and inappropriate content, without unreasonably impacting teaching and learning</i></b> |              |
| <b>Responsibility:</b> DSL and ITSP<br><br><b>Task:</b> Is your filtering provider a member of the IWF?                                  |              |
| <b>Responsibility:</b> DSL and ITSP<br><br><b>Task:</b> Does your filtering provider use the IWF list?                                   |              |
| <b>Responsibility:</b> DSL and ITSP<br><br><b>Task:</b> Does your filtering provider use the CTIRU list?                                 |              |
| <b>Responsibility:</b> DSL and ITSP<br><br><b>Task:</b> Are you blocking access to adult content?  |              |
| <b>Responsibility:</b> DSL and ITSP<br><br><b>Task:</b> Is filtering applied to all accounts including guest accounts? (Staff, pupils)   |              |
| <b>Responsibility:</b> DSL and ITSP<br><br><b>Task:</b> Is filtering applied to all school owned devices?                                |              |
| <b>Responsibility:</b> DSL and ITSP  |              |

|   |  |
|---|--|
| <p><b>Task:</b> Is filtering applied to any device which connects to the school broadband connection?</p>   |  |
| <p><b>Responsibility:</b> DSL and ITSP</p> <p><b>Task:</b> Do you filter all internet feeds including any backup connection?</p>  |  |
| <p><b>Responsibility:</b> DSL and ITSP</p> <p><b>Task:</b> Is filtering differentiated by age and ability of pupils?</p>  |  |
| <p><b>Responsibility:</b> DSL and ITSP</p> <p><b>Task:</b> Can filtering handle multilingual content, images, misspellings, abbreviations?</p>  |  |
| <p><b>Responsibility:</b> DSL and ITSP</p> <p><b>Task:</b> Can filtering identify VPNs and proxy services and then block them?</p>  |  |
| <p><b>Responsibility:</b> DSL and ITSP</p> <p><b>Task:</b> Can filtering system provide alerts when access to content has been blocked?</p>   |  |
| <p><b>Responsibility:</b> DSL and ITSP</p> <p><b>Task:</b> Does filtering work on mobile devices? <i>Is there evidence, have you checked?</i></p>   |  |
| <p><b>Responsibility:</b> DSL and ITSP</p> <p><b>Task:</b> Does filtering work on app content? <i>Is there evidence, have you checked?</i></p>  |  |
| <p><b>Responsibility:</b> DSL and ITSP</p> <p><b>Task:</b> Will the filtering system identify the IP address, device name and ID and where possible the individual who has attempted to access unsuitable or illegal content?</p> |  |

| <u>Task/responsibility</u>   | <u>Notes</u> |
|--|--------------|
| <b><i>Your filtering system should block harmful and inappropriate content, without unreasonably impacting teaching and learning</i></b> |              |
| <b>Responsibility:</b> ITSP  |              |

|   |  |
|---|--|
| <b>Task:</b> Are monitoring systems working as expected?  |  |
| <b>Responsibility:</b> ITSP   |  |
| <b>Task:</b> Are reports on pupil device activity available?  |  |
| <b>Responsibility:</b> ITSP   |  |
| <b>Task:</b> Are IT staff given safeguarding training including online safety training?                           |  |
| <b>Responsibility:</b> ITSP   |  |
| <b>Task:</b> Are IT staff reporting any issues (safeguarding concerns to the DSL)?                                |  |
| <b>Responsibility:</b> All staff  |  |
| <b>Task:</b> Are the wider staff body reporting safeguarding concerns to the DSL                                  |  |
| <b>Responsibility:</b> All staff  |  |
| <b>Task:</b> Are the wider staff body providing effective supervision of pupils?                                  |  |
| <b>Responsibility:</b> All staff  |  |
| <b>Task:</b> Are the wider staff body taking steps to maintain awareness of how devices are being used by pupils? |  |

**Key:**

Gov Governor with designated responsibility for online safety/safeguarding

DSL Designated safeguarding lead

SLT Member of the senior leadership/senior management team

ITSP IT service provider (this may be a staff technician or an external service provider)

JOINT This group should comprise the responsible governor, a member of SLT, the DSL and the IT service provider.

All staff All members of staff who are working with pupils in any capacity.