Headcorn Primary School
Online Safety Policy

This policy was approved by the Head Teacher (Lead DSL) and supersedes any previous E-safety, Online or Digital Policy. This policy has been based on the LA's exemplar school's Online Safety policy (Sept 2019), based on Keeping Children Safe in Education DfE Guidance (Sept 2019) and developed by the Deputy Head Teacher (E-safety DSL) and IT Co-ordinator. It will be reviewed annually or earlier if needed.

This policy will be reviewed as appropriate, and at minimum every year. Any amendments will require the approval of the Head Teacher.

Approval Body	Head Teacher
Approval Date	15th October 2019
Date for Review	October 2020 (1 year)
Signed - Head Teacher	S Symonds
Signed - E-safety Governor	D Gardner

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Using the Online Safety Policy Template

This online safety policy template provides educational settings with a framework to develop their online safety ethos and enables leaders and managers to detail strategic approaches and considerations, with regards to the safer use of technology.

The online safety policy should be recognised as a safeguarding policy, not a technical or computing policy and falls within the role and responsibilities the Designated Safeguarding Lead (DSL). There is no requirement for educational settings to have a separate online safety policy if online safety issues are appropriately addressed within other policies; this decision will be down to leaders and managers. If online safety is embedded within existing documents, settings should ensure that their community is aware of how and where to locate safety information, especially regarding responding to and reporting specific online safety concerns.

We encourage all educational settings to ensure that their online safety policy is individualised for their own specific context, to ensure that it is fit for purpose. It will not be appropriate for educational settings to adopt this template in its entirety; some statements will be more relevant to some settings than others.

This policy template requires leaders, managers and DSLs to adapt the content to include specific local information such as their own named points of contact, as well as their specific procedures and expectations. These decisions and details will vary from setting to setting, so this template should be used as a starting framework.

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Headcorn Primary School Online Safety Policy

1. Policy Aims

- This online safety policy has been written by Headcorn Primary School, involving staff, learners and parents/carers, building on the Kent County Council/The Education People online safety policy template, with specialist advice and input as required.
- It takes into account the DfE statutory guidance 'Keeping Children Safe in Education' 2019, Early Years and Foundation Stage 2017, 'Working Together to Safeguard Children' 2018 and the local Kent Safeguarding Children Multi-agency Partnership (KSCMP) procedures.

- The purpose of Headcorn Primary School online safety policy is to:
    - Safeguard and protect all members of Headcorn Primary School 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.

- Headcorn Primary School identifies that the issues classified within online safety are considerable, but can be broadly categorised into three 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.

2. Policy Scope

- Headcorn Primary School believes that online safety is an essential part of safeguarding and acknowledges its duty to ensure that all learners and staff are protected from potential harm online.
- Headcorn Primary School identifies that the internet and associated devices, such as computers, tablets, mobile phones and games consoles, are an important part of everyday life which present positive and exciting opportunities, as well as challenges and risks.
- Headcorn Primary School will empower our learners to acquire the knowledge needed to use the internet and technology in a safe, considered and respectful way, and develop their resilience so they can manage and respond to online risks.
- This policy applies to all staff including the governing body, leadership team, 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 learners, parents and carers.
- This policy applies to all access to the internet and use of technology, including personal devices, or where learners, staff or other individuals have been provided with setting issued devices for use off-site, such as a work laptops, tablets or mobile phones.

2.2 Links with other policies and practices

- This policy links with several other policies, practices and action plans including:
- Anti-bullying policy
- Staff code of conduct policy
- Behaviour policy
- Safeguarding policy
- Curriculum policies, such as: Computing, Personal Social and Health Education (PSHE), Citizenship and Relationships and Sex Education (RSE)
- GDPR and Data Protection Policy

3. Monitoring and Review

- Technology in this area evolves and changes rapidly. Headcorn Primary School 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 Head Teacher will be informed of online safety concerns, as appropriate.
- The named governor for safeguarding 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) Miss Symonds, the Head teacher, has ultimate lead responsibility for online safety. However the Deputy DSL, Lee Drury, the Deputy Head Teacher, leads on E-safety and works alongside the IT Co-ordinator, Lee Peters and E-safety Governor David Gardner.
- Headcorn Primary School recognises that all members of the community have important roles and responsibilities to play with regards to online safety.

4.1 The leadership and management team will:

- Create a whole setting culture that incorporates online safety throughout all elements of Headcorn Primary School life.
- Ensure that online safety is viewed as a safeguarding issue and that practice is in line with national and local recommendations and requirements.
- Implement appropriate and up-to-date policies regarding online safety; which addresses the acceptable use of technology, peer on peer abuse, use of social media and mobile

technology. including a staff code of conduct/behaviour policy, which covers acceptable use of technology.

- Ensure that suitable and appropriate filtering and monitoring systems are in place and work with technical staff to monitor the safety and security of our systems and networks.
- Ensure that online safety is embedded within a progressive curriculum, which enables all learners to develop an age-appropriate understanding of online safety.
- Work with technical staff and IT support to ensure that suitable and appropriate filtering and monitoring systems are in place.
- Support the DSL and any deputies by ensuring they have sufficient time and resources to fulfil their online safety responsibilities.
- Ensure there are robust reporting channels for the community to access regarding online safety concerns, including internal, local and national support.
- Ensure that appropriate risk assessments are undertaken regarding the safe use of technology.
- Audit and evaluate online safety practice to identify strengths and areas for improvement.
- Ensure that staff, learners and parents/carers are proactively engaged in activities which promote online safety.
- Support staff to ensure that online safety is embedded within a progressive whole setting curriculum which enables all learners to develop an appropriate understanding of online safety.

4.2 The Designated Safeguarding Lead (DSL) will:

- Act as a named point of contact on all online safeguarding issues and liaise with other members of staff or other agencies, as appropriate.
- Liaise with other members of staff, such as pastoral support staff, IT co-ordinator, IT support, network managers and the Inclusion Lead on matters of online safety.
- Ensure appropriate referrals are made to relevant external partner 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.
- Ensure all members of staff receive regular, up-to-date and appropriate online safety training and information as part of their induction and child protection training.
- Access regular and appropriate training and support to ensure they understand the unique risks associated with online safety and have the relevant knowledge and up to date required to keep learners safe online.
- Access regular and appropriate training and support to ensure they recognise the additional risks that learners with SEN and disabilities (SEND) face online.
- 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, as appropriate, to the management team and Governing Body.
- Work with the leadership team to review and update online safety policies on a regular basis (at least annually) with stakeholder input.
- Meet regularly with the governor with a lead responsibility for online safety.

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

- 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.
- 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.
- 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.

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.
- Implement appropriate security measures as directed by the leadership team 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.
- Ensure that our filtering policy is applied and updated on a regular basis; responsibility for its implementation is shared with the leadership team.
- Ensure that our monitoring systems are applied and updated on a regular basis; responsibility for its implementation is shared with the leadership team
- Ensure appropriate access and technical support is given to the DSL to our filtering and monitoring systems, to enable them to take appropriate safeguarding action if/when required.

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

- Engage in age appropriate online safety education opportunities.
- Contribute to the development of online safety policies.
- Read and adhere to the acceptable use policies.
- 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, 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 home-school agreement *and/or* 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 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 learners

- The setting will establish and embed a progressive online safety curriculum to raise awareness and promote safe and responsible internet use amongst learners by:
    - Ensuring our curriculum and whole school approach is developed in line with the UK Council for Internet Safety (UKCIS) '[Education for a Connected World Framework]' and DfE '[Teaching online safety in school]' guidance.
    - Ensuring education regarding safe and responsible use precedes internet access.
    - Including online safety in Personal, Social, Health and Economic (PSHE), Relationships and Sex Education (RSE) and computing programmes of study.
    - Reinforcing online safety messages whenever technology or the internet is in use.
    - Educating learners in the effective use of the internet to research; including the skills of knowledge location, retrieval and evaluation.
    - Teaching learners to be critically aware of the materials they read and shown how to validate information before accepting its accuracy.
    - Implementing appropriate peer education approaches.

  - Creating a safe environment in which all learners feel comfortable to say what they feel, without fear of getting into trouble and/or being judged for talking about something which happened to them online.
  - Involving the DSL (or a deputy) as part of planning for online safety lessons or activities, so they can advise on any known safeguarding cases, and ensure support is in place for any learners who may be impacted by the content.
  - Making informed decisions to ensure that any educational resources used are appropriate for our learners.
  - Using support, such as external visitors, where appropriate, to complement and support our internal online safety education approaches. *Using External Visitors to Support Online Safety Education: Guidance for Educational Settings*
  - Providing online safety education and training as part of the transition programme across the key stages and when moving between establishments.
  - Rewarding positive use of technology.

- The setting will support learners 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 learners that network and internet use will be monitored for safety and security purposes and in accordance with legislation.
  - Seeking learner voice when writing and developing online safety policies and practices, including curriculum development and implementation.

- Headcorn Primary School will ensure learners develop the underpinning knowledge and behaviours needed to navigate the online world safely, in a way which suits their age and ability by:
  - ensuring age appropriate education regarding safe and responsible use precedes internet access.
  - teaching learners to evaluate what they see online and recognise techniques used for persuasion, so they can make effective judgements about if what they see is true, valid or acceptable.
  - educating them in the effective use of the internet to research, including the skills of knowledge location, retrieval and evaluation.
  - enabling them to understand what acceptable and unacceptable online behaviour looks like.
  - preparing them to identify possible online risks and make informed decisions about how to act and respond.
  - ensuring they know how and when to seek support if they are concerned or upset by something they see or experience online.

5.2 Vulnerable Learners

- Headcorn Primary School recognises that some learners are more vulnerable online, and vulnerability can fluctuate depending on their age, developmental stage and personal

circumstances. However, there are some learners, for example looked after children and those with special educational needs, who may be more susceptible or may have less support in staying safe online.
- Headcorn Primary School will ensure that differentiated and ability appropriate online safety education, access and support is provided to vulnerable learners.
- When implementing an appropriate online safety policy and curriculum Headcorn Primary School will seek input from specialist staff as appropriate, including the Inclusion Lead, DSL to ensure that the policy and curriculum is appropriate to our community's needs..

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 on a regular basis, with at least annual updates.
    - This will cover the potential risks posed to learners (Content, Contact and Conduct) 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 learners.
- Ensure all members of staff are aware of the procedures to follow regarding online safety concerns affecting learners, colleagues or other members of the community.

5.4 Awareness and engagement with parents and carers

- Headcorn Primary School recognises 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, through Headcorn Headlines, 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.

6. Reducing Online Risks

- Headcorn Primary School recognises that the internet is a constantly changing environment with new apps, devices, websites and material emerging at a rapid pace.
- We will:
  - Regularly review the methods used to identify, assess and minimise online risks.
  - Examine emerging technologies for educational benefit and undertake appropriate risk assessments before use in the setting is permitted.
  - Ensure that appropriate filtering and monitoring is in place and take all reasonable precautions to ensure that users can only access appropriate material.
  - Due to the global and connected nature of the internet, it is not possible to guarantee that unsuitable material cannot be accessed via our computers or devices and as such identify clear procedures to follow if breaches or concerns arise.
- All members of the community are made aware of our expectations regarding safe and appropriate behaviour online and the importance of not posting any content, comments, images or videos which could cause harm, distress or offence to members of the community. This is clearly outlined in our acceptable use policies and highlighted through a variety of education and training approaches.

7. Safer Use of Technology

7.1 Classroom Use

- Headcorn Primary School uses a wide range of technology. This includes access to:

  - Computers, ipads and other digital devices
  - Internet which may include search engines and educational websites
  - Games consoles and other games-based technologies
  - 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 learners complies with copyright law and acknowledge the source of information.
- Supervision of learners will be appropriate to their age and ability.
  - **Early Years Foundation Stage and Key Stage 1**

        - Access to the internet will be by adult demonstration, with occasional directly supervised access to specific and approved online materials, which supports the learning outcomes planned for the learners age and ability.
    - **Key Stage 2**
        - Learners will use age-appropriate search engines and online tools.
        - Learners will be directed by the teacher to online materials and resources which support the learning outcomes planned for the learners age and ability.

7.2 Managing Internet Access

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

7.3 Filtering and Monitoring

7.3.1 Decision Making

- Headcorn Primary School governors and leaders have ensured that our setting has age and ability appropriate filtering and monitoring in place, to limit learner'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.
- 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.
- All members of staff are aware that they cannot rely on filtering and monitoring alone to safeguard learners; effective classroom management and regular education about safe and responsible use is essential.
  www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring

7.3.2 Filtering

- Education broadband connectivity is provided through KPSN.
- We use Light Speed which blocks sites which can be categorised as: pornography, racial hatred, extremism, gaming and sites of an illegal nature.
- The filtering system blocks all sites on the Internet Watch Foundation (IWF) list.
- We work with KPSN and Light Speed to ensure that our filtering policy is continually reviewed.
- If learners 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 deputy) 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, Kent Police or CEOP.

7.3.4 Monitoring

- We will appropriately monitor internet use on all setting owned or provided internet enabled devices. This is achieved by:
    - ***Detail how this will be achieved e.g. physical monitoring (supervision), monitoring internet and web access (reviewing logfile information) and/or active/pro-active technology monitoring services.***
- If a concern is identified via monitoring approaches we will:
    - ***List how concerns will be responded to e.g. DSL or deputy 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.

7.4 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.
    - Full information can be found in our information security policy. (***http://www.headcorn.kent.sch.uk/key-information/school-policies/***)

7.5 Security and Management of Information Systems

- We take appropriate steps to ensure the security of our information systems, including:
    - Virus protection being updated regularly.
    - Not using portable media.
    - 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.
        - Specific user logins and passwords will be enforced for all but the youngest users.
    - All users are expected to log off or lock their screens/devices if systems are unattended.

7.5.1 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.

- From Year 1, all learners are provided with their own unique username and private passwords to access our systems; learners are responsible for keeping their password private.
- We require all users to:
    - Use strong passwords for access into our system.
    - 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.
    - Lock access to devices/systems when not in use.

7.6 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 learner'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.

7.7 Publishing Images and Videos Online

- We will ensure that all images and videos shared online are used in accordance with the associated polices, 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.

7.8 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 tell Mr Drury (Deputy Head Teacher/Deputy DSL) if they receive offensive communication, and this will be recorded in our safeguarding files/records.

7.8.1 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, learners and parents.

8. Social Media

8.1 Expectations

- The expectations' regarding safe and responsible use of social media applies to all members of Headcorn Primary School community.
- 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 Headcorn Primary School community are expected to engage in social media in a positive and responsible manner.
    - All members of Headcorn Primary School community are advised not to post or share content that may be considered threatening, hurtful or defamatory to others on any social media service.
- We will control learner and staff access to social media whilst using Headcorn Primary School provided devices and systems on site.
    - The use of social media during school hours for personal use is not permitted for learners.
    - Inappropriate or excessive use of social media during school hours or whilst using school devices may result in removal of internet access and/or disciplinary or legal action.
- Concerns regarding the online conduct of any member of Headcorn Primary School community on social media, will be reported to the DSL and be managed in accordance with our anti-bullying, allegations against staff, behaviour and child protection policies.

8.2 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 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.
    - 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 Headcorn Primary School 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 learners 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.

8.2.2 Communicating with learners and parents/carers

- Staff will not use personal social media accounts to contact learners or parents/carers, nor should any contact be accepted.
- All members of staff are advised not to communicate with or add any current or past learners or their family members, as ‘friends’ on any personal social media sites, applications or profiles.
- Any pre-existing relationships or exceptions which compromise this requirement will be discussed with the DSL and the Head Teacher.
    - Decisions made and advice provided in these situations will be formally recorded in order to safeguard learners, the setting and members of staff.
- 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 communication from learners and parents received on personal social media accounts will be reported to the DSL (or deputy) and the Head Teacher.

8.3 Learners Personal Use of Social Media

- Safe and appropriate use of social media will be taught to learners 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, therefore we will not create accounts specifically for learners under this age.
- Any concerns regarding learner's use of social media will be dealt with in accordance with existing policies, including anti-bullying and behaviour.
    - Concerns will be shared with parents/carers as appropriate, particularly when concerning underage use of social media sites, games or tools.
- Learners 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.
    - 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.

8.4 Official Use of Social Media

Headcorn Primary School official social media channel is Twitter.

- 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 Head Teacher.
    - 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, where possible, run or 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.

- All communication on official social media platforms by staff on behalf of the setting will be clear, transparent and open to scrutiny.
- Parents/carers and learners will be informed of any official social media use, along with expectations for safe use and action taken to safeguard the community.
    - Only the social media tool Twitter, which have been risk assessed and approved as suitable for educational purposes, will be used.
- Parents and carers will be informed of any official social media use with learners; 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.

8.4.1 Staff expectations

- Members of staff who follow and/or like our official social media channels will be advised to use dedicated professionals 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 code of conduct policy.
    - Always be professional and aware they are an ambassador for the setting.
    - Disclose their official role and position 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 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, learners, parents and carers.
    - Inform their line manager, the DSL of any concerns, such as criticism, inappropriate content or contact from learners.

9. Use of Personal Devices and Mobile Phones

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

9.1 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 Headcorn Primary 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 Headcorn Primary 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, toilets and swimming pools.
- 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 Headcorn Primary School community 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.

9.2 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 eg lockable desk unit or personal locker.
    - Keep mobile phones and personal devices switched off or switched to 'silent' mode during lesson times.
    - Not use personal devices during teaching periods, unless written permission has been given by the Head Teacher, such as in emergency circumstances.
    - Ensure that any content bought 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 learners or parents and carers.
    - Any pre-existing relationships, which could undermine this, will be discussed with the DSL.
- Staff will not use personal devices:
    - To take photos or videos of learners and will only use work-provided equipment for this purpose.

    - Directly with learners and will only use work-provided equipment during lessons/educational activities.
- If a member of staff breaches our policy, action will be taken in line with our code of conduct 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 and the LADO (Local Authority Designated Officer) will be informed in line with our allegations policy.

9.3 Learners Use of Personal Devices and Mobile Phones

- Learners will be educated regarding the safe and appropriate use of personal devices and mobile phones, **however mobile phones are not allowed to be on the school premises**.
- If a learner breaches the policy, the phone or device will be confiscated and will be held in a secure place.
    - Mobile phones and devices that have been confiscated will be released to parents or carers at the end of the school day

9.4 Visitors' Use of Personal Devices and Mobile Phones

- Parents/carers and visitors (including volunteers and contractors) should ensure that mobile phones are out of sight and switched to 'silent'.
- We will ensure appropriate signage and information is displayed and provided to inform parents, carers and visitors of expectations of use.
- Visitors (including volunteers and contractors) who are on site for a regular or extended period will use their mobile phones and personal devices in accordance with our code of conduct policy and other associated policies, such as: anti-bullying, behaviour, child protection and image use.
- Members of staff are expected to challenge visitors if they have concerns and will always inform the DSL / Head Teacher of any breaches our policy.

10. 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 (sexting), cyberbullying and illegal content.
- All members of the community must respect confidentiality and the need to follow the official procedures for reporting concerns.
    - Learners, parents and staff will be informed of our complaints procedure and staff will be made aware of the whistleblowing procedure.
- We require staff, parents, carers and learners 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.

- If we are unsure how to proceed with an incident or concern, the DSL (or deputy) will seek advice from the Education Safeguarding Service.
- Where there is suspicion that illegal activity has taken place, we will contact the Education Safeguarding Service or Kent 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 will speak with Kent Police or the Education Safeguarding Service first to ensure that potential investigations are not compromised.

10.1 Concerns about Learners Online Behaviour and/or Welfare

- The DSL will be informed of any online safety incidents involving safeguarding or child protection concerns.
    - The DSL will record these issues in line with our child protection policy.
- Headcorn Primary School recognises that whilst risks can be posed by unknown individuals or adults online, learners can also abuse their peers; all online peer on peer abuse concerns will be responded to in line with our child protection and behaviour policies.
- The DSL will ensure that online safety concerns are escalated and reported to relevant agencies in line with the Kent Safeguarding Children Board thresholds and procedures.
- We will inform parents and carers of online safety incidents or concerns involving their child, as and when required.

10.2 Concerns about staff online behaviour and/or welfare

- Any complaint about staff misuse will be referred to the Head Teacher, in accordance with the allegations policy.
- Any allegations regarding a member of staff's online conduct will be discussed with the LADO (Local Authority Designated Officer).
- Appropriate action will be taken in accordance with our staff behaviour policy/code of conduct.
- Welfare support will be offered to staff as appropriate.

10.3 Concerns about parent/carer online behaviour and/or welfare

- Concerns regarding parents/carers behaviour and/or welfare online will be reported to the Head Teacher and/or DSL (or deputy).The Head Teacher and/or DSL will respond to concerns in line with existing policies, including but not limited to Safeguarding, Anti-bullying, Complaints, Grievance, Home School Agreement, GDPR, Behaviour policy.
- Civil or legal action will be taken if necessary.
- Welfare support will be offered to parents/carers as appropriate.

11. Procedures for Responding to Specific Online Incidents or Concerns

11.1 Online Sexual Violence and Sexual Harassment between Children

www.childnet.com/resources/step-up-speak-up/guidance-and-training-for-schools-and-professionals

- Our DSL Team has accessed and understood "Sexual violence and sexual harassment between children in schools and colleges" (2018) guidance and part 5 of 'Keeping children safe in education' 2019.
- Headcorn Primary School recognises that sexual violence and sexual harassment between children can take place online. Examples may include; non-consensual sharing of sexual images and videos, 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.
- Headcorn Primary School recognises that sexual violence and sexual harassment between children can take place online. Examples may include;
    - Non-consensual sharing of sexual images and videos
    - Sexualised online bullying
    - Online coercion and threats
    - 'Upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of obtaining sexual gratification, or causing the victim humiliation, distress or alarm. It is a criminal offence
    - Unwanted sexual comments and messages on social media
    - Online sexual exploitation
- Headcorn Primary School recognises that 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.
- Headcorn Primary School also recognises the potential for repeat victimisation in the future if abusive content continues to exist somewhere online.
- Headcorn Primary School 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 PSHE 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 and act in accordance with our child protection and anti-bullying policies.
- If content is contained on learners electronic devices, they will be managed in accordance with the DfE 'searching screening and confiscation' advice.
- Provide the necessary safeguards and support for all learners 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 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 Work Service 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 will discuss this with Kent 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.

11.2 Youth Produced Sexual Imagery ("Sexting")

- Headcorn Primary School recognises youth produced sexual imagery (known as "sexting") 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 UKCCIS guidance: 'Sexting in schools and colleges: responding to incidents and safeguarding young people' and KSCMP guidance: "Responding to youth produced sexual imagery".
    - Youth produced sexual imagery or 'sexting' is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts.
    - It is an offence to possess, distribute, show and make indecent images of children. The Sexual Offences Act 2003 defines a child, for the purposes of indecent images, as anyone under the age of 18.
- Headcorn Primary School will ensure that all members of the community are made aware of the potential social, psychological and criminal consequences of 'sexting' by implementing preventative approaches, via a range of age and ability appropriate educational methods.
- 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 site or using setting provided or personal equipment.
- We will not:
    - View any images suspected of being youth produced sexual imagery, unless there is no other possible option, or there is a clear need or reason to do so.
        - If it is deemed necessary, the image will only be viewed by the DSL (or deputy DSL) and their justification for viewing the image will be clearly documented.

    - 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 learners 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 policies and the relevant Kent Safeguarding Child Board's procedures.
    - Ensure the DSL (or deputy) responds in line with the 'Sexting in schools and colleges: responding to incidents and safeguarding 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 learners 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 Work Service and/or the Police, as deemed appropriate in line with the UKCCIS : 'Sexting in schools and colleges: responding to incidents and safeguarding young people' guidance.
    - Provide the necessary safeguards and support for learners, such as offering counselling or pastoral support.
    - 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 UKCCIS: 'Sexting in schools and colleges: responding to incidents and safeguarding 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.

11.3 Online Child Sexual Abuse and Exploitation (including child criminal exploitation)

- Headcorn Primary School 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.
- Headcorn Primary School recognises 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 learners, 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 used to report online child sexual abuse is visible and available to learners and other members of our community.
- 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 Kent Safeguarding Child Board's procedures.
    - Store any devices containing evidence securely.
        - If content is contained on learners personal devices, they will be managed in accordance with the DfE 'searching screening and confiscation' advice.
        - If any evidence is stored on our network or devices, we will act to block access to other users and isolate the content.
    - If appropriate, make a referral to Children's Social Work Service (if required/appropriate) and immediately inform Kent police via 101, or 999 if a child is at immediate risk.
    - Carry out a risk assessment which considers any vulnerabilities of learner(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 learners, 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, learners 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/
- If we are unclear whether a criminal offence has been committed, the DSL (or deputy) will obtain advice immediately through the Education Safeguarding Service and/or Kent Police.
- If made aware of intelligence or information which may relate to child sexual exploitation (on or offline), it will be passed through to the Child Sexual Exploitation Team (CSET) by the DSL.
- If learners at other setting are believed to have been targeted, the DSL will seek support from Kent Police and/or the Education Safeguarding Service first to ensure that potential investigations are not compromised.

11.4 Indecent Images of Children (IIOC)

- Headcorn Primary School 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 subscribes to the Internet Watch Foundation block list and by implementing 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 Kent Police and/or the Education Safeguarding Service.
- If made aware of IIOC, we will:
    - Act in accordance with our child protection policy and the relevant Kent Safeguarding Child Boards procedures.
    - Store any devices involved securely.
    - Immediately inform appropriate organisations, such as the Internet Watch Foundation (IWF), Kent police.
- If made aware that a member of staff or a learner has been inadvertently exposed to indecent images of children, we will:
    - Ensure that the DSL is informed.
    - Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via 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) is informed.
    - Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via www.iwf.org.uk .
    - Ensure that any copies that exist of the image, for example in emails, are deleted.
    - Inform the police via 101 (999 if there is an immediate risk of harm) and Children's Social Work Service (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 Head Teacher 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.

11.5 Cyberbullying

- Cyberbullying, along with all other forms of bullying, will not be tolerated at Headcorn Primary School.
- Full details of how we will respond to cyberbullying are set out in our anti-bullying policy. (***http://www.headcorn.kent.sch.uk/key-information/school-policies/***)

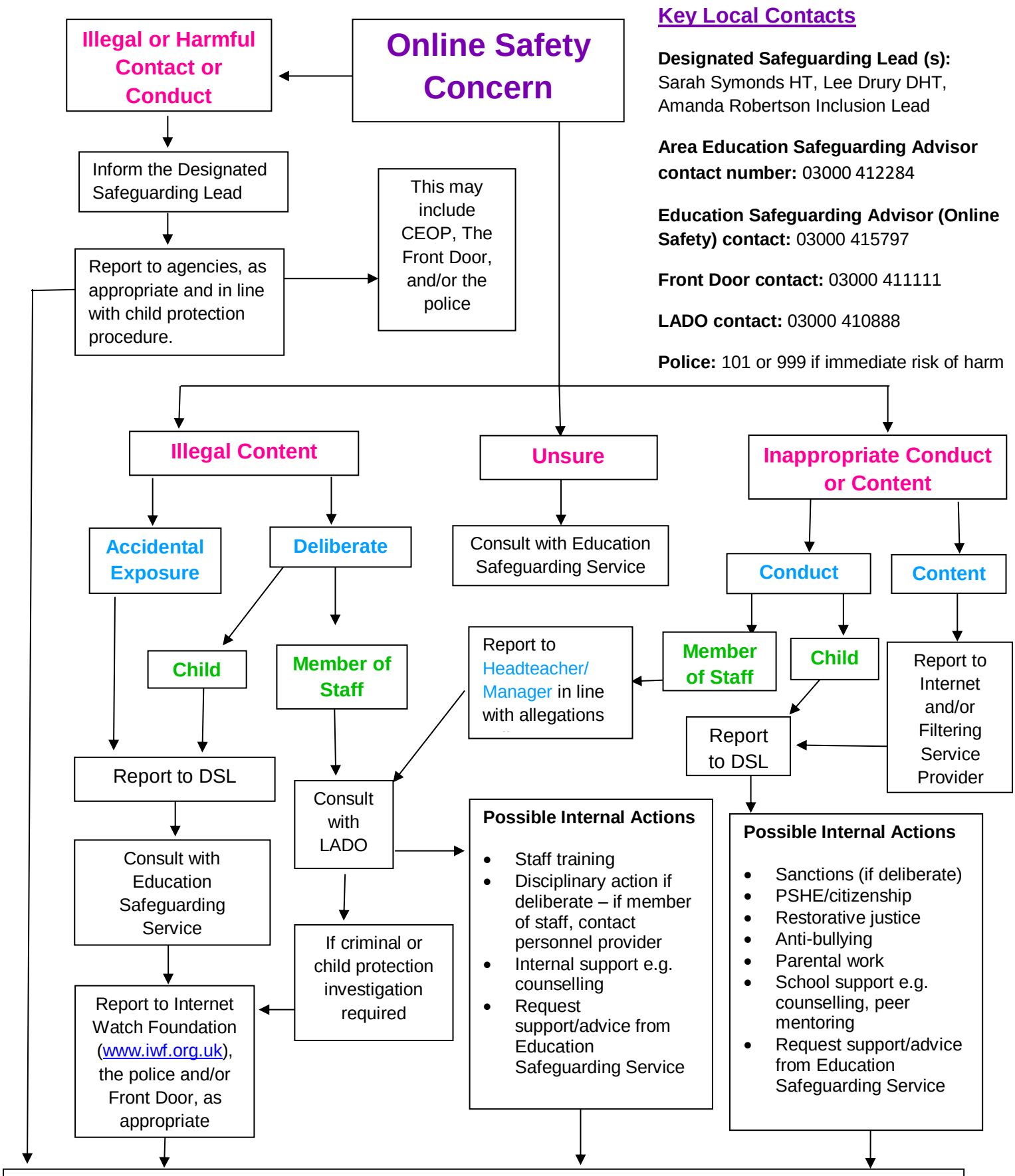
11.6 Online Hate

- Online hate content, directed towards or posted by, specific members of the community will not be tolerated at Headcorn Primary School 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) will obtain advice through the Education Safeguarding Service and/or Kent Police.

11.7 Online Radicalisation and Extremism

- We will take all reasonable precautions to ensure that learners and staff are safe from terrorist and extremist material when accessing the internet on site.
- If we are concerned that a child or parent/carer may be at risk of radicalisation online, the DSL (or deputy) will be informed immediately, and action will be taken in line with our child protection policy.
- If we are concerned that member of staff may be at risk of radicalisation online, the Head Teacher will be informed immediately, and action will be taken in line with the child protection and allegations policies.

Responding to an Online Safety Concern Flowchart



12. Useful Links for Educational Settings

Kent Support and Guidance for Educational Settings

Education Safeguarding Service:

- 03000 415797
  - Rebecca Avery, Education Safeguarding Advisor (Online Protection)
  - Ashley Assiter, Online Safety Development Officer
- Guidance for Educational Settings:
  - www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding
  - www.theeducationpeople.org/blog/?tags=Online+Safety&page=1

- **KSCMP:** https://www.kscmp.org.uk/about-kscb

Kent Police:

- www.kent.police.uk or www.kent.police.uk/internetsafety

In an emergency (a life is in danger or a crime in progress) dial 999. For other non-urgent enquiries contact Kent Police via 101

Front Door:

- The Front Door can be contacted on 03000 41 11 11
- Out of hours (after 5pm / Urgent calls only) please contact: 03000 41 91 91

Early Help and Preventative Services: www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-contacts

Other:

- EiS - ICT Support for Schools and Kent Schools Broadband Service Desk**:** www.eiskent.co.uk

National Links and Resources for Educational Settings, Learners and Parents/Carers

- CEOP:
  - www.thinkuknow.co.uk
  - www.ceop.police.uk

- Internet Watch Foundation (IWF): www.iwf.org.uk

- UK Council for Internet Safety (UKCIS): www.gov.uk/government/organisations/uk-council-for-internet-safety

- UK Safer Internet Centre: www.saferinternet.org.uk
  - Professional Online Safety Helpline: www.saferinternet.org.uk/about/helpline
  - Report Harmful Content: https://reportharmfulcontent.com/

- 360 Safe Self-Review tool for schools: www.360safe.org.uk

- Childnet: www.childnet.com
  - Step Up Speak Up – Online Sexual Harassment Guidance: www.childnet.com/resources/step-up-speak-up/guidance-and-training-for-schools-and-professionals
  - Cyberbullying Guidance: www.childnet.com/resources/cyberbullying-guidance-for-schools

- Internet Matters: www.internetmatters.org

- Parent Zone: https://parentzone.org.uk

- Parent Info: https://parentinfo.org

- NSPCC: www.nspcc.org.uk/onlinesafety
  - ChildLine: www.childline.org.uk
  - Net Aware: www.net-aware.org.uk

- Lucy Faithfull Foundation: www.lucyfaithfull.org

- The Marie Collins Foundation: www.mariecollinsfoundation.org.uk

- Action Fraud: www.actionfraud.police.uk

- Get Safe Online: www.getsafeonline.org