

# Ightham Primary School Online Safety Policy



## Key Details

**Designated Safeguarding Lead (s):** (David Sherhod, Head Teacher)

**Named governor with lead responsibility:** (Mrs M Pickering)

**Date written/updated:** November 2022

**Date agreed and ratified by governing body:** 24<sup>th</sup> November 2022

**Date of next review:** November 2023

This policy will be reviewed **at least** annually. It will also be revised following any changes to technology use, online safety concerns and/or updates to national and local guidance or procedures.

# Key Contacts

	Name	Contact information
Head Teacher Designated Safeguarding Lead (DSL)	Mr D Sherhod	01732 882405
Deputy Designated Safeguarding Lead	Miss J Avery Mrs J Richardson Mrs R Johnson Mrs R Adams	01732 882405
Safeguarding Governor	Mrs M Pickering	mpickering@ightham.kent.sch.uk

# Ightham Primary School Online Safety Policy

## 1. Policy Aims and Scope

- This policy has been written by Ightham Primary School, involving staff, learners and parents/carers, building on The Education People policy template, with specialist advice and input as required. It takes into account the DfE statutory guidance '[Keeping Children Safe in Education](#)', [Early Years and Foundation Stage](#), '[Working Together to Safeguard Children](#)' and the local Safeguarding Children Multi-agency Partnership procedures (<https://www.kscmp.org.uk/>).
- We recognise that online safety is an essential part of safeguarding and acknowledge our duty to ensure that all learners and staff are protected from potential harmful and inappropriate online material and/or behaviour. This policy sets out our whole school approach to online safety which will empower, protect and educate learners and staff in their use of technology and establishes the mechanisms in place to identify, intervene in, and escalate any concerns where appropriate.
- Ightham Primary School understands that breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
  - **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.
  - **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- Ightham Primary School recognises that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.
- This policy applies to learners, parents/carers and 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 school (collectively referred to as "staff" in this policy).
- Ightham Primary School identifies that the internet and technology, including computers, tablets, mobile phones, smart watches, games consoles and social media, is an important part of everyday life, and presents positive and exciting opportunities, as well as challenges and risks. This policy applies to all access to and use of technology, both on and off-site.
- This policy links with several other policies, practices and action plans, including but not limited to:
  - Anti-bullying policy
  - Acceptable Use Policies (AUP) and/or the Code of conduct/staff behaviour policy
  - Behaviour policy
  - Child protection policy
  - Confidentiality policy
  - Curriculum policies, such as: Computing, Personal Social and Health Education (including Relationships and Sex Education)
  - Data protection
  - Data/information security

- Cameras and image use policy
- Searching, screening and confiscation policy.

## 2. Responding to Emerging Risks

- Ightham 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:
  - carry out an annual review of our online safety approaches which will be supported by an annual risk assessment which considers and reflects the specific risks our learners face.
  - regularly review the methods used to identify, assess and minimise online risks.
  - examine emerging technologies for educational benefit and undertake appropriate risk assessments before their use is permitted.
  - ensure that appropriate filtering and monitoring is in place and take all reasonable precautions to ensure that internet access is appropriate.
  - recognise that due to the global and connected nature of the internet, it is not possible to guarantee that unsuitable material cannot be accessed via our systems, and as such identify clear procedures to follow if breaches or concerns arise.

## 3. Monitoring and Review

- Ightham Primary School will review this policy at least annually. The policy will also be revised following any national or local policy updates, any local concerns and/or any changes to our technical infrastructure.
- We will regularly monitor internet use taking place via our provided devices and systems 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 will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.
- Any issues identified will be incorporated into our action planning.

## 4. Roles and Responsibilities

- The Designated Safeguarding Lead (DSL) (David Sherhod, Head Teacher) is recognised as holding overall lead responsibility for online safety, however Ightham Primary School recognises that all members of the community have important roles and responsibilities to play with regards to online safety. Whilst activities of the DSL may be delegated to an appropriately trained deputy, the lead responsibility for safeguarding and child protection, including online safety remains with them.

## 4.1 The leadership and management team will:

- Create a whole school culture that incorporates online safety throughout.
- 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 which address the acceptable use of technology, peer on peer abuse, use of social media and mobile technology.
- Work with IT technicians to ensure that suitable and appropriate filtering and monitoring systems are in place.
- Support the DSL and any deputies by ensuring they have enough time and resources to carry out their responsibilities.
- Ensure robust reporting channels are in place regarding online safety concerns.
- Undertake appropriate risk assessments regarding the safe use of technology on site.
- 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 school 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.
- Liaise with other members of staff, such as the IT technicians on matters of online safety as appropriate.
- Ensure referrals are made to relevant external partner agencies, as appropriate.
- Work alongside deputy DSLs to ensure online safety is recognised as part of the schools safeguarding responsibilities, and that a coordinated whole school approach is implemented.
- Access regular and appropriate training and support to ensure they understand the unique risks associated with online safety and have the relevant and up-to-date knowledge required to keep learners safe online, including the additional risks that learners with SEN and disabilities (SEND) face online.
- 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.
- 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 schools safeguarding recording mechanisms.
- Monitor online safety incidents to identify gaps and trends and use this data to update the education response and school policies and procedures.
- Report online safety concerns, as appropriate, to the 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 (termly – 6 times a year) with the governor with a lead responsibility for safeguarding.

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

- Contribute to the development of our online safety policies.
- Read and adhere to our online safety policy and acceptable use of technology policies.
- Take responsibility for the security of IT systems and the electronic data they use or have access to.
- Model good practice when using technology with learners.
- 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 learners in their care.
- Identify online safety concerns and take appropriate action by following our safeguarding policies and procedures.
- Know when and how to escalate online safety issues, including reporting to the DSL and signposting learners and parents/carers 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 such as locking computers, using encrypted memory sticks as directed by the leadership team to ensure that the schools IT infrastructure is secure and not open to misuse or malicious attack, whilst allowing learning opportunities to be maximised.
- Ensure that our filtering policy and monitoring systems and approaches are applied and updated on a regular basis; responsibility for its implementation is shared with the leadership team.
- Ensure appropriate technical support and access to our filtering and monitoring systems is given to the DSL to enable them to take appropriate safeguarding action 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/ability appropriate online safety education.
- Contribute to the development of online safety policies.
- Read and adhere to the acceptable use of technology and behaviour policies.
- Respect the feelings and rights of others, on and offline.
- Take an appropriate level of responsibility for keeping themselves and others safe online.
- Seek help from a trusted adult, if they are concerned about anything, they or others experience online.

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

- Read our Acceptable Use of technology 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 and abide by the home-school agreement and acceptable use of technology policies.
- Seek help and support from the school or other appropriate agencies if they or their child encounter online issues.
- Contribute to the development of our online safety policies.
- Use our systems, such as learning platforms and other IT resources, safely and appropriately.
- Take responsibility for their own awareness in relation to the risks and opportunities posed by the new and emerging technologies that their children access and use at home.

## 5. Education and Engagement Approaches

### 5.1 Education and engagement with learners

- Ightham Primary School will establish and embed a whole school culture and will empower our learners to acquire the knowledge needed to use the technology in a safe, considered and respectful way, and develop their resilience so they can manage and respond to online risks.
- We and will 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 online safety is addressed in PSHE (including Relationships Education, Health Education) and embedded within the Computing and wider curriculum.
  - reinforcing online safety principles in other curriculum subjects and whenever technology or the internet is used on site.
  - 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 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 external visitors, where appropriate, to complement and support our internal online safety education approaches. Staff will also consult the DSL before booking an external visitor. Staff will read and use the guidance in UKCIS '[Using External Visitors to Support Online Safety Education: Guidance for Educational Schools](#)' when deciding to use an external visitor.
  - providing online safety education as part of the transition programme across the key stages and when moving between establishments.
  - rewarding positive use of technology.

- Ightham Primary School will support learners to understand and follow our Acceptable Use policies in a way which suits their age and ability by:
  - sharing our acceptable use policies with them in accessible and appropriate ways.
  - 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.
- Ightham 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.
  - enabling them to understand what acceptable and unacceptable online behaviour looks like.
  - 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.
  - 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

- Ightham Primary School recognises that any learner can be vulnerable online, and vulnerability can fluctuate depending on age, developmental stage and personal circumstances. However, there are some learners, for example looked after children and those with special educational needs or disabilities, who may be more susceptible or may have less support in staying safe online.
- Ightham Primary School will ensure that differentiated and appropriate online safety education, access and support is provided to all learners who require additional or targeted support. Resources from previous year groups will be used where appropriate or resources will be found to meet the needs of individual pupils. Pupils with High Needs Funding are supported by 1:1 TAs to access appropriate resources.
- Staff at Ightham Primary School will seek input from specialist staff as appropriate, including the DSL and SENCO, 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, including our acceptable use policy, with all members of staff as part of induction.
  - provide up-to-date and appropriate training for all staff which is integrated, aligned and considered as part of our overarching safeguarding approach. Online safety training is provided as part of our annual safeguarding training, through the distribution of the Children Protection newsletter and specific online safety sessions. Online safety is a set item on staff meeting agendas. This allows DSLs to update all staff on a regularly basis.



- ensure staff training covers the potential risks posed to learners (content, contact, conduct and commerce) as well as our professional practice expectations.
- build on existing expertise, by providing opportunities for staff to contribute to and shape our online safety approaches.
- ensure staff are 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.
- ensure staff are aware that their online conduct, including personal use of social media, can have an impact on their professional role and reputation.
- highlight useful educational resources and tools which staff could use with learners.
- ensure all members of staff are aware of the procedures to follow regarding online safety concerns involving learners, colleagues or other members of the community.

## 5.4 Awareness and engagement with parents and carers

- Ightham Primary School recognises that parents and carers have an essential role to play in enabling our learners 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 our online safety policy and expectations in our newsletters and other external communication (such as letters) as well as in our prospectus and on our website.
  - requesting parents and carers read online safety information as part of joining our community, for example, within our home school agreement.
  - requiring them to read our acceptable use of technology policies and discuss the implications with their children.

## 6. Safer Use of Technology

### 6.1 Classroom use

- Ightham Primary School uses a wide range of technology. This includes access to:
  - Computers, laptops, tablets and other digital devices
  - Internet, which may include search engines and educational websites
  - Learning platforms, remote learning platform/tools and intranet
  - Email
  - Games consoles and other games-based technologies
  - Digital cameras, web cams and video cameras.
- All school owned devices will be used in accordance with our acceptable use of technology policies and with appropriate safety and security measures in place. This includes:
  - Class record books for iPads. These detail the date, time the device handed out and the time the device was handed back in. These allows the school to know which child was using each device if an issue / concern is raised.
- Members of staff will always evaluate websites, tools and apps fully before use in the classroom or recommending for use at home.

- The school will use appropriate search tools as identified following an informed risk assessment. All children use [SWGfL Squiggles](#).
- 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 internet access and technology use will be appropriate to learners age and ability. This includes:
  - **Early Years Foundation Stage**
    - 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 1 and 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.

## 6.1 Managing internet access

- All users will read and agree and/or acknowledge our acceptable use policy, appropriate to their age, understanding and role, before being given access to our computer system, IT resources or the internet.
- We will maintain a record of users who are granted access to our devices and systems.

## 6.2 Filtering and monitoring

Leaders and DSLs should access guidance about establishing 'appropriate levels' of filtering and monitoring to help inform their decision making: [www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring](http://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring)

### 6.3.1 Decision making

- Ightham Primary School will do all we reasonably can to limit children's exposure to online risks through school provided IT systems/devices and will ensure that appropriate filtering and monitoring systems are in place.
- Ightham Primary School governors and DSLs have ensured that our school has age and ability appropriate filtering and monitoring in place to limit learner's exposure to online risks. 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.
- Governors and leaders are mindful to ensure that "over blocking" does not unreasonably restrict access to educational activities and safeguarding materials.
- 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.

### 6.3.2 Appropriate filtering

- Ightham Primary School's education broadband connectivity is provided through Cantium and Ightham Primary School uses Smoothwall provided by Cantium.
  - Ightham Primary School blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking, gambling, piracy and copyright theft, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material.
  - Smoothwall is a member of [Internet Watch Foundation](#) (IWF) and blocks access to illegal Child Abuse Images and Content (CAIC).
  - Smoothwall integrates the 'the police assessed list of unlawful terrorist content, produced on behalf of the Home Office'.
- We work with Smoothwall to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.
- If learners or staff discover unsuitable sites or material, they are required to:
  - **Turn off monitor/screen and report the concern immediately to a member of staff.**
  - **Staff to report concerns to a DSL.**
  - **Report the URL of the site to technical staff.**
- Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate in line with existing policies, including child protection, acceptable use and behaviour.
- Parents/carers will be informed of filtering breaches involving learners.
- Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the IWF, the police and/or NCA-Child Exploitation and Online Protection Command ([CEOP](#)).

### 6.3.3 Appropriate monitoring

- We will appropriately monitor internet use on all school owned or provided internet enabled devices. This is achieved by:
  - **Physical monitoring (supervision)**
  - **iPad record books**
  - **Monitoring internet and web access (reviewing logfile information)**
- 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.
- If a concern is identified via our monitoring approaches:
  - Where the concern relates to learners, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour.
  - Where the concern relates to staff, it will be reported to the Head Teacher (or chair of governors if the concern relates to the Head Teacher), in line with our staff behavior and allegations policy.

## 6.4 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 Data Protection policy which can be accessed at ([www.ightham.kent.sch.uk/policies](http://www.ightham.kent.sch.uk/policies)).

## 6.5 Information security and access management

- We take appropriate steps to ensure necessary security protection procedures are in place, in order to safeguard our systems, staff and learners.
- Further information about technical environment safety and security includes:
  - 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.
  - Preventing, as far as possible, access to websites or tools which could compromise our systems, including anonymous browsing and other filtering bypass tools.
  - Checking files held on our network, as required and when deemed necessary by leadership staff.
  - The appropriate use of user logins and passwords to access our network and user logins and passwords will be enforced for all users.
  - All users are expected to log off or lock their screens/devices if systems are unattended.
- We will review the effectiveness of our security approaches and procedures periodically in order to keep up with evolving cyber-crime technologies.

### 6.5.1 Password policy

- All members of staff have their own unique username and private passwords to access our systems; members of staff are responsible for keeping their password private.
- From year one, 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.
  - change their passwords every 6 months (staff only).
  - not share passwords or login information with others or leave passwords/login details where others can find them.
  - not to login as another user at any time.
  - lock access to devices/systems when not in use.

## 6.6 Managing the safety of our website

- We will ensure that information posted on our website meets the requirements as identified by the [DfE](#).
- We will ensure that our school 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 school 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.

## 6.7 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, social media and use of personal devices and mobile phones policies.

## 6.8 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 of technology policies and the code of conduct.
- 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.
- School email addresses and other official contact details will not be used to set up personal social media accounts.
- Members of the community will immediately report offensive communication to David Sherhod, Lead DSL and Head Teacher. In his absence Julie Avery, Deputy DSL and Deputy Head Teacher would be informed.
- 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 will have a dedicated email for reporting wellbeing and pastoral issues. This inbox will be managed by designated and trained staff.

### 6.8.1 Staff email

- All members of staff:
  - are provided with an email address to use for all official communication; the use of personal email addresses by staff for any official business is not permitted.
  - are encouraged to have an appropriate work life balance when responding to email, especially if communication is taking place between staff, learners and parents. Staff are will only respond to emails from parents between 8am and 6pm.

### 6.8.2 Learner email

- Learners will:
  - use a provided email account for educational purposes.
  - agree an Acceptable Use Policy and will receive education regarding safe and appropriate email etiquette before access is permitted.

## 6.9 Educational use of videoconferencing and/or webcams

- Ightham Primary School recognise that videoconferencing and/or use of webcams can be a challenging activity but brings a wide range of learning benefits.
  - All videoconferencing and/or webcam equipment will be switched off when not in use and will not be set to auto-answer.
  - Videoconferencing equipment connected to the educational broadband network will use the national E.164 numbering system and display their H.323 ID name; external IP addresses will not be made available to other sites.
  - Videoconferencing contact details will not be posted publicly.
  - Videoconferencing equipment will not be taken off the premises without prior permission from the Head Teacher.
  - Staff will ensure that external videoconferencing opportunities and/or tools are suitably risk assessed and will ensure that accounts and systems used to access these events are safe and secure.
  - Videoconferencing equipment and webcams will be kept securely and, if necessary, locked away or disabled when not in use.

### 6.9.1 Users

- Parents/carers consent will be obtained prior to learners taking part in videoconferencing activities.
- Learners will ask permission from a member of staff before making or answering a videoconference call or message.
- Videoconferencing will take place via official and approved communication channels following a robust risk assessment and will be supervised appropriately, according to the learners age and ability. As a school we use Zoom and Teams. Communication is supervised and controlled by a member of staff.
- The unique log on and password details for the videoconferencing services will only be issued to members of staff and will be kept securely, to prevent unauthorised access.

### 6.9.2 Content

- When recording a videoconference lesson, it should be made clear to all parties at the start of the conference and written permission will be obtained from all participants; the reason for the recording must be given and recorded material will be stored securely.
- If third party materials are included, we will check that recording is permitted to avoid infringing the third-party intellectual property rights.
- We will establish dialogue with other conference participants before taking part in a videoconference; if it is a non-educational site, staff will check that the material they are delivering is appropriate for the learners.

## 6.10 Management of learning platforms

- Ightham Primary School uses Microsoft Teams as its official learning platform and all access and use takes place in accordance with our acceptable use policies.
- 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, learners and parents will have access to the LP. When staff and/or learners leave the school, their account will be disabled or transferred to their new establishment.
- 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 learner's parents/carers may be informed.
  - If the content is illegal, we will respond in line with existing child protection procedures.
- Learners may require editorial approval from a member of staff. This may be given to the learner 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 as part of an agreed focus or a limited time slot.

### 6.11 Management of applications (apps) used to record progress

- We use Arbor to track learners progress and share appropriate information with parents and carers.
- The Head Teacher will ensure that the use of tracking systems is appropriately risk assessed prior to use, and that use takes place in accordance with data protection legislation, including the General Data Protection Regulations (GDPR) and Data Protection legislation.
- To safeguard learner's data:
  - only learner issued devices will be used for apps that record and store learners' 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 learners' personal details, attainment or images unless explicitly agreed or directed by the Head Teacher.
  - 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.

### 6.12 Management of remote learning

#### Where children are asked to learn online at home in response to a full or partial closure:

- Ightham Primary School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using school provided or approved communication channels; school provided email accounts and phone numbers and agreed systems Microsoft 365 or
  - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our code of conduct and Acceptable Use Policies.

- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP).
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. Ightham Primary School will continue to be clear who from the school their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.



## 7. Social Media

### 7.1 Expectations

- The expectations' regarding safe and responsible use of social media applies to all members of Ightham Primary School community. The policy applies to all use of social media; the term social media includes, but is not limited to, blogs, wikis, social networking sites, forums, bulletin boards, online gaming, apps, video/photo sharing sites, chatrooms and instant messenger apps or other online communication services.
- All members of our community are expected to engage in social media in a positive and responsible manner and 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 school provided devices and systems on site.
- 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 action. Staff should not access personal social media sites using school devices. School devices will only be used to update and manage official school social media sites.
- Concerns regarding the online conduct of any member of Ightham Primary School community on social media will be taken seriously. Concerns will be managed in accordance with the appropriate policies, including anti-bullying, allegations against staff, behaviour, home school-agreements, staff code of conduct, Acceptable Use Policies, and child protection.

### 7.2 Staff use of social media

- The use of social media during school hours for personal use is permitted for staff. Staff are permitted to access their personal devices during break times. Personal social media sites should not be accessed using school devices.
- Safe and professional online behaviour is outlined for all members of staff, including volunteers, as part of our code of conduct and acceptable use of technology policy.
- The safe and responsible use of social media sites will be discussed with all members of staff as part of staff induction. Advice will be provided and updated via staff training and additional guidance and resources will be shared with staff as required on a regular basis.
- Any complaint about staff misuse of social media or policy breaches will be taken seriously in line with our child protection and allegations against staff policy.

#### 7.2.1 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 school. 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. This may include, but is not limited to:
  - Setting appropriate privacy levels on their personal accounts/sites.
  - Being aware of the implications of using location sharing services.
  - Opting out of public listings on social networking sites.
  - Logging out of accounts after use.
  - Using strong passwords.

- Ensuring staff do not represent their personal views as being that of the school.
- Members of staff are encouraged not to identify themselves as employees of Ightham Primary School on their personal social networking accounts; this is to prevent information being linked with the setting and to safeguard the privacy of staff members.
- All staff are expected to ensure that their social media use is compatible with their professional role and is in accordance our policies and the wider professional reputation and legal framework. All members of staff are encouraged to carefully consider the information, including text and images, they share and post on social media.
- 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.

### **7.2.2 Communicating with learners and their families**

- Staff will not use any personal social media accounts to contact learners or their family members.
- 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 accounts.
- Any communication from learners and parents/carers received on personal social media accounts will be reported to the Head Teacher.
- Any pre-existing relationships or situations, which mean staff cannot comply with this requirement, will be discussed with the Head Teacher. Decisions made and advice provided in these situations will be formally recorded to safeguard learners, members of staff and the setting.
- 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.

## **7.3 Learners' use of social media**

- The use of social media during school hours for personal use is not permitted for learners.
- Ightham Primary School will empower our learners to acquire the knowledge needed to use social media in a safe, considered and respectful way, and develop their resilience so they can manage and respond to online risks. Safe and appropriate use of social media will be taught to learners as part of an embedded and progressive safeguarding education approach using age-appropriate sites and resources. Further information is contained within our child protection and relevant specific curriculum policies including PSHE.
- We are aware that many popular social media sites are not permitted for use by children under the age of 13, or in some cases higher. As such, we will not create accounts for learners under the required age as outlined in the services terms and conditions.
- Learners will be advised:
  - to consider the benefits and risks of sharing personal details or information 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, for example by making profiles private.
  - not to meet any online friends without a parent/carer or other appropriate adults' permission, and to only do so 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 on social media, both within the setting and externally.
- Any concerns regarding learners use of social media will be dealt with in accordance with appropriate existing policies, including anti-bullying, child protection and behaviour.
- The DSL (or deputy) will respond to social media concerns involving safeguarding or child protection risks in line with our child protection policy.
- Sanctions and/or pastoral/welfare support will be implemented and offered to learners as appropriate, in line with our child protection and behaviour policy. Civil or legal action may be taken if necessary.
- Concerns regarding learners use of social media will be shared with parents/carers as appropriate, particularly when concerning underage use of social media services and games.

## 8. Mobile and Smart Technology

### Safe use of mobile and smart technology expectations

- Lghtham Primary School recognises that use of mobile and smart technologies is part of everyday life for many learners, staff and parents/carers.
- Electronic devices of any kind that are brought onto site are the responsibility of the user. All members of the Lghtham Primary School community are advised to:
  - take steps to protect their mobile phones or personal devices from loss, theft or damage; we accept no responsibility for the loss, theft or damage of such items on our premises.
  - use passwords/PIN numbers to ensure that unauthorised access, calls or actions cannot be made on their phones or devices.
  - Y6 pupils who walk home are permitted to bring their mobile phone school. These are signed in and stored by the class teacher during the school day. Phones are then handed back to the children as they leave. No other pupils are permitted to bring mobile phones to school.
- Mobile phones and personal devices are not permitted to be used in specific areas on 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 in line with our anti-bullying, behaviour and child protection policies.
- All members of the Lghtham 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 illegal, or which would otherwise contravene our behaviour or child protection policies.

### 8.2 School provided mobile phones and devices

- Members of staff will be issued with a work phone number in addition to their work email address, where contact with learners or parents/carers is required.
- Staff providing formal remote learning will do so using school provided equipment in accordance with our Acceptable Use Policy/remote learning AUP.
- School mobile phones and devices will be suitably protected via a passcode/password/PIN and must only be accessed or used by members of staff.
- School mobile phones and devices will always be used in accordance with the acceptable use of technology policy and other relevant policies.

- Where staff and/or learners are using school provided mobile phones and/or devices, they will be informed prior to use via our Acceptable Use Policy (AUP) that activity may be monitored for safeguarding reasons and to ensure policy compliance.

### 8.3 Staff use of mobile and smart technology

- Members of staff will ensure that use of any mobile and smart technology, including personal phones and mobile devices, will take place in accordance with the law, as well as relevant school policy and procedures, such as confidentiality, child protection, data security staff code of conduct and Acceptable Use Policies.
- Staff will be advised to:
  - Keep mobile phones and personal devices in a safe and secure place (e.g. locked in a cupboard/drawer) during lesson time.
  - Keep personal mobile phones and devices switched off or set to 'silent' mode during lesson times.
  - Ensure that Bluetooth or other forms of communication, such as 'airdrop', are hidden or disabled 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 personal mobile phones and devices is compatible with their professional role and our behaviour 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 or circumstance, which could compromise staff's ability to comply with this, will be discussed with the Head Teacher.
- Staff will only use school provided equipment (not personal devices):
  - to take photos or videos of learners in line with our image use policy.
  - to work directly with learners during lessons/educational activities.
  - to communicate with parents/carers.
- Where remote learning activities take place, staff will use school provided equipment. If this is not available, staff will only use personal devices with prior approval from the Head Teacher, following a formal risk assessment. Staff will follow clear guidance outlined in the Acceptable Use Policy and/or remote learning AUP.
- If a member of staff breaches our policy, action will be taken in line with our staff code of conduct 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 using a personal device or mobile phone, the police will be contacted and the LADO (Local Authority Designated Officer) will be informed in line with our allegations policy.

## 8.4 Learners use of mobile and smart technology

- Learners will be educated regarding the safe and appropriate use of mobile and smart technology, including mobile phones and personal devices, and will be made aware of behaviour expectations and consequences for policy breaches.
- Safe and appropriate use of mobile and smart technology will be taught to learners as part of an embedded and progressive safeguarding education approach using age-appropriate sites and resources. Further information is contained within our child protection and relevant specific curriculum policies (PSHE).
- Mobile phones and/or personal devices will not be used on site by learners.
- Ightham Primary School expects learners' personal devices and mobile phones to be kept safe and secure when on site. This means:
  - Devices are switched off and handed into the class teacher at the start of day.
- If a learner needs to contact their parents or carers whilst on site, this contact will be made by a member of staff. Using a school phone.
- If a learner requires access to a personal device in exceptional circumstances, for example medical assistance and monitoring, this will be discussed with the Head Teacher prior to use being permitted.
  - Any arrangements regarding access to personal devices in exceptional circumstances will be documented and recorded by the school.
  - Any specific agreements and expectations (including sanctions for misuse) will be provided in writing and agreed by the learner and their parents carers before use is permitted.
- Where learners' mobile phones or personal devices are used when learning at home, this will be in accordance with our Acceptable Use Policy and/or Remote Learning AUP.
- Mobile phones and personal devices must not be taken into examinations. Learners found in possession of a mobile phone or personal device which facilitates communication or internet access during an exam will be reported to the appropriate examining body. This may result in the withdrawal from either that examination or all examinations.
- Any concerns regarding learners use of mobile technology or policy breaches will be dealt with in accordance with our existing policies, including anti-bullying, child protection and behaviour.
  - Staff may confiscate a learner's mobile phone or device if they believe it is being used to contravene our child protection, behaviour or anti-bullying policy.
  - Learners' mobile phones or devices may be searched by a member of the leadership team, with the consent of a parent/carer. Content may be deleted or requested to be deleted if it contravenes our policies and in line with the DfE 'Searching, Screening and Confiscation' guidance.
  - Mobile phones and devices that have been confiscated will be held in a secure place) Head Teachers office) and released to parents/carers at the end of the school day.
  - Appropriate sanctions and/or pastoral/welfare support will be implemented in line with our behaviour policy.
  - Concerns regarding policy breaches by learners will be shared with parents/carers as appropriate.
  - Where there is a concern that a child is at risk of harm, we will contact respond in line with our child protection policy.
  - If there is suspicion that material on a learner'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.

## 8.5 Visitors' use of mobile and smart technology

- Parents/carers and visitors, including volunteers and contractors, are expected to ensure that:
  - mobile phones and personal devices are not used in areas where the children are. Visitors may use the staff room and/or meeting room as needed.
- Appropriate signage and information is in place (safeguarding leaflets) to inform visitors of our expectations for safe and appropriate use of personal devices and mobile phones.
- Visitors, including volunteers and contractors, who are on site for regular or extended periods of time are expected to use mobile and smart technology in accordance with our acceptable use of technology policy and other associated policies, including child protection.
- If visitors require access to mobile and smart technology, for example when working with learners as part of multi-agency activity, this will be discussed with the Head Teacher prior to use being permitted.
  - Any arrangements regarding agreed visitor access to mobile/smart technology will be documented and recorded by the school. This may include undertaking appropriate risk assessments if necessary.
- Members of staff are expected to challenge visitors if they have concerns about their use of mobile and smart technology and will inform the Head Teacher of any breaches of our policy.

## 9. Responding to Online Risks and/or Policy Breaches

- 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.
  - are informed of the need to report policy breaches or concerns in line with existing school policies (child protection) and procedures.
  - will respect confidentiality and the need to follow the official procedures for reporting concerns.
  - will be informed of our complaints procedure and staff will be made aware of the whistleblowing procedure.
  - will be made aware of how the school will monitor policy compliance by: sharing and signing AUPs and staff training.
  - are expected to adopt a partnership with the school to resolve issues.
- If appropriate, after any investigations are completed, the DSL and leadership staff 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 Head Teacher will seek advice from the local authority or other agency in accordance with our child protection policy. As a Kent schools we will access the Education Safeguarding Service.
- Where there is a concern that illegal activity has taken place, we will contact the police using 101, or 999 if there is immediate danger or risk of harm.
- If information relating to a specific incident or a concern needs to be shared beyond our community, for example if other local schools are involved or the wider public may be at risk, the DSL will speak with the police and/or the Local Authority first, to ensure that potential criminal or child protection investigations are not compromised. As a Kent schools we will access the Education Safeguarding Service and ask their advice.

## 9.1 Concerns about learner online behaviour and/or welfare

- All concerns about learners will be responded to and recorded in line with our child protection policy:
  - The DSL will be informed of all online safety concerns involving safeguarding or child protection risks in line with our child protection policy.
  - The DSL will ensure that online safety concerns are escalated and reported to relevant partner agencies in line with local policies and procedures.
- Appropriate sanctions and/or pastoral/welfare support will be implemented and/or offered to learners as appropriate. Civil or legal action will be taken if necessary.
- We will inform parents/carers of online safety incidents or concerns involving their child, as and when required.

## 9.2 Concerns about staff online behaviour and/or welfare

- Any complaint about staff misuse will be referred to the Head Teacher, in accordance with our allegations against staff policy.
- Any allegations regarding a member of staff's online conduct will be discussed with the LADO (Local Authority Designated Officer). Contact details are 03000 41 11 11 or Email: kentchildrenslado@kent.gov.uk
- Where appropriate, welfare support will be offered, and where necessary, disciplinary, civil and/or legal action will be taken in accordance with our staff code of conduct.

## 9.3 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 dealt with in line with existing policies, including but not limited to child protection, anti-bullying, complaints, allegations against staff, home-school agreements, acceptable use of technology and behaviour policy.
- Where appropriate, welfare support will be offered, and where necessary, civil and/or legal action may be taken.

# 10. Procedures for Responding to Specific Online Concerns

## 10.1 Online peer on peer abuse

- Ightham 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.
- We recognise that online peer on peer abuse can take many forms, including but not limited to:
  - bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - abuse in intimate personal relationships between peers
  - physical abuse, this may include an online element which facilitates, threatens and/or encourages physical abuse
  - sexual violence and sexual harassment, which may include an online element which facilitates, threatens and/or encourages sexual violence

- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals.
- Ightham Primary School believes that abuse is abuse, including when it takes place online and it will never be tolerated or dismissed as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
- Ightham Primary School believes that all staff have a role to play in challenging inappropriate online behaviours between peers.
- Ightham Primary School recognises that, even if there are no reported cases of online peer on peer abuse, such abuse is still likely to be taking place.
- Concerns about learner's behaviour, including peer on peer abuse taking place online offsite will be responded to as part of a partnership approach with learners and parents/carers and in line with existing policies, for example anti-bullying, acceptable use, behaviour and child protection policies. Section 89(5) of the Education and Inspections Act 2006 gives Head Teachers a statutory power to discipline pupils for poor behaviour outside of the school premises e.g. when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable.
- Ightham Primary School want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of online peer on peer abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated policies, including child protection, anti-bullying and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

### 10.1.1 Child on child online sexual violence and sexual harassment

- When responding to concerns relating to online child on child sexual violence or harassment, Ightham Primary School will follow the guidance outlined in Part Five of KCSIE 2021 and the DfE [‘Sexual Violence and Sexual Harassment Between Children in Schools and Colleges’](#) guidance.
- Online sexual violence and sexual harassment exists on a continuum and may overlap with offline behaviours; it is never acceptable. Abuse that occurs online will not be downplayed and will be treated equally seriously.
- All victims of online sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting online sexual violence or sexual harassment or be made to feel ashamed for making a report.
- Ightham Primary School recognises that sexual violence and sexual harassment between children can take place online. Examples may include:
  - consensual and non-consensual sharing of nude and semi-nude images and videos
  - sharing of unwanted explicit content
  - ‘upskirting’ (which is a criminal offence and typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm)
  - sexualised online bullying
  - unwanted sexual comments and messages, including, on social media



- sexual exploitation, coercion and threats.
- Ightham Primary School recognises that sexual violence and sexual harassment occurring online (either in isolation or in connection to face to face incidents) can introduce a number of complex factors. These include the potential for the incident to take place across a number of social media platforms and 24 services, and for things to move from platform to platform online.
- Ightham Primary School 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.
- Ightham 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 and the support available, by implementing a range of age and ability appropriate educational methods as part of our PSHE curriculum.
- When there has been a report of online sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator and any other children involved/impacted.
  - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
  - Reports will initially be managed internally by the DSL, and where necessary will be referred to Children's Social Care and/or the Police. As a Kent school we will access specific advice via the Education Safeguarding Service.
  - The decision making and required action taken will vary on a case by case basis but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, or staff, and any other related issues or wider context.
  - If content is contained on learners' personal devices, they will be managed in accordance with the DfE '[searching screening and confiscation](#)' advice.
- Following an immediate risk assessment the school will:
  - provide the necessary safeguards and support for all learners involved, such as implementing safety plans, offering advice on blocking, reporting and removing online content, and providing appropriate counselling/pastoral support.
  - inform parents/carers for all children involved about the incident and how it is being managed and provide support and signposting, as appropriate, unless to do so would place a child at risk of significant harm.
  - if the concern involves children and young people at a different educational school, the DSL will 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 the 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.
- Ightham Primary School recognises that internet brings the potential for the impact of any concerns to extend further than the local community, and for a victim or alleged perpetrator to become marginalised and excluded by online communities. Ightham Primary School also recognises the potential for repeat victimisation in the future if abusive content continues to exist somewhere online.

## 10.1.2 Nude or semi-nude image sharing

- Ightham Primary School recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or “sexting”) can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- This policy defines sharing nude or semi-nude image sharing as when a person under the age of 18:
  - creates and/or shares nude and/or semi-nude imagery (photos or videos) of themselves with a peer(s) under the age of 18.
  - shares nude and/or semi-nude imagery created by another person under the age of 18 with a peer(s) under the age of 18.
  - possesses nude and/or semi-nude imagery created by another person under the age of 18.
- When made aware of concerns regarding nude and/or semi-nude imagery, Ightham Primary School will follow the advice as set out in the non-statutory UKCIS guidance: [‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’](#)
- Ightham Primary School will ensure that all members of the community are made aware of the potential social, psychological and criminal consequences of creating or sharing nude or semi-nude images and sources of support, by implementing preventative approaches, via a range of age and ability appropriate educational methods in PSHE lessons.
- We will respond to concerns regarding nude or semi-nude image sharing, regardless of whether the incident took place on site or using school provided or personal equipment.
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
  - Report any concerns to the DSL immediately.
  - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.
  - Not delete the imagery or ask the child to delete it.
  - Not say or do anything to blame or shame any children involved.
  - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
  - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- If made aware of an incident involving nude or semi-nude imagery, DSLs will:
  - act in accordance with our child protection policies and the relevant local procedures and in line with the [UKCIS](#) guidance.
  - carry out a risk assessment in line with the [UKCIS](#) guidance which considers the age and vulnerability of learners involved, including the possibility of carrying out relevant checks with other agencies.
  - a referral will be made to Children’s Social Care and/or the police immediately if:
    - the incident involves an adult (over 18).
    - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
    - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child’s developmental stage, or are violent.

- a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the local authority. As a Kent school we will access specific advice via the Education Safeguarding Service.
- Store any devices securely:
  - If content is contained on learners' personal devices, they will be managed in accordance with the DfE '[searching screening and confiscation](#)' advice.
  - If a potentially 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.
- inform parents/carers about the incident and how it is being managed and provide support and signposting, as appropriate, unless to do so would place a child at risk of significant harm.
- provide the necessary safeguards and support for learners, such as offering counselling or pastoral support.
- implement sanctions where necessary and appropriate 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 [UKCIS](#) 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.
  - Learners will be supported in accessing the Childline '[Report Remove](#)' tool where necessary: Report Remove Tool for nude images.
- 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.
- We will not:
  - view any imagery, unless there is no other option, or there is a clear safeguarding need or reason to do so. DSLs will follow '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' If it is deemed necessary, the imagery will only be viewed where possible by the DSL in line with the national [UKCIS guidance](#), and any decision making will be clearly documented.
  - send, share, save or make copies of content suspected to be an indecent image/video of a child and will not allow or request learners to do so.

### 10.1.3 Cyberbullying

- Cyberbullying, along with all other forms of bullying, will not be tolerated at Ightham Primary School.
- Full details of how we will respond to cyberbullying are set out in our anti-bullying policy. [Anti-Bullying-Policy-2021-22.pdf \(ightham.kent.sch.uk\)](#)

## 10.2 Online child abuse and exploitation

- Ightham Primary School recognises online abuse and exploitation, including sexual abuse and sexual or criminal exploitation, as a safeguarding issue and all concerns will be reported to and dealt with by the DSL, in line with our child protection policy.
- Ightham Primary School will ensure that all members of the community are aware of online child abuse and sexual or criminal exploitation, including the possible grooming approaches which may be employed by offenders to target learners, and understand how to respond to concerns.

- We will implement preventative approaches for online child abuse and exploitation via a range of age and ability appropriate education for learners, staff and parents/carers. This will be covered through our PSHE curriculum.
- We will ensure that all members of the community are aware of the support available regarding online child abuse and exploitation, both locally and nationally.
- If made aware of an incident involving online child abuse and/or exploitation, we will:
  - act in accordance with our child protection policies and the relevant local safeguarding children partnership 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 and inform the police via 101, or 999 if a learner is at immediate risk. As a Kent schools we will access specific advice via the Education Safeguarding Service.
  - 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 and provide support and signposting, as appropriate.
  - 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 abuse and exploitation, regardless of whether the incident took place on our premises or using school provided or personal equipment.
  - Where possible and appropriate, learners will be involved in decision making. If appropriate, they will be empowered to report concerns themselves with support, for example if the concern relates to online sexual abuse via the National Crime Agency CEOP Command (NCA-CEOP): [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 will obtain advice immediately through the Local Authority and/or police. As a Kent school we will access specific advice via the Education Safeguarding Service.
- We will ensure that the NCA-CEOP reporting tools are visible and available to learners and other members of our community. This can be access from the home page of the school website (<https://ightham.kent.sch.uk/>)
- If made aware of intelligence or information which may relate to child sexual exploitation (on or offline), it will be passed through to the police by the DSL.
- If members of the public or learners at other schools are believed to have been targeted, the DSL, will seek advice from the police and/or the Local Authority before sharing specific information to ensure that potential investigations are not compromised. As a Kent school we will access specific advice via the Education Safeguarding Service.

### 10.3 Indecent Images of Children (IIOC)

- Ightham Primary School will ensure that all members of the community are made aware of the possible consequences of accessing Indecent Images of Children (IIOC) as appropriate.

- 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 (IWF) 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 will obtain advice immediately through the police and/or the Local Authority. As a Kent school we will access specific advice via the Education Safeguarding Service.
- If made aware of IIOC, we will:
  - act in accordance with our child protection policy and the relevant local safeguarding children partnership procedures. As a Kent school we will access specific advice via the Education Safeguarding Service.
  - store any devices involved securely, until advice has been sought. If content is contained on learners personal devices, they will be managed in accordance with the DfE '[searching screening and confiscation](#)' advice.
  - immediately inform appropriate organisations, such as the IWF and police.
- If made aware that a member of staff or a learner has been 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 IWF via [www.iwf.org.uk](http://www.iwf.org.uk) and/or police.
  - inform the police as appropriate, for example if images have been deliberately sent to or shared by learners.
  - report concerns as appropriate to parents and carers.
- If made aware that indecent images of children have been found on school provided devices, we will:
  - ensure that the DSL is informed.
  - ensure that the URLs (webpage addresses), which contain the suspect images, are reported to the IWF via [www.iwf.org.uk](http://www.iwf.org.uk) .
  - inform the police via 101 or 999 if there is an immediate risk of harm, and any other agencies, as appropriate.
  - only store copies of images (securely, where no one else has access to them and delete all other copies) following a written request from the police.
  - report concerns, as appropriate to parents/carers.
- If made aware that a member of staff is in possession of indecent images of children, we will:
  - ensure that the Head Teacher is informed in line with our managing allegations against staff policy.
  - inform the LADO and other relevant organisations, such as the police in accordance with our managing allegations against staff policy.
  - quarantine any involved school provided devices until police advice has been sought.

## 10.4 Online hate

- Online hate content, directed towards or posted by specific members of the community will not be tolerated at Ightham Primary School and will be responded to in line with existing policies, including child protection, 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 will obtain advice through the Local Authority and/or the police. As a Kent school we will access specific advice via the Education Safeguarding Service.

## 10.5 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 learner or adult may be at risk of radicalisation online, the DSL will be informed immediately, and action will be taken in line with our child protection policy:
  - If the concerns relate to a member of staff, the Head Teacher will be informed immediately, and action will be taken in line with the child protection and allegations policies.

## 10.6 Cybercrime

- Ightham Primary School recognises that children with particular skills and interests in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

## 11. Useful Links

### Links for Schools

- UK Council for Internet Safety (UKCIS): [www.gov.uk/government/organisations/uk-council-for-internet-safety](http://www.gov.uk/government/organisations/uk-council-for-internet-safety)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- SWGfL: 360 Safe Self-Review tool for schools [www.360safe.org.uk](http://www.360safe.org.uk)
- Childnet: [www.childnet.com](http://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](http://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](http://www.childnet.com/resources/cyberbullying-guidance-for-schools)
- PSHE Association: [www.pshe-association.org.uk](http://www.pshe-association.org.uk)
- National Education Network (NEN): [www.nen.gov.uk](http://www.nen.gov.uk)
- National Cyber Security Centre (NCSC): [www.ncsc.gov.uk](http://www.ncsc.gov.uk)
- Educate against hate: <https://educateagainsthate.com>
- NCA-CEOP Education Resources: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Safer Recruitment Consortium: [www.saferrecruitmentconsortium.org/](http://www.saferrecruitmentconsortium.org/)

### Reporting Helplines

- NCA-CEOP Safety Centre: [www.ceop.police.uk/Safety-Centre](http://www.ceop.police.uk/Safety-Centre)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
  - Report Remove Tool for nude images: [www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety sexting/report-nude-image-online](http://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety sexting/report-nude-image-online)
- Stop it now! [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- The Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Revenge Porn Helpline: <https://revengepornhelpline.org.uk>
- Professional Online Safety Helpline: [www.saferinternet.org.uk/about/helpline](http://www.saferinternet.org.uk/about/helpline)

### Support for children and parents/carers

- Childnet: [www.childnet.com](http://www.childnet.com)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- Parent Zone: <https://parentzone.org.uk>
- NSPCC: [www.nspcc.org.uk/onlinesafety](http://www.nspcc.org.uk/onlinesafety)
  - Net Aware: [www.net-aware.org.uk](http://www.net-aware.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- NCA-CEOP Child and Parent Resources: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)