



**THE FEDERATION OF
LOWER HALSTOW & NEWINGTON CEP SCHOOLS**

Online Safety Policy

| Approved | Team | Review Date |
|----------|------|-------------|
| 20.03.18 | FGB | Spring 2019 |
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**Children, Young People and Education
Directorate**

Education Safeguarding Team

**Exemplar School Online Safety Policy
Template**

September 2017

**This template should be accessed alongside
the 'Writing an Online Safety Policy' guidance
[www.kelsi.org.uk/child-protection-and-
safeguarding/e-safety](http://www.kelsi.org.uk/child-protection-and-safeguarding/e-safety)**

The Lower Halstow & Newington CEP Federation Online Safety Policy



Key Details

**Designated Safeguarding Leads: Cathy Walker, Simon Krafft, Lindsay
Hayward**

Named Governor with lead responsibility: Tony Mould

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

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The Lower Halstow & Newington CEP Federation

Online Safety Policy

1. Policy Aims

- This online safety policy has been written by The Federation, involving staff, pupils and parents/carers, building on the Kent County Council (KCC) online safety policy template, with specialist advice and input as required.
- It takes into account the DfE statutory guidance "[Keeping Children Safe in Education](#)" 2016, [Early Years and Foundation Stage](#) 2017 and the [Kent Safeguarding Children Board](#) procedures.
- The purpose of The Federation online safety policy is to:
 - Safeguard and protect all members of the Federation 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.
- The Federation 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

- The Federation believes that online safety is an essential part of safeguarding and acknowledges it's duty to ensure that all pupils and staff are protected from potential harm online.
- The Federation identifies that the internet and associated devices, such as computers, tablets, mobile phones and games consoles, are an important part of everyday life.
- The Federation believes that pupils should be empowered to build resilience and to develop strategies to manage and respond to risk online.
- This policy applies to all staff including the governing body, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for, or provide services on behalf of the Federation (collectively referred to as 'staff' in this policy) as well as pupils and parents/carers.
- This policy applies to all access to the internet and use of technology, including personal devices, or where pupils, staff or other individuals have been provided with Federation 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 a number of other policies, practices and action plans including:
 - Anti-bullying policy
 - Acceptable Use Policies (AUP) and the Code of Conduct
 - Behaviour and Anti Bullying policy

- Child protection policy
- Confidentiality policy
- Curriculum policies, such as: Computing, Personal Social and Health Education (PSHE), Citizenship and Sex and Relationships Education (SRE)
- Data security
- Image use policy

3. Monitoring and Review

- The Federation 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 ensure that we regularly monitor internet use and evaluate online safety mechanisms to ensure that this policy is consistently applied.
- To ensure they have oversight of online safety, the headteacher will be informed of online safety concerns, as appropriate.
- The named Governor for safeguarding will report on a regular basis to the governing body on online safety incidents, including outcomes.
- Any issues identified will be incorporated into the Federation's action planning.

4. Roles and Responsibilities

- The Federation has appointed Simon Krafft, as Designated Safeguarding Lead to be the online safety lead.
- The Federation 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:

- Ensure that online safety is viewed as a safeguarding issue and that practice is in line with national and local recommendations and requirements.
- Ensure there are appropriate and up-to-date policies regarding online safety; including a Code of conduct and/or an AUP, which covers acceptable use of technology.
- Ensure that suitable and appropriate filtering and monitoring systems are in place.
- Work with technical staff to monitor the safety and security of Federation systems and networks.
- Ensure that online safety is embedded within a progressive whole school curriculum, which enables all pupils to develop an age-appropriate understanding of online safety.
- Support the Designated Safeguarding Lead by ensuring they have sufficient time and resources to fulfil their online safety responsibilities.
- Ensure there are robust reporting channels for the Federation 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.

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.
- Keep up-to-date with current research, legislation and trends regarding online safety and communicate this with the Federation community, as appropriate.
- Ensure all members of staff receive regular, up-to-date and appropriate online safety training.
- 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 Federations 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 6 times a year with the governor with a lead responsibility for safeguarding and 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 AUPs..
- Take responsibility for the security of Federation systems and the data they use, or have access to.
- Model good practice when using technology and maintain a professional level of conduct in their personal use of technology, both on and off site.
- Embed online safety education in curriculum delivery, wherever possible.
- Have an awareness of a range of online safety issues and how they may be experienced by the children in their care.
- Identify online safety concerns and take appropriate action by following the Federation's 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 (*including password policies and encryption*) to ensure that the Federation's IT infrastructure/system is secure and not open to misuse or malicious attack, whilst allowing learning opportunities to be maximised.
- Ensure that the Federations filtering policy is applied and updated on a regular basis; responsibility for its implementation is shared with the leadership team.

- Report any filtering breaches to the DSL and leadership team, as well as, the Federation's Internet Service Provider or other services, as appropriate.
- Ensure that any safeguarding concerns, identified through monitoring or filtering breaches are reported to the DSL, in accordance with the Federation's safeguarding procedures.

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

- Engage in age appropriate online safety education opportunities.
- Contribute to the development of online safety policies.
- Read and adhere to the Federation AUPs.
- 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 school AUPs and encourage their children to adhere to them.
- Support the Federation in their online safety approaches by discussing online safety issues with their children and reinforce appropriate, safe online behaviours at home.
- Role model safe and appropriate use of technology and social media.
- Abide by the Federation's home-school agreement and/or AUPs. Identify changes in behaviour that could indicate that their child is at risk of harm online.
- Seek help and support from the Federation, or other appropriate agencies, if they or their child encounter risk or concerns online.
- Contribute to the development of the Federation online safety policies.
- Use Federation systems, such as learning platforms, and other network resources, safely and appropriately.
- Take responsibility for their own awareness in relation to the risks and opportunities posed by new and emerging technologies.

5. Education and Engagement Approaches

5.1 Education and engagement with pupils

- The Federation will establish and embed a progressive online safety curriculum throughout the whole Federation, to raise awareness and promote safe and responsible internet use amongst pupils by:
 - Ensuring education regarding safe and responsible use precedes internet access.
 - Including online safety in the PSHE, SRE and Computing programmes of study, covering use both at home school and home. (Scratch, Purple Mash)
 - Reinforcing online safety messages whenever technology or the internet is in use.
 - Educating pupils in the effective use of the internet to research; including the skills of knowledge location, retrieval and evaluation.
 - Teaching pupils to be critically aware of the materials they read and shown how to validate information before accepting its accuracy.

- The Federation will support pupils to read and understand the AUP in a way which suits their age and ability by:
 - Displaying acceptable use posters in all rooms with internet access.
 - Informing pupils that network and internet use will be monitored for safety and security purposes and in accordance with legislation.
 - Rewarding positive use of technology by pupils.
 - Implementing appropriate peer education approaches.
 - Providing online safety education and training as part of the transition programme across the key stages and when moving between establishments.
 - Seeking pupil voice when writing and developing Federation online safety policies and practices, including curriculum development and implementation.
 - Using support, such as external visitors, where appropriate, to complement and support the Federations internal online safety education approaches.

5.1.1 Vulnerable Pupils

- The Federation is aware that some pupils are considered to be more vulnerable online due to a range of factors. This may include, but is not limited to children in care, children with Special Educational Needs and Disabilities (SEND) or mental health needs, children with English as an additional language (EAL) and children experiencing trauma or loss.
- The Federation will ensure that differentiated and ability appropriate online safety education, access and support is provided to vulnerable pupils. (Scratch, Purple Mash, ICT Policy)
- The Federation will seek input from specialist staff as appropriate, including the SENCO/Inclusion Manager, Child in Care Lead.

5.2 Training and engagement with staff

The Federation will:

- Provide and discuss the online safety policy 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 forms part of the Annual induction programme for all new and existing staff. The first INSET day in September is dedicated to safeguarding, child protection and online safety training together with the Code of Conduct.
 - This will cover the potential risks posed to pupils (Content, Contact and Conduct) as well as our professional practice expectations.
- Make staff aware that Federation systems are monitored and activity can be traced to individual users; staff will be reminded to behave professionally and in accordance with Federation's policies when accessing Federation systems and devices.
- Make staff aware that their online conduct out of school, including personal use of social media, could have an impact on their professional role and reputation within Federation.
- Highlight useful educational resources and tools which staff should use, according to the age and ability of the pupils.
- Ensure all members of staff are aware of the procedures to follow regarding online safety concerns affecting pupils, colleagues or other members of the Federation community.

5.3 Awareness and engagement with parents and carers

- The Federation recognises that parents and carers have an essential role to play in enabling children to become safe and responsible users of the internet and associated technologies.
- The Federation will build a partnership approach to online safety with parents and carers by:
 - Providing information and guidance on online safety in a variety of formats. This will include offering specific online safety awareness training and highlighting online safety at other events such as parent evenings, transition events, fetes and sports days.
 - Drawing their attention to the Federation 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 Federation, for example, within our home school agreement.
 - Requiring them to read the Federation AUP and discuss its implications with their children.

6. Reducing Online Risks

- The Federation 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 Federation 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 a Federation computer or device.
- All members of the Federation community are made aware of the Federation's 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 the Federation's AUP and highlighted through a variety of education and training approaches.

7. Safer Use of Technology

7.1 Classroom Use

- The Federation uses a wide range of technology. This includes access to:
 - Computers, laptops and other digital devices
 - Internet which may include search engines and educational websites
 - Federation learning platform/intranet
 - Email
 - Games consoles and other games based technologies
 - Digital cameras, ipods and video cameras
- All Federation owned devices will be used in accordance with the Federation's AUP and with appropriate safety and security measures in place. The Federation has 3 I pads, which are password protected and the Online Safety lead is responsible for loading any apps.
- Members of staff will always evaluate websites, tools and apps fully before use in the classroom or recommending for use at home.

The Federation will use age appropriate search tools. Suggested Search engines

[BBC Safe search](#) - (only searches approved BBC content)

[DK Find Out!](#) - Searches Dorling Kindersley content

[Swiggle \(SWGfL\)](#)

[nICE for Primary Schools](#) - search engine and library

[Kids Rex](#) - search engine

[Primary School ICT](#) - video, picture and website search engine

[VADS](#) - online resource for searching visual arts

[NEN image gallery](#) - for images to use in the classroom

[Pics4Learning](#) - for images to use in the classroom

[Dorling Kindersley](#) - Images for classroom use

following an informed risk assessment, to identify which tool best suits the needs of our community. The Federation will ensure that the use of internet-derived materials, by staff and pupils, complies with copyright law and acknowledge the source of information.

Supervision of pupils will be appropriate to their age and ability.

- **Early Years Foundation Stage and Key Stage 1**
 - Pupils' 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 pupils' age and ability.
- **Key Stage 2**
 - Pupils will use age-appropriate search engines and online tools.

- Children will be directed by the teacher to online materials and resources which support the learning outcomes planned for the pupils' age and ability.

7.2 Managing Internet Access

- The Federation will maintain a written record of users who are granted access to the Federation's devices and systems.
- All staff, pupils and visitors will read and sign an AUP before being given access to the Federation computer system, IT resources or internet.

7.3 Filtering and Monitoring

The Federation system is managed by Lightspeed and filtering systems are in place

7.3.1 Decision Making

- The Federation governors and leaders have ensured that the Federation has age and ability appropriate filtering and monitoring in place, to limit children's exposure to online risks.
- The governors and leaders are aware of the need to prevent "over blocking", as that may unreasonably restrict what children can be taught, with regards to online activities and safeguarding.
- The Federation's decision regarding filtering and monitoring has been informed by a risk assessment, taking into account our Federation's 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 pupils; effective classroom management and regular education about safe and responsible use is essential.

7.3.2 Filtering

- The Federation uses educational broadband connectivity through EIS
- The Federation uses EIS which blocks sites which can be categorised as: pornography, racial hatred, extremism, gaming and sites of an illegal nature.
 - The Federation filtering system blocks all sites on the [Internet Watch Foundation](#) (IWF) list.
- The Federation works with EIS to ensure that our filtering policy is continually reviewed.

Dealing with Filtering breaches

- The Federation has a clear procedure for reporting filtering breaches.
 - If pupils discover unsuitable sites, they will be required to click on the dolphin at the top of the screen, turn off the monitor and immediately report to the member of staff delivering the lesson.
 - The member of staff will report the concern (including the URL of the site if possible) to the Designated Safeguarding Lead 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 that the Federation believes is illegal will be reported immediately to the appropriate agencies, such as: IWF, Kent Police or CEOP.

7.3.4 Monitoring

- The Federation will appropriately monitor internet use on all Federation owned or provided internet enabled devices. This is achieved by:
 - physical monitoring (supervision), monitoring internet and web access reviewing logfile information (currently weekly)
- The Federation has a clear procedure for responding to concerns identified via monitoring approaches. DSL will respond in line with the child protection & safeguarding policy
- All users will be informed that use of Federation 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 the Data Protection Act 1998.
 - Full information can be found in the Federations information security policy. ([Link](#))

7.5 Security and Management of Information Systems

- The Federation takes appropriate steps to ensure the security of our information systems, including:
 - Virus protection being updated regularly.
 - Encryption for personal data sent over the Internet or taken off site (such as via portable media storage) or access via appropriate secure remote access systems.
 - Not using portable media without specific permission; portable media will be checked by an anti-virus /malware scan before use.
 - Not downloading unapproved software to work devices or opening unfamiliar email attachments.
 - Regularly checking files held on the Federation's network,
 - The appropriate use of user logins and passwords to access the Federation 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 Federation systems; members of staff are responsible for keeping their password private.
- From year 2 all pupils are provided with their own unique username and private passwords to access Federation systems; pupils are responsible for keeping their password private.
- We require all users to:
 - Use strong passwords for access into our system.
 - Change their passwords every year.
 - Always keep their password private; users must not share it with others or leave it where others can find it.
 - Not to login as another user at any time.

7.6 Managing the Safety of the Federation Website

- The Federation will ensure that information posted on our website meets the requirements as identified by the Department for Education (DfE)..
- The Federation 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 pupils' personal information will not be published on our website; the contact details on the website will be the Federation address, email and telephone number.
- The administrator account for the Federation website will be secured with an appropriately strong password.
- The Federation will post appropriate information about safeguarding, including online safety, on the Federation website for members of the community.

7.7 Publishing Images and Videos Online

- The Federation will ensure that all images and videos shared online are used in accordance with the associated policies, including (but not limited to): the Image use policy, Data security, AUPs, Codes of conduct, Social media and Use of personal devices and mobile phones.

7.8 Managing Email

- Access to Federation email systems will always take place in accordance with Data protection legislation and in line with other Federation policies, including: Confidentiality, AUPs and 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.
 - Federation email addresses and other official contact details will not be used for setting up personal social media accounts.
- Members of the Federation community will immediately tell Simon Krafft, DSL and Online Safety Lead if they receive offensive communication, and this will be recorded in the Federation safeguarding files/records.
- Excessive social email use can interfere with teaching and learning and will be restricted; access to external personal email accounts may be blocked in Federation.

7.8.1 Staff

- The use of personal email addresses by staff for any official Federation business is not permitted.
 - All members of staff are provided with a specific Federation 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 and pupils and parents.

7.8.2 Pupils

- Pupils will use Federation provided email accounts for educational purposes.

- Pupils will sign an AUP and will receive education regarding safe and appropriate email etiquette before access is permitted.
- Whole-class or group email addresses may be used for communication outside of the Federation.

7.9 Educational use of Videoconferencing and/or Webcams

- The Federation recognise that videoconferencing and use of webcams can be a challenging activity but brings a wide range of learning benefits.
 - All videoconferencing and webcam equipment will be switched off when not in use and will not be set to auto-answer.
 - Video conferencing 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 publically.
 - School videoconferencing equipment will not be taken off school premises without prior permission from the DSL.
 - 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.
 - Video conferencing equipment and webcams will be kept securely and, if necessary, locked away or disabled when not in use.

7.9.1 Users

- Parents and carers consent will be obtained prior to pupils taking part in videoconferencing activities.
- Pupils will ask permission from a teacher before making or answering a videoconference call or message.
- Videoconferencing will be supervised appropriately, according to the pupils' age and ability and an adult will always be present.
- Video conferencing will take place via official and approved communication channels following a robust risk assessment.
- Only key administrators will be given access to videoconferencing administration areas or remote control pages.
- The unique log on and password details for the videoconferencing services will only be issued to members of staff and should be kept securely, to prevent unauthorised access.

7.9.2 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, the school will check that recording is permitted to avoid infringing the third party intellectual property rights.

- The school will establish dialogue with other conference participants before taking part in a videoconference; if it is a non-school site, staff will check that the material they are delivering is appropriate for the class.

7.10 Management of Learning Platforms

- The Federation uses “Purple Mash” as its official learning platform.
- Leaders and staff will regularly monitor the usage of the Learning Platform (LP) in all areas, in particular, message and communication tools and publishing facilities.
- Only current members of staff, pupils and parents will have access to the LP.
- When staff and/or pupils’ leave the Federation, their account or rights to specific Federation areas will be disabled or transferred to their new establishment.
- Pupils and staff will be advised about acceptable conduct and use when using the LP.
- All users will be mindful of copyright and will only upload appropriate content onto the LP.
- Any concerns about content on the LP will be recorded and dealt with in the following ways:
 - The user will be asked to remove any material deemed to be inappropriate or offensive.
 - If the user does not comply, the material will be removed by the site administrator.
 - Access to the LP for the user may be suspended.
 - The user will need to discuss the issues with a member of leadership before reinstatement. e) A pupil’s parent/carer may be informed.
 - If the content is considered to be illegal, then the Federation will respond in line with existing child protection procedures.
- Pupils may require editorial approval from a member of staff. This may be given to the pupil to fulfil a specific aim and may have a limited time frame.
- A visitor may be invited onto the LP by a member of the leadership; in this instance, there may be an agreed focus or a limited time slot.

7.11 Management of Applications (apps) used to Record Children’s Progress

- The Federation uses SIMS to track pupils progress and share appropriate information with parents and carers.
- The Executive Headteacher is ultimately responsible for the security of any data or images held of children. As such, they will ensure that the use of tracking systems is appropriately risk assessed prior to use, and that they are used in accordance with data protection legislation
- In order to safeguard pupils data:
 - Only Federation issued devices will be used for apps that record and store children’s 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 children’s personal details, attainment or images.
 - Federation 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.

8. Social Media

8.1 Expectations

- The expectations' regarding safe and responsible use of social media applies to all members of The Federation 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 The Federation community are expected to engage in social media in a positive, safe and responsible manner, at all times.
 - All members of The Federation community are advised not to publish specific and detailed private thoughts, concerns, pictures or messages on any social media services, especially content that may be considered threatening, hurtful or defamatory to others.
- The Federation will control pupil and staff access to social media whilst using Federation provided devices and systems on site. The Federation has blocked all social media sites apart from YouTube and the EHT and Heads of School can access Twitter.
 - The use of social media during school hours for personal use **is not** permitted.
 - Inappropriate or excessive use of social media during school/work hours or whilst using Federation devices may result in disciplinary or legal action and/or removal of internet facilities.
- Concerns regarding the online conduct of any member of The Federation community on social media, should be reported to the Federation and will 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 the Federation Code of conduct within the AUP.

Reputation

- All members of staff are advised that their online conduct on social media can have an impact on their role and reputation within Federation. Civil, legal or disciplinary action may be taken if they 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 as strictly as they can.
 - 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 Federation.

- Members of staff are encouraged not to identify themselves as employees of The Federation on their personal social networking accounts. This is to prevent information on these sites from being linked with the Federation and also 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 with Federations 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 pupils 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 in the Federation.

Communicating with pupils and parents and carers

- All members of staff are advised not to communicate with or add as 'friends' any current or past pupils or current or past pupils' family members via any personal social media sites, applications or profiles.
 - Any pre-existing relationships or exceptions that may compromise this will be discussed with Designated Safeguarding Lead and/or the headteacher.
 - If ongoing contact with pupils is required once they have left the Federation roll, members of staff will be expected to use existing alumni networks or use official Federation provided communication tools.
- Staff will not use personal social media accounts to make contact with pupils or parents, nor should any contact be accepted, except in circumstance whereby prior approval has been given by the Headteacher.
- Any communication from pupils and parents received on personal social media accounts will be reported to the Federations Designated Safeguarding Lead.

8.3 Pupils' Personal Use of Social Media

- Safe and appropriate use of social media will be taught to pupils as part of an embedded and progressive education approach, via age appropriate sites and resources.
- The Federation is aware that many popular social media sites state that they are not for children under the age of 13, therefore the Federation will not create accounts specifically for children under this age.
- Any concerns regarding pupils' use of social media, both at home and at Federation, will be dealt with in accordance with existing Federation policies including anti-bullying and behaviour. Concerns will also be raised with parents/carers as appropriate, particularly when concerning underage use of social media sites or tools.
- Pupils 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. Examples would include real/full name, address, mobile or landline phone numbers, Federation attended, other social media contact details, email addresses, full names of friends/family, specific interests and clubs.
 - To only approve and invite known friends on social media sites and to deny access to others by making profiles private/protected.

- 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 and report concerns both within Federation and externally.

8.4 Official Use of Social Media

- The Federation official social media channels are:
Twitter
- The official use of social media sites, by the Federation, 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 Executive Headteacher.
 - Leadership staff have access to account information and login details for the social media channels, in case of emergency, such as staff absence.
- Official Federation social media channels have been set up as distinct and dedicated social media sites or accounts for educational or engagement purposes only.
 - Staff use Federation provided email addresses to register for and manage any official Federation social media channels.
 - Official social media sites are suitably protected and, where possible, run and link to the Federation website.
 - Public communications on behalf of the Federation 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 use, Data protection, Confidentiality and Child protection.
 - All communication on official social media platforms will be clear, transparent and open to scrutiny.
- Parents, carers and pupils will be informed of any official social media use, along with expectations for safe use and action taken to safeguard the community.
 - Social media tools which have been risk assessed and approved as suitable for educational purposes will be used i.e. Twitter.
- Parents and carers will be informed of any official social media use with pupils and written parental consent will be obtained, as required.
- The Federation will ensure that any official social media use does not exclude members of the community who are unable or unwilling to use social media channels.

Staff expectations

- Members of staff who follow and/or like the Federation social media channels will be advised to use dedicated professional accounts, where possible, to avoid blurring professional boundaries.
- If members of staff are participating in online social media activity as part of their capacity as an employee of the Federation, they will:
 - Sign the Federation's Social media acceptable use policy.

- Be professional at all times and aware that they are an ambassador for the Federation.
- Disclose their official role and/or position, but make it clear that they do not necessarily speak on behalf of the Federation.
- Be responsible, credible, fair and honest at all times 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 written consent before posting images on the official social media channel.
- Not disclose information, make commitments or engage in activities on behalf of the Federation unless they are authorised to do so.
- Not engage with any direct or private messaging with current, or past, pupils, parents and carers.
- Inform their line manager, the Designated Safeguarding Lead and/or the Headteacher of any concerns, such as criticism, inappropriate content or contact from pupils.

9. Use of Personal Devices and Mobile Phones

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

9.1 Expectations

- All use of personal devices and mobile phones will take place in accordance with the law and other appropriate Federation policies, including, but not limited to: Anti-bullying, Behaviour and Child protection.
- Electronic devices of any kind that are brought onto site are the responsibility of the user at all times.
 - All members of The Federation community are advised to take steps to protect their mobile phones or devices from loss, theft or damage; the Federation accepts no responsibility for the loss, theft or damage of such items on Federation premises.
 - All members of The Federation 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 Federation site such as changing rooms, toilets and swimming pools.
- The sending of abusive or inappropriate messages/ 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 The Federation community are advised to ensure that their mobile phones and personal devices do not contain any content which may be considered to be offensive, derogatory or would otherwise contravene the Federation 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 Federation 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 e.g. locked in a drawer or cupboard
 - Keep mobile phones and personal devices switched off or switched to 'silent' mode during lesson times.
 - Ensure that Bluetooth or other forms of communication (such as 'airdrop') are hidden or disabled during lesson times.
 - Not use personal devices during teaching periods, unless written permission has been given by the headteacher, 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 pupils or parents and carers.
 - Any pre-existing relationships, which could undermine this, will be discussed with the Designated Safeguarding Lead and Executive Headteacher.
- Staff will not use personal devices, such as: mobile phones, tablets or cameras:
 - To take photos or videos of pupils and will only use work-provided equipment for this purpose.
 - Directly with pupils, and will only use work-provided equipment during lessons/educational activities.
- If a member of staff breaches the Federation policy, action will be taken in line with the Federation behaviour and allegations policy
 - If a member of staff is thought to have illegal content saved or stored on a mobile phone or personal device or have committed a criminal offence, the police will be contacted.

9.3 Pupils' Use of Personal Devices and Mobile Phones

- Pupils will be educated regarding the safe and appropriate use of personal devices and mobile phones and will be made aware of boundaries and consequences.
- The Federation expects pupil's personal devices and mobile phones to be handed in to the Federation office at the beginning of day and collected from there at the end of the day. All devices must be named and switched off and will be stored in a lockable cabinet. The Federation is not responsible for the loss or damage to any devices.
- If a pupil needs to contact his/her parents or carers the Federation office will contact them on their behalf.
 - Parents are advised to contact their child via the Federation office during Federation hours; exceptions may be permitted on a case-by-case basis, as approved by the headteacher.
- Mobile phones or personal devices will not be used by pupils during lessons or formal Federation time unless as part of an approved and directed curriculum based activity with consent from a member of staff.
 - The use of personal mobile phones or devices for a specific education purpose does not mean that blanket use is permitted.

- If members of staff have an educational reason to allow children to use their mobile phones or personal devices as part of an educational activity, it will only take place when approved by the Leadership Team.
- Mobile phones and personal devices must not be taken into examinations.
 - Pupils found in possession of a mobile phone or personal device during an exam will be reported to the appropriate examining body. This may result in the pupil's withdrawal from either that examination or all examinations.
- If a pupil breaches the Federation policy, the phone or device will be confiscated and will be held in a secure place.
 - Federation staff may confiscate a pupil's mobile phone or device if they believe it is being used to contravene the Federation's Behaviour or Bullying policy, or could contain youth produced sexual imagery (sexting).
 - Searches of mobile phone or personal devices will only be carried out in accordance with the Federation's policy. www.gov.uk/government/publications/searching-screening-and-confiscation)
 - Pupils' mobile phones or devices may be searched by a member of the leadership team, with the consent of the pupil or a parent/ carer. Content may be deleted or requested to be deleted, if it contravenes Federation policies.
 - Mobile phones and devices that have been confiscated will be released to parents or carers at the end of the day.
 - If there is suspicion that material on a pupil'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.

9.4 Visitors' Use of Personal Devices and Mobile Phones

- Parents, carers and visitors (including volunteers and contractors) must use their mobile phones and personal devices in accordance with the Federation's Acceptable use policy and other associated policies, such as: Anti-bullying, Behaviour, Child protection and Image use.
- The Federation will ensure appropriate signage and information is provided to inform parents, carers and visitors of expectations of use.
- Members of staff are expected to challenge visitors if they have concerns and will always inform the Designated Safeguarding Lead of any breaches of Federation policy.

9.5 Officially provided mobile phones and devices.

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

10. Responding to Online Safety Incidents and Concerns

- All members of the Federation 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 Federation procedures for reporting concerns.
 - Pupils, parents and staff will be informed of the Federation's complaints procedure and staff will be made aware of the whistleblowing procedure.
- The Federation requires staff, parents, carers and pupils to work in partnership to resolve online safety issues.
- After any investigations are completed, the Federation will debrief, identify lessons learnt and implement any policy or curriculum changes as required.
- If the Federation is unsure how to proceed with an incident or concern, the DSL will seek advice from the Education Safeguarding Team.
- Where there is suspicion that illegal activity has taken place, the Federation will contact the Education Safeguarding Team 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 the Federation community (for example if other local Federations are involved or the public may be at risk), the Federation will speak with Kent Police and/or the Education Safeguarding Team first, to ensure that potential investigations are not compromised.

10.1 Concerns about Pupils 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 the Federation's child protection policy.
- 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.
- The Federation will inform parents and carers of any incidents or concerns involving their child, as and when required.

10.2 Staff Misuse

- Any complaint about staff misuse will be referred to the Executive Headteacher, according to 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 the Behaviour policy and Code of conduct.

11. Procedures for Responding to Specific Online Incidents or Concerns

11.1 Youth Produced Sexual Imagery or “Sexting”

- The Federation recognises youth produced sexual imagery (known as “sexting”) as a safeguarding issue; therefore all concerns will be reported to and dealt with by the Designated Safeguarding Lead.
- The Federation 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 [KSCB](#) guidance: “Responding to youth produced sexual imagery”.
- The Federation 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.
- The Federation will ensure that all members of the community are aware of sources of support regarding youth produced sexual imagery.

11.1.1 Dealing with ‘Sexting’

- If the Federation are made aware of an incident involving the creation or distribution of youth produced sexual imagery, the Federation will:
 - Act in accordance with our Child protection and Safeguarding policies and the relevant Kent Safeguarding Child Board’s procedures.
 - Immediately notify the Designated Safeguarding Lead.
 - Store the device securely.
 - If an indecent image has been taken or shared on the Federation network or devices, the Federation will take action to block access to all users and isolate the image.
 - Carry out a risk assessment which considers any vulnerability of pupil(s) 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 Specialist Children’s Services and/or the Police, as appropriate.
 - Provide the necessary safeguards and support for pupils, such as offering counselling or pastoral support.
 - Implement appropriate sanctions in accordance with the Federation’s 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 Federation 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.
- The Federation will take action regarding youth produced sexual imagery, regardless of whether the incident took place on/off Federation premises, using Federation or personal equipment.
- The Federation 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.

- In this case, the image will only be viewed by the Designated Safeguarding Lead 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 children (i.e. youth produced sexual imagery) and will not allow or request pupils to do so.

11.2 Online Child Sexual Abuse and Exploitation

- The Federation 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.
- The Federation recognises online child sexual abuse as a safeguarding issue and, as such, all concerns will be reported to and dealt with by the Designated Safeguarding Lead.
- The Federation will implement preventative approaches for online child sexual abuse via a range of age and ability appropriate education for pupils, staff and parents/carers.
- The Federation will ensure that all members of the community are aware of the support available regarding online child sexual abuse, both locally and nationally.
- The Federation will ensure that the 'Click CEOP' report button is visible and available to pupils and other members of the Federation community. This can be found on the Federation websites.

11.2. 1 Dealing with Online Child Sexual Abuse and Exploitation

- If the Federation are made aware of incident involving online sexual abuse of a child, the Federation will:
 - Act in accordance with the Federation's Child protection and Safeguarding policies and the relevant Kent Safeguarding Child Board's procedures.
 - Immediately notify the Designated Safeguarding Lead.
 - Store any devices involved securely.
 - 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 pupil(s) involved (including carrying out relevant checks with other agencies).
 - Inform parents/carers about the incident and how it is being managed.
 - Make a referral to Specialist Children's Services (if required/ appropriate).
 - Provide the necessary safeguards and support for pupils, such as, offering counselling or pastoral support.
 - Review the handling of any incidents to ensure that best practice is implemented; Federation leadership team will review and update any management procedures, where necessary.
- The Federation will take action regarding online child sexual abuse, regardless of whether the incident took place on/off Federation premises, using Federation or personal equipment.
 - Where possible pupils 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 the Federation is unclear whether a criminal offence has been committed, the Designated Safeguarding Lead will obtain advice immediately through the Education Safeguarding Team and/or Kent Police.
- If the Federation is 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 Designated Safeguarding Lead.

- If pupils at other Federations are believed to have been targeted, the Federation will seek support from Kent Police and/or the Education Safeguarding Team first to ensure that potential investigations are not compromised.

11.3 Indecent Images of Children (IIOC)

- The Federation will ensure that all members of the community are made aware of the possible consequences of accessing Indecent Images of Children (IIOC).
- The Federation will take action regarding IIOC on Federation equipment and/or personal equipment, even if access took place off site.
- The Federation will take action 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 the Federation is unclear if a criminal offence has been committed, the Designated Safeguarding Lead will obtain advice immediately through Kent Police and/or the Education Safeguarding Team.
- If made aware of IIOC, the Federation will:
 - Act in accordance with the Federations child protection and safeguarding policy and the relevant Kent Safeguarding Child Boards procedures.
 - Immediately notify the Federation Designated Safeguard Lead.
 - Store any devices involved securely.
 - Immediately inform appropriate organisations, such as the Internet Watch Foundation (IWF), Kent police or the LADO.
- If made aware that a member of staff or a pupil has been inadvertently exposed to indecent images of children whilst using the internet, the Federation will:
 - Ensure that the Designated Safeguard Lead 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 Federation devices, the federation will:
 - Ensure that the Designated Safeguard Lead 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 services (as appropriate).
 - Only store copies of images (securely, where no one else has access to them and delete all other copies) at the request of the police only.
 - Report concerns, as appropriate to parents and carers.
- If made aware that a member of staff is in possession of indecent images of children on federation devices, the Federation will:
 - Ensure that the headteacher is informed.

- Inform the Local Authority Designated Officer (LADO) and other relevant organisations in accordance with the Federations managing allegations policy.
- Quarantine any devices until police advice has been sought.

11.4 Cyberbullying

- Cyberbullying, along with all other forms of bullying, will not be tolerated at The Federation.
- Full details of how the Federation will respond to cyberbullying are set out in the Anti-bullying policy.

11.5 Online Hate

- Online hate content, directed towards or posted by, specific members of the community will not be tolerated at The Federation and will be responded to in line with existing Federation policies, including Anti-bullying and Behaviour.
- All members of the community will be advised to report online hate in accordance with relevant Federation policies and procedures.
- The Police will be contacted if a criminal offence is suspected.
- If the Federation is unclear on how to respond, or whether a criminal offence has been committed, the Designated Safeguarding Lead will obtain advice through the Education Safeguarding Team and/or Kent Police.

11.6 Online Radicalisation and Extremism

- The Federation will take all reasonable precautions to ensure that children are safe from terrorist and extremist material when accessing the internet in Federation.
- If the Federation is concerned that a child or parent/carer may be at risk of radicalisation online, the Designated Safeguarding Lead will be informed immediately and action will be taken in line with the Child protection policy.
- If the Federation is concerned that member of staff may be at risk of radicalisation online, the Headteacher will be informed immediately and action will be taken in line with the Child protection and Allegations policies.

12. Useful Links for Educational Settings

Kent Support and Guidance

Kent County Council Education Safeguarding Team:

- Rebecca Avery, Education Safeguarding Adviser (Online Protection)
- Ashley Assiter, e-Safety Development Officer
 - esafetyofficer@kent.gov.uk Tel: 03000 415797
- Guidance for Educational Settings:
 - www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding
 - www.kelsi.org.uk/child-protection-and-safeguarding/e-safety/e-safety-classroom-materials
 - www.kelsi.org.uk/child-protection-and-safeguarding/e-safety/e-safety-useful-links
 - Kent e-Safety Blog: www.kentsafety.wordpress.com

KSCB:

- www.kscb.org.uk

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

Other:

- Kent Public Service Network (KPSN): www.kpsn.net
- EiS - ICT Support for Schools and Kent Schools Broadband Service Desk: www.eiskent.co.uk

National Links and Resources

- Action Fraud: www.actionfraud.police.uk
- CEOP:
 - www.thinkuknow.co.uk
 - www.ceop.police.uk
- Childnet: www.childnet.com
- Get Safe Online: www.getsafeonline.org
- Internet Matters: www.internetmatters.org
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Lucy Faithfull Foundation: www.lucyfaithfull.org
- NSPCC: www.nspcc.org.uk/onlinesafety
 - ChildLine: www.childline.org.uk
 - Net Aware: www.net-aware.org.uk
- The Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- UK Safer Internet Centre: www.saferinternet.org.uk
 - Professional Online Safety Helpline: www.saferinternet.org.uk/about/helpline
- 360 Safe Self-Review tool for schools: www.360safe.org.uk