


Introduction

Key people / dates

	Designated Safeguarding Lead (DSL), with lead responsibility for filtering and monitoring	Michael Bradley
	Deputy Designated Safeguarding Lead	Lynsey Eversden
	Additional Safeguarding Officer	Ashleen Browne
	Link governor for safeguarding	Bianca Sanasi
	Link governor for web online safety	Robin Eastes Pembroke
	Curriculum leads with relevance to online safeguarding and their role	Lisa Laker (PSHE) Lynsey Eversden (Computing)
	Network manager / other technical support	MMICT
	Date this policy was reviewed and by whom	October 2025 Reviewed by Lynsey Eversden and CFC committee
	Date of next review and by whom	October 2027 Lynsey Eversden and CFC Committee

What is this policy?

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. Accordingly, this policy is written in line with ‘Keeping Children Safe in Education’ 2025 (KCSIE), ‘Teaching Online Safety in Schools’, statutory RSHE guidance and other statutory documents. It is cross-curricular (with relevance beyond Relationships, Health and Sex Education, Citizenship and Computing) and designed to sit alongside or be integrated into your school’s statutory Child Protection & Safeguarding Policy. Any issues and concerns with online safety must always follow the school’s safeguarding and child protection procedures.

Who is it for; when is it reviewed?

This policy is a living document, subject to full two yearly review but also amended where necessary during the year in response to developments in the school and local area. The policy sits alongside our AUP. Although many aspects will be informed by legislation and regulations, we will involve staff, governors, pupils and parents in writing and reviewing the policy and make sure the policy makes sense and is possible to follow in all respects. This will help all stakeholders to understand the rules that are in place and why, and that the policy affects day-to-day practice.

Who is in charge of online safety?

KCSIE makes clear that “the designated safeguarding lead should take **lead** responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).” The DSL can delegate activities but not the responsibility for this area and whilst subject leads (e.g. for RSHE) will plan the curriculum for their area, it is important that this ties into a whole-school approach.

What were the main online safety risks in 2024/2025?

Current Online Safeguarding Trends

In our school over the past year, we have had very few incidents in terms of device use and abuse and types of online/device-based incidents which affect the wellbeing and safeguarding of our students.

Nationally, some of the latest trends of the past twelve months are outlined below. These are reflected in this policy and the acceptable use agreements we use and seen in the context of the 5 Cs (see KCSIE for more details), a whole-school contextual safeguarding approach that incorporates policy and practice for curriculum, safeguarding and technical teams.

- One of the main issues for schools continues to be the rapid rise of generative AI (GenAI) and how schools can address the use of this not just in school, but by educating parents and students on safe use at home.
- Ofcom’s ‘Children and parents: media use and attitudes report 2025’ has shown that YouTube remains the most used site or app among all under 18s, followed by WhatsApp, TikTok, Snapchat and Instagram. With children aged 8-14 spending an average of 2 hours 59 minutes a day online across smartphone, tablet and computer – with girls spending more time online than boys, four in ten parents continue to report finding it hard to control their child’s screentime. Notably, 52% of 8-11s feel that their parents’ screentime is also too high, underlining the importance of modelling good behaviour.

Given the 13yrs+ minimum age requirement on most social media platforms, it is notable that over half of 3-12-year olds (55%) were reported using at least one app. Despite age restrictions, four in ten admit to giving a fake age online, exposing them to content inappropriate for their

age and increasing their risk of harm, with over a third of parents of all 3-17s saying they would allow their child to have a profile on sites or apps before they had reached the minimum age. As a school we recognise that many of our children and young people are on these apps regardless of age limits, which are often misunderstood or ignored. We therefore will remind about best practice.

- Also, growing numbers of children and young people are using social media and apps, primarily TikTok as their source of news and information, with little attention paid to the facts or veracity of influencers sharing news.
- Cyber Security is an essential component in safeguarding children and features within KCSIE. Sadly, the education sector remains a clear target for cyber-attacks, with the Cyber Security Breaches Survey 2025 reporting high levels of schools being attacked nationally, with 60% of secondary schools and 44% of primary schools reporting a breach or attack in the past year.

How will this policy be communicated?

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

- Posted on the school website
- Part of school induction pack for all new staff (including temporary, supply and non-classroom-based staff and those starting mid-year)
- Integral to safeguarding updates and training for all staff (especially in September refreshers)
- Clearly reflected in the Acceptable Use Policies (AUPs) for staff, volunteers, contractors, governors, pupils and parents/carers (which must be in accessible language appropriate to these groups), which will be issued to whole school community, on entry to the school, annually and whenever changed, plus displayed in school

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Overview

Aims

This policy aims to promote a whole school approach to online safety by:

- Setting out expectations for all Merton Abbey community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline)
- Helping safeguarding and senior leadership teams to have a better understanding and awareness of all elements of online safeguarding through effective collaboration and communication with technical colleagues (e.g. for filtering and monitoring), curriculum leads (e.g. RSHE) and beyond.
- Helping all stakeholders to recognise that online/digital behaviour standards (including social media activity) must be upheld beyond the confines of the school gates and school day, regardless of device or platform, and that the same standards of behaviour apply online and offline.
- Facilitating the safe, responsible, respectful and positive use of technology to support teaching & learning, increase attainment and prepare children and young people for the risks and opportunities of today's and tomorrow's digital world, to survive and thrive online.
- Helping school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
 - for the protection and benefit of the children and young people in their care, and
 - for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice.
 - for the benefit of the school, supporting the school ethos, aims and objectives, and protecting the reputation of the school and profession.
- Establishing clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as Behaviour Policy or Anti-Bullying Policy)

Scope

This policy applies to all members of the Merton Abbey community (including teaching, supply and support staff, governors, volunteers, contractors, students/pupils, parents/carers, visitors and community users) who have access to our digital technology, networks and systems, whether on-site or remotely, and at any time, or who use technology in their school role.

Roles and responsibilities

This school is a community, and all members have a duty to behave respectfully online and offline, to use technology for teaching and learning and to prepare for life after school, and to immediately report any concerns or inappropriate behaviour, to protect staff, pupils, families and the reputation of the

school. We learn together, make honest mistakes together and support each other in a world that is online and offline at the same time.

Depending on their role, all members of the school community should **read the relevant section in Appendix A of this document** that describes individual roles and responsibilities. Please note there is one for 'All Staff' which must be read even by those who have a named role in another section. There are also pupil, governor, role descriptions in the appendix. All staff have a key role to play in feeding back on potential issues.

Education and curriculum

Despite the risks associated with being online, Merton Abbey school recognises the opportunities and benefits to children too. Technology is a fundamental part of adult life and so developing the competencies to understand and use it, are critical to children's later positive outcomes. The choice to use technology in school will always be driven by pedagogy and inclusion. Our PSHE and Computing curriculums enable us to teach about online safety and harms through a whole school approach and provide an understanding of the risks to help tailor teaching and support to the specific needs of pupils, including vulnerable pupils.

The teaching of online safety, features in these particular areas of curriculum delivery:

- Relationships education, relationships and sex education (RSE) and health (also known as RSHE or PSHE) [Please be aware that during the 2025/6 school year this will be subject to significant changes of scope and content]
- Computing

Whenever overseeing the use of technology in school or setting as homework tasks, all staff should remind/encourage sensible use, monitor what pupils/students are doing and consider potential risks and the age appropriateness of tasks. This includes supporting them with search skills, reporting and accessing help, critical thinking (e.g. disinformation, misinformation, and conspiracy theories in line with KCSIE 2025), access to age-appropriate materials and signposting, and legal issues such as copyright and data law.

Handling safeguarding concerns and incidents

It is vital that all staff recognise that online safety is a part of safeguarding and so concerns must be handled in the same way as any other safeguarding concern. Safeguarding is often referred to as a jigsaw puzzle, so all stakeholders should speak to the safeguarding lead with any concerns (no matter how small these seem) to contribute to the overall picture or highlight what might not yet be a problem.

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

- Safeguarding and Child Protection Policy
- Anti-Bullying Policy

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

This school commits to take all reasonable precautions to safeguard pupils online but recognises that incidents will occur both inside school and outside school (and that those from outside school will continue to impact pupils when they come into school or during extended periods away from school). All members of the school are encouraged to report issues swiftly to allow us to deal with them quickly and sensitively through the school's escalation processes.

Any concern/allegation about staff misuse is always (similar to any safeguarding allegation) referred directly to the Headteacher, unless the concern is about the Headteacher in which case the complaint is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer).

We will inform parents/carers of online safety incidents involving their children, and the Police where staff or pupils engage in or are subject to behaviour which we consider is particularly concerning or breaks the law.

The following sub-sections provide detail on managing particular types of concern.

Nudes – sharing nudes and semi-nudes

All schools (regardless of phase) should refer to the UK Council for Internet Safety (UKCIS) guidance on sexting - now referred to as [Sharing nudes and semi-nudes: advice for education settings](#).

There is a one-page overview called [Sharing nudes and semi-nudes: how to respond to an incident](#) for all staff (not just classroom-based staff) to read, in recognition of the fact that it is mostly someone other than the designated safeguarding lead (DSL) or online safety lead to first become aware of an incident, and it is vital that the correct steps are taken. **Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL.**

It is important that everyone understands that whilst the sharing of nudes involving children is illegal, students should be encouraged and supported to talk to members of staff if they have made a mistake or had a problem in this area. The UKCIS guidance seeks to avoid unnecessary criminalisation of children.

The school DSL will use the full guidance document, [Sharing nudes and semi-nudes – advice for educational settings](#) to decide next steps and whether other agencies need to be involved and next steps regarding liaising with parents and supporting pupils.

Priority Areas

Online Bullying

Online bullying (which may also be referred to as cyberbullying), including incidents that take place outside of school should be treated like any other form of bullying and the school bullying policy should be followed. This includes issues arising from banter. Materials to support teaching about bullying and useful Department for Education guidance and case studies are at bullying.lgfl.net

Child-on-child sexual violence and sexual harassment

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

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

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

These are defined in the relevant Acceptable Use Policy as well as in this document. Where pupils contravene these rules, the school behaviour policy will be applied; where staff contravene these rules, action will be taken as outlined in the staff code of conduct/handbook. It will be necessary to reinforce these as usual at the beginning of any school year but also to remind pupils that **the same applies for any home learning** that may take place.

Further to these steps, the school reserves the right to withdraw – temporarily or permanently – any or all access to such technology, or the right to bring devices onto school property.

Social media incidents

Social media incidents involving pupils are often safeguarding concerns and should be treated as such and staff should follow the safeguarding policy. Other policies that govern these types of incidents are the school's Acceptable Use Policy.

Breaches will be dealt with in line with the school behaviour policy (for pupils) or code of conduct/handbook (for staff). See the social media section later in this document for rules and expectations of behaviour for children and adults in the Merton Abbey community.

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community (e.g. parent or visitor), Merton Abbey will request that the post be deleted and will expect this to be actioned promptly. Where an offending post has been made by a third party, the school may report it to the platform it is hosted on, and may contact the [Professionals' Online Safety Helpline](#), POSH, (run by the UK Safer Internet Centre) for support or help to accelerate this process.

Extremism

The school has obligations relating to radicalisation and all forms of extremism under the Prevent Duty. Staff will not support or promote extremist organisations, messages or individuals, give them a voice or opportunity to visit the school, nor browse, download or send material that is considered offensive or of an extremist nature. We ask for parents' support in this also, especially relating to social media, where extremism and hate speech can be widespread on certain platforms.

Data protection and cyber security

All pupils, staff, governors, volunteers, contractors and parents are bound by the school's data protection and cyber security policy. It is important to remember that there is a close relationship between both data protection and cyber security and a school's ability to effectively safeguard children. Schools are reminded of this in KCSIE which also refers to the DfE Standards of Cyber Security for Schools and Colleges.

Schools should remember that data protection does not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in *Data protection in schools, 2023*, "It's not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child." And in KCSIE 2025, "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children."

Appropriate filtering and monitoring

The designated safeguarding lead (DSL) Michael Bradley, has lead responsibility for filtering and monitoring and works closely with Lynsey Eversden, SENSO and MMIT to implement the DfE filtering and monitoring standards, which require schools to:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs.

We look to provide 'appropriate filtering and monitoring (as outlined in Keeping Children Safe in Education) at all times. We ensure ALL STAFF are aware of filtering and monitoring systems and play their part in feeding back about areas of concern, potential for students to bypass systems and any potential overblocking.

Technical and safeguarding colleagues work together closely to carry out annual reviews and check and also to ensure that the school responds to issues and integrates with the curriculum. We carry out checks to ensure filtering is operational, functioning as expected, etc and an annual review as part of an online safety audit of strategy and platforms.

Safe Search is enforced on any accessible search engines on all school-managed devices and we use the Google search engine and Chrome browser.

Our YouTube mode is moderate. This helps us to limit inappropriate content that is served to pupils but stops over-blocking so this can be used appropriately in classrooms.

Staff will be reminded of the systems in place and their responsibilities at induction and start of year safeguarding as well as via AUPs and regular training reminders in the light of the annual review and regular checks that will be carried out.

The DSL and DDSL check filtering reports and notifications bi-weekly and take any necessary action as a result. If the notification is of high importance, it will be checked within two days.

According to the DfE standards, “Your monitoring plan should include how you will monitor students when using school-managed devices connected to the internet. This includes:

- device monitoring using device management software (SENSO)
- in-person monitoring in the classroom
- network monitoring using log files of internet traffic and web access (School Protect)

Messaging/commenting systems (incl. email, learning platforms & more)

Authorised systems

- Staff at this school use the email system provided by LGfL for all school emails. They never use a personal/private email account to communicate with children or parents, or to colleagues when relating to school/child data, using a non-school-administered system. Staff do not email parents directly.
- For secure emails staff use both the Egress platform and LGfL USO system.
- The GSuite platform is used for certain Computing units and children can access this with a login provided by the Local Authority tech team.

Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member).

Use of generative AI

At Merton Abbey, we acknowledge that generative AI platforms (e.g. ChatGPT or Gemini for text creation or the use of Co-Pilot or Adobe Firefly to create images and videos) are becoming widespread.

We are aware of and will follow the [DfE's guidance](#) on this. In particular:

- We will talk about the use of these tools with pupils, staff and parents – their practical use as well as their ethical pros and cons.
- We are aware that there will be use of these apps and exposure to AI creations on devices at home for some students – these experiences may be both positive/creative and also negative (inappropriate data use, misinformation, bullying, deepfakes, nudifying apps and inappropriate chatbots).
- In school, we are currently formulating our policy on how this will be allowed in school. AI websites are currently blocked in the Computing suite, and on classroom computers. Some office computers are able to access these sites; however, they are not used by children.

Online storage or learning platforms

All the principles outlined above also apply to any system to which you log in online to conduct school business, whether it is to simply store files or data (an online 'drive') or collaborate, learn, teach, etc. In Merton Abbey this includes CPOMS, SIMS and GSuite.

For all these, it is important to consider data protection and cyber security before adopting such a platform or service and at all times when using it. Any new platforms will be approved by the Headteacher and MMITCT.

School website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. We are currently in the process of reviewing and updating our website and as such we are reviewing the staff who are managing it.

The website is managed by / hosted by Juniper Education.

Where staff submit information for the website, they are asked to remember that schools have the same duty as any person or organisation to respect and uphold copyright law. Sources must always be credited, and material only used with permission. There are many open-access libraries of public-domain images/sounds etc that can be used. Finding something on Google or YouTube does not mean that copyright has been respected.

Digital images and video

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

- For the newsletter
- For use in paper-based school marketing
- For online prospectus or websites
- For social media

Any pupils shown in public facing materials are never identified with more than first name (and photo file names/tags do not include full names to avoid accidentally sharing them). Staff will be made aware of children who do not have photo or video consent.

All staff are governed by their contract of employment and the school's Acceptable Use Policy, which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. At Merton Abbey members of staff use the school digital camera to take photos or videos of pupils. These will be appropriate, linked to school activities, taken without secrecy and not in a one-to-one situation, and always moved to school storage as soon as possible.

Photos are stored on the StaffShare network in line with the retention schedule of the school Data Protection Policy. Any concerns about the nature of these images will be reported to the DSL

Staff and parents are reminded annually about the importance of not sharing images on social media or otherwise without permission, due to reasons of child protection, data protection, religious or cultural reasons, or simply for reasons of personal privacy.

We encourage young people to think about their online reputation and digital footprint, so we should be good adult role models by not oversharing. Pupils are taught about how images can be manipulated in their online safety education programme and also taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children. Pupils are advised to be very careful about placing any personal photos on social media. They are taught to understand the need to maintain privacy settings so as not to make public, personal information.

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

Social media

Our SM presence

Merton Abbey Primary School recognises that social media plays an important role in how schools communicate with families, celebrate achievements, and engage the wider community. Our social media strategy supports the broader aims of our Online Safety Policy — promoting transparency, safeguarding, and positive communication — while helping us share the life of the school in a modern, relatable way.

Objectives

Our social media presence is designed to:

- Increase awareness of the school amongst prospective families, supporting pupil recruitment and retention.
- Strengthen community engagement by helping parents, carers, and local residents feel connected to school life.
- Promote the creative and inclusive ethos of the school by sharing examples of children’s work, curriculum highlights, and enrichment activities.
- Ensure the tone, style, and content of our communications reflect our values: kindness, curiosity, and respect.

The school will maintain two distinct presences:

- **Official School Account** – focused on celebrating learning, upcoming events, and day-to-day achievements, managed an appointed staff member, with oversight from the Senior Leadership Team (SLT), with support from Governors.

The school’s legacy Twitter/X account will be reviewed and, once the new channels are established, redirected to Instagram as the primary platform for public updates.

- **Friends of Merton Abbey** – for community engagement, fundraising, and event promotion, managed by parent volunteers (currently led by Izzy Harvey-Trott).

Governance and Safeguarding

All social media activity will adhere to:

- The **school’s Data Protection Policy** and UK GDPR requirements.

- The **Digital Images and Video** section of this policy, ensuring all imagery complies with parental consent records managed by the safeguarding team.
- The **Acceptable Use Policies** for staff and volunteers, which set out clear expectations for professional conduct and privacy.
- Guidance from the **Designated Safeguarding Lead** and **Data Protection Officer** to ensure that any digital content shared protects pupils' safety and dignity at all times.

No posts will include identifying information beyond a child's first name, and any photographs or videos will be stored securely and used only with explicit parental consent.

Roles, Oversight and Review

Responsibility for maintaining social media accounts lies with named administrators under SLT oversight. Account access, login credentials, and permissions will be reviewed termly. The governors' **Curriculum, Families and Community Committee (CFC)** will receive periodic updates on engagement, reach, and compliance.

Content will be scheduled using approved tools where possible to manage workload and ensure consistent posting. Staff are encouraged to share content ideas with the communications lead but must not post directly from personal accounts on behalf of the school.

Next Steps and Clarifications

As this strategy evolves, the following areas will be clarified in line with best practice:

- Confirming administrator roles, backup access, and posting protocols.
- Developing an annual content plan reflecting the school calendar and key curriculum themes.
- Establishing a clear moderation process for comments and direct messages.
- Creating guidance for handling image withdrawal requests or data deletion.

This strategy will be reviewed annually by CFC to ensure alignment with safeguarding, online safety, and community engagement priorities.

Staff, pupils' and parents' SM presence

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

As outlined in the Acceptable Use Policies, pupils/students are not allowed to be 'friends' with or make a friend request to any staff, governors, volunteers and contractors or otherwise communicate via social media. Pupils/students are discouraged from 'following' staff, governor, volunteer or contractor public accounts (e.g. following a staff member with a public Instagram account) as laid out in the AUPs. However, we accept that this can be hard to control (but this highlights the need for staff to remain professional in their private lives). In the reverse situation, however, staff must not follow such public student accounts.

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

Parents must **not** covertly film or make recordings of any interactions with pupils or adults in schools or near the school gates, nor share images of other people's children on social media as there may be cultural or legal reasons why this would be inappropriate or even dangerous. Parents are reminded of this during whole-school assemblies or productions.

Device usage

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

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

- **Pupils/students** in Y5 and Y6 who walk home alone are allowed to bring mobile phones in for emergency use only but not when moving around the school buildings. During lessons, phones must remain turned off at all times, and handed in to the teacher at the beginning of the day. Any attempt to use a phone in lessons without permission or to take illicit photographs or videos will lead to a behaviour sanction and the withdrawal of mobile privileges. Important messages and phone calls to or from parents can be made at the school office, which will also pass on messages from parents to pupils in emergencies.
- Other personal recording devices such as smart glasses are not permitted in school without written permission. It is forbidden to take secret photos, videos or recordings of teachers or students, including remotely, with any device.
- **All staff who work directly with children** should leave their mobile phones on silent and only use them in private staff areas during school hours. See also the 'Digital images and video' section of

this document and the school data protection cyber security policies. Child/staff data should never be downloaded onto a private phone. If a staff member is expecting an important personal call when teaching or otherwise on duty, they may leave their phone with the school office to answer on their behalf or ask for the message to be left with the school office. Other personal recording devices such as smart glasses are not permitted in school without written permission. It is forbidden to take secret photos, videos or recordings of teachers or students, including remotely, with any device

- **Volunteers, contractors, governors** should leave their phones in their pockets and turned off. Under no circumstances should they be used in the presence of children or to take photographs or videos. If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the headteacher should be sought (the headteacher may choose to delegate this) and this should be done in the presence of a member staff. Other personal recording devices such as smart glasses are not permitted in school without written permission. It is forbidden to take secret photos, videos or recordings of teachers or students, including remotely, with any device.
- **Parents** They should ask permission before taking any photos, e.g. of displays in corridors or classrooms, and avoid capturing other children. Please see the Digital images and video section of this document for more information about filming and photography at school events. Parents are asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office.
- Where BYOD is allowed, neither staff nor students are allowed to use a mobile hotspot to provide internet to the device as this would potentially bypass filtering in contravention of AUPs.

Use of school devices

Staff and pupils are expected to follow the terms of the school acceptable use policies for appropriate use and behaviour when on school devices, whether on site or at home. School devices are not to be used in any way which contravenes AUPs, behaviour policy / staff code of conduct.

School devices for staff or students are restricted to the apps/software installed by the school, whether for use at home or school, and may be used for learning and reasonable as well as appropriate personal use.

Trips / events away from school

For school trips/events away from school, teachers will take their personal phones so that they can be contacted by or contact the school. All communication will be done through the school office or directly with the Headteacher. Photos and videos will be taken on the school provided digital camera or iPad.

Searching and confiscation

In line with the DfE guidance '[Searching, screening and confiscation: advice for schools](#)', the Headteacher and staff authorised by them have a statutory power to search pupils/property on school premises with the child and another adult present. This includes the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material.

Appendix A – Roles

Please read the relevant roles & responsibilities section from the following pages.

All school staff must read the “All Staff” section as well as any other relevant to specialist roles.

Roles:

- All Staff
- Headteacher/Principal
- Designated Safeguarding Lead
- Governing Body, led by Online Safety / Safeguarding Link Governor
- PSHE / RSHE Lead/s
- Computing Lead
- Subject / aspect leaders
- Network Manager/technician
- Data Protection Officer (DPO)
- Volunteers and contractors (including tutor)
- Pupils
- Parents/carers
- External groups including parent associations

All staff

All staff should sign and follow the staff acceptable use policy in conjunction with this policy, the school’s main safeguarding policy, the code of conduct/handbook and relevant parts of Keeping Children Safe in Education to support a whole-school safeguarding approach.

They must report any concerns, no matter how small, to the designated safety lead as named in the AUP, maintaining an awareness of current online safety issues (see the start of this document for issues in 2025) and guidance (such as KCSIE), modelling safe, responsible and professional behaviours in their own use of technology at school.

Staff should also be aware of the DfE standards for filtering and monitoring and play their part in feeding back to the DSL about overblocking, gaps in provision or pupils bypassing protections. All staff are also responsible for the physical monitoring of pupils’ online devices during any session/class they are working within.

Headteacher – Michael Bradley

Key responsibilities:

- Foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding.
- Oversee and support the activities of the designated safeguarding lead team and ensure they work technical colleagues to complete an online safety audit in line with KCSIE (including technology in use in the school).
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and Local Safeguarding Children Partnership support and guidance.
- Ensure ALL staff undergo safeguarding training (including online safety) at induction and with regular updates and that they agree and adhere to policies and procedures.
- Ensure ALL governors undergo safeguarding and child protection training and updates (including online safety) to provide strategic challenge and oversight into policy and practice and that governors are regularly updated on the nature and effectiveness of the school's arrangements.
- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including remote systems are implemented according to child-safety first principles.
- Better understand, review and drive the rationale behind decisions in filtering and monitoring as per the DfE standards—through regular liaison with technical colleagues and the DSL— in particular understand what is blocked or allowed for whom, when, and how as per KCSIE.
- Liaise with the designated safeguarding lead on all online safety issues which might arise and receive regular updates on school issues and broader policy and practice information.
- Support safeguarding leads and technical staff as they review protections for pupils in the home and remote-learning procedures, rules and safeguards.
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information.
- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident.
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised.
- Ensure the school website meets statutory requirements.

Designated Safeguarding Lead – Michael Bradley

Key responsibilities (remember the DSL can delegate certain online safety duties but not the overall responsibility; this assertion and all quotes below are from Keeping Children Safe in Education):

- The DSL should “take **lead responsibility** for safeguarding and child protection (**including online safety and understanding the filtering and monitoring** systems and processes in place).
- Ensure “An effective whole school approach to online safety as per KCSIE.
- Ensure the school is complying with the DfE’s standards on Filtering and Monitoring.
- As part of this, DSLs will work with technical teams to carry out reviews and checks on filtering and monitoring, to compile the relevant documentation and ensure that safeguarding and technology work together. This will include a decision on relevant YouTube mode and preferred search engine/s etc.
- Where online safety duties are delegated and in areas of the curriculum where the DSL is not directly responsible, but which cover areas of online safety (e.g. RSHE), ensure there is regular review and open communication and that the DSL’s clear overarching responsibility for online safety is not compromised or messaging to pupils confused.
- Ensure ALL staff and supply staff undergo safeguarding and child protection training (including online safety) at induction and that this is regularly updated.
 - This must include filtering and monitoring and help them to understand their roles.
 - All staff must read KCSIE Part 1 and all those working with children also Annex B – translations are available in 13 community languages at kcsietranslate.lgfl.net (the condensed Annex A can be provided instead to staff who do not directly work with children if this is better)
 - Cascade knowledge of risks and opportunities throughout the organisation.
- Ensure that ALL governors and undergo safeguarding and child protection training (including online safety) at induction to enable them to provide strategic challenge and oversight into policy and practice and that this is regularly updated.
- Take day-to-day responsibility for safeguarding issues and be aware of the potential for serious child protection concerns.
- Be mindful of using appropriate language and terminology around children when managing concerns, including avoiding victim-blaming language.
- Remind staff of safeguarding considerations as part of a review of remote learning procedures and technology, including that the same principles of online safety and behaviour apply.
- Work closely with SLT, staff and technical colleagues to complete an online safety audit (including technology in use in the school).
- Work with the headteacher, DPO and governors to ensure a compliant framework for storing data but helping to ensure that child protection is always put first, and data-protection processes support careful and legal sharing of information.
- Stay up to date with the latest trends in online safeguarding and “undertake Prevent awareness training.”

- Review and update this policy, other online safety documents (e.g. Acceptable Use Policies) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others) and submit for review to the governors.
- Receive regular updates about online safety issues and legislation, be aware of local and school trends.
- Ensure that online safety education is embedded across the curriculum in line with the statutory RSHE guidance and beyond, in wider school life.
- Promote an awareness of and commitment to online safety throughout the school community, with a strong focus on parents, including hard-to-reach parents.
- Communicate regularly with SLT and the safeguarding governor/committee to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring work and have been functioning/helping.
- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident.
- Ensure adequate provision for staff to flag issues when not in school and for pupils to disclose issues when off site, especially when in isolation/quarantine.
- Ensure staff adopt a zero-tolerance, whole school approach to all forms of child-on-child abuse, and don't dismiss it as banter (including bullying).
- Pay particular attention to **online tutors**, both those engaged by the school as part of the DfE scheme who can be asked to sign the contractor AUP.

Governing Body, led by Robin Eastes Pembroke and Online Safety / Safeguarding Link Governor – Bianca Sanasi

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

- Approve this policy and strategy and subsequently review its effectiveness, e.g. by asking the questions in the helpful document from the UK Council for Child Internet Safety (UKCIS) [Online safety in schools and colleges: Questions from the Governing Board](#) .
- Undergo (and signpost all other governors to attend) safeguarding and child protection training (including online safety) at induction to provide strategic challenge and into policy and practice, ensuring this is regularly updated.
- Ensure that all staff also receive appropriate safeguarding and child protection (including online) training at induction and that this is updated.
- Appoint a filtering and monitoring governor to work closely with the DSL on the new filtering and monitoring standards.
- Support the school in encouraging parents and the wider community to become engaged in online safety activities.
- Have regular strategic reviews with the online safety coordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings.

- Work with the DPO, DSL and headteacher to ensure a compliant framework for storing data but helping to ensure that child protection is always put first, and data-protection processes support careful and legal sharing of information.
- Ensure that all staff undergo safeguarding and child protection training (including online safety and now also reminders about filtering and monitoring).

PSHE / RSHE Lead/s – Lisa Laker

Key responsibilities:

- As listed in the ‘all staff’ section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online as well as raising awareness of the risks and challenges from latest trends in self-generative artificial intelligence, financial extortion and sharing intimate pictures online into the PSHE / Relationships education, relationships and sex education (RSE) and health education curriculum. “This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age-appropriate way that is relevant to their pupils’ lives.”
- Focus on the underpinning knowledge and behaviours outlined in [Teaching Online Safety in Schools](#) in an age appropriate way to help pupils to navigate the online world safely and confidently regardless of their device, platform or app.
- Work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSHE.
- Note that an RSHE policy should be included on the school website.
- Work closely with the Computing subject leader to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach.

Computing Lead – Lynsey Eversden

Key responsibilities:

- As listed in the ‘all staff’ section, plus:
- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum.
- Work closely with the RSHE lead to avoid overlap but ensure a complementary whole-school approach.
- Work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing.

- Collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements.

Subject / aspect leaders

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Look for opportunities to embed online safety in your subject or aspect, especially as part of the RSHE curriculum, and model positive attitudes and approaches to staff and pupils alike.
- Consider how the UKCIS framework Education for a Connected World and Teaching Online Safety in Schools can be applied in your context.
- Work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing.
- Ensure subject specific action plans also have an online safety element.

Network Manager/other technical support roles – MMITC

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Collaborate regularly with the DSL and leadership team to help them make key strategic decisions around the safeguarding elements of technology.
- Support safeguarding teams to understand and manage filtering and monitoring systems and carry out regular reviews and annual checks
- Support DSLs and SLT to carry out an annual online safety audit as recommended in KCSIE. This should also include a review of technology, including filtering and monitoring systems (what is allowed, blocked and why and how 'over blocking' is avoided as per KCSIE) to support their role as per the DfE standards, protections for pupils in the home and remote-learning.
- Keep up to date with the school's online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant.
- Work closely with the designated safeguarding lead / online safety lead / data protection officer / LGfL nominated contact / RSHE lead to ensure that school systems and networks reflect school policy and there are no conflicts between educational messages and practice.
- Ensure the above stakeholders understand the consequences of existing services and of any changes to these systems (especially in terms of access to personal and sensitive records / data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms etc.
- Ensure filtering and monitoring systems work on new devices and services before releasing them to students and staff.

- Maintain up-to-date documentation of the school's online security and technical procedures.
- To report online safety related issues that come to their attention in line with school policy.
- Manage the school's systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption and backup for data, including disaster recovery plans, and auditable access controls.
- Ensure the data protection policy and cyber security policy are up to date, easy to follow and practicable
- Work with the Headteacher to ensure the school website meets statutory DfE requirements

Data Protection Officer (DPO) – Derek Crabtree

Key responsibilities:

- Alongside those of other staff, provide data protection expertise and training and support the DP and cyber security policy and compliance with those and legislation and ensure that the policies conform with each other and with this policy.
- Not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in *Data protection in schools, 2023*, "It's not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child." And in KCSIE, "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children."
- Note that retention schedules for safeguarding records may be required to be set as 'Very long-term need (until pupil is aged 25 or older)'. However, some local authorities require record retention until 25 for all pupil records. You should check the requirements in your area.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited.

Volunteers and contractors (including tutor)

Key responsibilities:

- Read, understand, sign and adhere to an Acceptable Use Policy (AUP)
- Report any concerns, no matter how small, to the designated safety lead.
- Maintain an awareness of current online safety issues and guidance.
- Model safe, responsible and professional behaviours in their own use of technology at school and as part of remote teaching or any online communications.
- Note that as per AUP agreement a contractor will never attempt to arrange any meeting, **including tutoring session**, without the full prior knowledge and approval of the school, and will never do so directly with a pupil. The same applies to any private/direct communication with a pupil.

Pupils

Key responsibilities:

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

Parents/carers

Key responsibilities:

- Talk to the school if they have any concerns about their children's and others' use of technology
- Promote positive online safety and model safe, responsible, respectful and positive behaviours in their own use of technology.
- Encourage children to engage fully in home-learning, whether for homework or during any school closures or isolation and flag any concerns
- Support the child during any home learning to avoid video calls in a bedroom if possible and if not, to ensure the child is fully dressed and not in bed, with the camera pointing away from beds/bedding/personal information etc. and the background blurred or changed where possible.

External groups (e.g. those hiring the premises) including parent associations

Key responsibilities:

- Any external individual/organisation will sign an acceptable use policy prior to using technology or the internet within school.
- Support the school in promoting online safety and data protection.

- Model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other’s images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers.