



# Cross Keys Learning

## Online Safety & Acceptable Use Policy for Students & Staff

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

Date written:	Sept 2023
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This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures

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**This policy is written in accordance with Kent County Council's Safeguarding Procedures for Online Safety and Acceptable Use procedures within Schools and Education Services dated September 2024.**

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

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## 1. Aims

Our school aims to:

- Have robust processes in place to ensure the online safety of students, staff, volunteers, and proprietors
- Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

### The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as student or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scam

## 2. Legislation and guidance

This policy is based on the Department for Education's (DfE) statutory safeguarding guidance, Keeping Children Safe in Education, and its advice for schools on:

- Teaching online safety in schools
- Preventing and tackling bullying and cyber-bullying: advice for headteachers and school staff
- Relationships and sex education
- Searching, screening and confiscation

It also refers to the DfE's guidance on protecting children from radicalisation.

It reflects existing legislation, including but not limited to the Education Act 1996 (as amended), the Education and Inspections Act 2006 and the Equality Act 2010. In addition, it reflects the Education Act 2011, which has given teachers stronger powers to tackle cyber-

bullying by, if necessary, searching for and deleting inappropriate images or files on students' electronic devices where they believe there is a 'good reason' to do so.

The policy also takes into account the National Curriculum computing programmes of study.

### **3. Roles and responsibilities**

#### **3.1 The management committee**

The management committee has overall responsibility for monitoring this policy and holding the headteacher to account for its implementation.

The management committee will coordinate regular meetings with appropriate staff to discuss online safety and monitor online safety logs as provided by the designated safeguarding lead (DSL).

The safeguarding governor will oversee online safety.

All proprietors will:

- Ensure that they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet (appendix 3)
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable students' victims of abuse and some students with SEND because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all students in all situations, and a more personalised or contextualised approach may often be more suitable

#### **3.2 The headteacher**

The headteacher is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school.

#### **3.3 The designated safeguarding lead**

Details of the school's DSL and deputy/deputies are set out in our child protection and safeguarding policy as well as relevant job descriptions.

The DSL takes lead responsibility for online safety in school, in particular:

- Supporting the headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school
- Working with the headteacher, ICT manager and other staff, as necessary, to address any online safety issues or incidents
- Managing all online safety issues and incidents in line with the school child protection policy
- Ensuring that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy

- Ensuring that any incidents of cyberbullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety (appendix 4 contains a self-audit for staff on online safety training needs)
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the headteacher and/or management committee

This list is not intended to be exhaustive.

### **3.4 The ICT manager**

The ICT manager is responsible for:

- Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems, which are reviewed and updated on a regular basis to assess effectiveness and ensure students are kept safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
- Ensuring that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring the school's ICT systems on a fortnightly basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

This list is not intended to be exhaustive.

### **3.5 All staff and volunteers**

All staff, including contractors and agency staff, and volunteers are responsible for:

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet (appendix 2), and ensuring that students follow the school's terms on acceptable use (appendix 1)
- Working with the DSL to ensure that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

- Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline and maintaining an attitude of 'it could happen here'

This list is not intended to be exhaustive.

### **3.6 Parents**

Parents are expected to:

- Notify a member of staff or the headteacher of any concerns or queries regarding this policy
- Ensure their child has read, understood, and agreed to the terms on acceptable use of the school's ICT systems and internet (appendix 1)

Parents can seek further guidance on keeping children safe online from the following organisations and websites:

- What are the issues? – [UK Safer Internet Centre](#)
- Hot topics – [Childnet International](#)
- Parent resource sheet – [Childnet International](#)
- Healthy relationships – [Disrespect Nobody](#)

### **3.7 Visitors and members of the community**

Visitors and members of the community who use the school's ICT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use (appendix 3).

## **4. Educating students about online safety**

Students will be taught:

- To understand how changes in technology affect safety, including new ways to protect their online privacy and identity
- How to report a range of concerns
- Their rights, responsibilities, and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g., pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners

- That sharing and viewing indecent images of student (including those created by student) is a criminal offence which carries severe penalties including jail
- How information and data is generated, collected, shared, and used online
- How to identify harmful behaviours online (including bullying, abuse, or harassment) and how to report, or find support, if they have been affected by those behaviours
- How people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)

The safe use of social media and the internet will also be covered in other subjects where relevant.

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable students, victims of abuse and some students with SEND.

## **5. Educating parents about online safety**

The school will raise parents' awareness of internet safety in letters or other communications home, and in information via our website or virtual learning environment (VLE). This policy will also be shared with parents.

Online safety will also be covered during parents' evenings.

If parents have any queries or concerns in relation to online safety, these should be raised in the first instance with the headteacher and/or the DSL.

Concerns or queries about this policy can be raised with any member of staff or the headteacher.

## **6. Cyber-bullying**

### **6.1 Definition**

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power. (See also the school behaviour policy.)

### **6.2 Preventing and addressing cyber-bullying**

To help prevent cyber-bullying, we will ensure that students understand what it is and what to do if they become aware of it happening to them or others. We will ensure that students know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The school will actively discuss cyber-bullying with students, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Class teachers/form teachers will discuss cyber-bullying with their tutor groups.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.



All staff, proprietors, and volunteers (where appropriate) receive training on cyber-bullying, its impact, and ways to support students, as part of safeguarding training (see section 11 for more detail).

The school also sends information/leaflets on cyber-bullying to parents so that they are aware of the signs, how to report it and how they can support students who may be affected.

In relation to a specific incident of cyber-bullying, the school will follow the processes set out in the school behaviour policy. Where illegal, inappropriate, or harmful material has been spread among students, the school will use all reasonable endeavours to ensure the incident is contained.

The DSL will consider whether the incident should be reported to the police if it involves illegal material and will work with external services if it is deemed necessary to do so.

### **6.3 Examining electronic devices**

School staff have the specific power under the Education and Inspections Act 2006 (which has been increased by the Education Act 2011) to search for and, if necessary, delete inappropriate images or files on students' electronic devices, including mobile phones, iPads, and other tablet devices, where they believe there is a 'good reason' to do so.

When deciding whether there is a good reason to examine or erase data or files on an electronic device, staff must reasonably suspect that the data or file in question has been, or could be, used to:

- Cause harm, and/or
- Disrupt teaching, and/or
- Break any of the school rules

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL or other member of the senior leadership team to decide whether they should:

- Delete that material, or
- Retain it as evidence (of a criminal offence or a breach of school discipline), and/or
- *Report it to the police\**

*\* Staff may also confiscate devices for evidence to hand to the police, if a student discloses that they are being abused and that this abuse includes an online element.*

Any searching of students will be carried out in line with:

- The DfE's latest guidance on screening, searching and confiscation
- UKCIS guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people
- The school's COVID-19 risk assessment

Any complaints about searching for or deleting inappropriate images or files on students' electronic devices will be dealt with through the school complaints procedure.

## **7. Acceptable use of the internet in school**

All students, parents, staff, volunteers, and proprietors are expected to sign an agreement regarding the acceptable use of the school's ICT systems and the internet (appendices 1-2). Visitors will be expected to read and agree to the school's terms on acceptable use if relevant.

Use of the school's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role.

We will monitor the websites visited by students, staff, volunteers, proprietors, and visitors (where relevant) to ensure they comply with the above.

More information is set out in the acceptable use agreements in appendices 1 and 2.

## **8. Students using mobile devices in school**

Students are not allowed to bring mobile devices into school. They are not permitted to use them during:

- Lessons
- Tutor group time
- where appropriate such as Clubs before or after school, or any other activities organised by the school

Any use of mobile devices for school purposes by students must be in line with the acceptable use agreement (see appendix 1).

Any breach of the acceptable use agreement by a student may trigger disciplinary action in line with the school behaviour policy and Mobile Phone & Smart Technology policy, which may result in the confiscation of their device.

## **9. Staff using work devices outside school**

All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- Keeping the device password-protected – strong passwords are at least 8 characters, with a combination of upper and lower-case letters, numbers, and special characters (e.g., asterisk or currency symbol)
- Ensuring their hard drive is encrypted – this means if the device is lost or stolen, no one can access the files stored on the hard drive by attaching it to a new device
- Making sure the device locks if left inactive for a period of time
- Not sharing the device among family or friends
- Installing anti-virus and anti-spyware software
- Keeping operating systems up to date – always install the latest updates

Staff members must not use the device in any way which would violate the school's terms of acceptable use, as set out in appendix 2.

Work devices must be used solely for work activities.

If staff have any concerns over the security of their device, they must seek advice from the ICT manager.

## **10. How the School will respond to issues of misuse**

Where a student misuses the school's ICT systems or internet, we will follow the procedures set out in our policies: behaviour and ICT and internet acceptable use and mobile phone. The action taken will depend on the individual circumstances, nature, and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the school's ICT systems or the internet or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with the staff disciplinary procedures/staff code of conduct. The action taken will depend on the individual circumstances, nature, and seriousness of the specific incident.

The school will consider whether incidents which involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

## **11. Training**

All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation.

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins, and staff meetings).

By way of this training, all staff will be made aware that:

- Technology is a significant component in many safeguarding and wellbeing issues, and that student are at risk of online abuse
- Students can abuse their peers online through:
  - Abusive, harassing, and misogynistic messages
  - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
  - Sharing of abusive images and pornography, to those who don't want to receive such content
- Physical abuse, sexual violence and initiation/hazing type violence can all contain an online element

Training will also help staff:

- develop better awareness to assist in spotting the signs and symptoms of online abuse
- develop the ability to ensure students can recognise dangers and risks in online activity and can weigh the risks up
- develop the ability to influence students to make the healthiest long-term choices and keep them safe from harm in the short term

The DSL and deputy/deputies will undertake child protection and safeguarding training, which will include online safety, at least every 2 years. They will also update their knowledge and skills on the subject of online safety at regular intervals, and at least annually.

Proprietors will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

More information about safeguarding training is set out in our child protection and safeguarding policy.

## **12. Monitoring arrangements**

The DSL logs behaviour and safeguarding issues related to online safety. An incident report log can be found in appendix 5.

This policy will be reviewed every year by the Assistant Headteacher Inclusion. At every review, the policy will be shared with the management committee. The review (such as the one available [here](#)) will be supported by an annual risk assessment that considers and reflects the risks students face online. This is important because technology, and the risks and harms related to it, evolve, and change rapidly.

## **13. Links with other policies**

This online safety policy is linked to our:

- Child protection and safeguarding policy
- Behaviour policy
- Staff disciplinary procedures
- Data protection policy and privacy notices
- Complaints procedure
- ICT and internet acceptable use policy
- Mobile Phone and smart Technology Policy

Add any other related policies and procedures that the school has here.

## Appendix 1: Acceptable use agreement (students and parents/carers)

### ACCEPTABLE USE OF THE SCHOOL'S ICT SYSTEMS AND INTERNET: AGREEMENT FOR STUDENTS AND PARENTS/CARERS

Name of student:

**I will read and follow the rules in the acceptable use agreement policy**

**When I use the school's ICT systems (like computers) and get onto the internet in school I will:**

- Always use the school's ICT systems and the internet responsibly and for educational purposes only
- Only use them when a teacher is present, or with a teacher's permission
- Keep my username and passwords safe and not share these with others
- Keep my private information safe at all times and not give my name, address, or telephone number to anyone without the permission of my teacher or parent/carer
- Tell a teacher (or sensible adult) immediately if I find any material which might upset, distress or harm me or others
- Always log off or shut down a computer when I'm finished working on it

**I will not:**

- Access any inappropriate websites including social networking sites, chat rooms and gaming sites unless my teacher has expressly allowed this as part of a learning activity
- Open any attachments in emails, or follow any links in emails, without first checking with a teacher
- Use any inappropriate language when communicating online, including in emails
- Log in to the school's network using someone else's details
- Arrange to meet anyone offline without first consulting my parent/carer, or without adult supervision

**If I bring a personal mobile phone or other personal electronic devices into school:**

- I will hand it in to the school office on arrival, **with the exception of year 11 students**
- I will not use a personal mobile phone during lessons, tutor group time, clubs or other activities organised by the school, without a teacher's permission.
- I will use it responsibly and will not access any inappropriate websites or other inappropriate material or use inappropriate language when communicating online when using it off site for educational purposes.

**I agree that the school will monitor the websites I visit and that there will be consequences if I don't follow the rules.**

Signed (student):

Date:

**Parent/carer's agreement:** I agree that my child can use the school's ICT systems and internet when appropriately supervised by a member of school staff. I agree to the conditions set out above for students using the school's ICT systems and internet, and for using personal electronic devices in school, and will make sure my child understands these.

Signed (parent/carer):

Date:

## Appendix 2: acceptable use agreement (staff, proprietors, volunteers, and visitors)

### ACCEPTABLE USE OF THE SCHOOL'S ICT SYSTEMS AND INTERNET: AGREEMENT FOR STAFF, PROPRIETORS, VOLUNTEERS AND VISITORS

Name of staff member/governor/volunteer/visitor:

When using the school's ICT systems and accessing the internet in school, or outside school on a work device (if applicable), I will not:

- Access, or attempt to access inappropriate material, including but not limited to material of a violent, criminal, or pornographic nature (or create, share, link to or send such material)
- Use them in any way which could harm the school's reputation
- Access social networking sites or chat rooms
- Use any improper language when communicating online, including in emails or other messaging services
- Install any unauthorised software, or connect unauthorised hardware or devices to the school's network
- Share my password with others or log in to the school's network using someone else's details
- Take photographs of students without checking with teachers first
- Share confidential information about the school, its students or staff, or other members of the community
- Access, modify or share data I'm not authorised to access, modify or share
- Promote private businesses, unless that business is directly related to the school

I will only use the school's ICT systems and access the internet in school, or outside school on a work device, for educational purposes or for the purpose of fulfilling the duties of my role.

I agree that the school will monitor the websites I visit and my use of the school's ICT facilities and systems.

I will take all reasonable steps to ensure that work devices are secure and password-protected when using them outside school, and keep all data securely stored in accordance with this policy and the school's data protection policy.

I will let the designated safeguarding lead (DSL) and ICT manager know if a student informs me, they have found any material which might upset, distress or harm them or others, and will also do so if I encounter any such material.

I will always use the school's ICT systems and internet responsibly and ensure that students in my care do so too.

Signed (staff member/governor/volunteer/visitor):

Date:

### Appendix 3: online safety training needs – self audit for staff

ONLINE SAFETY TRAINING NEEDS AUDIT	
Name of staff member/volunteer:	Date:
Question	Yes/No (add comments if necessary)
Do you know the name of the person who has lead responsibility for online safety in the school?	
Are you aware of the ways students can abuse their peers online?	
Do you know what you must do if a student approaches you with a concern or issue?	
Are you familiar with the school’s acceptable use agreement for staff, volunteers, proprietors, and visitors?	
Are you familiar with the school’s acceptable use agreement for students and parents?	
Do you regularly change your password for accessing the school’s ICT systems?	
Are you familiar with the school’s approach to tackling cyber-bullying?	
Are there any areas of online safety in which you would like training/further training?	

## Appendix 4: online safety incident report log

ONLINE SAFETY INCIDENT LOG				
Date	Where the incident took place	Description of the incident	Action taken	Name and signature of staff member recording the incident