

Online Safety Policy

Felixstowe International College



Approved by:	Governing Board	Date: January 2023
Last reviewed on:	January 2022	
Next review due by:	January 2024	

We believe this policy should be a working document that is fit for purpose, represents the school ethos, enables consistency and quality across the school and is related to the following legislation:

- Obscene Publications Act 1959
- Children Act 1989
- Computer Misuse Act 1990
- Education Act 1996
- Education Act 1997
- Police Act 1997
- Data Protection Act 2018
- Human Rights Act 1998
- Standards and Framework Act 1998
- Freedom of Information Act 2000
- Education Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Education and Inspections Act 2006
- Children and Young Persons Act 2008
- School Staffing (England) Regulations 2009
- Equality Act 2010
- Education Act 2011
- Protection of Freedoms Act 2012
- Counter Terrorism and Security Act 2015

The following documentation is also related to this policy:

- Equality Act 2010: Advice for Schools (DfE)
- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (DfE)
- Prevent Strategy (HM Gov)
- Teaching online safety in school (DfE)
- Teaching approaches that help build resilience to extremism among people (DfE)
- Working Together to Safeguard Children: A Guide to Inter-agency Working to Safeguard and Promote the Welfare of Children
- Race Disparity Audit - Summary Findings from the Ethnicity Facts and Figures Website (Cabinet Office)

We are committed to safeguarding and promoting the welfare of all pupils as the safety and protection of children is of paramount importance to everyone in this school. We work hard to create a culture of vigilance and at all times we will ensure what is best in the interests of all pupils.

We believe that all pupils have the right to be safe in our society. We recognise that we have a duty to ensure arrangements are in place for safeguarding and promoting the welfare of pupils by creating a safe online environment.

We want all pupils to feel safe at all times. We want to hear their views of how we can improve all aspects of online safeguarding and from the evidence gained we put into place all necessary improvements.

We acknowledge online safety:

- ‘..... refers to the act of staying safe online ... and is also commonly known as internet safety, e-safety and cyber safety. It encompasses all technological devices which have access to the Internet from PCs and laptops to smartphones and tablets. Being safe online means individuals are protecting themselves and others from online harms and risks which may jeopardize their personal information, lead to unsafe communications or even effect their mental health and wellbeing.’ (National Online Safety)
- ‘..... is being aware of the nature of the possible threats that anyone could encounter whilst engaging in activity through the Internet, these could be security threats, protecting and managing your personal data, online reputation management, and harmful or illegal content.’ (South West Grid for Learning)

We work hard to ensure that pupils are safeguarded from potentially harmful and inappropriate online material. We understand that there are many online safeguarding issues that can be categorised into four areas of risk:

Content:	Being exposed to illegal, inappropriate or harmful material 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 child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
Conduct:	Personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images.
Commerce:	Risk such as online gambling, inappropriate advertising, phishing and of financial scams

(Amended from 'Keeping children safe in education')

We believe online safety:

- is an integral part of safeguarding and requires a whole school, cross-curricular approach;
- must follow the school's safeguarding and child protection procedures;
- will educate pupils about the benefits and risks of using technology;
- will provide safeguards and awareness to enable pupils to control their online experience.

We ensure all governors undertake online safeguarding training on induction and will attend regular refresher training.

We ensure the IT infrastructure is as safe and secure as is reasonably possible and therefore we have employed an IT service provider who carries out all the online safety measures on our behalf.

We ensure we record, classify and track online safety issues.

We believe that all pupils, school personnel and governors have a duty to:

- behave respectfully online and offline;
- use technology for teaching and learning and to prepare for life after school;
- report any concerns or inappropriate behaviour;
- protect each other and the good name of the school;
- promote and model positive online safety behaviour.

We believe the teaching of online safety and its harms must be taught within a whole school approach. 'It is important to teach pupils about the underpinning knowledge and behaviours that can help pupils to navigate the online world safely and confidently regardless of the device, platform or app.' (DfE)

Annually, we celebrate 'Safer Internet Day' which is celebrated globally in February each year to promote the safe and positive use of digital technology for children and young people.

We work hard to ensure that pupils have an understanding of the risks that exist online.

We wish to work closely with the Student Council and to hear their views and opinions as we acknowledge and support Article 12 of the United Nations Convention on the Rights of the Child that children should be encouraged to form and to express their views.

We as a school community have a commitment to promote equality. Therefore, an equality impact assessment has been undertaken and we believe this policy is in line with the Equality Act 2010.

We all have a responsibility to ensure equality permeates in to all aspects of school life and that everyone is treated equally irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We want everyone connected with this school to feel safe, secure, valued and of equal worth.

We believe it is essential that this policy clearly identifies and outlines the roles and responsibilities of all those involved in the procedures and arrangements that is connected with this policy.

Aims

- To safeguard and promote the welfare of all pupils as the safety and protection of children is of paramount importance to everyone in this school.
- To ensure arrangements are in place for safeguarding and promoting the welfare of pupils by creating a safe online environment.
- To create a culture of vigilance and at all times ensure what is in the best interests of all pupils.
- To ensure compliance with all relevant legislation connected to this policy.
- To share good practice within the school, with other schools and with the local authority in order to improve this policy.

Responsibility for the Policy and Procedure

Role of the Governing Body

The governing body has:

- appointed a Designated Online Safeguarding Lead (DOSL) to be responsible for online safety;
- delegated powers and responsibilities to the headteacher to ensure all school personnel and stakeholders are aware of and comply with this policy;
- responsibility for ensuring:
 - the approval of this policy;
 - full compliance with all statutory responsibilities;
 - the school complies with all equalities legislation;
 - funding is in place to support this policy;
 - this policy and all policies are maintained and updated regularly;
 - all policies are made available to parents;
 - the nomination of a designated equalities governor to ensure that appropriate action will be taken to deal with all prejudice related incidents or incidents which are a breach of this policy;
 - the involvement of the online school council in:
 - determining this policy with the governing body;
 - discussing improvements to this policy during the school year;
 - organising surveys to gauge the thoughts of all pupils;
 - reviewing the effectiveness of this policy with the governing body.
- the nomination of an Online Safety Governor (OSG) to:

- visit the school regularly;
- work closely with the headteacher and the DOSL;
- ensure that this policy and other linked policies are up to date;
- ensure that everyone connected with the school is aware of this policy;
- attend training related to this policy;
- report to the governing body every term;
- annually report to the governing body on the success and development of this policy.

- the effective implementation, monitoring and evaluation of this policy undertaken by the governors/directors.

Role of the Headteacher

The headteacher will:

- work in conjunction with the senior leadership team to ensure all school personnel, pupils and parents are aware of and comply with this policy;
- ensure risk assessments are:
 - in place and cover all aspects of this policy;
 - accurate and suitable;
 - reviewed annually;
 - easily available for all school personnel.
- establish a culture of safeguarding where online safety is fully integrated into whole school safeguarding;
- undertake training in offline and online safeguarding;
- ensure all school personnel and governors undertake training in offline and online safeguarding;
- ensure all school personnel, pupils, governors and parents are aware of the procedures to be followed in the event of an online safeguarding incident;
- ensure the DOSL receives suitable training to enable him/her to carry out their online safety role and to training other colleagues as relevant;
- ensure child protection is always put first and data-protection processes support careful and legal sharing of information;
- ensure that online safety education is embedded across the curriculum in line with the statutory RSHE guidance;
- organise a series of online safeguarding and child protection workshops to ensure parents are aware of:
 - Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges
 - Working Together to Safeguard Children: A Guide to Inter-agency Working to Safeguard and Promote the Welfare of Children
 - the Safeguarding and Child Protection policy
 - all online safeguarding procedures in place;
 - all online safeguarding policies;
 - their role in online safeguarding and pupils protection
- ensure good practice is shared throughout the school;
- work closely with the DOSL and OSG;
- provide leadership and vision in respect of equality;
- provide guidance, support and training to all staff;
- monitor the effectiveness of this policy by:

- monitoring online learning and teaching through observing lessons
 - monitoring logs of reported incidents
 - speaking with pupils, school personnel, parents and governors
- annually report to the governing body on the success and development of this policy;
 - promote and model positive online safety behaviour

Role of the Designated Online Safeguarding Lead (DOSL)

The DOSL will:

- lead the development of this policy throughout the school;
- work closely with the Headteacher and the OSG to:
 - discuss current issues;
 - review incident logs;
 - review filtering and monitoring;
 - change control logs
- be:
 - trained in online safeguarding issues;
 - aware of the potential for serious child protection/safeguarding issues which may arise from:
 - sharing of personal data
 - access to illegal/inappropriate materials
 - inappropriate online conduct
 - potential or actual incidents of grooming
 - online bullying
 - disclosures by *pupils/students*
- be responsible for the day-to-day online safety;
- review protections for pupils in the home and remote learning procedures, rules and safeguards;
- ensure school personnel are aware of the procedures that need to be followed in the event of an online safety incident taking place;
- in regard to an online safeguarding issue will liaise with the appropriate safeguarding authority;
- log and report all online safety incidents;
- ensure a GDPR-compliant framework for storing data is in place;
- ensure that online safety education is embedded across the curriculum in line with the statutory RSHE guidance;
- chair the Online Safety Group;
- attend relevant Governor meetings;
- be responsible for reviewing the school online safety policies and documents;
- liaise with IT support personnel;
- provide guidance and support to all school personnel;
- provide training for all school personnel on induction and when the need arises regarding;
- make effective use of relevant research and information to improve this policy;
- keep up to date with new developments, resources, online safety issues and legislation;
- undertake risk assessments when required;
- review and monitor;
- annually report to the governing body on the success and development of this policy;
- promote and model positive online safety behaviour

Role of the Data Protection Officer

The Data Protection Officer will:

- have expert knowledge of data protection law and practices;
- inform the school and school personnel about their obligations to comply with the Data Protection Act 2018 laws;
- ensure data management is strengthened and unified;
- monitor compliance with the Data Protection Act 2018;
- manage internal data protection activities;
- ensure risk and impact assessments are conducted in accordance with ICO guidance;
- report data breaches within 72 hours;
- ensure individuals have greater control over their personal data;
- ensure that prior to the processing of an individual's data that:
 - the process is in line with ICO guidance;
 - the process is transparent;
 - the individual will be notified;
 - the notification is written in a form that is understandable to children;
 - when sharing an individual's data to a third party outside of school that details for the sharing are clearly defined within the notifications
- share an individual's data where it is a legal requirement to provide such information;
- process all written subject access requests from individuals within 40 days of receiving them;
- have in place a formal contract or service level agreement with a chosen data processor who is GDPR compliant;
- ensure the secure disposal of redundant data and IT hardware holding data in compliance with ICO guidance;
- train school personnel;
- conduct audits;
- be the first point of contact for supervisory authorities and for individuals whose data is processed;
- keep up to date documentation of all data protection activities;
- work closely with the headteacher and nominated governor;
- periodically report to the headteacher and to the governing body;
- annually report to the governing body on the success and development of this policy;
- promote and model positive online safety behaviour

Role of the Curriculum Leader

The Curriculum Leader will:

- ensure that online safety education is embedded across the curriculum;
- ensure teaching staff:
 - are aware that RSHE, Computing and Citizenship have the clearest online safety links;
 - identify opportunities to thread online safety through the curriculum and other school activities;
 - monitor what pupils are doing and consider potential online dangers;
 - supervise and guide pupils when engaged in online learning activities
- annually organise Safer Internet Day;
- provide strategic leadership and direction;

- provide a curriculum that provides pupils with the essential knowledge they need to be educated citizens in democratic Britain;
- coordinate a number of working parties in order to explore ways of improving the curriculum and the way in which we deliver it with a view of ensuring the highest standards of delivery and consistency in pupil's learning and teaching experiences and opportunities throughout the school;
- provide an environment that is fun, stimulating and challenging to all pupils;
- promote an awareness of and respect for a diversity of cultures, values, beliefs and abilities;
- equip children with a range of skills and a desire for lifelong learning;
- ensure appropriate coverage of the curriculum;
- provide support and advice;
- monitor pupil progress;
- ensure sufficient and up to date resources are in place;
- promote and model positive online safety behaviour;

Role of School Personnel

School personnel will:

- comply with all aspects of this policy;
- be fully aware of all online safeguarding policies and procedures;
- undertake online safeguarding training on induction and when necessary;
- report all suspected safeguarding concerns and disclosures to the Online Designated Safeguarding Lead;
- ensure all communications with pupils and parents will be on a professional level;
- read, understand and sign the Online Safeguarding policy;
- reinforce online safety messages when teaching online;
- be aware that RSHE, Computing and Citizenship have the clearest online safety links;
- identify opportunities to thread online safety through the curriculum and other school activities;
- monitor what pupils are doing and consider potential online dangers;
- supervise and guide pupils when engaged in online learning activities
- teach all pupils to:
 - be critically aware of the materials/content they access online and will show how to validate the accuracy of information;
 - report abuse or any form of online bullying;
 - be vigilant against online radicalisation;
 - acknowledge the source of information used and to respect copyright when using material accessed on the internet;
 - demonstrate appropriate online behaviour;
 - consider potential risks and the age-appropriateness of websites
- create a safe online environment for their pupils;
- remind pupils to follow the acceptable use policy;
- promote and model positive online safety behaviour

Role of Pupils

Pupils will:

- being aware of and comply with this policy;
- be expected to sign the acceptable use agreement and will be encouraged to adopt safe and responsible use of the internet;
- be trained in the importance of:

- adopting good online safety practice;
 - reporting abuse, misuse or access to inappropriate materials or any form of online bullying;
 - being vigilant in monitoring the content of websites
 - recognising and avoiding online safety risks and building their resilience;
- be supported:
 - in building resilience to radicalisation by providing a safe online environment;
 - be given support to supporting the online school Code of Conduct and guidance necessary to ensure the smooth running of the school;
 - taking part in the student council
 - taking part in questionnaires and surveys

Role of Parents/Carers

Parents/carers will:

- be aware of and comply with this policy;
- work in partnership with the school;
- be made aware that that they play an essential role in the online education of their children;
- be expected to sign the acceptable use agreement and will be encouraged to adopt safe and responsible use of the internet;
- promote and model positive online safety behaviour;
- be trained in:
 - understanding online safety risks and issues;
 - how to monitor their children's online behaviours;
 - how to monitor the material that their children may find on the internet
- comply with this policy for the benefit of their children;
- be asked to take part periodic surveys conducted by the school;
- support the school Online Code of Conduct and guidance necessary to ensure the smooth running of the school;

Role of the IT Manager

The IT Manager will:

- ensure the service provider carries out all online safety measures;
- ensure the Internet filtering service will be annually reviewed;
- ensure access to the Internet is designed to protect pupils and school personnel by blocking the following content:
 - adult content containing sexually explicit images
 - violent content containing graphically violent images
 - hate material content promoting violence or attack on individuals or institutions on the basis of religious, racial or gender grounds
 - illegal drug taking content relating to the use or promotion of illegal drugs or the misuse or prescription drugs
 - criminal content relating to the promotion of criminal and other activities

- gambling content relating to the use of online gambling websites
- non educational websites such as social networking sites
- ensure all users access the Internet in accordance with the School's Acceptable Internet Use Agreement and will inform the ICT coordinator if at any time they find they have accessed inappropriate Internet sites;
- ensure the technical infrastructure is secure and not open to misuse or malicious attack;
- ensure the online school meets all online safety technical requirements;
- keep up to date with online technical information;
- promote and model positive online safety behaviour;

Raising Awareness of this Policy

We will raise awareness of this policy via:

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| <ul style="list-style-type: none"> ▪ School handbook/prospectus; ▪ School website; ▪ Staff handbook; ▪ Meetings with parents such as introductory, transition, parent-teacher consultations and periodic curriculum workshops; ▪ School events; ▪ Meetings with school personnel; ▪ Written communications with home such as weekly newsletters and of end of half term newsletters; | <ul style="list-style-type: none"> ▪ Headteacher reports to the governing body; ▪ Information displays in the main school entrance; ▪ Text messages; ▪ Email; ▪ Social media: <ul style="list-style-type: none"> <input type="checkbox"/> Facebook <input type="checkbox"/> Twitter <input type="checkbox"/> Virtual pin boards <input type="checkbox"/> School blog |
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Training

We ensure:

- all school personnel:
 - have received the appropriate training on all safeguarding policies and procedures undertaken by a registered training provider;
 - are familiar with the following documentation:
 - Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges
 - Working Together to Safeguard Children: A Guide to Inter-agency Working to Safeguard and Promote the Welfare of Children
 - are aware of the following linked policies:

<ul style="list-style-type: none"> ➢ All aspects of this policy ➢ Safeguarding and Child Protection ➢ Acceptable Internet Use Agreement ➢ Pupil Behaviour and Discipline ➢ Anti-bullying ➢ Remote Learning 	<ul style="list-style-type: none"> ➢ School Website ➢ Mobile Phone Safety and Acceptable Use ➢ Equal opportunities ➢ Inclusion ➢ Dealing with Sexual Harassment and Sexual Violence
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- the content of all training is correct, delivered well and engages staff as we believe that the more engaging training is, the better the outcomes that we need to measure;

- that we have in place data that evidences staff understanding by using a simple short multiple-choice test through one of the following applications such as Google Forms, Microsoft Forms, Kahoot or SurveyMonkey;
- that we have in place evidence for all staff that:
 - highlights the knowledge gaps in the training;
 - shows how those knowledge gaps were corrected
- all school personnel understand and undertake their role in safeguarding and child protection effectively

Safeguarding

We are committed to safeguarding and promoting the welfare of all children as the safety and protection of children is of paramount importance to everyone in this school. We work hard to create a culture of vigilance and at all times we will ensure what is best in the interests of all children.

We believe that all children have the right to be safe in our society. We recognise that we have a duty to ensure arrangements are in place for safeguarding and promoting the welfare of children by creating a positive school atmosphere through our teaching and learning, pastoral support and care for both pupils and school personnel, training for school personnel and with working with parents. We teach all our children about safeguarding.

We work hard to ensure that everyone keeps careful watch throughout the school and in everything we do for possible dangers or difficulties. We want all children to feel safe at all times. We want to hear their views of how we can improve all aspects of safeguarding and from the evidence gained we put into place all necessary improvements.

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.

Race Disparity Audit

We acknowledge the findings of the Race Disparity Audit that clearly shows how people of different ethnicities are treated across the public services of health, education, employment and the criminal justice system.

The educational section of the audit that covers: differences by region; attainment and economic disadvantage; exclusions and abuse; and destinations, has a significant importance for the strategic planning of this school.

Monitoring the Implementation and Effectiveness of the Policy

The practical application of this policy will be reviewed annually or when the need arises by the coordinator, the Headteacher and the nominated governor.

A statement of the policy's effectiveness and the necessary recommendations for improvement will be presented to the governing body for further discussion and endorsement.

Linked Policies

- Safeguarding and Child Protection
- Acceptable Internet Use Agreement
- Pupil Behaviour and Discipline
- School Website
- Prevent Duty - Dealing with Extremism and Radicalisation
- Dealing with Sexual Harassment and Sexual Violence
- Anti-bullying
- Bring Your Own Device
- Mobile Phone Safety and Acceptable Use
- Remote Learning (Online Code of Conduct for Students, Online Code of Conduct for Teachers)

We believe this policy:

- has been reviewed thoroughly by the safeguarding governor and the Designated Safeguarding Lead has been questioned on it to make sure it stands up to scrutiny;
- flows and is easy to follow;
- is an essential part of the school;
- supports staff in managing certain situations;
- forms an important framework that will ensure consistency in applying values and principles throughout the establishment;
- provides guidance, consistency, accountability, efficiency, and clarity on how the school operates;
- provides a roadmap for day-to-day operations;
- ensures compliance with laws and regulations, gives guidance for decision-making, and streamlining internal processes;
- is designed to influence and determine all major decisions, actions and all activities taking place within the boundaries set by them;
- stems from the school's vision and objectives which are formed in strategic management meetings;
- has been received by all school personnel via appropriate safeguarding training;
- is provided to all school personnel and a hard copy can be found in the staffroom reference library

Key staff involved in Online Safety

Role	Name(s)
Head of School	Rebecca Mainprice
Chair of Governors	Robert Noakes
DSL & DOSL	Chaerin Lee
Online Safety Governor	Robert Noakes
ICT Manager	David Jennings
DPO	Andy Crow
Deputy DSL	Joyce Jennings