

## **LEARNING OPPORTUNITIES**

### **Online Safety Policy**

#### **Key Details**

**Designated Safeguarding Lead(s):** Simon Graydon - Headteacher  
Heather Tulett  
Catherine Graydon

**Date written: (September 2018)**

**Date of next review: (September 2022)**

**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 procedure**

## Online Safety Policy

### Policy aims

This online safety policy has been written by Learning Opportunities and builds on the Kent County Council / The Education People online safety policy template, with specialist advice and input provided as required. It takes into account the DfE statutory guidance '[Keeping Children Safe in Education](#)' 2021, '[Working Together to Safeguard Children](#)' 2018 and the local [Kent Safeguarding Children Multi-agency Partnership](#) (KSCMP) procedures.

The purpose of Learning Opportunities online safety policy is to:

- safeguard and promote the welfare of all members of Learning Opportunities community online.
- identify approaches to educate and raise awareness of online safety throughout our community.
- enable all staff to work safely and responsibly, to role model positive behaviour online and to manage professional standards and practice when using technology.
- identify clear procedures to follow when responding to online safety concerns.

Learning Opportunities identifies that the issues classified within online safety are considerable but can be broadly categorised into four areas of risk;

- **Content:** being exposed to illegal, inappropriate or harmful material
- **Contact:** being subjected to harmful online interaction with other users
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- **Commerce:** being exposed to advertising and marketing schemes, which can also mean inadvertently spending money online, for example within applications.

### Policy scope

- Learning Opportunities recognises that online safety is an essential part of safeguarding and acknowledges its duty to ensure that all students and staff are protected from potential harm online.
- Learning Opportunities identifies that the internet and associated devices, such as computers, tablets, mobile phones and games consoles are an important part of everyday life which present positive and exciting opportunities, as well as challenges and risks.
- Learning Opportunities will empower our students to acquire the knowledge needed to use the internet and technology in a safe, considered and respectful way, and develop their resilience so they can manage and respond to online risks.
- This policy applies to all staff, including the leadership team, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for, or provide services on behalf of the setting (collectively referred to as "staff" in this policy) as well as students and parents and carers.
- This policy applies to all access to the internet and use of technology, including mobile technology, or where students, staff or other individuals have been provided with setting issued devices for use, both on and off-site.

### Links with other policies and practices

This policy links with several other policies, practices and action plans, including but not limited to:

- Anti-bullying policy
- Acceptable Use Policies (AUP) and the staff Code of conduct
- Positive Behaviour Management policy
- Safeguarding / Child protection policy
- Confidentiality policy
- Curriculum policies, such as: Computing, Personal Social and Health Education (PSHE), Citizenship and Relationships and Sex Education (RSE)
- Data security

### **Monitoring and review**

- Technology evolves and changes rapidly; as such Learning Opportunities will review this policy at least annually. The policy will be revised following any national or local policy updates, any local child protection concerns and/or any changes to our technical infrastructure.
- We will regularly monitor internet use and evaluate online safety mechanisms to ensure that this policy is consistently applied.
- To ensure they have oversight of online safety, the Head Teacher will be informed of online safety concerns, as appropriate.
- Any issues identified via monitoring policy compliance will be incorporated into our action planning.

### **Roles and Responsibilities**

- The Designated Safeguarding Lead (DSL) (*Simon Graydon / Head Teacher*) is recognised as holding overall lead responsibility for online safety.
- Learning Opportunities recognises that all members of the community have important roles and responsibilities to play with regards to online safety.

### **The leadership and management team will:**

- Create a whole setting culture that incorporates online safety throughout all elements of school life.
- Ensure that online safety is viewed as a safeguarding issue and that practice is in line with national and local recommendations and requirements.
- Implement appropriate and up-to-date policies regarding online safety, which addresses the acceptable use of technology, peer on peer abuse, use of social media and mobile technology.
- Work with an IT support consultant to ensure that suitable and appropriate filtering and monitoring systems are in place.
- Support the DSL by ensuring they have enough time and resources to carry out their responsibilities.
- Ensure robust reporting channels are in place for the whole community to access regarding online safety concerns.
- Undertake appropriate risk assessments regarding the safe use of technology on site.
- Audit and evaluate online safety practice to identify strengths and areas for improvement.
- Ensure that staff, students and parents/carers are proactively engaged in activities, which promote online safety.
- Support staff to ensure that online safety is embedded within a progressive whole setting curriculum, which enables all students to develop an appropriate understanding of online safety.

### **The Designated Safeguarding Leads (DSLs) will:**

- Act as a named point of contact within the setting on all online safeguarding issues.
- Liaise with other members of staff on matters of online safety.
- Ensure appropriate referrals are made to relevant external partner agencies, as appropriate.
- Ensure online safety is recognised as part of the settings safeguarding responsibilities, and that a coordinated whole school approach is implemented.
- Access regular and appropriate training and support to ensure they understand the unique risks associated with online safety and have the relevant and up-to-date knowledge required to keep students safe online.
- Access regular and appropriate training and support to ensure they recognise the additional risks that students with SEN and disabilities (SEND) face online.
- Ensure all members of staff receive regular, up-to-date and appropriate online safety training and information as part of their induction and child protection training.
- Keep up-to-date with current research, legislation and trends regarding online safety and communicate this with the community, as appropriate.
- Work with staff to coordinate participation in local and national events to promote positive online behaviour, such as Safer Internet Day.
- Ensure that online safety is promoted to parents, carers and the wider community through a variety of channels and approaches.
- Maintain records of online safety concerns, as well as actions taken, as part of the settings safeguarding recording mechanisms.
- Monitor online safety incidents to identify gaps and trends and use this data to update the education response and school policies and procedures.
- Report online safety concerns, as appropriate, to the senior leadership team.
- Work with the leadership team to review and update online safety policies on a regular basis (at least annually).

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

- Contribute to the development of our online safety policies.
- Read and adhere to our online safety policy and acceptable use of technology policies.
- Take responsibility for the security of IT systems and the electronic data they use or have access to.
- Model good practice when using technology with students
- Maintain a professional level of conduct in their personal use of technology, both on and off site.
- Embed online safety education in curriculum delivery wherever possible.
- Have an awareness of a range of online safety issues and how they may be experienced by the students in their care.
- Identify online safety concerns and take appropriate action by following the school safeguarding policies and procedures.
- Know when and how to escalate online safety issues, including reporting to the DSL and signposting students and parents/carers to appropriate support, internally and externally.
- Take personal responsibility for professional development in this area.

**It is the responsibility of staff managing the technical environment to:**

- Provide technical support and perspective to the DSL and Learning Opportunities leadership team, especially in the development and implementation of appropriate online safety policies and procedures.

- Implement appropriate security measures as directed by the leadership team to ensure that the settings IT infrastructure is secure and not open to misuse or malicious attack, whilst allowing learning opportunities to be maximised.
- Ensure that our filtering policy and monitoring systems and approaches are applied and updated on a regular basis; responsibility for its implementation is shared with the leadership team.
- Ensure appropriate technical support and access to our filtering and monitoring systems is given to the DSLs to enable them to take appropriate safeguarding action when required.

**It is the responsibility of students (at a level that is appropriate to their individual age and ability) to:**

- Engage in age/ability appropriate online safety education.
- Contribute to the development of online safety policies.
- Read and adhere to the acceptable use of technology and behaviour policies.
- Respect the feelings and rights of others, on and offline.
- Take an appropriate level of responsibility for keeping themselves and others safe online.
- Seek help from a trusted adult, if they are concerned about anything, they or others experience online.

**It is the responsibility of parents and carers to:**

- Read our acceptable use of technology policies and encourage their children to adhere to them.
- Support our online safety approaches by discussing online safety issues with their children and reinforcing appropriate and safe online behaviours at home.
- Role model safe and appropriate use of technology and social media and abide by the home-school agreement and acceptable use of technology policies.
- Seek help and support from Learning Opportunities or other appropriate agencies, if they or their child encounter online issues.
- Contribute to the development of our online safety policies.
- Take responsibility for their own awareness in relation to the risks and opportunities posed by the new and emerging technologies that their children access and use at home.

**Education and engagement approaches**

**Education and engagement with students**

- The setting will establish and embed a whole school culture and will raise awareness and promote safe and responsible internet use amongst students by:
  - o ensuring our curriculum and whole school approach is developed in line with the UK Council for Internet Safety (UKCIS) '[Education for a Connected World Framework](#)' and DfE '[Teaching online safety in school](#)' guidance.
  - o ensuring online safety is addressed in PSHE and Computing programmes of study.
  - o reinforcing online safety principles in other curriculum subjects as appropriate, and whenever technology or the internet is used on site.
  - o creating a safe environment in which all students feel comfortable to say what they feel, without fear of getting into trouble and/or being judged for talking about something which happened to them online.

- o involving the DSL as part of planning for online safety lessons or activities, so they can advise on any known safeguarding cases, and ensure support is in place for any students who may be impacted by the content.
  - o making informed decisions to ensure that any educational resources used are appropriate for our students.
  - o using external visitors, where appropriate, to complement and support our internal online safety education approaches.
  - o providing online safety education as part of the transition programme across the key stages and/or when moving between establishments.
- Learning Opportunities will support students to understand and follow our acceptable use policies in a way which suits their age and ability by:
    - o displaying acceptable use posters in all rooms with internet access.
    - o informing students that network and internet use will be monitored for safety and security purposes, and in accordance with legislation.
    - o seeking student voice when writing and developing online safety policies and practices.
  - Learning Opportunities will ensure students develop the underpinning knowledge and behaviours needed to navigate the online world safely, in a way which suits their age and ability by:
    - o ensuring age appropriate education regarding safe and responsible use precedes internet access.
    - o teaching students to evaluate what they see online and recognise techniques used for persuasion, so they can make effective judgements about if what they see is true, valid or acceptable.
    - o educating them in the effective use of the internet to research, including the skills of knowledge location, retrieval and evaluation.
    - o enabling them to understand what acceptable and unacceptable online behaviour looks like.
    - o preparing them to identify possible online risks and make informed decisions about how to act and respond.
    - o ensuring they know how and when to seek support if they are concerned or upset by something they see or experience online.

### **Vulnerable Students**

- Learning Opportunities recognises that any student can be vulnerable online, and vulnerability can fluctuate depending on their age, developmental stage and personal circumstances. However, there are some learners, for example looked after children and those with special educational needs, who may be more susceptible or may have less support in staying safe online.
- Learning Opportunities will ensure that differentiated and appropriate online safety education, access and support is provided to vulnerable students through small group and individual work as appropriate.
- Staff at Learning Opportunities will seek input from specialist staff as appropriate, including the DSL and Designated Teacher to ensure that the policy and curriculum is appropriate to our community's needs.

### **Training and engagement with staff**

- We will
  - o provide and discuss the online safety policy and procedures with all members of staff as part of induction.

- o provide up-to-date and appropriate online safety training for all staff which is integrated, aligned and considered as part of our overarching safeguarding approach as part of the existing safeguarding and child protection training / updates.
- o Staff training covers the potential risks posed to students (content, contact and conduct) as well as our professional practice expectations.
- o build on existing expertise by providing opportunities for staff to contribute to and shape our online safety approaches, including curriculum, policies and procedures.
- o make staff aware that our IT systems are monitored, and that activity can be traced to individual users. Staff will be reminded to behave professionally and in accordance with our policies when accessing our systems and devices.
- o make staff aware that their online conduct, including personal use of social media, can have an impact on their professional role and reputation.
- o highlight useful educational resources and tools which staff could use with students.
- o ensure all members of staff are aware of the procedures to follow regarding online safety concerns involving students, colleagues or other members of the community.

### **Awareness and engagement with parents and carers**

- Learning Opportunities recognises that parents and carers have an essential role to play in enabling children and young people to become safe and responsible users of the internet and associated technologies.
- We will build a partnership approach to online safety with parents and carers by
  - o providing information and guidance on online safety in a variety of formats. This will include offering specific online safety awareness sessions and highlighting online safety at other events such as parent evenings, transition events, and whole school community events e.g summer / Christmas fairs.
  - o drawing their attention to our online safety policy and expectations in our newsletters and other external communication, as well as in our prospectus and on our website.
  - o requesting parents and carers read online safety information as part of joining our community, for example, within our home school agreement.
  - o requiring them to read our acceptable use policies and discuss the implications with their children.

### **Reducing Online Risks**

- Learning Opportunities recognises that the internet is a constantly changing environment with new apps, devices, websites and material emerging at a rapid pace.
- We will
  - o regularly review the methods used to identify, assess and minimise online risks.
  - o Examine emerging technologies for educational benefit and undertake appropriate risk assessments before their use in the school is permitted.
  - o ensure that appropriate filtering and monitoring is in place and take all reasonable precautions to ensure that access is appropriate.
  - o recognise that due to the global and connected nature of the internet, it is not possible to guarantee that unsuitable material cannot be accessed via our systems or devices and as such identify clear procedures to follow if breaches or concerns arise.
- All members of the community are made aware of our expectations regarding safe and appropriate behaviour online and the importance of not posting any content, comments, images or videos which could cause harm, distress or offence. This is clearly outlined in our acceptable use of technology policies and highlighted through a variety of education and training approaches.

## **Safer Use of Technology**

### **Classroom use**

- Learning Opportunities uses a wide range of technology. This includes access to:
  - Computers, laptops, tablets and other digital devices
  - Internet, which may include search engines and educational websites
  - School intranet
  - Email
  - Games consoles and other games-based technologies
  - Digital cameras
- All setting owned devices will be used in accordance with our acceptable use of technology policies and with appropriate safety and security measures in place.
- Members of staff will always evaluate websites, tools and apps fully before use in the classroom or recommending for use at home.
- The school will use appropriate filtering and monitoring of search tools following an informed risk assessment. The school has age and ability appropriate filtering and monitoring in place to limit student's exposure to online risks.
- We will ensure that the use of internet-derived materials, by staff and students complies with copyright law and acknowledge the source of information.
- Supervision of internet access and technology use will be appropriate to student's age and ability e.g.
  - Students will use filtered and monitored search engines and online tools.
  - Students will be directed by the teacher to online materials and resources which support the learning outcomes planned for the students age and ability.
  - Students will be appropriately supervised when using technology, according to their ability and understanding.

### **Managing internet access**

- We will maintain a written record of users who are granted access to our devices and systems.
- All staff, students, parents / carers and visitors will read and agree an acceptable use policy before being given access to our computer system, IT resources or the internet.

### **Filtering and monitoring**

- Education broadband connectivity is provided through Focus.
- We use Watchguard, which blocks sites which can be categorised as: pornography, racial hatred, extremism, gaming and sites of an illegal nature.
- The filtering system blocks all sites on the [Internet Watch Foundation](#) (IWF) list.
- We work with Primary Technologies to ensure that our filtering policy is continually reviewed.
- If students discover unsuitable sites, they will be required to:
  - Turn off monitor/screen and report the concern immediate to a member of staff.



- o The member of staff will report the concern (including the URL of the site if possible) to the DSL (or deputy) and/or technical staff.
- o The breach will be recorded and escalated as appropriate.
- o Parents/carers will be informed of filtering breaches involving their child.
- Any material believed to be illegal will be reported immediately to the appropriate agencies, such as the IWF, Kent Police or CEOP.

### **Monitoring**

- We will appropriately monitor internet use on all setting owned or provided internet enabled devices. This is achieved by:
  - o Monitoring / supervision of students
  - o Monitoring internet and web access using securus
  - o If a concern is identified via monitoring approaches the DSL or deputy will respond in line with the child protection policy.
- All users will be informed that use of our systems can be monitored and that all monitoring will be in line with data protection, human rights and privacy legislation.

### **Decision making**

- Learning Opportunities senior leadership team have ensured that our school has age and ability appropriate filtering and monitoring in place to limit student's exposure to online risks.
- Our decision regarding filtering and monitoring has been informed by a risk assessment, considering our specific needs and circumstances.
- Changes to the filtering and monitoring approach will be risk assessed by staff with educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.
- The leadership team will ensure that regular checks are made to ensure that the filtering and monitoring methods are effective and appropriate.
- Learning Opportunities are mindful to ensure that "over blocking" does not unreasonably restrict access to educational activities and safeguarding materials.
- All members of staff are aware that they cannot rely on filtering and monitoring alone to safeguard students; effective classroom management and regular education about safe and responsible use is essential.

### **Managing personal data online**

- Personal data will be recorded, processed, transferred and made available online in accordance with General Data Protection Regulations and Data Protection legislation.
  - o Full information can be found in our GDPR & Data Protection Policy which is available from the school.

### **Security and management of information systems**

We take appropriate steps to ensure the security of our information systems, including:

- o Virus protection being updated regularly.
- o Password encryption for personal data sent over the Internet or taken off site (such as via portable media storage) or access via appropriate secure remote access systems.

- o Not using portable media without specific permission; portable media will be checked by an anti-virus/malware scan before use.
- o Not downloading unapproved software to work devices or opening unfamiliar email attachments.
- o Preventing, as far as possible, access to websites or tools which could compromise our systems, including anonymous browsing and other filtering bypass tools.
- o Checking files held on our network, as required and when deemed necessary by leadership staff.
- o The appropriate use of user logins and passwords to access our network.
  - Specific user logins and passwords will be enforced for all users.
- o All users are expected to log off or lock their screens/devices if systems are unattended.

### **Password policy**

All members of staff have their own unique username and private passwords to access our systems; members of staff are responsible for keeping their password private.

- We require all staff to
  - o use strong passwords for access into our system.
  - o change their passwords regularly, every 30 days is recommended.
  - o not share passwords or login information with others or leave passwords/login details where others can find them.
  - o not to login as another user at any time.
  - o lock access to devices/systems when not in use.

### **Managing the safety of our website**

- We will ensure that information posted on our website meets the requirements as identified by the DfE.
- We will ensure that our website complies with guidelines for publications including accessibility, data protection, respect for intellectual property rights, privacy policies and copyright.
- Staff or student's personal information will not be published on our website; the contact details on the website will be our setting address, email and telephone number.
- The administrator account for our website will be secured with an appropriately strong password.
- We will post appropriate information about safeguarding, including online safety, on our website for members of the community.

### **Publishing images and videos online**

- We will ensure that all images and videos shared online are used in accordance with the associated policies, including (but not limited to) data security, acceptable use policies, codes of conduct / behaviour policies.

### **Managing email**

- Access to our email systems will always take place in accordance with data protection legislation and in line with other policies, including confidentiality, acceptable use of technology policies and the code of conduct / behaviour policy.
- The forwarding of any chain messages/emails is not permitted.
- Any electronic communication which contains sensitive or personal information will only be sent in a password protected document or using secure and encrypted email.
- Setting email addresses and other official contact details will not be used to set up personal social media accounts.

- Members of the school will immediately tell the Head Teacher if they receive offensive communication, and this will be recorded in our safeguarding files/records.

### **Staff email**

- All members of staff are provided with an email address to use for all official communication; the use of personal email addresses by staff for any official business is not permitted.
- Members of staff are encouraged to have an appropriate work life balance when responding to email, especially if communication is taking place between staff, students and parents / carers.

### **Student email**

- Students will use a provided email account for educational purposes.
- Students will agree an acceptable use policy and will receive education regarding safe and appropriate email etiquette before access is permitted.

### **Management of applications (apps) used to record children's progress**

- We use Classroom Monitor to track students' progress.
- The Data Manager will ensure that the use of tracking systems is appropriately risk assessed prior to use, and that use takes place in accordance with data protection legislation, including the General Data Protection Regulations (GDPR) and Data Protection legislation.
- To safeguard learner's data
  - o only school issued devices will be used for apps that record and store learners' personal details, attainment or photographs.
  - o personal staff mobile phones or devices will not be used to access or upload content to any apps which record and store learners' personal details, attainment or images.
  - o devices will be appropriately encrypted if taken off site, to reduce the risk of a data security breach, in the event of loss or theft.
  - o all users will be advised regarding safety measures, such as using strong passwords and logging out of systems.
  - o parents and carers will be informed of the expectations regarding safe and appropriate use, prior to being given access; for example, not sharing passwords or images.

### **Social Media**

#### **Expectations**

- The expectations' regarding safe and responsible use of social media applies to all members of Learning Opportunities.
- The term social media may include (but is not limited to) blogs, wikis, social networking sites, forums, bulletin boards, online gaming, apps, video/photo sharing sites, chatrooms and instant messenger.
- All members of Learning Opportunities are expected to engage in social media in a positive and responsible manner.
  - All members of Learning Opportunities are advised not to post or share content that may be considered threatening, hurtful or defamatory to others on any social media service.

- We will control student and staff access to social media whilst using school provided devices and systems on site.
  - The use of social media during school hours for personal use is not permitted for staff.
  - Inappropriate or excessive use of social media during *school/setting* hours or whilst using *school/setting* devices may result in removal of internet access and/or disciplinary or legal action.
- Concerns regarding the online conduct of any member of Learning Opportunities community on social media, will be reported to the DSL and be managed in accordance with our anti-bullying, allegations against staff, behaviour and child protection policies.

### **Staff personal use of social media**

- The safe and responsible use of social media sites will be discussed with all members of staff as part of staff induction and will be revisited and communicated via regular staff training opportunities.
- Safe and professional behaviour will be outlined for all members of staff, including volunteers, as part of our code of conduct and acceptable use of technology policy.

### **Reputation**

- All members of staff are advised that their online conduct on social media can have an impact on their role and reputation within the school.
  - Civil, legal or disciplinary action may be taken if staff are found to bring the profession or school into disrepute, or if something is felt to have undermined confidence in their professional abilities.
- All members of staff are advised to safeguard themselves and their privacy when using social media services. Advice will be provided to staff via staff training and by sharing appropriate guidance and resources on a regular basis. This will include, but is not limited to:
  - Setting appropriate privacy levels on their personal accounts/sites.
  - Being aware of the implications of using location sharing services.
  - Opting out of public listings on social networking sites.
  - Logging out of accounts after use.
  - Using strong passwords.
  - Ensuring staff do not represent their personal views as being that of Learning Opportunities.
- Members of staff are encouraged not to identify themselves as employees of Learning Opportunities on their personal social networking accounts; this is to prevent information being linked with the setting and to safeguard the privacy of staff members.
- All members of staff are encouraged to carefully consider the information, including text and images, they share and post online. Staff are expected to ensure that their social media use is compatible with their professional role and is in accordance with our policies, and the wider professional and legal framework.
- Information and content that staff members have access to as part of their employment, including photos and personal information about students and their family members or colleagues, will not be shared or discussed on social media sites.
- Members of staff will notify the leadership team immediately if they consider that any content shared on social media sites conflicts with their role.

### **Communicating with students and parents/carers**

- Staff will not use personal social media accounts to contact students or parents/carers, nor should any contact be accepted.

- All members of staff are advised not to communicate with or add any current or past students or their family members, as 'friends' on any personal social media sites, applications or profiles.
- Any pre-existing relationships or exceptions which compromise this requirement will be discussed with the Head Teacher.
  - Decisions made and advice provided in these situations will be formally recorded in order to safeguard students, Learning Opportunities and members of staff.
- If ongoing contact with students is required once they have left the school, members of staff will be expected to use existing alumni networks, or use official setting provided communication tools.
- Any communication from students and parents / carers received on personal social media accounts will be reported to the DSL and Head Teacher.

### **Students use of social media**

- Safe and appropriate use of social media will be taught to students as part of an embedded and progressive education approach via age appropriate sites and resources.
- Any concerns regarding students use of social media will be dealt with in accordance with existing policies, including anti-bullying and behaviour.
- Concerns regarding students use of social media will be shared with parents/carers as appropriate, particularly when concerning underage use of social media services and games.
- Students will be advised:
  - to consider the benefits and risks of sharing personal details or information on social media sites which could identify them and/or their location.
  - to only approve and invite known friends on social media sites and to deny access to others by making profiles private.
  - not to meet any online friends without a parent/carer or other appropriate adults' permission, and to only do so when a trusted adult is present.
  - to use safe passwords.
  - to use social media sites which are appropriate for their age and abilities.
  - how to block and report unwanted communications.
  - how to report concerns on social media, both within the setting and externally.

### **Mobile Technology: Use of Personal Devices and Mobile Phones**

Learning Opportunities recognises that personal communication through mobile technologies is part of everyday life for many students, staff and parents/carers. Mobile technology needs to be used safely and appropriately within the school.

### **Expectations**

- All use of mobile technology including mobile phones and personal devices such as tablets, games consoles and wearable technology will take place in accordance with our policies, such as anti-bullying, behaviour and safeguarding / child protection and with the law.
- Electronic devices of any kind that are brought into school are the responsibility of the user.
  - All members of Learning Opportunities community are advised to take steps to protect their mobile phones or personal devices from loss, theft or damage; we accept no responsibility for the loss, theft or damage of such items on our premises.

- o All members of Learning Opportunities community are advised to use passwords/pin numbers to ensure that unauthorised calls or actions cannot be made on their phones or devices; passwords and pin numbers should be kept confidential and mobile phones and personal devices should not be shared.
- Mobile phones and personal devices are only permitted to be used in specific areas.
- The sending of abusive or inappropriate messages or content via mobile phones or personal devices is forbidden by any member of the community; any breaches will be dealt with in line with our anti-bullying and behaviour policies.
- All members of Learning Opportunities community are advised to ensure that their mobile phones and personal devices do not contain any content which may be offensive, derogatory or would otherwise contravene our behaviour or child protection policies.

### **Staff use of personal devices and mobile phones**

- Members of staff will ensure that use of personal phones and devices takes place in accordance with the law, as well as, relevant policy and procedures, such as confidentiality, child protection, data security and acceptable use of technology.
- Staff will be advised to :
  - o keep mobile phones and personal devices in a safe and secure place during lesson time.
  - o keep mobile phones and personal devices switched off or switched to 'silent' mode during lesson times.
  - o ensure that Bluetooth or other forms of communication, such as 'airdrop', are hidden or disabled during lesson times.
  - o not use personal devices during teaching periods, unless permission has been given by the Head Teacher such as in emergency circumstances.
  - o ensure that any content brought onto site via mobile phones and personal devices are compatible with their professional role and expectations.
  - o Access to school emails on personal devices must always be password protected. Staff must set up their account/device so that each time they access their '@learningopps.org' account they are required to use their password, in addition to the password/security to access the device.
- Members of staff are not permitted to use their own personal phones or devices for contacting students or parents and carers.
  - o Any pre-existing relationships which could undermine this, will be discussed with the DSL and Head Teacher.
- If a member of staff breaches our policy, action will be taken in line with our staff code of conduct and employee handbook.
- If a member of staff is thought to have illegal content saved or stored on a mobile phone or personal device, or have committed a criminal offence using a personal device or mobile phone, the police will be contacted and the LADO (Local Authority Designated Officer) will be informed in line with our allegations policy.

### **Student's use of personal devices and mobile phones**

- Students will be educated regarding the safe and appropriate use of personal devices and mobile phones and will be made aware of boundaries and consequences. They will be involved in the creation and updating of the school's mobile phone code of conduct.
  - o Learning Opportunities expects students' personal devices and mobile phones to be switched off, kept out of sight during lessons and while moving between lessons.
- If a student needs to contact his/her parents or carers they will be allowed to use the school office phone.

- o Parents / carers are advised to contact their child via the school office; exceptions may be permitted on a case-by-case basis, as approved by the Head Teacher.
- Mobile phones or personal devices will not be used by students during lessons or formal educational time.
- Mobile phones and personal devices must not be taken into examinations.
  - o Students found in possession of a mobile phone or personal device during an exam will be reported to the appropriate examining body. This may result in the withdrawal from either that examination or all examinations.
- If a student breaches the policy, the phone or device may be confiscated and held in a secure place.
  - o Staff may confiscate a student's mobile phone or device if they believe it is being used to contravene our child protection, behaviour or anti-bullying policy.
  - o Students mobile phones or devices may be searched by a member of the leadership team, with the consent of the student or a parent/ carer. Content may be deleted or requested to be deleted, if it contravenes our policies in line with the DfE 'Searching, Screening and Confiscation' guidance.
  - o Mobile phones and devices that have been confiscated will be released to student's or parents/ carers at the end of the day.
  - o If there is suspicion that material on a student's personal device or mobile phone may be illegal, or may provide evidence relating to a criminal offence, the device will be handed over to the police for further investigation.

#### **Visitors' use of personal devices and mobile phones**

- Parents/carers and visitors, including volunteers and contractors, should ensure that mobile phones and personal devices should not be used when in attending lessons.
- Appropriate signage and information is provided to inform parents/carers and visitors of expectations of use.
- Visitors, including volunteers and contractors, who are on site for regular or extended periods of time are expected to use their mobile phones and personal devices in accordance with our acceptable use of technology policy and other associated policies, including but not limited to anti-bullying, behaviour, child protection and image use.
- Members of staff are expected to challenge visitors if they have concerns and inform the DSL or Head Teacher of any breaches of our policy.

#### **Responding to Online Safety Incidents**

- All members of the community will be made aware of the reporting procedure for online safety concerns, including breaches of filtering, peer on peer abuse, including cyberbullying and youth produced sexual imagery (sexting), online sexual violence and harassment, online abuse and exploitation and illegal content.
- All members of the community will respect confidentiality and the need to follow the official procedures for reporting concerns.
  - o Students, parents / carers and staff will be informed of our complaints procedure and staff will be made aware of the whistleblowing procedure.
- We require staff, parents, carers and students to work in partnership with us to resolve online safety issues.
- After any investigations are completed, leadership staff will debrief, identify lessons learnt and implement any policy or curriculum changes, as required.
- If we are unsure how to proceed with an incident or concern, the DSL will seek advice from the Education Safeguarding Service.
- Where there is a concern that illegal activity has taken place, we will contact the police using 101, or 999 if there is immediate danger or risk of harm as appropriate.

- If information relating to a specific incident or a concern needs to be shared beyond our school, for example if other local settings are involved or the wider public may be at risk, the DSL and/or Head Teacher will speak with the police and/or the Education Safeguarding Service first, to ensure that potential criminal or child protection investigations are not compromised.

### **Concerns about student online behaviour and/or welfare**

- The DSL will be informed of all online safety concerns involving safeguarding or child protection risks in line with our child protection policy.
- All concerns about students will be recorded in line with our child protection policy.
- Learning Opportunities recognises that whilst risks can be posed by unknown individuals or adults online, students can also abuse their peers; all online peer on peer abuse concerns will be responded to in line with our child protection and behaviour policies.
- The DSL will ensure that online safety concerns are escalated and reported to relevant partner agencies in line with local policies and procedures.
- Appropriate sanctions and/or pastoral/welfare support will be offered to students as appropriate. Civil or legal action will be taken if necessary.
- We will inform parents/carers of online safety incidents or concerns involving their child, as and when required.

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

- Any complaint about staff misuse will be referred to the Head Teacher, in accordance with our allegations against staff policy.
- Any allegations regarding a member of staff's online conduct will be discussed with the LADO (Local Authority Designated Officer).
- Appropriate disciplinary, civil and/or legal action will be taken in accordance with our staff code of conduct and employee handbook.
- Welfare support will be offered to staff as appropriate.

### **Concerns about parent/carer online behaviour and/or welfare**

- Concerns regarding parents/carers behaviour and/or welfare online will be reported to the Head Teacher and/or DSL. The Head Teacher and/or DSL will respond to concerns in line with existing policies, including but not limited to child protection, anti-bullying, complaints, allegations against staff, home-school agreements, acceptable use of technology and behaviour policy.
- Civil or legal action will be taken if necessary.
- Welfare support will be offered to parents/carers as appropriate.

### **Procedures for Responding to Specific Online Concerns**

#### **Online sexual violence and sexual harassment between children**

- Our Head Teacher, DSL and appropriate members of staff have accessed and understood the DfE "[Sexual violence and sexual harassment between children in schools and colleges](#)" (2021) guidance and part 5 of '[Keeping children safe in education](#)' 2021.
  - Full details of our response to peer on peer abuse, including sexual violence and harassment can be found in our safeguarding / child protection policy.



- Learning Opportunities recognises that sexual violence and sexual harassment between children can take place online. Examples may include;
  - Non-consensual sharing of sexual images and videos
  - Sexualised online bullying
  - Online coercion and threats
  - ‘Upskirting’, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of obtaining sexual gratification, or causing the victim humiliation, distress or alarm. It is a criminal offence
  - Unwanted sexual comments and messages on social media
  - Online sexual exploitation
- We will respond to concerns regarding online sexual violence and sexual harassment between children, regardless of whether the incident took place on our premises or using our equipment.
- If made aware of any concerns relating to online sexual violence and sexual harassment, we will:
  - immediately notify the DSL and act in accordance with our child protection and anti-bullying policies.
  - if content is contained on students personal devices, they will be managed in accordance with the DfE [‘searching screening and confiscation’](#) advice.
  - provide the necessary safeguards and support for all students involved, such as implementing safety plans, offering advice on blocking, reporting and removing online content, and providing appropriate counselling/pastoral support.
  - implement appropriate sanctions in accordance with our behaviour policy.
  - inform parents and carers, if appropriate, about the incident and how it is being managed.
  - If appropriate, make referrals to partner agencies, such as Children’s Social Work Service and/or the police.
  - if the concern involves children and young people at a different educational setting, the DSL will work in partnership with other DSLs to ensure appropriate safeguarding action is taken in the wider local community.
    - If a criminal offence has been committed, the DSL will discuss this with the police first to ensure that investigations are not compromised.
  - review the handling of any incidents to ensure that best practice was implemented, and policies/procedures are appropriate.
- Learning Opportunities recognises that internet brings the potential for the impact of any sexual violence and sexual harassment concerns to extend further than the local community, and for a victim or alleged perpetrator to become marginalised and excluded by online communities.
- Learning Opportunities recognises the potential for repeat victimisation in the future if abusive content continues to exist somewhere online.
- To help minimise concerns, Learning Opportunities will ensure that all members of the community are made aware of the potential social, psychological and criminal consequences of online sexual violence and sexual harassment by implementing a range of age and ability appropriate educational methods as part of our curriculum.
- We will ensure that all members of the school are aware of sources of support regarding online sexual violence and sexual harassment between students.

### **Youth produced sexual imagery (“sexting”)**

- Learning Opportunities recognises youth produced sexual imagery (also known as “sexting”) as a safeguarding issue; all concerns will be reported to and dealt with by the DSL.

- We will follow the advice as set out in the non-statutory UKCIS guidance: [‘Sexting in schools and colleges: responding to incidents and safeguarding young people’](#) and the local [KSCMP](#) guidance: “Responding to youth produced sexual imagery”.
  - Youth produced sexual imagery or ‘sexting’ is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts.
  - It is an offence to possess, distribute, show and make indecent images of children. The Sexual Offences Act 2003 defines a child, for the purposes of indecent images, as anyone under the age of 18.
- Learning Opportunities will ensure that all members of the school are made aware of the potential social, psychological and criminal consequences of creating or sharing youth produced sexual imagery by implementing preventative approaches, via a range of age and ability appropriate educational methods.
- We will ensure that all members of the school are aware of sources of support regarding the taking and sharing of youth produced sexual imagery.
- We will respond to concerns regarding youth produced sexual imagery, regardless of whether the incident took place on site or using setting provided or personal equipment.
- We will not:
  - view any suspected youth produced sexual imagery, unless there is no other option, or there is a clear safeguarding need or reason to do so.
    - If it is deemed necessary, the imagery will only be viewed where possible by the DSL, and any decision making will be clearly documented.
  - send, share, save or make copies of content suspected to be an indecent image/video of a child (i.e. youth produced sexual imagery) and will not allow or request learners to do so.
- If made aware of an incident involving the creation or distribution of youth produced sexual imagery, we will:
  - act in accordance with our child protection policies and the relevant local procedures.
  - ensure the DSL responds in line with the [UKCIS](#) and KSCMP guidance.
  - Store any devices containing potential youth produced sexual imagery securely
    - If content is contained on students personal devices, they will be managed in accordance with the DfE [‘searching screening and confiscation’](#) advice.
    - If a potentially indecent image has been taken or shared on our network or devices, we will act to block access to all users and isolate the image.
  - carry out a risk assessment in line with the [UKCIS](#) and KSCMP guidance which considers the age and vulnerability of students involved, including the possibility of carrying out relevant checks with other agencies.
  - inform parents/carers about the incident and how it is being managed and provide support and signposting, as appropriate.
  - make a referral to Children’s Social Work Service and/or the police, as deemed appropriate in line with the [UKCIS](#) and KSCMP guidance.
  - provide the necessary safeguards and support for students, such as offering counselling or pastoral support.
  - implement appropriate sanctions in accordance with our behaviour policy but taking care not to further traumatise victims where possible.
  - consider the deletion of images in accordance with the [UKCIS](#) guidance.
    - Images will only be deleted once the DSL has confirmed that other agencies do not need to be involved and are sure that to do so would not place a child at risk or compromise an investigation.
  - review the handling of any incidents to ensure that best practice was implemented; the leadership team will also review and update any management procedures, where necessary.

### Online abuse and exploitation (including child sexual abuse and sexual or criminal exploitation)

- Learning Opportunities recognises online abuse and exploitation, including sexual abuse and sexual or criminal exploitation, as a safeguarding issue and all concerns will be reported to and dealt with by the DSL (or deputy), in line with our child protection policy.
- Learning Opportunities will ensure that all members of the school are aware of online child abuse and sexual or criminal exploitation, including the possible grooming approaches which may be employed by offenders to target learners, and understand how to respond to concerns.
- We will implement preventative approaches for online child abuse and exploitation via a range of age and ability appropriate education for students, staff and parents/carers. This will be delivered through the PSHE and Computing curriculum and additional events including Safer Internet Day.
- We will ensure that all members of the community are aware of the support available regarding online child abuse and exploitation, both locally and nationally.
- We will ensure that the 'Click CEOP' report button used to report online child sexual abuse is visible and available to learners and other members of our school. This will be available on the school website.
- If made aware of an incident involving online child abuse and/or exploitation, we will:
  - o act in accordance with our child protection policies and the relevant KSCMP procedures.
  - o store any devices containing evidence securely.
    - If content is contained on learners personal devices, they will be managed in accordance with the DfE ['searching screening and confiscation'](#) advice.
    - If any evidence is stored on our network or devices, we will act to block access to other users and isolate the content.
  - o if appropriate, make a referral to Children's Social Work Service and inform the police via 101, or 999 if a student is at immediate risk.
  - o carry out a risk assessment which considers any vulnerabilities of student(s) involved, including carrying out relevant checks with other agencies.
  - o inform parents/carers about the incident and how it is being managed and provide support and signposting, as appropriate.
  - o provide the necessary safeguards and support for students, such as, offering counselling or pastoral support.
  - o review the handling of any incidents to ensure that best practice is implemented; leadership team will review and update any management procedures, where necessary.
- We will respond to concerns regarding online abuse and exploitation, regardless of whether the incident took place on our premises or using setting provided or personal equipment.
  - o Where possible and appropriate, students will be involved in decision-making. If appropriate, they will be empowered to report concerns themselves with support, for example if the concern relates to online sexual abuse via CEOP: [www.ceop.police.uk/safety-centre/](http://www.ceop.police.uk/safety-centre/)
- If we are unclear whether a criminal offence has been committed, the DSL will obtain advice immediately through the Education Safeguarding Service and/or police.
- If made aware of intelligence or information which may relate to child sexual exploitation (on or offline), it will be passed through to the police by the DSL.
- If members of the public or students at other settings are believed to have been targeted, the DSL will seek advice from the police and/or the Education Safeguarding Service before sharing specific information to ensure that potential investigations are not compromised.

## Indecent Images of Children (IIOC)

- Learning Opportunities will ensure that all members of the school are made aware of the possible consequences of accessing Indecent Images of Children (IIOC) as appropriate to the age and ability.
- We will respond to concerns regarding IIOC on our equipment and/or personal equipment, even if access took place off site.
- We will seek to prevent accidental access to IIOC by implementing appropriate filtering, firewalls and anti-spam software.
- If we are unclear if a criminal offence has been committed, the DSL will obtain advice immediately through the police and/or the Education Safeguarding Service.
- If made aware of IIOC, we will:
  - act in accordance with our child protection policy and the relevant KSCMP procedures.
  - store any devices involved securely.
  - immediately inform appropriate organisations, such as the IWF and police.
- If made aware that a member of staff or a student has been inadvertently exposed to indecent images of children, we will:
  - ensure that the DSL is informed.
  - ensure that the URLs (webpage addresses) which contain the suspect images are reported to the IWF via [www.iwf.org.uk](http://www.iwf.org.uk).
  - ensure that any copies that exist of the image, for example in emails, are deleted.
  - report concerns, as appropriate to parents and carers.
- If made aware that indecent images of children have been found on the setting provided devices, we will:
  - ensure that the DSL (or deputy) is informed.
  - ensure that the URLs (webpage addresses) which contain the suspect images are reported to the IWF via [www.iwf.org.uk](http://www.iwf.org.uk).
  - inform the police via 101 or 999 if there is an immediate risk of harm, and Children's Social Work Service, as appropriate.
  - only store copies of images (securely, where no one else has access to them and delete all other copies) following a written request from the police.
  - report concerns, as appropriate to parents/carers.
- If made aware that a member of staff is in possession of indecent images of children on school provided devices, we will:
  - ensure that the Head Teacher is informed in line with our managing allegations against staff policy.
  - inform the Local LADO and other relevant organisations in accordance with our managing allegations against staff policy.
  - quarantine any devices until police advice has been sought.

## Cyberbullying

Cyberbullying, along with all other forms of bullying, will not be tolerated at Learning Opportunities. Full details of how we will respond to cyberbullying are set out in our anti-bullying policy.

## Online hate

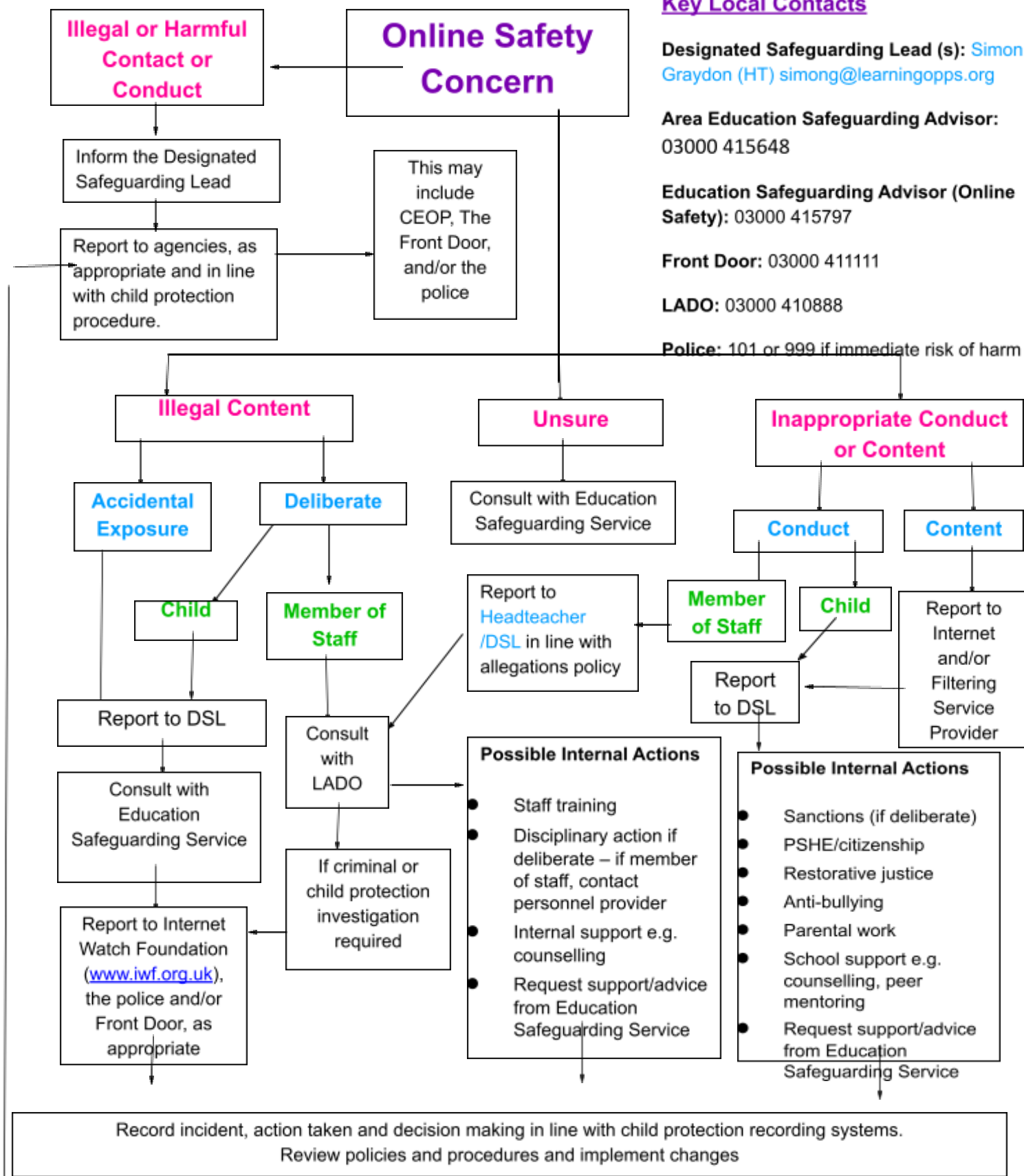
- Online hate content, directed towards or posted by, specific members of the school will not be tolerated at Learning Opportunities and will be responded to in line with existing policies, including child protection, anti-bullying and behaviour.
- All members of the school will be advised to report online hate in accordance with relevant policies and procedures.
- The police will be contacted if a criminal offence is suspected.
- If we are unclear on how to respond, or whether a criminal offence has been committed, the DSL (or deputy) will obtain advice through the Education Safeguarding Service and/or the police.

#### **Online radicalisation and extremism**

- As listed in this policy, we will take all reasonable precautions to ensure that students and staff are safe from terrorist and extremist material when accessing the internet on site.
- If we are concerned that a student or adult may be at risk of radicalisation online, the DSL will be informed immediately, and action will be taken in line with our child protection policy.

If we are concerned that a member of staff may be at risk of radicalisation online, the Head Teacher will be informed immediately, and action will be taken in line with the child protection and allegations policies.

# Responding to an Online Safety Concern Flowchart



## Key Local Contacts

Designated Safeguarding Lead (s): [Simon Graydon \(HT\) simong@learningopps.org](mailto:simong@learningopps.org)

Area Education Safeguarding Advisor: 03000 415648

Education Safeguarding Advisor (Online Safety): 03000 415797

Front Door: 03000 411111

LADO: 03000 410888

Police: 101 or 999 if immediate risk of harm

Record incident, action taken and decision making in line with child protection recording systems.  
Review policies and procedures and implement changes

## Useful Links

### Kent Educational Setting Support and Guidance

#### Education Safeguarding Service, The Education People:

- 03000 415797
  - Rebecca Avery, Education Safeguarding Advisor (Online Protection)
  - Ashley Assiter, Online Safety Development Officer
- Guidance for Educational Settings:
  - [www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding](http://www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding)
  - [www.theeducationpeople.org/blog/?tags=Online+Safety&page=1](http://www.theeducationpeople.org/blog/?tags=Online+Safety&page=1)

**KSCMP:** [www.kscb.org.uk](http://www.kscb.org.uk)

#### Kent Police:

- [www.kent.police.uk](http://www.kent.police.uk) or [www.kent.police.uk/internetsafety](http://www.kent.police.uk/internetsafety)
- In an emergency (a life is in danger or a crime in progress) dial 999. For non-urgent enquiries, contact Kent Police via 101

#### Front Door:

- The Front Door can be contacted on 03000 41 11 11
- Out of hours (after 5pm / Urgent calls only) please contact: 03000 41 91 91

#### Early Help and Preventative Services:

[www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-contacts](http://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-contacts)

#### Other:

- EIS - ICT Support for Schools and Kent Schools Broadband Service Desk: [www.eisit.uk](http://www.eisit.uk)

### National Links and Resources for Settings, Students and Parents/carers

- CEOP:
  - [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
  - [www.ceop.police.uk](http://www.ceop.police.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- UK Council for Internet Safety (UKCIS): [www.gov.uk/government/organisations/uk-council-for-internet-safety](http://www.gov.uk/government/organisations/uk-council-for-internet-safety)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
  - Professional Online Safety Helpline: [www.saferinternet.org.uk/about/helpline](http://www.saferinternet.org.uk/about/helpline)
  - Report Harmful Content: <https://reportharmfulcontent.com/>
- 360 Safe Self-Review tool for schools: [www.360safe.org.uk](http://www.360safe.org.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)

- o Step Up Speak Up – Online Sexual Harassment Guidance:  
[www.childnet.com/resources/step-up-speak-up/guidance-and-training-for-schools-and-professionals](http://www.childnet.com/resources/step-up-speak-up/guidance-and-training-for-schools-and-professionals)
- o Cyberbullying Guidance: [www.childnet.com/resources/cyberbullying-guidance-for-schools](http://www.childnet.com/resources/cyberbullying-guidance-for-schools)
  
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
  
- Parent Zone: <https://parentzone.org.uk>
  
- Parent Info: <https://parentinfo.org>
  
- NSPCC: [www.nspcc.org.uk/onlinesafety](http://www.nspcc.org.uk/onlinesafety)
  - o ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
  - o Net Aware: [www.net-aware.org.uk](http://www.net-aware.org.uk)
  
- Lucy Faithfull Foundation: [www.lucyfaithfull.org](http://www.lucyfaithfull.org)
  
- The Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
  
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)
  
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)