# Northcote Primary School

## On-line Safety Policy

Review date: September 2024

**Key people**

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| Northcote School | Designated Safeguarding Lead (DSL) team | Ms L McCullock<br>Mrs G Langley<br>Mrs K Manley<br>Mr R Morgan<br>Mrs J Monks<br>Mrs S Scott<br>Mrs L Hearnshaw |
| | Online-safety lead | Mrs L McCullock |
| | Online-safety / safeguarding link governor | Heather Harris |
| | PSHE/RSHE lead | Miss A Turner |
| | Network manager / other technical support | Ben Watts MGL |

**Introduction**

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. Accordingly, this policy is written in line with 'Keeping Children Safe in Education' 2020 (KCSIE), 'Teaching Online Safety in Schools' 2019, statutory RSHE guidance 2019 and other statutory documents. It complements existing and forthcoming subjects including Health, Relationships and Sex Education, Citizenship and Computing; and it is designed to sit alongside our school's statutory Safeguarding Policy.

**What are the main online safety risks today?**

Online-safety risks are traditionally categorised as one of the 3 Cs: Content, Contact or Conduct (identified by Professor Tanya Byron's 2008 report "Safer children in a digital world"). These three areas remain a helpful way to understand the risks and potential school response, whether technological or educational. They do not stand in isolation, however, and it is important to understand the interplay between all three.
Many of these new risks are mentioned in KCSIE 2020, e.g. extra-familial harms where children are at risk of abuse or exploitation to multiple harms in situations outside their families including sexual Exploitation, criminal exploitation, serious youth violence, upskirting and sticky design.

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

- Posted on the school website
- Available on staff drive in the policies folder
- Available in paper format in the staffroom
- Part of school induction pack for all new staff (including temporary, supply and non-classroom-based staff)
- Integral to safeguarding updates and training for all staff (especially in September refreshers)
- Clearly reflected in the Acceptable Use Policies (AUPs) for staff, volunteers, contractors, governors, pupils and parents/carers (which must be in accessible language appropriate to these groups).
- AUPs issued to whole school community, on entry to the school, with annual reminders of where to find them if unchanged, and reissued if updated after annual review
- Guidance displayed in appropriate classrooms/corridors (not just in Computing corridors/classrooms)
- Reviews of this online-safety policy will include input from staff, pupils and other stakeholders, helping to ensure further engagement

**Overview**

**Aims**

This policy aims to:

- Set out expectations for all Northcote School community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline)
- Help all stakeholders to recognise that online/digital behaviour standards (including social media activity) must be upheld beyond the confines of the school gates and school day, and regardless of device or platform
- Facilitate the safe, responsible and respectful use of technology to support teaching & learning, increase attainment and prepare children and young people for the risks and opportunities of today's and tomorrow's digital world, to survive and thrive online
- Help school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
    - for the protection and benefit of the children and young people in their care, and
    - for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice
    - for the benefit of the school, supporting the school ethos, aims and objectives, and protecting the reputation of the school and profession
- Establish clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as our Behaviour Policy)

This policy applies to all members of the Northcote School community (including teaching and support staff, supply teachers and tutors engaged under the DfE National Tutoring Programme, governors, volunteers, contractors, students/pupils, parents/carers, visitors and community users) who have

access to our digital technology, networks and systems, whether on-site or remotely, and at any time, or who use technology in their school role.

**Roles and responsibilities**

We have a duty to behave respectfully online and offline. We should report any concerns or inappropriate behavior following our safeguarding procedures.

**Headteacher Key responsibilities:**

- Support safeguarding leads and technical staff as they review protections for **pupils in the home** and **remote-learning** procedures, rules and safeguards (see coronavirus.lgfl.net/safeguarding for an addendum to policies and an infographic overview of safeguarding considerations for remote teaching technology.
- Foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding
- Oversee the activities of the designated safeguarding lead and ensure that the DSL responsibilities listed in the section below are being followed and fully supported
- Ensure that policies and procedures are followed by all staff
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and relevant Local Safeguarding Partnerships
- Liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including cloud systems are implemented according to child-safety first principles
- Be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles
- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
- Ensure that there is a system in place to monitor and support staff (e.g. network manager) who carry out internal technical online-safety procedures
- Ensure governors are regularly updated on the nature and effectiveness of the school's arrangements for online safety
- Ensure the school website meets statutory requirements (see appendices for website audit document)

**Designated Safeguarding Lead / Online Safety Lead**

**Key responsibilities**

- The designated safeguarding lead will take **lead responsibility** for safeguarding and child protection [including online safety]
- Work with the SLT and technical staff to review protections for **pupils in the home** and **remote-learning** procedures, rules and safeguards.

- Ensure “An effective approach to online safety that empowers school to protect and educate the whole school in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.
- Liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- Take day-to-day responsibility for online safety issues and be aware of the potential for serious child protection concerns
- Remind staff of safeguarding considerations as part of a review of remote learning procedures and technology, including that the same principles of online safety and behaviour apply
- Work with the Headteacher, DPO and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Stay up to date with the latest trends in online safeguarding and undertake Prevent awareness training.
- Review and update this policy, other online safety documents (e.g. Acceptable Use Policies) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others) and submit for review to the governors.
- Receive regular updates in online safety issues and legislation, be aware of local and school trends.
- Ensure that online safety education is embedded across the curriculum in line with the statutory RSHE guidance (e.g. by use of the updated UKCIS framework ‘Education for a Connected World – 2020 edition’) and beyond, in wider school life
- Promote an awareness of and commitment to online safety throughout the school community, with a strong focus on parents, who are often appreciative of school support in this area, but also including hard-to-reach parents.
- Communicate regularly with SLT and the designated safeguarding and online safety governor/committee to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring work and have been functioning/helping.
- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident.
- Ensure adequate provision for staff to flag issues when not in school and for pupils to disclose issues when off site, especially when in isolation/quarantine/lockdown.
- Ensure the 2018 DfE guidance on sexual violence and harassment is followed throughout the school and that staff adopt a zero-tolerance approach to this, as well as to bullying

**Governing Body, led by Online Safety / Safeguarding Link Governor –**
**Key responsibilities (quotes are taken from Keeping Children Safe in Education 2020)**

- Approve this policy and strategy and subsequently review its effectiveness, e.g. by asking the questions in the helpful document from the UK Council for Child Internet Safety (UKCIS).
- Ask about how the school has reviewed protections for **pupils in the home** (including when with online tutors) and **remote-learning** procedures, rules and safeguards

- Ensure an appropriate **senior member** of staff, from the school, is appointed to the role of DSL with **lead responsibility** for safeguarding and child protection (including online safety) with the appropriate status and authority [and] time, funding, training, resources and support.
- Support the school in encouraging parents and the wider community to become engaged in online safety activities
- Have regular strategic reviews with the online-safety co-ordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings
- Work with the DPO, DSL and Headteacher to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Check all school staff have read Part 1 of KCSIE; SLT and all working directly with children have read Annex A; check that Annex C on Online Safety reflects practice in your school
- Ensure that all staff undergo safeguarding and child protection training (including online safety) at induction.
- The training should be regularly updated in line with advice from the local three safeguarding partners, integrated, aligned and considered as part of the overarching safeguard approach.
- Ensure appropriate filters and appropriate monitoring systems are in place which do not lead to 'overblocking', with unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.
- Ensure that children are taught about safeguarding, including online safety as part of providing a broad and balanced curriculum, which incorporates 'Education for a Connected World – 2020 edition'.

**All staff**

**Key responsibilities:**

- Pay attention to safeguarding provisions for **home-learning** and **remote- teaching technologies**.
- Recognise that **RSHE** is a whole-school subject requiring the support of all staff; online safety has become core to this new subject
- Understand that online safety is a core part of safeguarding; as such it is part of everyone's job – never think that someone else will pick it up
- Know who the Designated Safeguarding Lead (DSL) and Online Safety Lead (OSL) are.
- Read Part 1, Annex A and Annex C of Keeping Children Safe in Education (whilst Part 1 is statutory for all staff, Annex A for SLT and those working directly with children, it is good practice for all staff to read all three sections).
- Read and follow this policy in conjunction with the school's main safeguarding policy
- Record online-safety incidents in the same way as any safeguarding incident and report in accordance with school procedures.
- **Understand that safeguarding is often referred to as a jigsaw puzzle – you may have discovered the missing piece so do not keep anything to yourself.**
- Sign and follow the staff acceptable use policy and code of conduct/handbook.
- Notify the DSL/OSL if policy does not reflect practice in your school and follow escalation procedures if concerns are not promptly acted upon
- Identify opportunities to thread online safety through all school activities as part of a whole school approach in line with the RSHE curriculum, both outside the classroom and within the curriculum, supporting curriculum/ Key stage/subject leads, and making the most of unexpected

learning opportunities as they arise

- Whenever overseeing the use of technology in school or for homework or remote teaching, encourage and talk about appropriate behaviour and how to get help and consider potential risks and the age-appropriateness of websites (find out what appropriate filtering and monitoring systems are in place).
- When supporting pupils remotely, be mindful of additional safeguarding considerations – refer to the 20 Safeguarding Principles for Remote Lessons infographic which applies to all online learning
- Carefully supervise and guide pupils when engaged in learning activities involving online technology, supporting them with search skills, critical thinking, age appropriate materials and signposting, and legal issues such as copyright and GDPR.
- Be aware of security best-practice at all times, including password hygiene and phishing strategies.
- Prepare and check all online source and resources before using
- Encourage pupils to follow their acceptable use policy at home as well as at school, remind them about it and enforce school sanctions.
- Notify the DSL of new trends and issues before they become a problem
- Take a zero-tolerance approach to bullying and low-level sexual harassment.
- Be aware that you are often most likely to see or overhear online-safety issues (particularly relating to bullying and sexual harassment and violence) in the playground, corridors, toilets and other communal areas outside the classroom – let the DSL know
- Receive regular updates from the DSL and have a healthy curiosity for online safeguarding issues
- Model safe, responsible and professional behaviours in their own use of technology. This includes outside the school hours and site, and on social media, in all aspects upholding the reputation of the school and of the professional reputation of all staff.

**PSHE / RSHE Lead**

**Key responsibilities:**

- As listed in the 'all staff' section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online into the PSHE / Relationships education, relationships and sex education (RSE) and health education curriculum. "This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age appropriate way that is relevant to their pupils' lives."
- This will complement the computing curriculum, which covers the principles of online safety at all key stages, with progression in the content to reflect the different and escalating risks that pupils face. This includes how to use technology safely, responsibly, respectfully and securely, and where to go for help and support when they have concerns about content or contact on the internet or other online technologies.
- Work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSHE.
- Note that an RSHE policy should now be included on the school website.
- Work closely with the Computing lead to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach

**Computing Lead**

**Key responsibilities:**

- As listed in the 'all staff' section, plus:
- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum
- Work closely with the RSHE lead to avoid overlap but ensure a complementary whole-school approach
- Work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements

**Subject Leaders Key**

**responsibilities:**

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

**Network Manager/technician – MGL**

**Key responsibilities:**

- As listed in the 'all staff' section, plus:
- Support the HT and DSL team as they review protections for remote-learning procedures, rules and safeguards.
- Keep up to date with the school's online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- Meet the RSHE lead to see how the online-safety curriculum delivered through this new subject can complement the school IT system and vice versa, and ensure no conflicts between educational messages and practice.
- Work closely with the designated safeguarding lead / online safety lead / data protection officer to ensure that school systems and networks reflect school policy

- Ensure the above stakeholders understand the consequences of existing services and of any changes to these systems (especially in terms of access to personal and sensitive records / data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms.
- Support and advise on the implementation of 'appropriate filtering and monitoring' as decided by the DSL and senior leadership team
- Maintain up-to-date documentation of the school's online security and technical procedures
- To report online-safety related issues that come to their attention in line with school policy
- Manage the school's systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption and backup for data, including disaster recovery plans, and auditable access controls
- Monitor the use of school technology, online platforms and social media presence and that any misuse/attempted misuse is identified and reported in line with school policy
- Work with the Headteacher to ensure the school website meets statutory DfE requirements.

**Data Protection**

**Key responsibilities:**

- Be aware that of references to the relationship between data protection and safeguarding in key Department for Education documents 'Keeping Children Safe in Education' and 'Data protection: a toolkit for schools' (August 2018), especially this quote from the latter document:
- GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. **The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent** (DPA, Part 2, 18; Schedule 8, 4) When Designated Safeguarding Leads in schools are considering whether, or not, to share safeguarding information (especially with other agencies) it is considered best practice for them to record who they are sharing that information with and for what reason. If they have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file. All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of children.
- Work with the DSL, Headteacher and governors to ensure frameworks are in place for the protection of data and of safeguarding information sharing as outlined above.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited

**Volunteers and contractors (including tutors)**

**Key responsibilities:**

- Read, understand, sign and adhere to an acceptable use policy (AUP)

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

**Pupils**

**Key responsibilities:**

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

**Parents/carers**

**Key responsibilities:**

- Read, sign and promote with your child, the school's acceptable use policy (AUP)
- Consult with the school if they have any concerns about their children's and others' use of technology
- Promote positive online safety and model safe, responsible and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers.
- Encourage children to engage fully in home-learning during any period of isolation/quarantine or bubble/school closure and flag any concerns
- Support the child during remote learning to avoid video calls in a bedroom if possible and if not, to ensure the child is fully dressed and not in bed, with the camera pointing away from beds/bedding/personal information etc. and the background blurred or changes where possible.
- If organising private online tuition, remain in the room if possible, ensure the child knows tutors

should not arrange new sessions directly with the child or attempt to communicate privately.

**Education and curriculum**

It is the role of all staff to identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils). Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc.) in school or setting as homework tasks, all staff should encourage sensible use, monitor what pupils/students are doing and consider potential dangers and the age appropriateness of websites. Equally, all staff should carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular, extended school activities if relevant and remote teaching), supporting them with search skills, critical thinking (e.g. fake news), age appropriate materials and signposting, and legal issues such as copyright and data law. saferesources.lgfl.net has regularly updated theme-based resources, materials and signposting for teachers and parents.

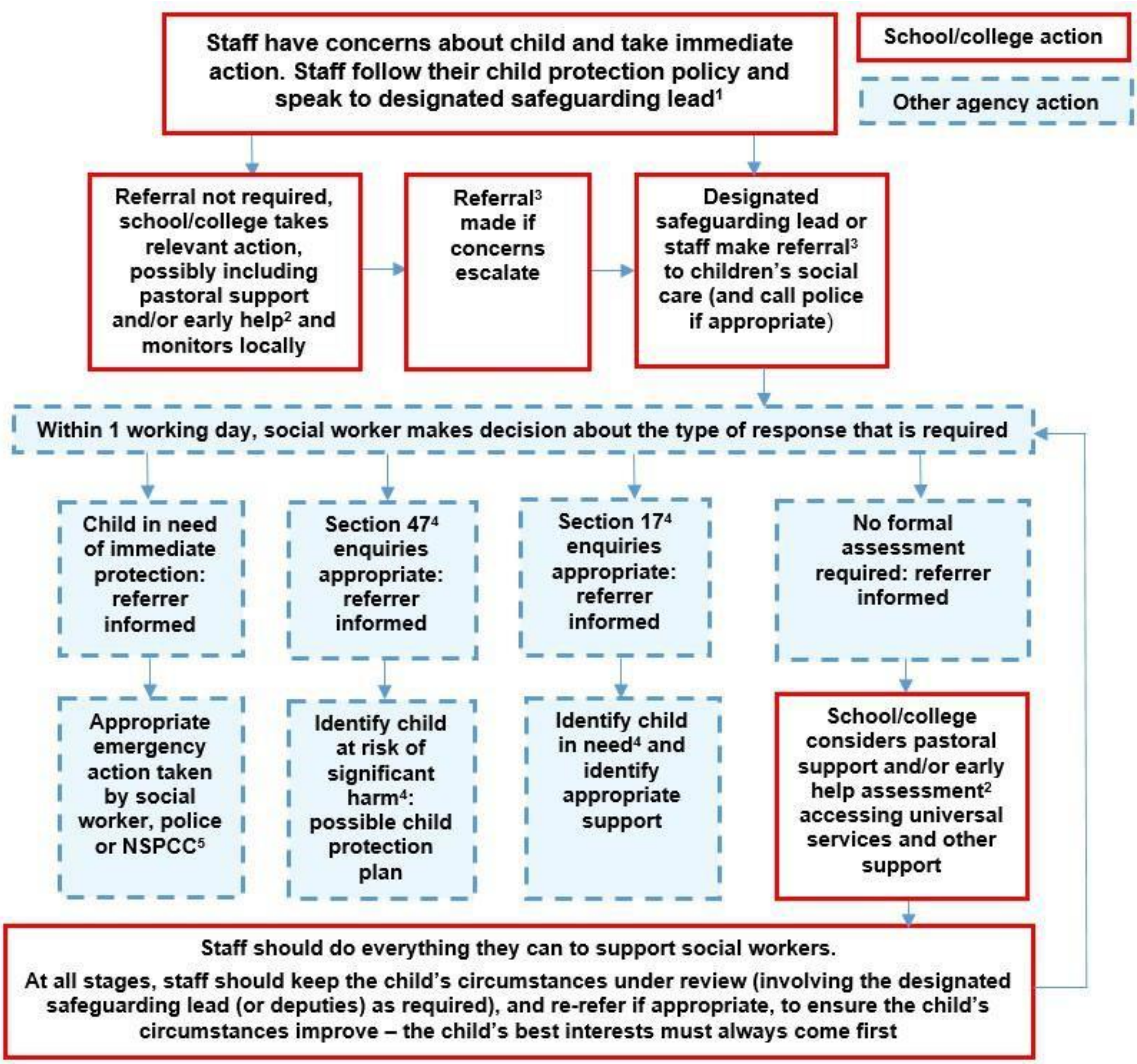
**Handling online-safety concerns and incidents**

It is vital that all staff recognise that online-safety is a part of safeguarding (as well as being a curriculum strand of Computing, PSHE/RSHE and Citizenship.

This school commits to take all reasonable precautions to ensure online safety, but recognises that incidents will occur both inside school and outside school (and that those from outside school will continue to impact on pupils when they come into school or during extended periods away from school. All members of the school are encouraged to report issues swiftly to allow us to deal with them quickly and sensitively through the school's escalation processes.
Any suspected online risk or infringement should be reported to the online safety lead / designated safeguarding lead on the same day – where clearly urgent, it will be made by the end of the lesson. Northcote safeguarding procedures should be followed, as outlined in our school safeguarding policy.Any concern/allegation about staff misuse is always referred directly to the Headteacher, unless the concern is about the Headteacher in which case the compliant is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer). Staff may also use the NSPCC Whistleblowing Helpline. The school will actively seek support from other agencies as needed (i.e. the local authority, LGfL, UK Safer Internet Centre's Professionals' Online Safety Helpline, NCA CEOP, Prevent Officer, Police, IWF). We will inform parents/carers of online-safety incidents involving their children, and the Police where staff or pupils engage in or are subject to behaviour which we consider is particularly disturbing or breaks the law (particular procedures are in place for sexting and upskirting; see section below).

**Actions where there are concerns about a child**

As outlined previously, online safety concerns are no different to any other safeguarding


School/college action
Other agency action
Staff have concerns about child and take immediate action. Staff follow their child protection policy and speak to designated safeguarding lead[1]
Referral not required, school/college takes relevant action, possibly including pastoral support and/or early help[2] and monitors locally
Referral[3] made if concerns escalate
Designated safeguarding lead or staff make referral[3] to children's social care (and call police if appropriate)
Within 1 working day, social worker makes decision about the type of response that is required
Child in need of immediate protection: referrer informed
Section 47[4] enquiries appropriate: referrer informed
Section 17[4] enquiries appropriate: referrer informed
No formal assessment required: referrer informed
Appropriate emergency action taken by social worker, police or NSPCC[5]
Identify child at risk of significant harm[4]: possible child protection plan
Identify child in need[4] and identify appropriate support
School/college considers pastoral support and/or early help assessment[2] accessing universal services and other support
Staff should do everything they can to support social workers.
At all stages, staff should keep the child's circumstances under review (involving the designated safeguarding lead (or deputies) as required), and re-refer if appropriate, to ensure the child's circumstances improve – the child's best interests must always come first

### Sexting

Northcote School refers to the UK Council for Internet Safety (UKCIS) guidance on sexting in schools.
NB - where one of the parties is over 18, this is no longer sexting but child sexual abuse.
A one-page overview called Sexting; how to respond to an incident is displayed in the staff room for all staff (not just classroom-based staff) to read, in recognition of the fact that it is mostly someone other than the designated safeguarding lead (DSL) or online safety lead to first become aware of an incident, and it is vital that the correct steps are taken. **Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL.**
The school DSL will in turn use the full guidance document, Sexting in Schools and Colleges to decide next steps and whether other agencies need to be involved.
It is important that everyone understands that whilst sexting is illegal, pupils/students can come and talk to members of staff if they have made a mistake or had a problem in this area.
The documents referenced above and materials to support teaching about sexting can be found at sexting.lgfl.net

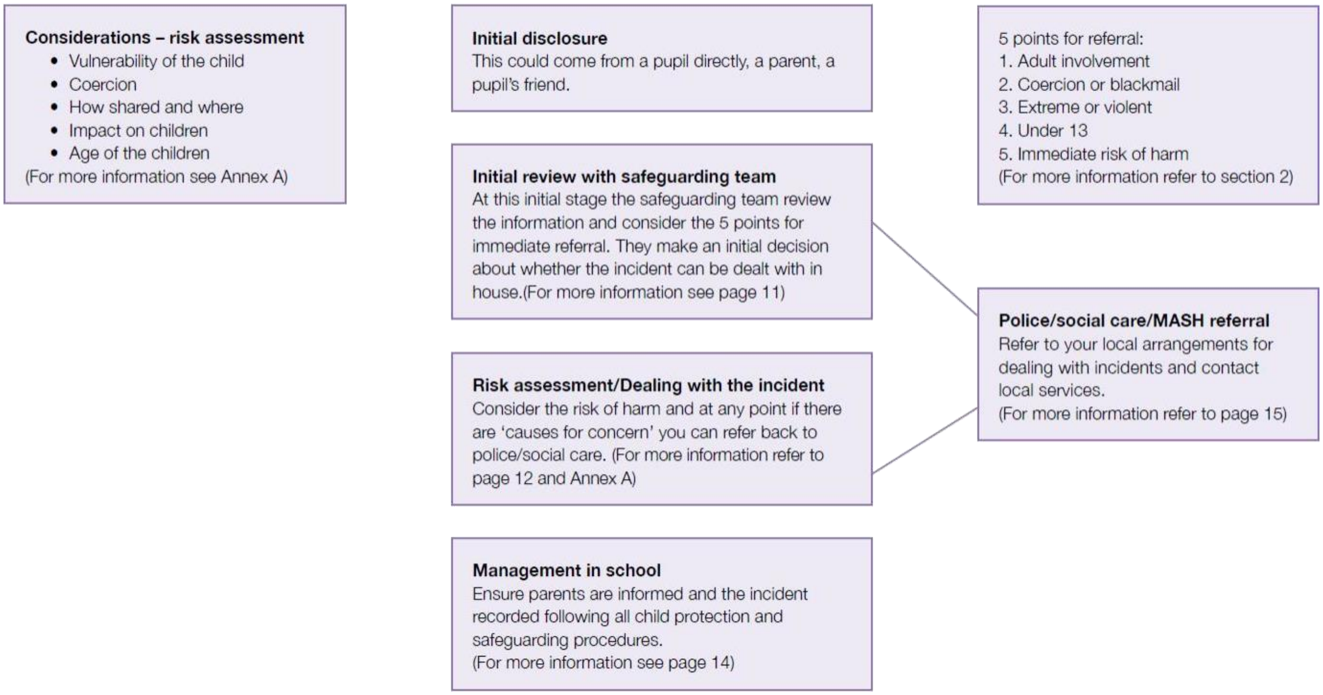
### Upskirting

Northcote School understands that upskirting (taking a photo of someone under their clothing, not necessarily a skirt) is now a criminal offence, as highlighted in Keeping Children Safe in Education. Pupils can come and talk to members of staff if they have made a mistake or had a problem in this area.

### Bullying

Online bullying, which may also be referred to as cyberbullying, including issues arising from banter, is treated like any other form of bullying.

Flowchart for responding to incidents



**Considerations – risk assessment**
- Vulnerability of the child
- Coercion
- How shared and where
- Impact on children
- Age of the children

(For more information see Annex A)

**Initial disclosure**
This could come from a pupil directly, a parent, a pupil's friend.

**Initial review with safeguarding team**
At this initial stage the safeguarding team review the information and consider the 5 points for immediate referral. They make an initial decision about whether the incident can be dealt with in house.(For more information see page 11)

**Risk assessment/Dealing with the incident**
Consider the risk of harm and at any point if there are 'causes for concern' you can refer back to police/social care. (For more information refer to page 12 and Annex A)

**Management in school**
Ensure parents are informed and the incident recorded following all child protection and safeguarding procedures.
(For more information see page 14)

5 points for referral:
1. Adult involvement
2. Coercion or blackmail
3. Extreme or violent
4. Under 13
5. Immediate risk of harm

(For more information refer to section 2)

**Police/social care/MASH referral**
Refer to your local arrangements for dealing with incidents and contact local services.
(For more information refer to page 15)

Materials to support teaching about bullying and useful Department for Education guidance and case studies are at bullying.lgfl.net

### Sexual violence and harassment

DfE guidance on sexual violence and harassment is referenced in Keeping Children Safe in Education and also a document in its own right

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

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

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

These are defined in the relevant Acceptable Use Policy as well as in this document, for example in the sections relating to the professional and personal use of school platforms/networks/clouds, devices and other technology,

Where pupils contravene these rules, the school behaviour policy will be applied; where staff contravene these rules, action will be taken as outlined in the staff code of conduct/handbook.

It will be necessary to reinforce these as usual at the beginning of any school year but also to remind pupils that the same applies for any home learning that may take place in future periods of closure/quarantine etc.

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

### Social media incidents

See the social media section later in this document for rules and expectations of behaviour for children and adults in Northcote School. These are also governed by school Acceptable Use Policies. Breaches will be dealt within line with the school behaviour policy (for pupils) or code of conduct/handbook (for staff).

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community, Northcote School will request that the post be deleted and will expect this to be actioned promptly.

Where an offending post has been made by a third party, the school may report it to the platform it is hosted on, and may contact the Professionals' Online Safety Helpline (run by the UK Safer Internet Centre) for support or help to accelerate this process.

## Data protection and data security

“GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children’s Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. The Data Protection Act 2018 introduced ‘safeguarding’ as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4) When Designated Safeguarding Leads in schools are considering whether, or not, to share safeguarding information (especially with other agencies) it is considered best practice for them to record who they are sharing that information with and for what reason. If they have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file. All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children.”

All pupils, staff, governors, volunteers, contractors and parents are bound by the school’s data protection policy and agreements.
The Headteacherand governors work together to ensure a GDPR-compliant framework for storing data, but which ensures that child protection is always put first and data-protection processes support careful and legal sharing of information.
Staff are reminded that all safeguarding data is highly sensitive and should be treated with the strictest confidentiality at all times, and only shared via approved channels to colleagues or agencies with appropriate permissions. The use of Egress to encrypt all non-internal emails is compulsory for sharing pupil data. If this is not possible, the DSL should be informed in advance.

## Appropriate filtering and monitoring

Keeping Children Safe in Education obliges schools to “ensure appropriate filters and appropriate monitoring systems are in place [and] not be able to access harmful or inappropriate material [but at the same time] be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.”
At this school, the internet connection is provided by MGL. This means we have a dedicated and secure, school safe connection that is protected with firewalls and multiple layers of security, including a web filtering system called Smooth Wall.
There are three types of appropriate monitoring identified by the Safer Internet Centre. These are:

1. Physical monitoring (adult supervision in the classroom, at all times)
2. Internet and web access
3. Active/Pro-active technology monitoring services

At Northcote School we have decided that options 1 and 2 are appropriate because children are usually supervised using the internet in school and to support this internet and web access is monitored through MGL.

**Email**

- Staff at this school use Outlook for all school emails

General principles for email use are as follows:

- SeeSaw are the only means of electronic communication to be used between staff and pupils / staff
  and parents (in both directions). Use of a different platform must be approved in advance by the Headteacher in advance. Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member).
- Email may only be sent using the email system above. There should be no circumstances where a
  private email is used; if this happens by mistake, the DSL/Headteacher should be informed immediately.
- Staff or pupil personal data should never be sent/shared/stored on email.
- If data needs to be shared with external agencies the Egress system will be used.
- Appropriate behaviour is expected at all times, and the system should not be used to send
  inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or
  compromise the professionalism of staff
- Staff are not allowed to use the email system for personal use. Emails using inappropriate language,
- images, malware or to adult sites may be blocked and not arrive at their intended destination.

**School website**

The school website is a key public-facing information portal for the school community (both existing
and prospective stakeholders) with a key reputational value.
Where staff submit information for the website, they are asked to remember:

- School have the same duty as any person or organisation to respect and uphold copyright law
  – schools have been fined thousands of pounds for copyright breaches. Sources must always be credited and material only used with permission.
- Where pupil work, images or videos are published on the website, their identities are protected and
  full names are not published.

**Cloud platforms**

SeeSaw is used as School Cloud platforms.
For online safety, basic rules of good password hygiene ("Treat your password like your toothbrush – never share
It with anyone!"), expert administration and training can help to keep staff and pupils safe, and to avoid incidents. The following principles apply:

- Privacy statements inform parents and children (13+) when and what sort of data is stored in the cloud

- The DPO approves new cloud systems, what may or may not be stored in them and by whom. This is

  noted in a DPIA (data-protection impact statement) and parental permission is sought
- Staff understand sharing functionality and should ensure that pupil data is not shared by mistake. Open access or widely shared folders are clearly marked as such
- Pupils and staff are only given access and/or sharing rights when they can demonstrate an understanding of what data may be stored and how it can be seen
- Two-factor authentication is used for access to staff or pupil data
- Pupil images/videos are only made public with parental permission
- Only school-approved platforms are used by students or staff to store pupil work
- All stakeholders understand the difference between consumer and education products (e.g. a private

  Gmail account or Google Drive and those belonging to a managed educational domain)

**Digital images and video**

When a pupil/student joins the school, parents/carers are asked if they give consent for their child's image to be captured in photographs or videos to be used on the Northcote School website and social media accounts (twitter).
Whenever a photo or video is taken/made, the member of staff taking it will check the latest database before
using it for any purpose.
Any pupils shown in public facing materials are never identified with more than first name (and photo
file names/tags do not include full names to avoid accidentally sharing them).
All staff are governed by their contract of employment and the school's Acceptable Use Policy, which covers
the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored.
At Northcote School, no member of staff will ever use their personal phone to capture photos or videos of pupils.
Photos are stored on the school network in line with the retention schedule of the school Data Protection Policy. Staff and parents are reminded annually about the importance of not sharing without permission, due to reasons of child protection data protection, religious or cultural reasons, or simply for reasons of personal privacy.
We encourage young people to think about their online reputation and digital footprint, so we should be good
adult role models by not oversharing.
Pupils are taught about how images can be manipulated in their online safety education programme and also
taught to consider how to publish for a wide range of audiences which might include governors, parents or
younger children.
Pupils are advised to be very careful about placing any personal photos on social media. They are taught
to understand the need to maintain privacy settings so as not to make public, personal information.

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

### Social Media

### Northcote School presence

Northcote works on the principle that if we don't manage our social media reputation, someone else will.

Online Reputation Management (ORM) is about understanding and managing our digital footprint (everything that can be seen or read about the school online). Few parents will apply for a school place without first 'googling' the school, and the Ofsted pre-inspection check includes monitoring what is being said online (Mumsnet is a favourite).

Negative coverage almost always causes some level of disruption. Up to half of all cases dealt with by the Professionals Online Safety Helpline (POSH: helpline@saferinternet.org.uk) involve schools' (and staff members') online reputation.

Accordingly, we manage and monitor our social media footprint carefully to know what is being said about the school and to respond to criticism and praise in a fair, responsible manner. **It should be noted that Northcote School does not have a Facebook account.**

### Staff, pupils' and parents' SM presence

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

This positive behaviour can be summarised as not making any posts which are or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which might bring the school or (particularly for staff) teaching profession into disrepute. This applies both to public pages and to private posts, e.g. parent chats, pages or groups.

If parents have a concern about the school, we would urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, the school complaints procedure should be followed.

Sharing complaints on social media is unlikely to help resolve the matter, but can cause upset to staff, pupils and parents, also undermining staff morale and the reputation of the school (which is important

for the pupils
we serve).
Many social media platforms have a minimum age of 13 (note that WhatsApp is 16+). We ask parents to
respect age ratings on social media platforms wherever possible and not encourage or condone underage use.
However, the school has to strike a difficult balance of not encouraging underage use at the same time as
needing to acknowledge reality in order to best help our pupils/students to avoid or cope with issues if they
arise. Online safety lessons will look at social media and other online behaviour, how to be a good friend
online and how to report bullying, misuse, intimidation or abuse. However, children will often learn most from
the models of behaviour they see and experience, which will often be from adults.
Parents can best support this by talking to their children about the apps, sites and games they use (you don't
need to know them – ask your child to explain it to you), with whom, for how long, and when (late at night
in bedrooms is not helpful for a good night's sleep and productive teaching and learning at school the next day).

The school has an official Twitter account but asks parents/carers not to use these channels to communicate

about their children.
Pupils/students are not allowed to be 'friends' with or make a friend request to any staff, governors, Volunteers and contractors or otherwise communicate via social media.

Staff are reminded that they are obliged not to bring the school or profession into disrepute and the easiest way
to avoid this is to have the strictest privacy settings and avoid inappropriate sharing and oversharing online.
They should never discuss the school or its stakeholders on social media and be careful that their personal
opinions might not be attributed to the school, trust or local authority, bringing the school into disrepute.
The serious consequences of inappropriate behaviour on social media are underlined by the fact that of the
131 Prohibition Orders issued to staff in 2017, 73 involved social media/technology (and 27 of the 66 orders
by August 2018).
All members of the school community are reminded that permission is sought before uploading photographs, videos or any other information about other people.
The statements of the Acceptable Use Policies (AUPs) which all members of the school community have signed
are also relevant to social media activity and Data Protection.

**Device usage**

Remind those with access to school devices about rules on the misuse of school technology –

devices used at home should be used just like if they were in full view of a teacher or colleague. Please read the following in conjunction with acceptable use policies and the following sections of this document which all impact upon device usage: copyright, data protection, and social media, misuse of technology, and digital images and video.

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

- **Pupils** are not allowed to bring mobile phones into school.
- **All staff who work directly with children** should leave their mobile phones on silent and only use them in private staff areas during school hours. See also the Digital images and video section and Data protection and data security section. Child/staff data should never be downloaded onto a private phone. If a staff member is expecting an important personal call when teaching or otherwise on duty, they should seek permission for this from the Headteacher. Any phone call should then be used in the private staff areas.
- **Volunteers, contractors, governors** should leave their phones in their pockets and turned on silent.
- Under no circumstances should they be used in the presence of children or to take photographs or videos. If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the Headteacher should be sought (the Headteacher may choose to delegate this) and this should be done in the presence of a member staff.

### Network / internet access on school devices

- **Pupils/students** are not allowed networked file access via personal devices.
- **All staff who work directly with children** should leave their mobile phones on silent and only use them in private staff areas during school hours. See also the Digital images and video section, Data protection and data security section. Child/staff data should never be downloaded onto a private phone.
- **Parents** have no access to the school network or wireless internet on personal devices.

### Trips / events away from school

For school trips/events away from school, teachers will be issued a school mobile phone and this number used for any authorised or emergency communications with pupils/students and parents. Any deviation from this policy (e.g. by mistake or because the school phone will not work) will be notified immediately to the Headteacher. Teachers using their personal phone in an emergency will ensure that the number is hidden to avoid a parent or student accessing a teacher's private phone number.

### Searching and confiscation

In line with the DfE guidance 'Searching, screening and confiscation: advice for schools', the Headteacher and
staff authorised by them have a statutory power to search pupils/property on school premises. This includes
the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material, including but not exclusive to sexual images, pornography, violence or bullying.