Online Safety Policy

October 2023

Policy Date:	October 2023
Director Approval:	

Statement of intent

Fulwell Infant School Academy understands that using online services is an important aspect of raising educational standards, promoting pupil achievement, and enhancing teaching and learning. The use of online services is embedded throughout the school; therefore, there are a number of controls in place to ensure the safety of pupils and staff.

The breadth of issues classified within online safety is considerable, but they can be categorised into four areas of risk:

- **Content**: Being exposed to illegal, inappropriate or harmful material, e.g. pornography, fake news, self-harm and suicide, and discriminatory or extremist views.
- **Contact**: Being subjected to harmful online interaction with other users, e.g. peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children.
- **Conduct**: Personal online behaviour that increases the likelihood of, or causes, harm, e.g. sending and receiving explicit messages, and cyber bullying.
- **Commerce**: Risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

The measures implemented to protect pupils and staff revolve around these areas of risk. Our school has created this policy with the aim of ensuring appropriate and safe use of the internet and other digital technology devices by all pupils and staff.

1. Legal framework

This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- Voyeurism (Offences) Act 2019
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2021) 'Harmful online challenges and online hoaxes'
- DfE (2023) 'Keeping children safe in education 2023'
- DfE (2023) 'Teaching online safety in school'
- DfE (2022) 'Searching, screening and confiscation'
- DfE (2023) 'Generative artificial intelligence in education'
- Department for Digital, Culture, Media and Sport and UK Council for Internet Safety (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- UK Council for Child Internet Safety (2020) 'Education for a Connected World – 2020 edition'
- National Cyber Security Centre (2018) 'Small Business Guide: Cyber Security' This

policy operates in conjunction with the following school policies:

- Allegations of Abuse Against Staff Policy
- Acceptable Use Agreement
- Child Protection and Safeguarding Policy
- Child-on-child Abuse Policy
- Anti-Bullying Policy
- Staff Code of Conduct
- Behaviour Policy
- Disciplinary Policy and Procedure
- Data Protection Policy
- Confidentiality Policy
- Photography Policy
- Prevent Duty Policy
- Remote Education Policy

2. Roles and responsibilities

The governing board will be responsible for:

- Ensuring that this policy is effective and complies with relevant laws and statutory guidance.
- Ensuring the DSL's remit covers online safety.
- Reviewing this policy.
- Ensuring their own knowledge of online safety issues is up-to-date.
- Ensuring all staff undergoes safeguarding and child protection training, including online safety, at induction and at regular intervals.
- Ensuring that there are appropriate filtering and monitoring systems in place.
- Ensuring that all relevant school policies have an effective approach to planning for and responding to, online challenges and hoaxes embedded within them.

The Headteacher will be responsible for:

- Ensuring that online safety is a running and interrelated theme throughout the school's policies and procedures, including in those related to the curriculum, teacher training and safeguarding.
- Taking the lead responsibility for online safety in the school.
- Supporting deputy DSL by ensuring they have enough time and resources to carry out their responsibilities in relation to online safety.
- Ensuring staff receive regular, up-to-date and appropriate online safety training and information as part of their induction and safeguarding training.
- Ensuring online safety practices are audited and evaluated.
- Organising engagement with parents to keep them up-to-date with current online safety issues and how the school is keeping pupils safe.
- Working with the Deputy DSL and ICT technicians to conduct **any** reviews of this policy.
- Working with the Deputy DSL and governing board to update this policy.

The Deputy DSL will be responsible for:

- Undertaking training so they understand the risks associated with online safety and can recognise additional risks that pupils with SEND face online.
- Liaising with relevant members of staff on online safety matters, e.g. the SENCO and ICT technicians.
- Ensuring online safety is recognised as part of the school's safeguarding responsibilities and that a coordinated approach is implemented.
- Ensuring safeguarding is considered in the school's approach to remote learning, when needed.
- Establishing a procedure for reporting online safety incidents and inappropriate internet use, both by pupils and staff, and ensuring all members of the school community understand this procedure.
- Maintaining records of reported online safety concerns as well as the actions taken in response to concerns.
- Monitoring online safety incidents to identify trends and any gaps in the school's provision, and using this data to update the school's procedures.
- Reporting to the governing board about online safety on a **termly** basis.
- Working with the Headteacher and ICT technicians to conduct reviews of this policy.
- Working with the Headteacher and governing board to update this policy.

ICT technicians will be responsible for:

- Providing technical support in the development and implementation of the school's online safety policies and procedures.
- Implementing appropriate security measures as directed by the Headteacher.
- Ensuring that the school's filtering and monitoring systems are updated as appropriate.
- Working with the DSL and Headteacher to conduct **half-termly** light-touch reviews of this policy.

All staff members will be responsible for:

- Taking responsibility for the security of ICT systems and electronic data they use or have access to.
- Modelling good online behaviours.
- Maintaining a professional level of conduct in their personal use of technology.
- Having an awareness of online safety issues.
- Ensuring they are familiar with, and understand, the indicators that pupils may be unsafe

online.
- Reporting concerns in line with the school's reporting procedure.
- Where relevant to their role, ensuring online safety is embedded in their teaching of the curriculum.

Pupils will be responsible for:

- Adhering to the Acceptable Use Agreement and other relevant policies (age appropriate and with adult support where necessary).
- Seeking help from school staff if they are concerned about something they or a peer have experienced online.
- Reporting online safety incidents and concerns to their classroom staff.

3. Managing online safety

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues affecting young people, particularly owing to the rise of social media and the increased prevalence of children using the internet.

The Headteacher has overall responsibility for the school's approach to online safety, with support from the deputy and will ensure that there are strong processes in place to handle any concerns about pupils' safety online. The Headteacher will liaise with the police or children's social care services for support responding to harmful online sexual behaviour.

The importance of online safety is integrated across all school operations in the following ways:

- Staff and governors receive regular training
- Staff meetings address any updates on online safety information and any changes to online safety guidance or legislation
- Online safety is integrated into learning throughout the curriculum
- Assemblies are conducted on the topic of remaining safe online

Handling online safety concerns

Any disclosures made by pupils to staff members about online abuse, harassment or exploitation, whether they are the victim or disclosing on behalf of another child, will be handled in line with the Child Protection and Safeguarding Policy.

Concerns regarding a staff member's online behaviour are reported to the Headteacher, who decides on the best course of action in line with the relevant policies. If the concern is about the Headteacher, it is reported to the chair of governors.

Concerns regarding a pupil's online behaviour are reported to the DSL, who investigates concerns with relevant staff members, e.g. the Headteacher and ICT technicians, and manages concerns in accordance with relevant policies depending on their nature, e.g. the Behaviour Policy and Child Protection and Safeguarding Policy.

Where there is a concern that illegal activity has taken place, the Headteacher contacts the police.

All online safety incidents and the school's response are recorded by the DSL. The school online safeguarding system CPOMS and CPOMS staff safe is used to record incidents.

4. Cyber bullying

Cyber bullying can include, but is not limited to, the following:

- Threatening, intimidating or upsetting text messages
- Threatening or embarrassing pictures and video clips sent via mobile phone cameras
- Silent or abusive phone calls or using the victim's phone to harass others, to make them think the victim is responsible
- Threatening or bullying emails, possibly sent using a pseudonym or someone else's name
- Unpleasant messages sent via instant messaging
- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g. Facebook
- Discriminatory bullying online i.e. homophobia, racism, misogyny/misandry.

The school will be aware that certain pupils can be more at risk of abuse and/or bullying online, such as LGBTQ+ pupils and pupils with SEND.

Cyber bullying against pupils or staff is not tolerated under any circumstances. Incidents of cyber bullying are dealt with quickly and effectively wherever they occur in line with the Anti- bullying Policy.

5. Child-on-child sexual abuse and harassment

It must be recognised by the school community that pupils may also use the internet and technology as a vehicle for sexual abuse and harassment. Staff will understand that this abuse can occur both in and outside of school, off and online, and will remain aware that pupils are less likely to report concerning online sexual behaviours, particularly if they are using websites that they know adults will consider to be inappropriate for their age.

The following are examples of online harmful sexual behaviour of which staff will be expected to be aware:

- Threatening, facilitating or encouraging sexual violence
- Up skirting, i.e., taking a picture underneath a person's clothing without consent and with the intention of viewing their genitals, breasts or buttocks
- Sexualised online bullying, e.g. sexual jokes or taunts
- Unwanted and unsolicited sexual comments and messages
- Consensual or non-consensual sharing of sexualised imagery
- Abuse between young people in intimate relationships online, i.e. teenage relationship abuse

All staff will be aware of and promote a zero-tolerance approach to sexually harassing or abusive behaviour, and any attempts to pass such behaviour off as trivial or harmless. Staff will be aware that allowing such behaviour could lead to a school culture that normalises abuse and leads to pupils becoming less likely to report such conduct.

Staff will be aware that creating, possessing, and distributing indecent imagery of other children, i.e. individuals under the age of 18, is a criminal offence, even where the imagery is created, possessed, and distributed with the permission of the child depicted, or by the child themselves.

The school will be aware that interactions between the victim of online harmful sexual behaviour and the alleged perpetrator(s) are likely to occur over social media following the initial report, as well as interactions with other pupils taking "sides", often leading to repeat harassment. The school will respond to these incidents in line with the Child-on-child Abuse Policy.

The school will respond to all concerns regarding online child-on-child sexual abuse and harassment, regardless of whether the incident took place on the school premises or using school-owned equipment. Concerns regarding online child-on-child abuse will be reported to the DSL, who will investigate the

matter in line with the Child-on-child Abuse Policy and the Child Protection and Safeguarding Policy.

6. Grooming and exploitation

Grooming is defined as the situation whereby an adult builds a relationship, trust and emotional connection with a child with the intention of manipulating, exploiting and/or abusing them.

Staff will be aware that grooming often takes place online and that pupils who are being groomed are commonly unlikely to report this behaviour for many reasons, e.g. the pupil may have been manipulated into feeling a strong bond with their groomer and may have feelings of loyalty, admiration, or love, as well as fear, distress and confusion.

Despite our pupils being under 7 years of age, staff vigilance is essential. Pupils are less likely to report grooming than other online offences, it is particularly important that staff understand the indicators of this type of abuse. The DSL will ensure that online safety training covers online abuse, the importance of looking for signs of grooming, and what the signs of online grooming are, including:

- Being secretive about how they are spending their time online.
- Having an older boyfriend or girlfriend, usually one that does not attend the school and whom their close friends have not met.
- Having money or new possessions, e.g. clothes and technological devices that they cannot or will not explain.

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

Although CSE often involves physical sexual abuse or violence, online elements may be prevalent, e.g. sexual coercion and encouraging children to behave in sexually inappropriate ways through the internet. In some cases, a pupil may be groomed online to become involved in a wider network of exploitation, e.g. the production of child pornography or forced child prostitution and sexual trafficking.

CCE is a form of exploitation in which children are forced or manipulated into committing crimes for the benefit of their abuser, e.g. drug transporting, shoplifting and serious violence. While these crimes often take place in person, it is increasingly common for children to be groomed and manipulated into participating through the internet.

Where staff have any concerns about pupils with relation to CSE or CCE, they will bring these concerns to the DSL without delay, who will manage the situation in line with the Child Protection and Safeguarding Policy.

Radicalisation

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. This process can occur through direct recruitment,
e.g. individuals in extremist groups identifying, targeting and contacting young people with the intention of involving them in terrorist activity, or by exposure to violent ideological propaganda. Children who are targets for radicalisation are likely to be groomed by extremists online to the extent that they believe the extremist has their best interests at heart, making them more likely to adopt the same radical ideology.

Staff members will be aware of the factors which can place certain pupils at increased vulnerability to radicalisation, as outlined in the Prevent Duty Policy. Staff will be expected to exercise vigilance towards any pupils displaying indicators that they have been, or are being, radicalised.

Where staff have a concern about a pupil relating to radicalisation, they will report this to the DSL without delay, who will handle the situation in line with the Prevent Duty Policy.

7. Mental health

Staff will be aware that online activity both in and outside of school can have a substantial impact on a pupil's mental state, both positively and negatively. The DSL will ensure that training is available to help ensure that staff members understand popular social media sites and terminology, the ways in which social media and the internet in general can impact mental health, and the indicators that a pupil is suffering from challenges in their mental health. Concerns about the mental health of a pupil will be dealt with in line with the PSHE/RSE Policies and pupils may be supported through our ELSA programme.

8. Online hoaxes and harmful online challenges

For the purposes of this policy, an **"online hoax"** is defined as a deliberate lie designed to seem truthful, normally one that is intended to scaremonger or to distress individuals who come across it, spread on online social media platforms.

For the purposes of this policy, **"harmful online challenges"** refers to challenges that are targeted at young people and generally involve users recording themselves participating in an online challenge, distributing the video through social media channels and daring others to do the same. Although many online challenges are harmless, an online challenge becomes harmful when it could potentially put the participant at risk of harm, either directly as a result of partaking in the challenge itself or indirectly as a result of the distribution of the video online – the latter will usually depend on the age of the pupil and the way in which they are depicted in the video.

Where staff suspect there may be a harmful online challenge or online hoax circulating amongst pupils in the school, they will report this to the DSL immediately.

The DSL will conduct a case-by-case assessment for any harmful online content brought to their attention, establishing the scale and nature of the possible risk to pupils, and whether the risk is one that is localised to the school or the local area, or whether it extends more widely across the country. Where the harmful content is prevalent mainly in the local area, the DSL will consult with the LA about whether quick local action can prevent the hoax or challenge from spreading more widely.

Prior to deciding how to respond to a harmful online challenge or hoax, the Headteacher will decide whether each proposed response is:

- In line with any advice received from a known, reliable source, e.g. the UK Safer Internet Centre, when fact-checking the risk of online challenges or hoaxes.
- Careful to avoid needlessly scaring or distressing pupils.
- Not inadvertently encouraging pupils to view the hoax or challenge where they would not have otherwise come across it, e.g. where content is explained to younger pupils but is almost exclusively being shared amongst older pupils.
- Proportional to the actual or perceived risk.
- Helpful to the pupils who are, or are perceived to be, at risk.
- Appropriate for the relevant pupils' age and developmental stage.
- Supportive.
- In line with the Child Protection and Safeguarding Policy.

Where the head teacher's assessment finds an online challenge to be putting pupils at risk of harm, they will ensure that the challenge is directly addressed to the relevant pupils, e.g. those within a particular age range that is directly affected or individual pupils at risk where appropriate.

The Headteacher will only implement a school-wide approach to highlighting potential harms of a hoax or challenge when the risk of needlessly increasing pupils' exposure to the risk is considered and

mitigated as far as possible.

9. Cyber-crime

Cyber-crime is criminal activity committed using computers and/or the internet. There are two key categories of cyber-crime:

- **Cyber-enabled** – these crimes can be carried out offline; however, are made easier and can be conducted at higher scales and speeds online, e.g. fraud, purchasing and selling of illegal drugs, and sexual abuse and exploitation.
- **Cyber-dependent** – these crimes can only be carried out online or by using a computer, e.g. making, supplying or obtaining malware, illegal hacking, and 'booting', which means overwhelming a network, computer or website with internet traffic to render it unavailable.

The school will factor into its approach to online safety the risk that pupils with a particular affinity or skill in technology may become involved, whether deliberately or inadvertently, in cyber-crime. Where there are any concerns about a pupil's use of technology and their intentions with regard to using their skill and affinity towards it, the DSL will consider a referral to the Cyber Choices programme, which aims to intervene where children are at risk of committing cyber-crime and divert them to a more positive use of their skills and interests.

The Headteacher will ensure that pupils are taught, throughout the curriculum, how to use technology safely, responsibly and lawfully.

10. Online safety training for staff

The Headteacher ensures that all safeguarding training given to staff includes elements of online safety, including how the internet can facilitate abuse and exploitation. All staff will be made aware that pupils are at risk of abuse, by their peers and by adults, online as well as in person, and that, often, abuse will take place concurrently via online channels and in daily life.

11. Online safety and the curriculum

Online safety is embedded throughout the curriculum; however, it is particularly addressed in the following subjects:

Relationships and health education

- PSHE
- Computing

Online safety teaching is always appropriate to pupils' ages and developmental stages.

Pupils are taught the underpinning knowledge and behaviours that can help them to navigate the online world safely and confidently regardless of the device, platform or app they are using. The underpinning knowledge and behaviours pupils learn through the curriculum include the following:

- How to evaluate what they see online
- How to recognise techniques used for persuasion
- Acceptable and unacceptable online behaviour
- How to identify online risks
- How and when to seek support
- Knowledge and behaviours that are covered in the government's online media literacy strategy

The online risks pupils may face online are always considered when developing the curriculum. The risks that are considered and how they are covered in the curriculum can be found in Appendix 1 of this policy.

The Deputy DSL will be involved with the development of the school's online safety curriculum. Pupils will be consulted on the online safety curriculum, where appropriate, due to their unique knowledge of the kinds of websites they and their peers frequent and the kinds of behaviours in which they engage online.

Relevant members of staff, e.g. the SENCO and designated teacher for LAC, will work together to ensure the curriculum is tailored so that pupils who may be more vulnerable to online harms, e.g. pupils with SEND and LAC, receive the information and support they need.

The school will also endeavour to take a more personalised or contextualised approach to teaching about online safety for more susceptible children, and in response to instances of harmful online behaviour from pupils.

Class teachers will review external resources prior to using them for the online safety curriculum, to ensure they are appropriate for the cohort of pupils.

External visitors may be invited into school to help with the delivery of certain aspects of the online safety curriculum. The Headteacher will decide when it is appropriate to invite external groups into school and ensure the visitors selected are appropriate.

Before conducting a lesson or activity on online safety, the class teacher will consider the topic that is being covered and the potential that pupils in the class have suffered or may be suffering from online abuse or harm in this way. The Deputy DSL will advise the staff member on how to best support any pupil who may be especially impacted by a lesson or activity. Lessons and activities will be planned carefully so they do not draw attention to a pupil who is being or has been abused or harmed online, to avoid publicising the abuse.

During an online safety lesson or activity, the class teacher will ensure a safe environment is maintained in which pupils feel comfortable to say what they feel and ask questions, and are not worried about getting into trouble or being judged.

If a staff member is concerned about anything pupils raise during online safety lessons and activities, they will make a report in line with the Child Protection and Safeguarding Policy.

If a pupil makes a disclosure to a member of staff regarding online abuse following a lesson or activity, the staff member will follow the reporting procedure outlined in the Child Protection and Safeguarding Policy.

12. Use of technology in the classroom

A wide range of technology will be used during lessons, including the following:

- Laptops
- Tablets
- Internet
- Email
- Cameras

Prior to using any websites, tools, apps or other online platforms in the classroom, or recommending that pupils use these platforms at home, the class teacher will review and evaluate the resource. Class teachers will ensure that any internet-derived materials are used in line with copyright law.

Pupils will be supervised when using online materials during lesson time – this supervision is suitable to their age and ability.

13. Use of smart technology

While the school recognises that the use of smart technology can have educational benefits, there are also a variety of associated risks which the school will ensure it manages.

Staff will use all smart technology and personal technology in line with the school's Staff Code of Conduct.

Pupils will not be permitted to use smart devices or any other personal technology whilst in the school.

Where there is a significant problem with the misuse of smart technology among pupils, the school will discipline those involved in line with the school's Behaviour and Sanctions Policy.

The school will hold assemblies, where appropriate, which address any specific concerns related to the misuse of smart technology and outline the importance of using smart technology in an appropriate manner.

The school will seek to ensure that it is kept up to date with the latest devices, platforms, apps, trends and related threats.

14. Educating parents

The school will work in partnership with parents to ensure pupils stay safe online at school and at home. Parents will be provided with information about the school's approach to online safety and their role in protecting their children.

Parents will be made aware of the various ways in which their children may be at risk online, including, but not limited to:

- Child sexual abuse, including grooming.
- Exposure to radicalising content.
- Sharing of indecent imagery of pupils, e.g. sexting.
- Cyber bullying.
- Exposure to age-inappropriate content, e.g. pornography.
- Exposure to harmful content, e.g. content that encourages self-destructive behaviour.

Parents will be informed of the ways in which they can prevent their child from accessing harmful content at home, e.g. by implementing parental controls to block age-inappropriate content.

Parental awareness regarding how they can support their children to be safe online will be raised in the following ways:

- Parent meeting for online safety
- Parents' evenings
- Newsletters
- Online resources

15. Internet access

Pupils, staff and other members of the school community will only be granted access to the school's internet network once they have read and signed the Acceptable Use Agreement. A record will be kept

of users who have been granted internet access by the school office manager.

All members of the school community will be encouraged to use the school's internet network, instead of 3G, 4G and 5G networks, as the network has appropriate filtering and monitoring to ensure individuals are using the internet appropriately.

16. Filtering and monitoring online activity

The governing board will ensure the school's ICT network has appropriate filters and monitoring systems in place. The governing board will ensure 'over blocking' does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding.

The Headteacher and ICT technicians will undertake a risk assessment to determine what filtering and monitoring systems are required. The filtering and monitoring systems the school implements will be appropriate to pupils' ages, the number of pupils using the network, how often pupils access the network, and the proportionality of costs compared to the risks. The Headteacher will undertake monthly checks on the filtering and monitoring systems to ensure they are effective and appropriate.

Requests regarding making changes to the filtering system will be directed to the Headteacher. Prior to making any changes to the filtering system, ICT technicians and the DSL will conduct a risk assessment. Any changes made to the system will be recorded by ICT technicians. Reports of inappropriate websites or materials will be made to an ICT technician immediately, who will investigate the matter and makes any necessary changes.
Deliberate breaches of the filtering system will be reported to the DSL and ICT technicians, who will escalate the matter appropriately. If a pupil has deliberately breached the filtering system, they will be disciplined in line with the Behaviour Policy. If a member of staff has deliberately breached the filtering system, they will be disciplined in line with the staff code of conduct.

If material that is believed to be illegal is accessed, inadvertently or deliberately, this material will be reported to the appropriate agency immediately, e.g. the Internet Watch Foundation (IWF), CEOP and/or the police.

The school's network and school-owned devices will be appropriately monitored. All users of the network and school-owned devices will be informed about how and why they are monitored. Concerns identified through monitoring will be reported to the Headteacher who will manage the situation in line with the Child Protection and Safeguarding Policy.

17. Network security

Technical security features, such as anti-virus software, will be kept up-to-date and managed by ICT technicians (Connected its). Firewalls will be switched on at all times. ICT technicians (Connected its) will review the firewalls to ensure they are running correctly, and to carry out any required updates.

Staff and pupils will be advised not to download unapproved software or open unfamiliar email attachments, and will be expected to report all malware and virus attacks to ICT technicians (Connectedits).

All members of staff will have their own unique usernames and private passwords to access the school's systems. Passwords will have a minimum and maximum length and require a mixture of letters, numbers and symbols to ensure they are as secure as possible.

Users will inform ICT technicians (Connectedits) if they forget their login details, who will arrange for the user to access the systems under different login details. Users will not be permitted to share their login details with others and will not be allowed to log in as another user at any time. If a user is found to be sharing their login details or otherwise mistreating the password system, the Headteacher will

be informed and will decide the necessary action to take.

Users will be required to lock access to devices and systems when they are not in use.

Full details of the school's network security measures can be found in the Cyber-security Policy.

18. Emails

Access to and the use of emails will be managed in line with the Data Protection Policy, Acceptable Use Agreement, and the Pupil Confidentiality Policy and Staff and Volunteer Confidentiality Policy.

Our current filtering system filters emails and those that are spam. Staff and pupils will be given approved school email accounts and will only be able to use these accounts at school and when doing school-related work outside of school hours. Prior to being authorised to use the email system, staff and pupils must agree to and sign the Acceptable Use Agreement. Personal email accounts will not be permitted to be used on the school site. Any email that contains sensitive or personal information will only be sent using secure and encrypted email.

Staff members will be required to block spam and junk mail, and where appropriate report to Connectedits. The school's monitoring system can detect inappropriate links, malware and profanity within emails – staff and pupils will be made aware of this. Chain letters, spam and all other emails from unknown sources will be deleted without being opened. How to determine whether an email address is legitimate includes:

- The types of address a phishing email could use
- The importance of asking "does the email urge you to act immediately?"
- The importance of checking the spelling and grammar of an email

Any cyber-attacks initiated through emails will be managed in line with the Cyber Response and Recovery Plan.

19. Generative artificial intelligence (AI)

The school will take steps to prepare pupils for changing and emerging technologies, e.g. generative AI and how to use them safely and appropriately with consideration given to pupils' age.

The school will ensure its IT system includes appropriate filtering and monitoring systems to limit pupil's ability to access or create harmful or inappropriate content through generative AI.

The school will ensure that pupils are not accessing or creating harmful or inappropriate content, including through generative AI.

The school will take steps to ensure that personal and sensitive data is not entered into generative AI tools and that it is not identifiable.

The school will make use of any guidance and support that enables it to have a safe, secure and reliable foundation in place before using more powerful technology such as generative AI.

20. The school website

The Headteacher will be responsible for the overall content of the school website – they will ensure the content is appropriate, accurate, and up-to-date and meets government requirements.

The website complies with guidelines for publications including accessibility, data protection, and respect for intellectual property rights, privacy policies and copyright law. Personal information relating

to staff and pupils is not published on the website. Images and videos are only posted on the website if the provisions in the Photography Policy are met.

21. Use of devices

Staff members are issued with the following devices to assist with their work:

- Laptop
- Tablet

Pupils are provided with school-owned devices as necessary to assist in the delivery of the curriculum, e.g. tablets to use during lessons.

ICT technicians review all school-owned devices on a constant basis to carry out software updates and ensure there is no inappropriate material or malware on the devices. No software, apps or other programs can be downloaded onto a device without administrator authorisation.

Cases of staff members or pupils found to be misusing school-owned devices will be managed in line with the Disciplinary Policy.

Personal devices

Any personal electronic device that is brought into school is the responsibility of the user.

Staff members are not permitted to use their personal devices during lesson time, other than in an emergency. Staff members are not permitted to use their personal devices to take photos or videos of pupils. Staff members are permitted to use personal devices during non-contact times with pupils and only in non-teaching areas e.g. staffroom.

Staff members report concerns about their colleagues' use of personal devices on the school premises in line with the Managing Allegations and Low Level Concerns and Whistle Blowing Policies. If a member of staff is thought to have illegal content saved or stored on a personal device, or to have committed an offence using a personal device, the Headteacher will inform the police and action will be taken in line with the Managing Allegations and Low Level Concerns and Whistle Blowing Policies.

Pupils are not permitted to use their personal devices during school time or on the school premises, unless a phone is a medical device for the management of a condition (diabetes). The Headteacher may authorise the use of mobile devices by a pupil for safety or precautionary use.

Where a pupil uses accessibility features on a personal device to help them access education,
e.g. where a pupil who is deaf uses their mobile phone to adjust the settings on an internal hearing aid in response to audible stimuli during class, the arrangements and rules for conduct for this are developed and managed on a case-by-case basis.

Pupils' devices can be searched, screened and confiscated in accordance with the behaviour and discipline policy. If a staff member reasonably believes a pupil's personal device has been used to commit an offence or may provide evidence relating to an offence, the device will be handed to the police.

Appropriate signage is displayed to inform visitors to the school of the expected use of personal devices. Any concerns about visitors' use of personal devices on the school premises are reported to the DSL.

22. Responding to Incidents of Misuse

It is hoped that all members of the school community will be responsible users of ICT, who understand and follow this policy. However, there may be times when infringements of the policy could take place,

through careless or irresponsible or, very rarely, through deliberate misuse. Listed below are the responses that will be made to any apparent or actual incidents of misuse:

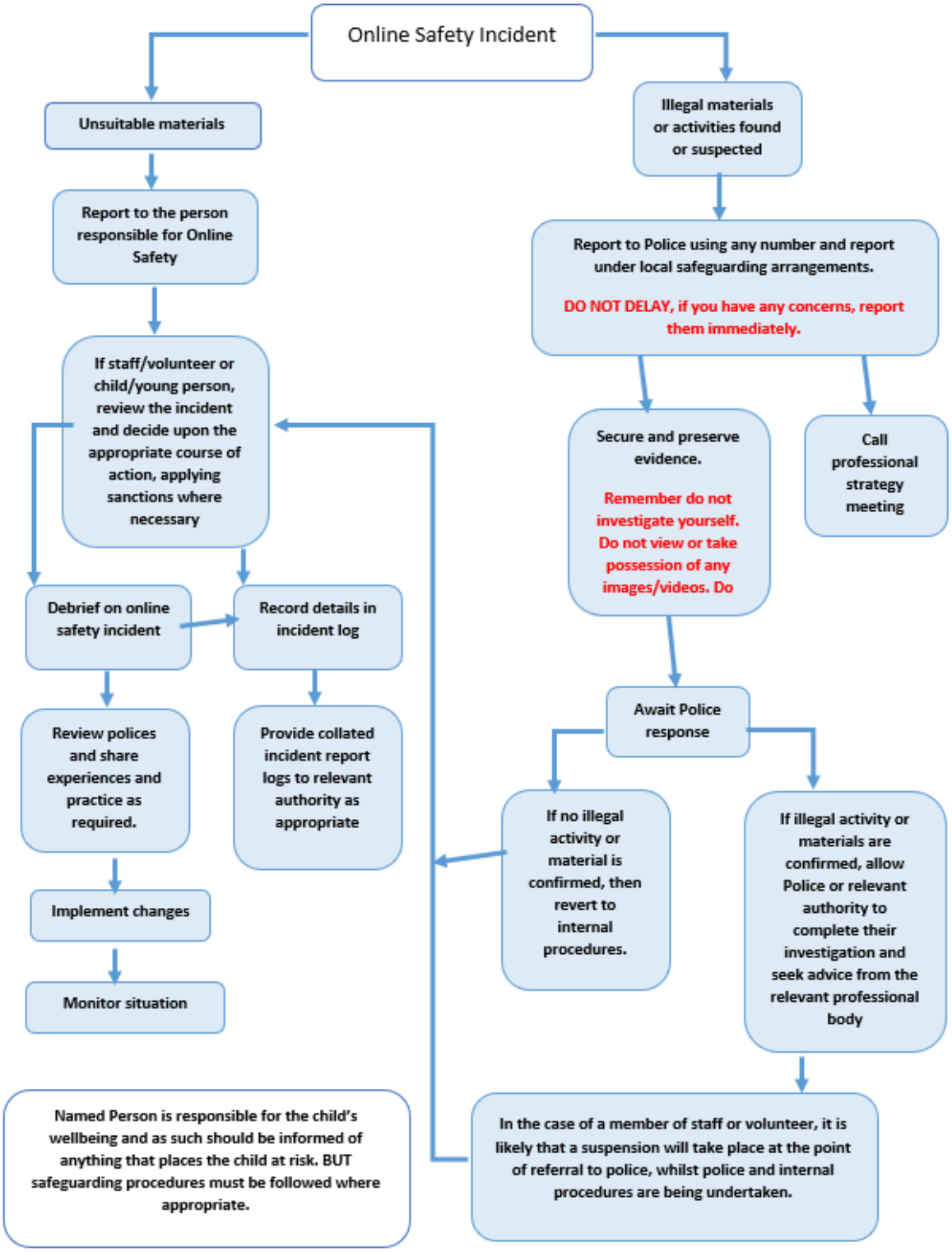
- If apparent or actual misuse appears to involve illegal activity (e.g. child sexual abuse images; adult material which potentially breaches the Obscene Publications Act; criminally racist material; other criminal conduct, activity or materials), the flow chart issued by the Sunderland Safeguarding Children Board must be consulted and actions followed in line with the flow chart, in particular the sections on reporting the incident to the police and the preservation of evidence. This flowchart indicating how to proceed can be found at the back of this policy. All members of staff have received training about this matter and have been issued with a copy of the flowchart.
- If members of staff suspect that misuse might have taken place, but that misuse is not illegal, it is essential that correct procedures are used to investigate, preserve evidence and protect those carrying out the investigation. At Fulwell Infant School Academy, like other schools in Sunderland, when an incident occurs it is important that we keep a clear record of what has and is taking place. At Fulwell Infant School Academy we will use the recording log.
- It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour / disciplinary procedures as follows:
- The Curriculum Network and Internet Usage will be monitored through Smoothwall and reports will be provided weekly and as requested. Any incident or deliberate misuse will be reported immediately to either the Headteacher or Deputy DSL.
- Incidents of pupil misuse will be addressed by the pupil sanctions systems and reported to Governors. Incidents of Staff/ Volunteer misuse will be addressed using the Staff Disciplinary Procedures and reported to the Chair of Governors.

Smoothwall (RADAR)

As part of our duty of care, we have a legal obligation to closely monitor access to our network and the Internet. At Fulwell Infant School Academy we use government approved software/hardware Smoothwall (RADAR) to monitor, report and alert of potential computer misuse as part of our online Safety strategy. This software is installed on all pupil and staff devices in the school. RADAR offers a wide range of features to ensure the online safety of pupils and staff, in particular identifying and preventing:

- Bullying and threatening behaviour
- Abusive comments or offensive attitudes
- Inadvertent exposure to inappropriate websites (pornography, violence, suicide)
- Deliberate access to inappropriate websites
- Online gambling and shopping
- Un-moderated discussion forums and chat rooms
- Use of inappropriate vocabulary

Responding to incidents of misuse – flow chart



E-Safety Incident Report	
This Event Report Form Compiled by: Name: Title: Date:	
Staff informed: Headteacher Deputy DSL Other	Name & Date
Nature of Concern: Who was involved: pupil/staff/parents?	
Where did it occur: home, school?	
Time and date of Incident:	
Time and date the incident was logged:	
Action taken: (please tick)	Evidence preserved Senior staff informed Other action
Incident witnessed by:	Staff Pupil Parent Other
Other Officers Involved in Response:	LA Officer LADO NCC Network Security Manager Other
Follow up Action:	
Evidence Collected (and where retained):	
Review Date if required:	

23. Remote learning

All remote learning will be delivered in line with the school's Remote Education Policy. This policy specifically sets out how online safety will be considered when delivering remote education.

24. Monitoring and review

The school recognises that the online world is constantly changing; therefore, the Deputy DSL, ICT technicians and the Headteacher will update this policy as statutory guidance changes.

The governing board, Headteacher and Deputy DSL will review this policy in full on an annual basis and following any online safety incidents.

Any changes made to this policy are communicated to all members of the school community.

Appendix 1

Fulwell Infant School Academy
Online harms and risks – curriculum coverage

Subject area	Description and teaching content	Curriculum area the harm or risk is covered in
How to navigate the internet and manage information		
Age Restrictions	Some online activities have age restrictions because they include content which is not appropriate for children under a specific age. Teaching includes: • That age verification exists and why some online platforms ask users to verify their age • Why age restrictions exist • That content that requires age verification can be damaging to under-age consumers • What the age of digital consent is (13 for most platforms) and why it is important	This risk or harm are covered in the following curriculum areas: • RSE - Y1 Recognising how to keep safe online and Y2 Rules for Online Safety • Computing – Internet Safety Week (NSPCC Keeping Children Safe link) • Computing – identifying dangers online and what to do to stay safe
How content can be used and shared	Knowing what happens to information, comments or images that are put online. Teaching includes the following: • What a digital footprint is, how it develops and how it can affect pupils' futures • How content can be shared, tagged and traced • How difficult it is to remove something once it has been shared online	This risk or harm is covered in the following curriculum areas: • RSE – Y1 Being Safe; Privacy • Computing - Internet Safety Week (NSPCC Keeping Children Safe link) Y1 Digital Footprint
Disinformation, misinformation and hoaxes	Some information shared online is accidentally or intentionally wrong, misleading or exaggerated. Teaching includes the following: • Disinformation and why individuals or groups choose to share false information in order to deliberately deceive • Misinformation and being aware that false and misleading information can be shared inadvertently • Online hoaxes, which can be deliberately and inadvertently spread for a variety of reasons • That the widespread nature of this sort of content can often appear to be a stamp of authenticity, making it important to evaluate what is seen online • The potential consequences of sharing information that may not be true	This risk or harm is covered in the following curriculum areas: • RSE • Computing – Name ways to stay safe KS1 • Computing - Internet Safety Week (NSPCC Keeping Children Safe link) Y2 False Information

Personal data	Online platforms and search engines gather personal data – this is often referred to as 'harvesting' or 'farming'. Teaching includes the following: • How data is farmed from sources which look neutral • How and why personal data is shared by online companies • How pupils can protect themselves and that acting quickly is essential when something happens • The rights children have with regards to their data	This risk or harm is covered in the following curriculum areas: • RSE – Y1 Privacy • Computing – identifying dangers online KS1 outcome
Targeting of online content	Much of the information seen online is a result of some form of targeting. Teaching includes the following: • How adverts seen at the top of online searches and social media have often come from companies paying to be on there and different people will see different adverts • How the targeting is done • The concept of clickbait and how companies can use it to draw people to their sites and services	This risk or harm is covered in the following curriculum areas: • RSE – Y1 Privacy • Computing – Digital Footprint KS1 Outcome
How to stay safe online		
Online abuse	Some online behaviours are abusive. They are negative in nature, potentially harmful and, in some cases, can be illegal. Teaching includes the following: • How to respond to online abuse and how to access support • How to respond when the abuse is anonymous • The potential implications of online abuse • What acceptable and unacceptable online behaviours look like	This risk or harm is covered in the following curriculum areas: • RSE • Computing - Internet Safety Week (NSPCC Keeping Children Safe link) Y2 Cyber Bullying
Unsafe communication	Knowing different strategies for staying safe when communicating with others, especially people they do not know or have not met. Teaching includes the following: • That communicating safely online and protecting your privacy and data is important, regardless of who you are communicating with • The risks associated with giving out addresses, phone numbers or email addresses to people pupils do not know, or arranging to meet someone they have not met before	This risk or harm is covered in the following curriculum areas: • RSE • Computing – Y2 Sending safe emails • Computing – Internet Safety Week (NSPCC Keeping Children Safe link) Y2 Online Security

Well Being		
Impact on quality of life, physical and mental health and relationships	Knowing how to identify when online behaviours stop being fun and begin to create anxiety, including that there needs to be a balance between time spent online and offline. Teaching includes the following: • How to evaluate critically what pupils are doing online, why they are doing it and for how long (screen time) • How to consider quality vs. quantity of online activity • The need for pupils to consider if they are actually enjoying being online or just doing it out of habit, due to peer pressure or due to the fear or missing out • That time spent online gives users less time to do other activities, which can lead some users to become physically inactive	This risk or harm is covered in the following curriculum areas: • RSE • Computing - Internet Safety Week (NSPCC Keeping Children Safe link) Y1 Screen Time
Online vs. offline behaviours	People can often behave differently online to how they would act face to face. Teaching includes the following: • How and why people are unkind or hurtful online when they would not necessarily be unkind to someone face to face	This risk or harm is covered in the following curriculum areas: • RSE • Computing - Computing - Internet Safety Week (NSPCC Keeping Children Safe link) Y2 Cyber Bullying

Appendix 2: Governors E-Safety Checklist

Action	Completed by:
The Acceptable Use Policy is in place and has been revised to accommodate any developments in technology and its use.	
Governors know that all staff (teaching and non-teaching) and any volunteers or supply staff are familiar with the current Online Safety policy and the Acceptable Use Policy.	
E-Safety forms part of the induction of all new staff	
Governors know that all new parents/carers have received a copy of the Trust's AUA.	
Governors know that all parents/ carers have signed a copy of the internet access permission form in the child's diary.	
All staff (teaching and non-teaching) and any volunteers or supply staff are in possession of the 'A concern is raised' flow diagram and know what to do if an incident occurs.	
All users understand the use of 'Online Safety monitoring software (Smoothwall) where installed.	

Governor signature:

Date: