

Brook Field Primary School

Online Safety Policy

Based on SWGfL template policy September 2023



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Introduction

The DfE Keeping Children Safe in Education statutory guidance requires Local Authorities, Multi Academy Trusts, and schools in England to ensure learners are safe from harm:

*“It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to **online safety** empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate”*

*“Governing bodies and proprietors should ensure **online safety** is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies and procedures. This will include considering how **online safety** is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement”*

The DfE Keeping Children Safe in Education guidance also recommends:

Reviewing online safety ... Technology, and risks and harms related to it, evolve, and change rapidly. Schools and colleges should consider carrying out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. A free online safety self-review tool for schools can be found via the 360 safe self-review tool.

The DfE Keeping Children Safe in Education guidance suggests that:

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

content: *being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.*

contact: *being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.*

conduct: *online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and*

commerce: *risks such as online gambling, inappropriate advertising, phishing and or financial scams.*

Scope of the Online Safety Policy

This Online Safety Policy outlines the commitment of Brook Field Primary School to safeguard members of our school community online in accordance with statutory guidance and best practice.

This policy also reflects duties arising from the Online Safety Act 2024, particularly the strengthened requirements for age assurance, content moderation, and child protection on online platforms.

This Online Safety Policy applies to all members of the school community (including staff, learners, governors, volunteers, parents and carers, visitors, community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

Brook Field Primary School will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents/carers of incidents of inappropriate online safety behaviour that take place out of school.

Schedule for development, monitoring and review

This Online Safety Policy was approved by the school governing body on:	19 th November 2025
The implementation of this Online Safety Policy will be monitored by:	Rachel Taylor DSL Nikki Marvell DDSL Becky Brake Safeguarding Governor
Monitoring will take place at regular intervals:	April 2026
The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new technological developments, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	September 2026

Responsibilities

To ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviours, learning from each other and from good practice elsewhere, reporting inappropriate online behaviours, concerns, and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals and groups within the school.

Headteacher and senior leaders

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding, though the day-to-day responsibility for

online safety is held by the Designated Safeguarding Lead, as defined in Keeping Children Safe in Education.

- The headteacher and (at least) another member of the senior leadership team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff.
- The headteacher/senior leaders are responsible for ensuring that the Designated Safeguarding Lead / Online Safety Lead, IT provider/technical staff, and other relevant staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.
- The headteacher/senior leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role.
- The headteacher/senior leaders will receive regular monitoring reports from the Designated Safeguarding Lead / Online Safety Lead.
- The headteacher/senior leaders will work with the responsible Governor, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring.
- Schools must now undertake an annual review of their filtering and monitoring provision, evidencing decision-making and assigning named roles for accountability, in line with DfE Filtering and Monitoring Standards (updated 2024–25).

Governors

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. This review will be carried out by Brook Field Local governing Body who will receive regular information about online safety incidents and monitoring reports. A member of the governing body will take on the role of Online Safety Governor to include:

- regular meetings with the Designated Safeguarding Lead / Online Safety Lead
- regularly receiving (collated and anonymised) reports of online safety incidents
- checking that provision outlined in the Online Safety Policy (e.g. online safety education provision and staff training is taking place as intended)
- Ensuring that the filtering and monitoring provision is reviewed and recorded, at least annually.
- reporting to the Local Governing Body

The governing body will also support the school in encouraging parents/carers and the wider community to become engaged in online safety activities.

Designated Safety Lead (DSL)

The DSL will:

- hold the lead responsibility for filtering and monitoring, within their safeguarding role. Receive relevant and regularly updated training in online safety to enable them to understand the risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online
- meet regularly with the online safety governor to discuss current issues, review (anonymised) incidents and filtering and monitoring logs and ensuring that annual (at least) filtering and

monitoring checks are carried out, including evidencing any decision making or actions carried out as a result of any check

- report regularly to headteacher/senior leadership team
- be responsible for receiving reports of online safety incidents and handling them, and deciding whether to make a referral by liaising with relevant agencies, ensuring that all incidents are recorded.
- liaise with staff and IT providers on matters of safety and safeguarding and welfare (including online and digital safety)

Online Safety Lead

The Online Safety Lead will:

- work closely on a day-to-day basis with the Designated Safeguarding Lead (DSL), (this role is combined at Brook Field and the named person is Rachel Taylor, Headteacher)
- receive reports of online safety issues, being aware of the potential for serious child protection concerns and ensure that these are logged to inform future online safety developments
- have a leading role in establishing and reviewing the school online safety policies/documents
- promote an awareness of and commitment to online safety education / awareness raising across the school and beyond
- liaise with curriculum leaders to ensure that the online safety curriculum is planned, mapped, embedded and evaluated
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents
- provide (or identify sources of) training and advice for staff/governors/parents/carers/ learners
- liaise with (school/local authority/MAT/external provider) technical staff, pastoral staff and support staff (as relevant)
- receive regularly updated training to allow them to understand how digital technologies are used and are developing
- develop a planned and coordinated online safety education programme including critical thinking about misinformation, disinformation, conspiracy theories, and safe, ethical use of artificial intelligence tools.

School Staff

School staff are responsible for ensuring that:

- they have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices
- they understand that online safety is a core part of safeguarding
- they have read, understood, and signed the staff acceptable use agreement (AUA)
- they immediately report any suspected misuse or problem to the headteacher/DSL for investigation/action, in line with the school safeguarding procedures
- all digital communications with learners and parents/carers are on a professional level and only carried out using official school systems
- online safety issues are embedded in all aspects of the curriculum and other activities

- ensure learners understand and follow the Online Safety Policy and acceptable use agreements, have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they supervise and monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other school activities (where allowed) and implement current policies regarding these devices
- Use AI in a manner which remains complimentary to GDPR and in line with the Acceptable Use Policy
- in lessons where internet use is pre-planned learners are guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- where lessons take place using live-streaming or video-conferencing, there is regard to national safeguarding guidance and local safeguarding policies
- there is a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc
- they model safe, responsible, and professional online behaviours in their own use of technology, including out of school and in their use of social media.

IT Provider/IT support

If the school has a technology service provided by an outside contractor, it is the responsibility of the school to ensure that the provider carries out all the online safety measures that the school's obligations and responsibilities require. It is also important that the provider follows and implements school Online Safety Policy and procedures.

The IT Provider is responsible for ensuring that:

- they are aware of and follow the school Online Safety Policy and Technical Security Policy to carry out their work effectively in line with school policy
- the school technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets (as a minimum) the required online safety technical requirements as identified by the DfE Meeting Digital and Technology Standards in Schools & Colleges and guidance from MAT or other relevant body
- there is clear, safe, and managed control of user access to networks and devices
- they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- the use of technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported to the headteacher/DSL for investigation and action
- the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single
- monitoring systems are implemented and regularly updated as agreed in school policies

Learners

- are responsible for using the school digital technology systems in accordance with the Home School Agreement and Online Safety Policy
- should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology.

- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school, if related to their membership of the school.

Parents and carers

Parents and carers play a crucial role in ensuring that their children understand the need to use the online services and devices in an appropriate way.

The school will take every opportunity to help parents and carers understand these issues through:

- publishing the school Online Safety Policy on the school website
- providing them with a copy of the Home school Agreement – which is on the website, given to all new starters in Foundation Stage and again when the children are in Year 3.
- publish information about appropriate use of social media relating to posts concerning the school.
- seeking their permissions concerning digital images, cloud services etc
- parents'/carers' evenings, newsletters, website, social media and information about national/local online safety campaigns and literature.

Community users

Community users who access school systems/website/learning platform as part of the wider school provision will be expected to sign a community user AUA before being provided with access to school systems.

Acceptable use

The school has defined what it regards as acceptable/unacceptable use and this is shown in the tables below.

Acceptable use agreements

The Online Safety Policy and acceptable use agreements define acceptable use at the school. The acceptable use agreements.

User Actions	Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
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Users shall not access online content (including apps, games, sites) to make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Any illegal activity for example: <ul style="list-style-type: none"> • Child sexual abuse imagery* • Child sexual abuse/exploitation/grooming • Terrorism • Encouraging or assisting suicide • Offences relating to sexual images i.e., revenge and extreme pornography • Incitement to and threats of violence • Hate crime • Public order offences - harassment and stalking • Drug-related offences • Weapons / firearms offences • Fraud and financial crime including money laundering UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges					X
Users shall not undertake activities that might be classed as cyber-crime under the Computer Misuse Act (1990)	<ul style="list-style-type: none"> • Using another individual's username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised) • Gaining unauthorised access to school networks, data and files, through the use of computers/devices • Creating or propagating computer viruses or other harmful files • Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords) • Disable/Impair/Disrupt network functionality through the use of computers/devices Using penetration testing equipment (without relevant permission)					X
Users will ensure any use of AI will assist in the effective delivery of education whilst remaining compliant with GDPR and Data Protection Practices	<ul style="list-style-type: none"> • To comply with UK GDPR, no personal, identifiable, or sensitive information (such as pupil names, images, contact details, or assessment data) should be entered into any AI system • Model responsible AI use and guide pupils in evaluating AI-generated content. • Report any misuse of AI tools or suspected data breaches to the Data Protection Officer (DPO) immediately. 					X
Users shall not undertake activities that are not illegal but are classed as	Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs)			X	X	
	Promotion of any kind of discrimination				X	
	Using school systems to run a private business				X	

unacceptable in school policies:	Using systems, applications, websites or other mechanisms that bypass the filtering/monitoring or other safeguards employed by the school				X	
	Infringing copyright				X	
	Unfair usage (downloading/uploading large files that hinders others in their use of the internet)			X	X	
	Any other information which may be offensive to others or breaches the integrity of the ethos of the school or brings the school into disrepute			X	X	

Consideration should be given for the following activities when undertaken for non-educational purposes.	Staff and other adults				Learners			
	Not allowed	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff awareness
Online gambling	X				X			
Online shopping/commerce	X				X			
File sharing		X			X			
Social media			X		X			
Messaging/chat			X		X			
Entertainment streaming e.g. Netflix, Disney+			X		X			
Use of video broadcasting, e.g. YouTube, Twitch, TikTok		X			X			
Mobile phones may be brought to school		X					X	
Use of mobile phones for learning at school			X		X			
Use of mobile phones in social time at school		X			X			
Taking photos on mobile phones/cameras			X		X			
Use of other personal devices, e.g. tablets, gaming devices	X				X			
Use of personal e-mail in school, or on school network/wi-fi			X		X			
Use of school e-mail for personal e-mails	X				X			
Use of smart watches for the purpose of telling the time		X						X

When using communication technologies, the school considers the following as good practice:

- when communicating in a professional capacity, staff should ensure that the technologies they use are officially sanctioned by the school.
- any digital communication between staff and learners or parents/carers (e-mail, social media, learning platform, etc.) must be professional in tone and content. Personal e-mail addresses, text messaging or social media must not be used for these communications.
- staff should be expected to follow good practice when using personal social media regarding their own professional reputation and that of the school and its community
- users should immediately report to a nominated person – in accordance with the school policy – the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.

- relevant policies and permissions should be followed when posting information online e.g., school website and social media. Only school e-mail addresses should be used to identify members of staff and learners.

Reporting and responding

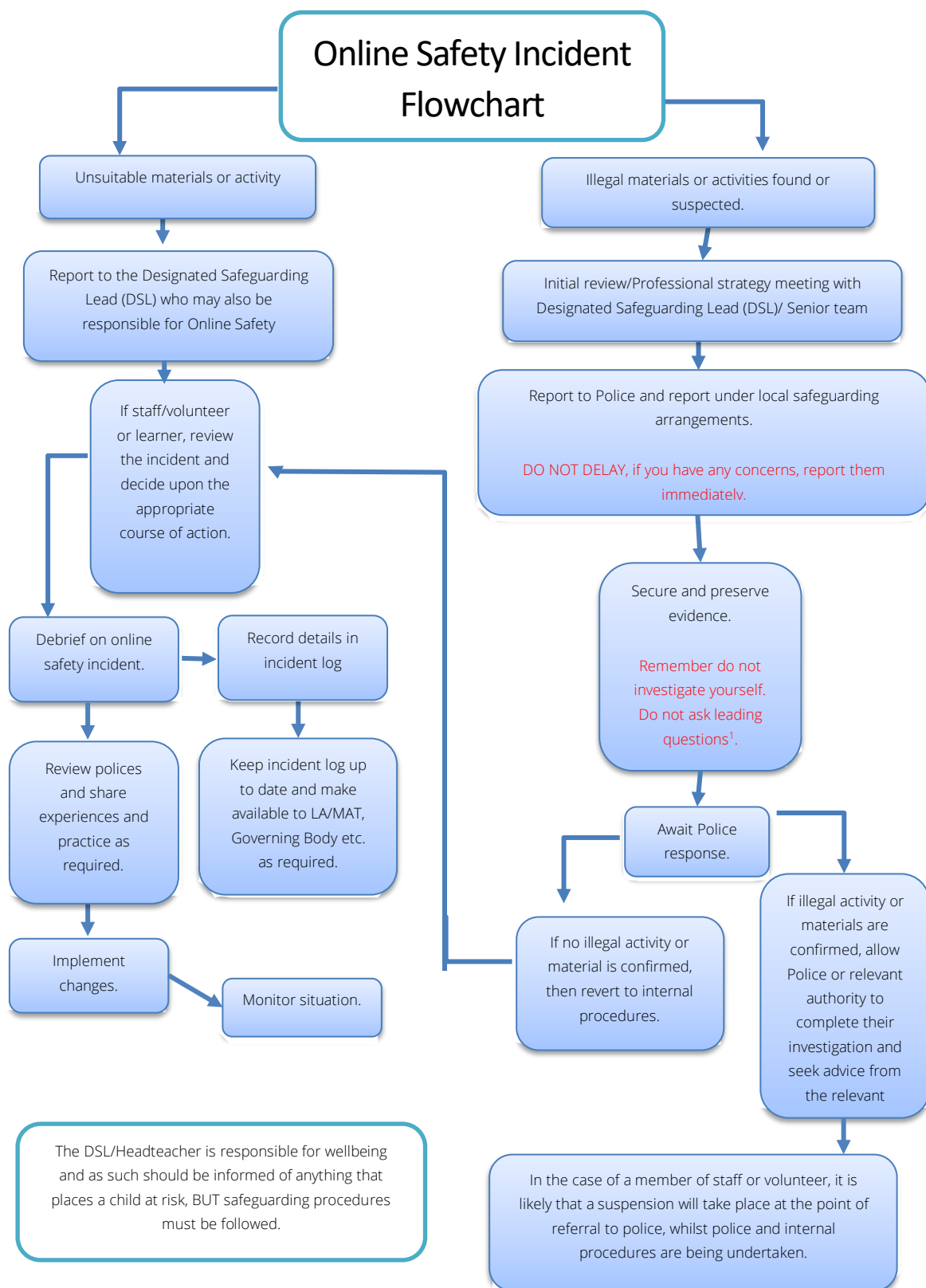
The school will take all reasonable precautions to ensure online safety for all school users but recognises that incidents may occur inside and outside of the school (with impact on the school) which will need intervention.

The school will ensure:

- all members of the school community will be made aware of the need to report online safety issues/incidents
- there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the school safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies.
- if there is any suspicion that the incident involves any illegal activity or the potential for serious harm (see flowchart and user actions chart in the appendix), the incident must be escalated through the agreed school safeguarding procedures, this may include
 - Non-consensual images
 - Self-generated images
 - Terrorism/extremism
 - Hate crime/ Abuse
 - Fraud and extortion
 - Harassment/stalking
 - Child Sexual Abuse Material (CSAM)
 - Child Sexual Exploitation Grooming
 - Extreme Pornography
 - Sale of illegal materials/substances
 - Cyber or hacking offences under the Computer Misuse Act
 - Copyright theft or piracy
- any concern about staff misuse will be reported to the Headteacher, unless the concern involves the Headteacher, in which case the complaint is referred to the CEO, Gary Evans.
- where there is no suspected illegal activity, devices may be checked using the following procedures:
 - one or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
 - conduct the procedure using a designated device that will not be used by learners and, if necessary, can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). Use the same device for the duration of the procedure.
 - ensure that the relevant staff have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
 - record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed, and attached to the form

- once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:
 - internal response or discipline procedures
 - involvement by the MAT
 - police involvement and/or action
- it is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively
- there are support strategies in place e.g., peer support for those reporting or affected by an online safety incident
- incidents should be logged using CPOMS
- those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions
- learning from the incident (or pattern of incidents) will be used to support staff CPD and opportunities for classroom learning

The school will make the flowchart below available to staff to support the decision-making process for dealing with online safety incidents.



School actions

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 (Blue Kite Disciplinary Procedure) as follows:

Online Safety Education Programme

Online safety is a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways

- A planned online safety curriculum for all year groups and regularly taught in a variety of contexts eg. computing curriculum and PSHE lessons
- Lessons are matched to need; are age-related and build on prior learning including lessons to promote: critical thinking, misinformation, disinformation, conspiracy theories and the safe ethical use of artificial intelligence tools
- Lessons are context-relevant with agreed objectives leading to clear and evidenced outcomes
- it incorporates/makes use of relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week
- the programme will be accessible to learners at different ages and abilities such as those with additional learning needs or those with English as an additional language.
- vulnerability is actively addressed as part of a personalised online safety curriculum e.g., for victims of abuse and SEND.
- learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school.
- staff should act as good role models in their use of digital technologies the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- where learners are allowed to freely search the internet, staff should be vigilant in supervising the learners and monitoring the content of the websites the young people visit
- it is accepted that from time to time, for good educational reasons, students may need to research topics, (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff should be able to request the temporary removal of those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need
- the online safety education programme should be relevant and up to date to ensure the quality of learning and outcomes.

Artificial intelligence (AI)

- Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

- We recognise that AI has many uses to help pupils learn, but may also have the potential to be used to bully others. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real. This includes deepfake pornography: pornographic content created using AI to include someone's likeness.
- We will treat any use of AI to bully pupils in line with our behaviour policy.
- Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out a risk assessment where new AI tools are being used by the school.

Staff/volunteers

All staff will receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- the training will be an integral part of the school's annual safeguarding and data protection training for all staff
- all new staff will receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements. It includes explicit reference to classroom management, professional conduct, online reputation and the need to model positive online behaviours.
- training is updated on the basis of new technology use, raising awareness and ensuring best practice including: AI awareness of content risks, misinformation and updated filtering and monitoring responsibilities

Families

The school will seek to provide information and awareness to parents and carers through:

- regular communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes
- the learners – who are encouraged to pass on to parents the online safety messages they have learned in lessons and by learners leading sessions at parent/carers evenings.
- letters, newsletters, website, learning platform,
- high profile events / campaigns e.g. [Safer Internet Day](#)
- reference to the relevant web sites/publications, e.g. [SWGfL](#); www.saferinternet.org.uk/; www.childnet.com/parents-and-carers (see Appendix for further links/resources).

Filtering & Monitoring

Schools in England (and Wales) are required *“to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering”* Furthermore, the Department for Education's statutory guidance 'Keeping Children Safe in Education' obliges schools and colleges in England to *“ensure appropriate filters and appropriate monitoring systems are in place and regularly review their effectiveness”* and they *“should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT”* however, schools will need to *“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.”

Ofsted concluded as far back as 2010 that “Pupils in the schools that had ‘managed’ systems had better knowledge and understanding of how to stay safe than those in schools with ‘locked down’ systems. Pupils were more vulnerable overall when schools used locked down systems because they were not given enough opportunities to learn how to assess and manage risk for themselves.”

To further support schools and colleges in England, the Department for Education published Digital and Technology standards.

- There is a filtering and monitoring system in place that safeguards staff and learners by blocking harmful, illegal and inappropriate content.
- There is a monitoring system that enables the prompt investigation of a potential safeguarding incident and outcomes are logged.
- Roles and responsibilities for the management of filtering and monitoring systems have been defined and allocated.
- There is a defined and agreed process for making changes to the filtering or monitoring system that involves a senior leader in the agreement of the change.
- Mobile devices that access the school’s internet connection (whether school or personal devices) will be subject to the same filtering standards as other devices on the school systems.
- The school has provided enhanced/differentiated user-level filtering using the Securly filtering system. There are three separate groups – staff, pupils and a privileged group (allowing different filtering levels for different ages/stages and different groups of users – staff/learners etc.)

Roles and Responsibilities

The school and Trust work in partnership with the IT service provider (*insert name of provider*) to ensure that the school infrastructure/network is as safe and secure as is reasonably possible. DfE Filtering Standards require that schools and colleges identify and assign roles and responsibilities to manage filtering and monitoring systems.

Role	Responsibility	Name / Position
Responsible Governor	Strategic responsibility for filtering and monitoring and need assurance that the standards are being met.	Becky Brake Adrian Champ
Senior Leadership	Team Member Responsible for ensuring these standards are met and: <ul style="list-style-type: none">• procuring filtering and monitoring systems• documenting decisions on what is blocked or allowed and why• reviewing the effectiveness of your provision• overseeing reports Ensure that all staff: <ul style="list-style-type: none">• understand their role	Rachel Taylor

	<ul style="list-style-type: none"> • are appropriately trained • follow policies, processes and procedures • act on reports and concerns 	
Designated Safeguarding Lead	Lead responsibility for safeguarding and online safety, which includes overseeing and acting on: <ul style="list-style-type: none"> • filtering and monitoring reports • safeguarding concerns • checks to filtering and monitoring systems 	Rachel Taylor
IT Service Provider	Technical responsibility for: <ul style="list-style-type: none"> • maintaining filtering and monitoring systems • providing filtering and monitoring reports • completing actions following concerns or checks to systems 	GHS
All staff need to be aware of reporting mechanisms for safeguarding and technical concerns. They should report if:	<ul style="list-style-type: none"> • they witness or suspect unsuitable material has been accessed • they can access unsuitable material • they are teaching topics which could create unusual activity on the filtering logs • there is failure in the software or abuse of the system • there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks • they notice abbreviations or misspellings that allow access to restricted material 	

Filtering Procedures

The filtering of internet content provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context. The filtering system cannot, however, provide a 100% guarantee that it will do so, as online content changes dynamically and new technologies are constantly being developed. It is important, therefore, to understand that filtering is only one element in a larger strategy for online safety and acceptable use.

Internet access is filtered for all users. Differentiated internet access is available for staff and customised filtering changes are managed by the school. Illegal content is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation URL list and other illegal content lists. There is a clear route for reporting and managing changes to the filtering system.

The filtering system used in our school is up to date and applied to all:

- users, including guest accounts
- school owned devices
- devices using the school broadband connection

This system:

- filters all internet feeds, including any backup connections

- is age and ability appropriate for the users and is suitable for educational settings
- handles multilingual web content, images, common misspellings and abbreviations
- identifies technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them
- provides alerts when any web content has been blocked
- is regularly updated

Mobile and app content is often presented in a different way to web browser content. If a pupil is searching through an iPad, the usual filtering applies, however a user name is not required, anything that is flagged by the filter cannot immediately be traced to a particular individual. iPads are distributed to year groups and staff will be aware of the users.

Monitoring Procedures

Monitoring user activity on school and college devices is an important part of providing a safe environment for children and staff. Unlike filtering, it does not stop users from accessing material through internet searches or software. Monitoring allows review of user activity on school devices. For monitoring to be effective it must pick up incidents urgently, usually through alerts or observations, allowing prompt action to be taken.

Our monitoring strategy includes:

- physical monitoring by staff watching screens of users
- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services

The monitoring process alerts the school to breaches of the filtering policy, which are then acted upon.

Filtering and Monitoring Review and Checks

Strategic review

The filtering and monitoring provision is reviewed at least annually, as part of a wider online safety annual review, using [the 360 degree safe tool](#), or when:

- a safeguarding risk is identified
- there is a change in working practice, e.g. remote access or BYOD
- new technology is introduced

The review is conducted by members of the senior leadership team, the designated safeguarding lead (DSL), and the IT service provider.

Operational review

In addition to the annual review of filtering and monitoring, checks to filtering and monitoring systems are completed and recorded as part of the filtering and monitoring review process. How often the checks take

place will be based on the context, the risks highlighted in the filtering and monitoring review, and any other risk assessments.

Checks will be undertaken from both a safeguarding and IT perspective.

In our school, we complete the following checks:-

1. A review of the monitoring logs to check for patterns and themes which may arise from user access and cause concern. These are completed weekly.
2. Checks of the filtering systems are performed on a range of:
 - school owned devices and services, including those used off site
 - geographical areas across the site
 - user groups, for example, teachers, pupils and guests
 - a test user account is set up for both pupil and staff access rights and this is used when testing filtering.

Logs of checks are kept so they can be reviewed. These record:

- when the checks took place
- who did the check
- what was tested or checked
- resulting actions

A check using the SWGfL Test Filtering website is also completed termly.

Changes to Filtering and Monitoring Systems

- If changes are needed to allow access to previously filtered material, requests should go in the first instance to the headteacher, who will decide whether the educational impact of not accessing the site outweighs the potential risk of change. This should be done as far in advance as possible so that any necessary consultation can be completed.
- A second responsible person (SLT/DSL) will agree to the change before it is made

Training/Awareness

It is a statutory requirement in England that staff receive training, at least annually, about safeguarding, child protection, online safety and filtering and monitoring.

Governors, Senior Leaders and staff are made aware of the expectations of them:

- at induction
- at whole-staff/governor training
- through the awareness of policy requirements
- through the acceptable use agreements
- in regular updates throughout the year

Those with specific responsibilities for filtering and monitoring receive enhanced training to help them understand filtering and monitoring systems and their implementation and review.

Learners are made aware of the expectations of them:

- in lessons
- through the acceptable use agreements

Parents are informed of the school's filtering policy through the acceptable use agreement and through online safety awareness sessions/newsletter etc.

Technical Security

The school technical systems will be managed in ways that ensure that the school meets recommended technical requirements

- responsibility for technical security resides with SLT who may delegate activities to identified roles.
- all users have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the IT service provider and will be reviewed, at least annually, by the SLT/Online Safety Group
- password policy and procedures are implemented. (consistent with guidance from the National Cyber Security Centre)
- the security of their username and password and must not allow other users to access the systems using their log on details.
- all users have responsibility for the security of their username and password and must not allow other users to access the systems using their log on details.
- all school networks and system will be protected by secure passwords. Passwords must not be shared with anyone
- the administrator passwords for school systems are kept in a secure place, e.g. school safe.
- there is a risk-based approach to the allocation of learner usernames and passwords.
- there will be regular reviews and audits of the safety and security of school technical systems
- servers, wireless systems and cabling are securely located and physical access restricted
- appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems and devices from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up-to-date endpoint software.
- there are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud,
- The ICT TA/GHS are responsible for ensuring that all software purchased by and used by the school is adequately licenced and that the latest software updates (patches) are applied.
- an appropriate system is in place for users to report any actual/potential technical incident/security breach to the relevant person, as agreed)
- use of school devices out of school and by family members is regulated by an acceptable use statement that a user consents to when the device is allocated to them
- personal use of any device on the school network is regulated by acceptable use statements that a user consents to when using the network
- staff members are not permitted to install software on a school-owned devices without the consent of the SLT/IT service provider
- removable media is not permitted unless approved by the SLT/IT service provider

- systems are in place to control and protect personal data and data is encrypted at rest and in transit.
- guest users are provided with appropriate access to school systems based on an identified risk profile.

Mobile technologies

The school acceptable use agreements for staff, learners, parents, and carers outline the expectations around the use of mobile technologies.

The school allows: (the school should complete the table below to indicate which devices are allowed and define their access to school systems).

	School devices			Personal devices		
	School owned for individual use	School owned for multiple users	Authorised device ¹	Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	N/A	No	Yes	Yes
Full network access	Yes	Yes	Yes	No	No	No
Internet only				No	Yes	Yes
No network access				No		

Social media

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to learners through:

- ensuring that personal information is not published.
- education/training being provided including acceptable use, age restrictions, social media risks, digital and video images policy, checking of settings, data protection and reporting issues.
- clear reporting guidance, including responsibilities, procedures, and sanctions.
- risk assessment, including legal risk.
- guidance for learners, parents/carers

School staff should ensure that:

- No reference should be made in social media to learners, parents/carers or school staff.

¹ Authorised device – purchased by the learner/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school.

- they do not engage in online discussion on personal matters relating to members of the school community.
- personal opinions should not be attributed to the school.
- security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.
- they act as positive role models in their use of social media

When official school social media accounts are established, there should be:

- a process for approval by senior leaders
- clear processes for the administration, moderation, and monitoring of these accounts – involving at least two members of staff
- a code of behaviour for users of the accounts
- systems for reporting and dealing with abuse and misuse
- understanding of how incidents may be dealt with under school disciplinary procedures.

Personal use

- personal communications are those made via personal social media accounts. In all cases, where a personal account is used which associates itself with, or impacts on, the school it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy
- personal communications which do not refer to or impact upon the school are outside the scope of this policy
- where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken
- *the school permits reasonable and appropriate access to personal social media sites during school hours*

Monitoring of public social media

- As part of active social media engagement, the school may pro-actively monitor the Internet for public postings about the school.
- the school should effectively respond to social media comments made by others according to a defined policy or process.
- when parents/carers express concerns about the school on social media we will urge them to make direct contact with the school, in private, to resolve the matter. Where this cannot be resolved, parents/carers should be informed of the school complaints procedure.
- School use of social media for professional purposes will be checked regularly by a senior leader and the Online Safety Lead to ensure compliance with the social media, data protection, communications, digital image and video policies. In the event of any social media issues that the school is unable to resolve support may be sought from the Professionals Online Safety Helpline.

Digital and video images

The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- the school may use live-streaming or video-conferencing services in line with national and local safeguarding guidance / policies.
- when using digital images, staff will inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images.
- staff/volunteers must be aware of those learners whose images must not be taken/published. Those images should only be taken on school devices. The personal devices of staff should not be used for such purposes
- in accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other *learners* in the digital/video images (adapt as necessary)
- care should be taken when sharing digital/video images that learners are appropriately dressed
- learners must not take, use, share, publish or distribute images of others without their permission
- photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with Online Safety Policy
- learners' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- written permission from parents or carers will be obtained before photographs of learners are taken for use in school or published on the school website/social media.
- parents/carers will be informed of the purposes for the use of images, how they will be stored and for how long – in line with the school data protection policy
- images will be securely stored in line with the school retention policy

Online Publishing

The school communicates with parents/carers and the wider community and promotes the school through:

- Public-facing website
- Social media
- Online newsletters
- Email messages

The school website is managed/hosted by Primary Site. The school ensures that online safety policy has been followed in the use of online publishing e.g., use of digital and video images, copyright, identification of young people, publication of school calendars and personal information – ensuring that there is least risk to members of the school community, through such publications.

Where learner work, images or videos are published, their identities are protected, and full names are not published.

Data Protection

Personal data will be recorded, processed, transferred, and made available according to the current data protection legislation.

The school:

- has a Data Protection Policy.
- implements the data protection principles and can demonstrate that it does so
- has paid the appropriate fee to the Information Commissioner's Office (ICO)
- has appointed an appropriate Data Protection Officer (DPO) who has effective understanding of data protection law and is free from any conflict of interest.
- has a 'Record of Processing Activities' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- the Record of Processing Activities lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis is listed
- has an 'information asset register' in place and knows exactly [what personal data is held](#), where, why and which member of staff has responsibility for managing it
- information asset register lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis will have also been listed
- will hold the minimum personal data necessary to enable it to perform its function and will not hold it for longer than necessary for the purposes it was collected for. The school 'retention schedule' supports this
- data held is accurate and up to date and is held only for the purpose it was held for. Systems are in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- provides staff, parents, volunteers, teenagers, and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice
- has procedures in place to deal with the individual rights of the data subject
- carries out Data Protection Impact Assessments (DPIA) where necessary e.g. to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier
- has undertaken appropriate due diligence and has data protection compliant contracts in place with any data processors
- understands how to share data lawfully and safely with other relevant data controllers.
- has clear and understood policies and routines for the deletion and disposal of data
- reports any relevant breaches to the Information Commissioner within 72hrs of becoming aware of the breach as required by law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents
- has a Freedom of Information Policy which sets out how it will deal with FOI requests

- provides data protection training for all staff at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff

When personal data is stored on any mobile device or removable media the:

- data will be encrypted, and password protected.
- device will be password protected.
- device will be protected by up-to-date endpoint (anti-virus) software
- data will be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete.

Staff must ensure that they:

- at all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse
- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- can help data subjects understand their rights and know how to handle a request whether verbal or written and know who to pass it to in the school
- only use encrypted data storage for personal data
- will not transfer any school personal data to personal devices
- use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data
- transfer data using encryption, a secure email account (where appropriate), and secure password protected devices.

Outcomes

The impact of the Online Safety Policy and practice is regularly evaluated through the review/audit of online safety incident logs; behaviour/bullying reports; surveys of staff, learners; parents/carers and is reported to relevant groups:

- there is balanced professional debate about the evidence taken from the reviews/audits and the impact of preventative work e.g., online safety education, awareness, and training
- there are well-established routes to regularly report patterns of online safety incidents and outcomes to school leadership and Governors
- parents/carers are informed of patterns of online safety incidents as part of the school's online safety awareness raising
- online safety (and related) policies and procedures are regularly updated in response to the evidence gathered from these reviews/audits/professional debate
- the evidence of impact is shared with other schools, agencies and LAs to help ensure the development of a consistent and effective local online safety strategy.

School Online Safety Policy

Appendices

Acceptable Use Agreement for Community Users Template

This acceptable use agreement is intended to ensure:

- that community users of school digital technologies will be responsible users and stay safe while using these systems and devices
- that school systems, devices and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that users are protected from potential harm in their use of these systems and devices

Acceptable Use Agreement

I understand that I must use school systems and devices in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems, devices and other users. This agreement will also apply to any personal devices that I bring into the school:

- I understand that my use of school systems and devices will be monitored
- I will not use a personal device that I have brought into school for any activity that would be inappropriate in a school setting.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, terrorist and extremist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will not upload any sensitive identifying information including names, addresses, photos, data relating to any individual onto AI platforms that would be in breach of GDPR practice.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.
- I will not access, copy, remove or otherwise alter any other user's files, without permission.
- I will ensure that if I take and/or publish images of others I will only do so with their permission. I will not use my personal equipment to record these images, without permission. If images are published it will not be possible to identify by name, or other personal information, those who are featured.
- I will not publish or share any information I have obtained whilst in the school on any personal website, social networking site or through any other means, unless I have permission from the school.
- I will not, without permission, make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a school device, nor will I try to alter computer settings, unless I have permission to do so.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.

- I will immediately report any damage or faults involving equipment or software, whatever the cause.
- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).
- I understand that if I fail to comply with this acceptable use agreement, the school has the right to remove my access to school systems/devices

I have read and understand the above and agree to use the school systems (both in and out of school) and my own devices (in school and when carrying out communications related to the school) within these guidelines.

Name: Signed: Date:

Record of reviewing devices/internet sites (responding to incidents of misuse)

Group:
Date:
Reason for investigation:
.....
.....

Details of first reviewing person

Name:
Position:
Signature:

Details of second reviewing person

Name:
Position:
Signature:

Name and location of computer used for review (for web sites)

.....
.....

Web site(s) address/device	Reason for concern

Conclusion and Action proposed or taken

Filtering 'Stress-Test' Process Guidance

Rationale

Please note that the first non-negotiable element of filtering testing within school is the regular use of testfiltering.com on:

- a range of devices,
- in a range of physical locations,
- using a range of log-ins

These should be logged to provide evidence of effective monitoring.

In addition, random spot checks have been advised by *Sarah Turner Consulting* to check the efficacy of the filtering system, by using search terms that would be expected to be filtered, relevant to emergent safeguarding themes or incidents. Carrying out these spot checks will be referred to as 'stress-testing' for the remainder of this document.

This guidance must be read in full by all staff involved in stress-testing prior to completing the process.

Principles

The process for filtering spot checks must be followed carefully to ensure:

- robust coverage of safeguarding themes over time
- protection from accusations of misconduct for the staff members completing the checks
- school network usage is not affected by planned inappropriate search terms (e.g. auto-fill fields, browser history, etc are not retained on devices, leading to pupils being exposed to inappropriate language or themes)

Themes and search terms

Each year, an agreed Filtering Terms List (Appendix A) will be completed in consultation with key stakeholders. This list should provide suggested search terms to be used throughout the year in order to stress-test network filters.

Suggested words or phrases to be included within the Filtering Terms List will be categorised to allow mapping to ensure that coverage of different safeguarding themes is robust across the course of the school year and is matched to the specific school context. The Filtering Terms Map (Appendix B) can be used for this purpose.

Due to the constantly evolving nature of safeguarding, it may be advisable to stress-test additional terms not already included on the list, for example in the wake of new guidance around safeguarding or as a result of recent incidents within school or after local or national incidents of concern. In this case, mapping can be updated as required.

Protecting staff from harm or accusations of misconduct

Due to the nature of the search terms to be tested, if filtering is unsuccessful, staff may be exposed to content of an inappropriate and potentially harmful nature. No staff member should be involved in this stress-testing without being aware of this risk, and undue pressure or expectation must not

be placed upon any staff member to be involved in the process. Staff conducting stress-testing must enter into the process both aware of, and prepared for, the risk of exposure to this content. Search terms should be selected with this, and the individual circumstances of staff conducting stress-testing, in mind.

Similarly, existing monitoring procedures – if sufficiently robust - ought to highlight concerns around any network user entering them into the system. It is therefore important to ensure that all filtering stress-tests are planned and approved in advance, and logged accordingly, and are only carried out by approved personnel. This ensures that the staff members conducting the stress-tests can be confident that their own network usage at these times is not in breach of the school's policies and acceptable use agreements.

No member of staff is ever permitted to carry out a filtering stress-test without another member of staff present.

For staff to undertake stress-tests, they must first have completed a Filtering Stress-Test Proposal form (Appendix C).

This form contains details of:

- the staff members to conduct the stress-test
- the proposed devices or log-ins to be used
- the proposed search terms to be tested (which may originate from the Filtering Terms Map explained above, or in response to emerging themes or incidents)

Staff members must be aware that completing the form is not sufficient – approval must still be given by the Head Teacher before proceeding with the stress-test.

Once approval has been given and the stress test carried out, the staff members must also ensure that they record the date and time of completion and should be carried out within a one-hour window. In the unforeseen event that this task cannot be completed within this time, a new approval must be sought.

Staff must then ensure that they do not repeat these searches outside of this window, as doing so would not be covered by the initial approval given.

Protecting pupils from exposure to inappropriate search terms

In order to ensure that stress-testing does not have unintended consequences on users such as pupils or staff, the following precautions need to be taken before stress-testing begins:

Use of separate 'test' accounts, which are solely intended for the purpose of network testing, one set up as a pupil and the other as a member of staff, which are set up identically to specific user accounts of these types.

Windows devices, which have both *Edge* and *Chrome* installed, should be used, and the selected browser must be put into 'InPrivate' or 'Incognito' mode (both of these can be accessed via *Ctrl+Shift+N*). The use of these modes is intended to mitigate the risk of exposure to inappropriate search terms.

iPads must not be used for stress-testing as there are no separate user accounts and therefore the risk of accidental exposure of pupils to inappropriate terms (via browser history, auto-complete, etc.) is considered too great.

Appendix A

Filtering Terms List

The following list of search terms has been collated by a group of professionals. Search terms have been categorised to allow staff members responsible for filtering and monitoring within schools to map their filtering stress-testing across the year.

Categories have been collated from a variety of sources, including but not limited to:

- KCSiE and other statutory guidance
- testfiltering.com
- Securly filtering categories

Adult content / pornography	Child sexual abuse material This category <u>must not</u> be tested, other than through the use of testfiltering.com	Domestic abuse
Drugs	Gambling	Gang-related activity
Intolerance / extremism	Offensive language	Self-harm / suicide
Social media / social networking	Terrorism content This category <u>must not</u> be tested, other than through the use of testfiltering.com	Weapons

Appendix B

Filtering Terms Map

This document can be used at the start of the academic year to map search terms for filtering stress-tests. Search terms should be selected from the Filtering Terms List. It is not necessary to test terms from every category each term, but mapping should aim to ensure that all categories have been stress-tested across the course of the year.

	Term 1	Term 2	Term 3	Term 4	Term 5	Term 6
Adult Content / Pornography						
Domestic abuse						
Drugs						
Gambling						
Gang-related activity						
Intolerance / extremism						
Offensive language						

Self-harm / suicide						
Social media / social networking						
Weapons						

Appendix C

Filtering Stress-Test Proposal

This form must be completed and signed-off by the Head Teacher prior to stress-testing of network search terms.

This section must be completed prior to stress-testing

Staff involved:

- 1)
- 2)

Device(s) (e.g. specific staff laptop, pupil laptop):

Log-in:	testpupil	teststaff
----------------	-----------	-----------

Browser:	Chrome	Edge
-----------------	--------	------

Proposed search terms:

.....
.....
.....

Head Teacher signature to approve stress-test:

This section should be completed once stress-testing has been undertaken

Date stress-test completed:

Start time:

End time:

- ☐ All search terms were successfully filtered

Or

- ☐ The following search terms were not successfully filtered and this will now be reported to our filtering provider

.....

.....

Staff member signature:

Staff member signature:

Links to other organisations or documents

The following links may help those who are developing or reviewing a school online safety policy and creating their online safety provision:

UK Safer Internet Centre

Safer Internet Centre – <https://www.saferinternet.org.uk/>

South West Grid for Learning - <https://swgfl.org.uk/products-services/online-safety/>

Childnet – <http://www.childnet-int.org/>

CEOP - <http://ceop.police.uk/>

ThinkUKnow - <https://www.thinkuknow.co.uk/>

360 Degree Safe – Online Safety self-review tool – <https://360safe.org.uk/>

360Data – online data protection self-review tool: www.360data.org.uk

SWGfL Test filtering - <http://testfiltering.com/>