



Online safety policy

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Associated documents:			
<ul style="list-style-type: none"> Whistleblowing policy Anti-bullying policy Acceptable Use of Computers and Internet policy Behaviour policy Safeguarding and Child protection policy 		<ul style="list-style-type: none"> General principles and Practices of Employment Concerns and Complaints policy GDPR policy Photography and Videography policy 	
Links to:			
<ul style="list-style-type: none"> Children Act 2004 Communications Act 2003 Computer Misuse Act 1990 		<ul style="list-style-type: none"> Data Protection Act 2018 Freedom of Information Act 2000 Malicious Communications Act 1988 	
www.gov.uk/government/publications/teaching-online-safety-in-schools www.gov.uk/government/publications/preventing-and-tackling-bullying www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis www.gov.uk/government/publications/keeping-children-safe-in-education--2 www.gov.uk/government/publications/working-together-to-safeguard-children--2			

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1 Introduction

Academies staff and governors play a vital role in setting an example for the whole academies and are central to implementing policy and process. It is imperative that a whole academy community approach to online safety is adopted and that all stakeholders are aware of their responsibilities and duties in relation to keeping children safe online. This policy will support a robust online safety ethos and ensure that academies are providing the best online safety provision they possibly can.

This policy is applicable to all members of Diverse Academies. This includes, staff, students and pupils, volunteers, parents/carers, visitors and community users who have access to and are users of the Diverse Academies digital technology systems.

2 Online safety statement

Diverse Academies recognises that online safety is an essential element of safeguarding and duly acknowledges its statutory obligation to ensure that all learners and staff are protected from potential online harm.

Diverse Academies believes that the internet and associated devices are an integral part of everyday life.

Diverse Academies affirms that all learners should be empowered to build resilience and to develop strategies to recognise and respond to online risks.

3 Policy scope

This policy supports academies in meeting statutory requirements as per the DfE guidance under KCSiE (2020), Working Together to Safeguard Children (2018) and non-statutory guidance, teaching online safety in academies (2019). Effective, timely and robust online safety is fundamental to protecting children and young people in education and it is a significant part of the safeguarding agenda. Education has a vital role to fulfil in protecting children and young people from forms of online abuse whilst demonstrating a concerted obligation to respond with haste and flexibility to concerns as they arise. Safeguarding is everyone's responsibility in Diverse Academies.

Defining online abuse: "Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones" (NSPCC, 2019).

Hidden harms – types of online abuse may include:

- Cyberbullying
- Emotional abuse
- Grooming
- Sexting
- Sexual abuse
- Sexual exploitation

The types, patterns and different circumstances of significant harm and abuse should be considered within the categories identified for children in the Children Act 1989/2004. These are:

- Neglect
- Sexual
- Physical
- Emotional

Technology can facilitate a world of learning and development in addition to help yield a range of opportunities. However, the stark reality is that it can also present a window to potential and actual harm and abuse. It can elicit and support an array of illegal abusive behaviours including, but not limited to:

- Harassment
- Stalking
- Threatening behaviour
- Creating or sharing child sexual abuse material
- Inciting a child to sexual activity
- Sexual exploitation
- Grooming
- Sexual communication with a child
- Causing a child to view images or watch videos of a sexual act.

This policy should be read alongside the relevant policies relating to safeguarding of children and in addition to the associated statutory legislation and guidance as stipulated on page 1-2 of this policy.

4 Roles and responsibilities

The following section outlines the online safety roles and responsibilities of all stakeholders across the online community within Diverse Academies.

4.1 Teachers and staff

All members of academies staff (teaching and non-teaching) have a responsibility to protect children online. This includes every member of staff who works at the academies; principal, senior leadership, teachers, substitute teachers, work-experience staff, office staff, nurses, caretakers, cleaners, etc. All staff must always act in accordance with their own professional boundaries, upholding professional behaviour and conduct at all times.

All academies staff need to:

- Be aware of and adhere to all policies in academies which support online safety and safeguarding.
- Contribute to policy development and review.
- Support in the ownership and responsibility for the security of systems and the data accessed.
- Model good practice when using technology.
- Know the process for making referrals and reporting concerns.
- Know how to recognise, respond and report signs of online abuse and harm.
- Receive appropriate child protection training.
- Always act in the best interests of the child.
- Be responsible for their own continuing professional development in online safety.

4.2 Governors and senior leadership team

A governor's role for online safety in an academy should include, through delegation and robust QA via the academy leadership team:

- Upholding online safety as a safeguarding issue which is embedded across the whole academy's culture.
- Ensuring that children are provided with a safe environment in which to learn and develop.
- Ensuring that the academy has appropriate filters and monitoring systems in place.
- Ensuring the academy has effective policies and training in place.
- Ensuring that risk assessments are conducted on the effectiveness of filtering systems.
- Auditing and evaluating online safety practice with the designated safeguarding lead.
- Ensuring there are robust reporting channels via implementation and understanding of the safeguarding policy.

4.3 Designated safeguarding lead (DSL) and deputy designated safeguarding lead (deputy DSL)

With respect to online safety, it is the responsibility of the DSL to:

- Ensure children and young people are being appropriately taught about and know how to use the internet responsibly.
- Ensure teachers and parents are aware of measures to keep children safe online through relevant training provision.
- Take responsibility for all safeguarding matters, including online safety.
- Collaborate with the senior leadership team, the online safety lead and computing lead.
- Facilitate effective record keeping and the reporting and monitoring of all online safety concerns.
- Promote online safety and the adoption of a whole academy approach.
- Maintain own training and learning needs, ensuring they are up to date with all matters relating to online safety.

4.4 Children and young people

With respect to online safety in our academies, children need to:

- Know who the DSL is.
- Engage in age appropriate online safety education opportunities.
- Contribute to policy development and review.
- Read and adhere to online safety policies.
- Respect the feelings of others, both off and online.
- Take responsibility for keeping themselves and others safe online.
- Where and how to find help with any online incidents or concerns.
- How, when and where to report concerns and when to seek help from a trusted adult.

Diverse Academies follows the principles laid out in the UKCCIS 'education for a connected world' framework - <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>, which aims to equip children and young people for digital life. It covers:

- Self-image and identity
- Online relationships
- Online reputation
- Online bullying
- Managing online information
- Health, wellbeing and lifestyle
- Privacy and security
- Copyright and ownership

4.5 Parents and Carers

Diverse Academies are committed to enabling parents and carers to understand the risks that children face online to protect them from online dangers. Parents should be encouraged via communication from respective academies to:

- Read and adhere to all relevant policies.
- Be responsible when taking photos/using technology at academy events.
- Know who their child(ren's) academy DSL is.
- Know how to report online issues to the academy in the first instance.
- Support online safety approaches and education provision for their child(ren).
- Be a role model for safe and appropriate behaviour.
- Identify changes in their child(ren's) behaviour that could indicate they are at risk of online harm or abuse.

5 Education and Training

Effective online safety provision and promotion of the welfare of children and young people rely upon constructive relationships that enable robust multi-agency partnership working. This can only be effective when all staff are knowledgeable, confident and equipped with the skills to deal with processes and procedures when concerns arise relating to online abuse or harm.

To further staff knowledge around online safety and to provide a wealth of curriculum resources across the phases, Diverse Academies is committed to a partnership with National Online Safety (NOS).

<https://nationalonlinesafety.com/>

The support offered by NOS ensures online safety has a strong emphasis around training a competent workforce through knowledge of up to date policies and procedures, keeping ahead of the ever-changing online world, provision of webinars and accredited courses for staff at all levels.

Diverse Academies promotes and expects robust governance arrangements and collaborative practices.

Types of online risk usually fall under one of three categories:

Contact: Contact from someone online who may wish to bully or abuse the child. This could also include online grooming, online harassment or activities of a commercial nature, including tracking and harvesting person information.

Content: Inappropriate material available to children online including adverts, spam, sponsorship, personal info, violent or hateful content, pornographic or unwelcome sexual content, biased materials, racist materials, and misleading information or advice.

Conduct: The child may be the perpetrator of activities including illegal downloading, hacking, gambling, financial scams, bullying or harassing another child. They might create and upload inappropriate material or provide misleading information or advice.

5.1 Learners

Diverse Academies will promote safe and responsible internet use through:

- Education regarding safe and responsible use and access of the internet.
- Including online safety in personal, social, health and economic (PSHE) education, relationships and sex education (RSE) and information computer technology studies.
- Reinforcing online safety messages as a continuum.

Diverse Academies will support learner's understanding based on age and ability through:

- 'Acceptable use' posters in all rooms with internet access.
- Informing all learners of monitoring and filtering in place.
- Implement peer education strategies.
- Providing continuous training and education as part of their transition across key stages.
- Using alternative, complementary support where needed.
- Seeking learner voice.

5.2 Vulnerable Learners

Vulnerable children who need our help the most are not only missing out on opportunities to flourish online but are often experiencing the very worst that the online world can be. Diverse Academies recognise that many children within our settings are living in families with domestic abuse, parental substance abuse and mental health problems.

Diverse Academies recognises that some learners are more vulnerable due to a range of factors.

Those children may be:

- Receiving statutory care or support.
- Known to have experienced specific personal harm.
- With a disability, ill-health or developmental difficulties.
- In households or families with characteristics or locations that indicate higher potential likelihood of current and future harm.

- Vulnerable or of concern by virtue of their identity or nationality.
- At risk in relation to activity or institutions outside the home.
- Caring for others.

Diverse Academies will ensure the effective and safe provision of tailored online safety education.

Diverse Academies will obtain input and advice from specialist staff as deemed necessary. For example, through our formal, professional relationship with National Online Safety (NOS) and the National College.

5.3 Staff

Diverse Academies will:

- Ensure provision of robust policies and practices as part of induction and ongoing training provision.
- Facilitate designated safeguarding leads and the member of staff with responsibility for online safety in completing the NOS level 3 online safety accredited training.
- Provide up to date online safety training at least annually or more in line with legislative and statutory changes and/or online safety incidents arising.
- Ensure training will include recognition of risks and responding to concerns.
- Inform of monitoring and filtering processes.
- Make staff aware that their online conduct outside of work can impact upon their professional role and responsibilities.
- Advise of appropriate resources.
- Ensure that all staff are aware of procedures to follow in recognising, responding and reporting online safety concerns.
- Ensure that all staff are exposed to continuing professional development via NOS and National College in all areas concerning 'online safety', GDPR and 'acceptable use'.

5.4 Parents and carers

Diverse Academies will:

- Recognise and cultivate the essential role parents and carers have in fostering safer online safety practices in children and young people.
- Ensure provision of resources, support and advice – such as that provided by the regular updates from National Online Safety (ie: #WakeupWednesday).
- Ensure provision and adherence to online safety policies and other policies of relevance.

- Advise of how and when to raise concerns.
- Provide details of all relevant contacts (for example, the DSL).

6 Cultivating a safe environment

“All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from academies, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs” (DfE, 2019).

Children in Diverse Academies will be educated in an age-appropriate way around:

- How to evaluate what they see online
- How to recognise techniques for persuasion
- Their online behaviour
- How to identify online risks
- How and when to seek support

6.1 Evaluate: How to evaluate what they see online

This will enable our students/pupils to make judgements about what they see online and not automatically assume that what they see is true, valid or acceptable.

Diverse Academies will help students/pupils to consider questions including (but not exclusively):

- Is this website/URL/email fake? How can I tell?
- What does this cookie do and what information am I sharing?
- Is this person who they say they are?
- Why does someone want me to see this?
- Why does someone want me to send this?
- Why would someone want me to believe this?

6.2 Recognise: How to recognise techniques used for persuasion

This will enable students/pupils to recognise the techniques that are often used to persuade or manipulate others. A strong grasp of knowledge across many areas makes people less vulnerable to these techniques and better equipped to recognise and respond appropriately to strongly biased intent or malicious activity.

Diverse Academies will help students / pupils to recognise:

- Online content which tries to make people believe something false is true and/or mislead (misinformation and disinformation).
- Techniques that companies use to persuade people to buy something.
- Ways in which games and social media companies try to keep users online longer (persuasive/sticky design)
- Criminal activities such as grooming.

6.3 Online Behaviour

Diverse Academies expect that this section is read in conjunction with the trust behaviour and anti-bullying policies.

This will enable staff to educate students/pupils in understanding what acceptable and unacceptable online behaviour looks like. Diverse Academies will teach children that the same standard of behaviour and honesty applies online and offline, including the importance of respect for others. Diverse Academies will also teach them to recognise unacceptable behaviour in others.

Diverse Academies will help children to recognise acceptable and unacceptable behaviour by:

- Looking at why people behave differently online. For example, how anonymity (you do not know me) and invisibility (you cannot see me) affect what people do.
- Looking at how online emotions can be intensified resulting in mob mentality.
- Teaching techniques (relevant on and offline) to defuse or calm arguments (for example, a disagreement with friends) and disengage from unwanted contact or content online; and
- Considering unacceptable online behaviours often passed off as so-called social norms or just banter. For example, negative language that can be used, and in some cases is often expected, as part of online gaming and the acceptance of misogynistic, homophobic and racist language that would never be tolerated offline.

6.4 Identify: How to identify online risks

This will enable staff to educate students/pupils in identifying possible online risks and make informed decisions about how to act. This should not be about providing a list of what not to do

online. The focus should be to help them assess a situation, think through the consequences of acting in different ways and decide on the best course of action.

Diverse Academies will help children to identify and manage risk by:

- Discussing the ways in which someone may put themselves at risk online.
- Discussing risks posed by another person's online behaviour.
- Discussing when risk taking can be positive and negative.
- Discussing "online reputation" and the positive and negative aspects of an online digital footprint. This could include longer-term considerations, i.e. how past online behaviours could impact on their future when applying for a place at university or a job for example.
- Discussing the risks versus the benefits of sharing information online and how to make a judgement about when and how to share and who to share with.
- Asking questions such as what might happen if I post something online? Who will see it? Who might they send it to?

6.5 How and when to seek support

This will enable staff to support students/pupils in understanding safe ways in which to seek support if they are concerned or upset by something they have seen online.

Diverse Academies will:

- Help them to identify who trusted adults are.
- Look at the different ways to access support from, police, the National Crime Agency's Click CEOP reporting service for children, National Online Safety and organisations, such as Childline and the Internet Watch Foundation. The policy links to the wider Diverse Academies Trust policies and processes around reporting of safeguarding and child protection incidents and concerns to academy staff (see the current iteration of Keeping Children Safe in Education).
- Helping them to understand that various platforms and apps will have ways in which inappropriate contact or content can be reported.

7 Responding to online safety concerns

Any concern that children and young people may be at risk of harm or abuse must immediately be reported.

The DSL takes the lead responsibility for online safety concerns, which are initially recorded and actioned in My Concern. Children and young people will be enabled (at a level appropriate to their age and ability) to share online concerns. The safeguarding and child protection policy for Diverse Academies includes procedures to follow regarding online safety concerns.

Remember:

- Child welfare is the principal concern – the best interests of children always take precedence over GDPR and any other constraint that may present itself.
- If there is any immediate danger, contact the police on 999.
- Refer to all appropriate agencies as per Diverse Academies local safeguarding processes.
- Always adhere to local safeguarding procedures and report to the DSL and principal within each academy – who will then take appropriate action.

8 Responding to complaints

There are a number of sources from which a complaint or allegation might arise, including those from:

- A child or young person
- An adult
- A parent/carer
- A member of the public (including a friend or relative)
- A colleague

There may be up to three components in the consideration of an allegation:

- A police investigation of a possible criminal offence.
- Enquiries and assessment by children's social care or adult social care relating to whether a child, young person or adult at risk is in need of protection or services.
- Consideration by an employer of disciplinary action in respect of the individual (including suspension).

The guidance in the safeguarding whistleblowing protocol would be actioned in the event of the circumstances outlined below:

It is the responsibility of the member of staff to inform their principal, (or in the case of persons with a senior position of principal or above within the organisation, their immediate line manager) if they are being investigated in relation to children, young people or adults at risk with respect to protection concerns outside of work. They should also report if their own children/stepchildren/children they are living with become subject to child protection matters or an

adult related to them or living with them become subject to adult protection matters. The principal must report this to the trust DSL and HR. For disclosures involving persons of seniority from principal and above, this must be reported to the trust via the line manager.

9 Monitoring and compliance

Monitoring Requirements	For example: Analysing incident logs Checking planning for online safety lessons Student, pupils, parents and carers questionnaires Evaluations
Monitoring Method	My Concern/safeguarding audit process
Monitoring Prepared by	DSL and/or academy online safety lead
Monitoring Presented to	Principal, executive principal and LAC
Frequency of Reporting	Full termly to LAC/annually to trust via audit

10 Disclaimer

Every effort has been made to ensure that the information contained within this policy is up to date and accurate and reflective of the latest legislative and statutory guidance. The online world is fast changing, and we recognise that areas of policy may need to be adapted and amended to reflect this. If errors are brought to our attention, we will correct them as soon as is practicable

This policy will be reviewed at least annually, to reflect legislative changes or developments, to ensure its continuing relevance and effectiveness.

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