Walton-on-Trent Primary and Nursery School

ONLINE SAFETY PROCEDURES

November 2025

Reviewed: November 2026

Review:
November 2026

John Taylor MAT Online Safety Statement

John Taylor Multi Academy Trust (JTMAT) is committed to safeguarding and promoting the safe use of online tools and to the appropriate monitoring and filtering of unpalatable material and expects all staff and volunteers to share this commitment. Each school within the Trust has a separate approach to online safety that will form part of its procedures and taught curriculum which can be found on the school's individual website or made available via normal home school communications.

- JTMAT is a safe place for children to explore the internet and age-appropriate content. • Through our rich curriculum we regularly teach age-appropriate and engaging lessons to educate children how to; ○ stay safe from harm online;
  - ○ keep others through their own actions safe online; ○ use IT equipment and online services responsibly; ○ exercise their own age appropriate rights.
- Where access to a school email account is permitted age-appropriate rules are in place it limits a child's exposure to:
  - ○ Spam and phishing emails; ○ contact from outside the trust; ○ Viruses and other Malware.
- We have policies and procedures to govern the acceptable use of IT equipment.
- Through the use of technology, we actively monitor children's activity when using IT equipment, software and online services within our schools' to safeguard children and to ensure they kept safe from harm and exposure to harmful material.
- Age-appropriate, proportional filtering systems within our schools' ensure the curriculum can be taught in an engaging and meaningful way while ensuring children are kept safe from exposure to harmful material.
- Our use of online services is to a kept to a minimum, ensuring our sharing of personal information is limited.
- Local networks are configured to ensure children have access to a safe but monitored personal and shared storage areas.
- Our staff are frequently updated (at least annually) on the risks our children face and changes to local and national policies, procedures and legislation.
- It is the responsibility of every adult in our schools to ensure that we maintain the highest level of awareness about possible unsafe practices and deal with any issues immediately and appropriately.
- Appropriate reporting mechanisms are in place at each school to ensure our children, staff and volunteers can inform technical and/or safeguarding staff of any concerns.
- Each individual school is responsible for ensuring compliance with its policies, procedures and curriculum.
- Policies which support the Online Safety Statement:
  - ○ Child Protection & Safeguarding Policy

- Behaviour Policy
- Anti-Bullying Policy
- ICT Policies

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APPENDIX A – ONLINE HARMS AND RISKS: CURRICULUM COVERAGE **STATEMENT OF INTENT**

Shobnall Primary & Nursery School 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 cyberbullying.
- **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.

SIGNED BY:

HEADTEACHER: _____

DATE: _____

CHAIR OF GOVERNORS: _____

DATE: _____

1. LEGAL FRAMEWORK

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

- Online Safety Act 2023
- Voyeurism (Offences) Act 2019
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE 'Filtering and monitoring standards for schools and colleges'

- DfE ‘Harmful online challenges and online hoaxes’
- DfE (2025) ‘Keeping children safe in education’
- Department for Digital, Culture, Media and Sport and UK Council for Internet Safety ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’
- DfE ‘Teaching online safety in school’
- DfE ‘Searching, screening and confiscation’
- National Cyber Security Centre ‘Small Business Guide: Cyber Security’
- UK Council for Child Internet Safety ‘Education for a Connected World – 2020 edition’

This policy operates in conjunction with the following JTMAT and school policies:

- Social Media Code of Conduct for Parents
- JTMAT Staff Code of Conduct
- JTMAT Safeguarding Policy
- JTMAT Anti-Bullying Policy
- RSE and Health Education / PSHE Policy
- JTMAT Behaviour Policy
- Staff Disciplinary Policy
- JTMAT General Data Protection Regulation (GDPR) Policy
- JTMAT ICT Security – Acceptable Use Policy
- JTMAT ICT Security – Backup Policy
- JTMAT ICT Security – Encryption
- JTMAT ICT Security – Password Policy
- Prevent Duty
- Remote Learning Policy

2. ROLES AND RESPONSIBILITIES

The **local governing board** is 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 on an annual basis.

- Ensuring their own knowledge of online safety issues is up-to-date.
- Ensuring all staff undergo safeguarding and child protection training, including online safety, at induction.
- Ensuring that there are appropriate filtering and monitoring systems in place.
- Ensuring that the effectiveness of filtering and monitoring systems is reviewed at least annually in liaison with ICT staff and service providers.
- Ensuring that the SLT and other relevant staff have an awareness and understanding of the filtering and monitoring provisions in place and manage them effectively and know how to escalate concerns when identified.
- Ensuring that all relevant school policies have an effective approach to planning for, and responding to, online challenges and hoaxes embedded within them.
- Ensuring compliance with the DfE's 'Meeting digital and technology standards in schools and colleges', with particular regard to the filtering and monitoring standards in relation to safeguarding.

The **headteacher** is 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.
- Supporting the DSL and the 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.
- Supporting staff to ensure that online safety is embedded throughout the curriculum so that all pupils can develop an appropriate understanding of online safety.
- 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 DSL and ICT technicians to conduct light-touch reviews of this policy.
- Working with the DSL and governing board to update this policy on an annual basis.

The **DSL** is responsible for:

- Taking the lead responsibility for online safety in the school.
- Acting as the named point of contact within the school on all online safeguarding issues.
- 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.
- Ensuring appropriate referrals are made to external agencies, as required.
- Keeping up-to-date with current research, legislation and online trends.
- Coordinating the school's participation in local and national online safety events, e.g. Safer Internet Day.
- 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.
- Ensuring all members of the school community understand the reporting procedure.
- Understanding the filtering and monitoring processes in place at the school.
- Ensuring that all safeguarding training given to staff includes an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring systems at the school.
- 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 light-touch reviews of this policy.
- Working with the headteacher and governing board to update this policy on an annual basis.

ICT technicians are 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 light-touch reviews of this policy.

All **staff members** are 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 are responsible for:

- Adhering to the Acceptable Use Agreement and other relevant policies.
- Seeking help from school staff if they are concerned about something they or a peer have experienced online.
- Reporting online safety incidents and concerns in line with the procedures within this policy.

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 DSL has overall responsibility for the school's approach to online safety, with support from deputies and other senior leaders where appropriate, and will ensure that there are strong processes in place to handle any concerns about pupils' safety online.

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

Staff receive regular training

- Staff receive regular email updates regarding online safety information and any changes to online safety guidance or legislation
- Online safety is integrated into learning throughout the curriculum
- Assemblies are conducted termly on the topic of remaining safe online
- Online safety tips are communicated to parents via the weekly newsletter, workshops, dedicated school website page and Twitter

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 JTMAT Safeguarding Policy.

Staff will be aware that harmful online sexual behaviour can progress on a continuum, and appropriate and early intervention can prevent abusive behaviour in the future. Staff will also acknowledge that pupils displaying this type of behaviour are often victims of abuse themselves and should be suitably supported.

The victim of online harmful sexual behaviour may ask for no one to be told about the abuse. The DSL will consider whether sharing details of the abuse would put the victim

in a more harmful position, or whether it is necessary in order to protect them from further harm. Ultimately the DSL will balance the victim's wishes against their duty to protect the victim and other young people. The DSL and other appropriate staff members will meet with the victim's parents to discuss the safeguarding measures that are being put in place to support their child and how the report will progress.

Confidentiality will not be promised, and information may be still shared lawfully, for example, if the DSL decides that there is a legal basis under UK GDPR such as the public task basis whereby it is in the public interest to share the information. If the decision is made to report abuse to children's social care or the police against the victim's wishes, this must be handled extremely carefully – the reasons for sharing the information should be explained to the victim and appropriate specialised support should be offered.

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 Safeguarding Policy.

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

The school avoids unnecessarily criminalising pupils, e.g. calling the police, where criminal behaviour is thought to be inadvertent and as a result of ignorance or normal developmental curiosity, e.g. a pupil has taken and distributed indecent imagery of themselves. The DSL will decide in which cases this response is appropriate and will manage such cases in line with the Safeguarding Policy.

All online safety incidents and the school's response are recorded by the DSL.

4. CYBERBULLYING

Cyberbullying can include 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
- Menacing or upsetting responses to someone in a chatroom
- Unpleasant messages sent via instant messaging

- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g. Facebook
- Abuse between young people in intimate relationships online, i.e. teenage relationship abuse
- 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 lesbian, gay, bisexual, or gender questioning pupils and pupils with SEND.

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

5. CHILD-ON-CHILD SEXUAL ABUSE AND HARASSMENT

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 and 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
- Upskirting, 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 JTMAT Safeguarding 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 JTMAT 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, including the following:

- The pupil believes they are talking to another child, when they are actually talking to an adult masquerading as someone younger with the intention of gaining their trust to abuse them.
- The pupil does not want to admit to talking to someone they met on the internet for fear of judgement, feeling embarrassed, or a lack of understanding from their peers or adults in their life.
- The pupil may have been manipulated into feeling a sense of dependency on their groomer due to the groomer's attempts to isolate them from friends and family.
- Talking to someone secretly over the internet may make the pupil feel 'special', particularly if the person they are talking to is older.
- 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.

Due to the fact 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.
- 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. 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.

7. MENTAL HEALTH

The internet, particularly social media, can be the root cause of a number of mental health issues in pupils, e.g. low self-esteem and suicidal ideation.

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 JTMAT Safeguarding Policy.

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 DSL and 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 JTMAT Safeguarding Policy.

Where the DSL's assessment finds an online challenge to be putting pupils at risk of harm, e.g. it encourages children to participate in age-inappropriate activities that could increase safeguarding risks or become a child protection concern, 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 even to individual children at risk where appropriate.

The DSL and 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 DSL and headteacher will ensure that pupils are taught, throughout the curriculum, how to use technology safely, responsibly and lawfully, and will ensure that pupils cannot access sites or areas of the internet that may encourage them to stray from lawful use of technology, e.g. the 'dark web', on school-owned devices or on school networks through the use of appropriate firewalls.

10. ONLINE SAFETY TRAINING FOR STAFF

The DSL will ensure that all safeguarding training given to staff includes elements of online safety, including how the internet can facilitate abuse and exploitation, and understanding the expectations, roles and responsibilities relating to filtering and monitoring systems. 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.

Staff training will include a specific focus on harmful online narratives such as misinformation, disinformation, and conspiracy theories, helping staff to recognise the signs of influence or vulnerability among pupils.

Training will equip staff with the knowledge and confidence to identify signs of online harm, respond appropriately to disclosures or concerns, and support pupils in developing critical thinking skills and safe online behaviours.

Staff will also be guided on how to embed online safety themes across the wider curriculum, promoting a consistent, whole-school approach to digital safeguarding.

11. ONLINE SAFETY AND THE CURRICULUM

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

- RSE 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
- What healthy and respectful relationships, including friendships, look like
- Body confidence and self-esteem
- Consent, e.g. with relation to the sharing of indecent imagery or online coercion to perform sexual acts
- 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 A of this policy.

The school's approach to teaching online safety in the curriculum will reflect the everevolving nature of online risks, ensuring pupils develop the knowledge and resilience to navigate digital spaces safely and responsibly. Online safety education will address four key categories of risk: content, contact, conduct, and commerce.

Content Risks

Pupils will be taught how to critically evaluate online content and identify material that is illegal, inappropriate, or harmful. The curriculum will include discussions around harmful content such as pornography, racism, misogyny, self-harm, suicide, antiSemitism, radicalisation, extremism, misinformation, disinformation (including fake news), and conspiracy theories. Lessons will equip pupils with the skills to question

sources, verify information, and understand the dangers of engaging with such content.

Contact Risks

The school will educate pupils about the potential dangers of interacting with others online. Pupils will explore topics such as peer pressure, commercial exploitation, and grooming tactics used by adults who pose as children or young adults. They will learn how to recognise unsafe interactions, use privacy settings effectively, and report any concerning behaviour or messages to trusted adults and platforms.

Conduct Risks

Pupils will be guided on how their own online behaviour can impact both themselves and others. The curriculum will address the risks associated with creating, sharing, or receiving explicit images, including both consensual and non-consensual exchanges of nudes and semi-nudes. Online bullying, including the use of social media and messaging platforms to harass or intimidate others, will also be a key focus. Pupils will be taught responsible digital conduct and the legal and emotional consequences of harmful behaviour.

Commerce Risks

The curriculum will also include education on online commercial risks. Pupils will be informed about the dangers of online gambling, exposure to inappropriate advertising, and financial scams such as phishing. They will learn how to recognise fraudulent schemes, protect their personal and financial information, and seek help when confronted with suspicious online activity.

The 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 and DSL 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 and DSL 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 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 JTMAT 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 JTMAT Safeguarding Policy.

12. USE OF TECHNOLOGY IN THE CLASSROOM

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

- Computers
- Laptops
- Tablets
- Intranet
- 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 always reviews and evaluates the resource. Class teachers ensure that any internet-derived materials are used in line with copyright law.

Pupils are 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.

Pupils will be educated on the acceptable and appropriate use of personal devices and will use technology in line with the school's Acceptable Use Agreement for Pupils.

Staff will use all smart technology and personal technology in line with the JTMAT ICT Security Policies.
The school recognises that pupils' unlimited and unrestricted access to the internet via mobile phone networks means that some pupils may use the internet in a way which breaches the school's acceptable use of ICT agreement for pupils.

Inappropriate use of smart technology may include:

- Using mobile and smart technology to sexually harass, bully, troll or intimidate peers.
- Sharing indecent images, both consensually and non-consensually.
- Viewing and sharing pornography and other harmful content.

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

Where it is deemed necessary, the school will ban pupil's use of personal technology whilst on school site.

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 & Discipline 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.

The school will consider the 4C's (content, contact, conduct and commerce) when educating pupils about the risks involved with the inappropriate use of smart technology and enforcing the appropriate disciplinary measures.

14. EDUCATING PARENTS

The school works in partnership with parents to ensure pupils stay safe online at school and at home. Parents are provided with information about the school's approach to online safety and their role in protecting their children. Parents are sent a copy of the Acceptable Use Agreement at the beginning of each academic year and are encouraged to go through this with their child to ensure their child understands the document and the implications of not following it.

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.
- Cyberbullying.

- 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 is raised in the following ways:

- Parents' evenings
- Parent workshops
- Dedicated school website page
- Newsletters
- X
- Instagram

15. INTERNET ACCESS

Pupils, staff and other members of the school community are only granted access to the school's internet network once they have read and signed the Acceptable Use Agreement. A record is kept of users who have been granted internet access in the school office.

All members of the school community are 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 and that it is meeting the DfE's 'Filtering and monitoring standards for schools and colleges'. 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 DSL will ensure that specific roles and responsibilities are identified and assigned to manage filtering and monitoring systems and to ensure they meet the school's safeguarding needs.

The headteacher and ICT technicians undertake a risk assessment to determine what filtering and monitoring systems are required. The filtering and monitoring systems the school implements are 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. ICT technicians undertake weekly checks on the filtering and monitoring systems to ensure they are effective and appropriate.

Requests regarding making changes to the filtering system are directed to the headteacher. Prior to making any changes to the filtering system, ICT technicians and

the DSL conduct a risk assessment. Any changes made to the system are recorded by ICT technicians. Reports of inappropriate websites or materials are made to an ICT technician immediately, who investigates the matter and makes any necessary changes.
Deliberate breaches of the filtering system are 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 & Discipline Policy. If a member of staff has deliberately breached the filtering system, they will be disciplined in line with the Disciplinary Policy and Procedure.

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 are appropriately monitored. All users of the network and school-owned devices are informed about how and why they are monitored. Concerns identified through monitoring are reported to the DSL who manages the situation in line with the Child Protection and Safeguarding Policy.

17. NETWORK SECURITY

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

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

All members of staff have their own unique usernames and private passwords to access the school's systems. Pupils are provided with their own unique username and private passwords. Staff members and pupils are responsible for keeping their passwords private. Passwords have a minimum and maximum length and require a mixture of letters, numbers and symbols to ensure they are as secure as possible.

Users inform ICT technicians if they forget their login details, who will arrange for the user to access the systems under different login details. Users are not permitted to share their login details with others and are not 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 is informed and decides the necessary action to take.

Users are 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 Data and Cyber-Security Breach Prevention and Management Plan.

18. EMAILS

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

Staff and pupils are given approved school email accounts and are only 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 are not permitted to be used on the school site. Any email that contains sensitive or personal information is only sent using secure and encrypted email.

Staff members and pupils are required to block spam and junk mail, and report the matter to ICT technicians. The school's monitoring system can detect inappropriate links, malware and profanity within emails – staff and pupils are made aware of this. Chain letters, spam and all other emails from unknown sources are deleted without being opened. ICT technicians organise an annual assembly where they explain what a phishing email and other malicious emails might look like – this assembly includes information on the following:

- How to determine whether an email address is legitimate
- 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 are managed in line with the Data and Cyber-Security Breach Prevention and Management 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. SOCIAL NETWORKING

PERSONAL USE

Access to social networking sites is filtered as appropriate. Staff and pupils are not permitted to use social media for personal use during lesson time. Staff can use personal social media during break and lunchtimes; however, inappropriate or excessive use of personal social media during school hours may result in the removal of internet access or further action. Staff members are advised that their conduct on social media can have an impact on their role and reputation within the school. The Staff Code of Conduct contains information on the acceptable use of social media – staff members are required to follow these expectations at all times.

Staff receive annual training on how to use social media safely and responsibly. Staff are not permitted to communicate with pupils or parents over social networking sites and are reminded to alter their privacy settings to ensure pupils and parents are not able to contact them on social media. Where staff have an existing personal relationship with a parent or pupil, and thus are connected with them on social media, e.g. they are friends with a parent at the school, they will disclose this to the DSL and headteacher and will ensure that their social media conduct relating to that parent is appropriate for their position in the school.

Pupils are taught how to use social media safely and responsibly through the online safety curriculum.

Concerns regarding the online conduct of any member of the school community on social media are reported to the DSL and managed in accordance with the relevant policy, e.g. Anti-Bullying Policy, Staff Code of Conduct and Behaviour Policy.

USE ON BEHALF OF THE SCHOOL

The use of social media on behalf of the school is conducted in line with the Staff Code of Conduct. The school's official social media channels are only used for official educational or engagement purposes. Staff members must be authorised by the headteacher to access to the school's social media accounts.

All communication on official social media channels by staff on behalf of the school is clear, transparent and open to scrutiny.

21. THE SCHOOL WEBSITE

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

The website complies with guidelines for publications including accessibility, data protection, respect for intellectual property rights, privacy policies and copyright law. Personal information relating to staff and pupils is not published on the website.

22. USE OF DEVICES

SCHOOL-OWNED 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.

School-owned devices are used in accordance with the Device User Agreement. Staff and pupils are not permitted to connect school-owned devices to public Wi-Fi networks. All school-owned devices are password protected. All mobile school-owned devices are fitted with tracking software to ensure they can be retrieved if lost or stolen. All school-owned devices are fitted with software to ensure they can be remotely accessed, in case data on the device needs to be protected, retrieved or erased.

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

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

PERSONAL DEVICES

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

Personal devices are only permitted to be used in the staffroom.

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 report concerns about their colleagues' use of personal devices on the school premises in line with the Child Protection and Safeguarding Policy. 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 Child Protection and Safeguarding Policy.

Pupils are not permitted to use their personal devices during lesson time or when moving between lessons. If a pupil needs to contact their parents during the school day, they are allowed to use the phone in the school office. 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 Child Protection and Safeguarding 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.

23. REMOTE LEARNING

All remote learning is delivered in line with the school's Remote Learning Policy.

The school will risk assess the technology used for remote learning prior to use and ensure that there are no privacy issues or scope for inappropriate use. The school will consult with parents prior to the period of remote learning about what methods of delivering remote teaching are most suitable – alternate arrangements will be made where necessary.

The school will ensure that all school-owned equipment and technology used for remote learning has suitable anti-virus software installed, can establish secure connections, can recover lost work, and allows for audio and visual material to be recorded or downloaded, where required.

During the period of remote learning, the school will maintain regular contact with parents to:

- Reinforce the importance of children staying safe online.
- Ensure parents are aware of what their children are being asked to do, e.g. sites they have been asked to use and staff they will interact with.
- Encourage them to set age-appropriate parental controls on devices and internet filters to block malicious websites.
- Direct parents to useful resources to help them keep their children safe online.

The school will not be responsible for providing access to the internet off the school premises and will not be responsible for providing online safety software, e.g. antivirus software, on devices not owned by the school.

24. MONITORING AND REVIEW

The school recognises that the online world is constantly changing; therefore, the DSL, ICT technicians and the headteacher conduct regular light-touch reviews of this policy to evaluate its effectiveness.

The governing board, headteacher and DSL 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 A

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 the following: • 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 is covered in the following curriculum areas: • Health Education • Computing
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 cookies work • How content can be shared, tagged and traced • How difficult it is to remove something once it has been shared online • What is illegal online, e.g. youth produced sexual imagery (sexting)	This risk or harm is covered in the following curriculum areas: • Relationships Education • Health Education • Computing

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 • How to measure and check authenticity online • The potential consequences of sharing information that may not be true	This risk or harm is covered in the following curriculum areas: • Relationships and Health Education • Computing

Fake websites and scam emails	Fake websites and scam emails are used to extort data, money, images and other things that can either be used by the scammer to harm the person targeted or sold on for financial, or other, gain. Teaching includes the following: • How to recognise fake URLs and websites • What secure markings on websites are and how to assess the sources of emails • The risks of entering information to a website which is not secure	This risk or harm is covered in the following curriculum areas: • Relationships and Health Education • Computing

	• What pupils should do if they are harmed, targeted, or groomed as a result of interacting with a fake website or scam email • Who pupils should go to for support	
Online fraud	Fraud can take place online and can have serious consequences for individuals and organisations. Teaching includes the following: • What identity fraud, scams and phishing are • That children are sometimes targeted to access adults' data • What 'good' companies will and will not do when it comes to personal details	This risk or harm is covered in the following curriculum areas: • Relationships and Health Education • Computing

Password phishing	Password phishing is the process by which people try to find out individuals' passwords so they can access protected content. Teaching includes the following: • Why passwords are important, how to keep them safe and that others might try to get people to reveal them • How to recognise phishing scams • The importance of online security to protect against viruses that are designed to gain access to password information • What to do when a password is compromised or thought to be compromised	This risk or harm is covered in the following curriculum areas: • Relationships and Health Education • Computing
Personal data	Online platforms and search engines gather personal data – this is often referred to as 'harvesting' or 'farming'. Teaching includes the following: • How cookies work	This risk or harm is covered in the following curriculum areas:
	• 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 • How to limit the data companies can gather	• Relationships and Health Education • Computing

Persuasive design	Many devices, apps and games are designed to keep users online for longer than they might have planned or desired. Teaching includes the following: • That the majority of games and platforms are designed to make money, and that their primary driver is to encourage people to stay online for as long as possible • How notifications are used to pull users back online	This risk or harm is covered in the following curriculum areas: • Health Education • Computing
Privacy settings	Almost all devices, websites, apps and other online services come with privacy settings that can be used to control what is shared. Teaching includes the following: • How to find information about privacy settings on various devices and platforms • That privacy settings have limitations	This risk or harm is covered in the following curriculum areas: • Relationships and Health Education • Computing
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	This risk or harm is covered in the following curriculum areas:
	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	• Relationships and Health Education • Computing

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: • The types of online abuse, including sexual harassment, bullying, trolling and intimidation • When online abuse can become illegal • 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: • Relationships and Health Education • Computing
Challenges	Online challenges acquire mass followings and encourage others to take part in what they suggest. Teaching includes the following: • What an online challenge is and that, while some will be fun and harmless, others may be dangerous and even illegal • How to assess if the challenge is safe or potentially harmful, including considering who has generated the challenge and why • That it is okay to say no and to not take part in a challenge	This risk or harm is covered in the following curriculum areas: • Relationships and Health Education

	• How and where to go for help • The importance of telling an adult about challenges which include threats or secrecy, such as 'chain letter' style challenges	
Content which incites violence	Knowing that violence can be incited online and escalate very quickly into offline violence. Teaching includes the following: • That online content (sometimes gang related) can glamorise the possession of weapons and drugs • That to intentionally encourage or assist in an offence is also a criminal offence • How and where to get help if they are worried about involvement in violence	This risk or harm is covered in the following curriculum areas: • Relationships and Health Education
Fake profiles	Not everyone online is who they say they are. Teaching includes the following: • That, in some cases, profiles may be people posing as someone they are not or may be 'bots' • How to look out for fake profiles	This risk or harm is covered in the following curriculum areas: • Relationships and Health Education • Computing

Grooming	Knowing about the different types of grooming and motivations for it, e.g. radicalisation, child sexual abuse and exploitation, and gangs and county lines. Teaching includes the following: • Boundaries in friendships with peers, in families, and with others • Key indicators of grooming behaviour	This risk or harm is covered in the following curriculum areas: • Relationships and Health Education

	• The importance of disengaging from contact with suspected grooming and telling a trusted adult • How and where to report grooming both in school and to the police At all stages, it is important to balance teaching pupils about making sensible decisions to stay safe whilst being clear it is never the fault of the child who is abused and why victim blaming is always wrong.	

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 • How to identify indicators of risk and unsafe communications • 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 • What online consent is and how to develop strategies to confidently say no to both friends and strangers online	This risk or harm is covered in the following curriculum areas: • Relationships and Health Education • Computing
WELLBEING		
Impact on quality of life, physical and mental health	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	This risk or harm is covered in the following curriculum areas:

and relationships	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 • The impact that excessive social media usage can have on levels of anxiety, depression and other mental health issues • That isolation and loneliness can affect pupils and that it is very important for them to discuss their feelings with an adult and seek support • Where to get help	• Health Education
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 can often portray an exaggerated picture of their lives (especially online) and how that can lead to pressures around having perfect or curated lives • How and why people are unkind or hurtful online when they would not	This risk or harm is covered in the following curriculum areas: • Relationships and Health Education

	necessarily be unkind to someone face to face	
Suicide, selfharm and eating disorders	Pupils may raise topics including eating disorders, self-harm and suicide. Teachers must be aware of the risks of encouraging or making these seem a more viable option for pupils and should take care to avoid giving instructions or methods and avoid using language, videos and images.	