



Coton-in-the Elms Primary School

Online Safety Policy

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1. Introduction

The online safety policy should be recognised as a safeguarding policy, not a technical or computing policy and falls within the role and responsibilities the Designated Safeguarding Lead (DSL). This Online Safety Policy outlines the commitment of Coton-in-the-Elms Primary School to safeguard members of our school community online in accordance with statutory guidance and best practice. This policy should be read in conjunction with the school's Safeguarding **Children** policy, Acceptable Use policy, Computing policy, Social Media policy, Remote Learning Guidance's and handling complaints made by parents on-line using social media.

This Online Safety Policy applies to all members of the school community (including staff, learners, 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).

Coton-in-the-Elms 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 took place out of school.

Consultation with the whole school community has taken place through a range of formal and informal meetings.

1.1 Policy Aims

It takes into account the DfE statutory guidance '[Keeping Children Safe in Education](#)', [Early Years and Foundation Stage](#), [Working Together to Safeguard Children](#)' and the Derby and Derbyshire Safeguarding Children's Partnership Safeguarding procedures.

1.2 Policy Purpose

The purpose of this online safety policy is to:

- Safeguard and protect all members of Coton community online.
- Identify approaches to educate and raise awareness of online safety throughout the community.
- Enable all staff to work safely and responsibly, including in the delivery of remote learning, to role model positive behaviour online and to manage professional standards and practice when using technology.
- Identify clear procedures to use when responding to online safety concerns.

This school identifies that the issues classified within online safety are considerable, but can be broadly categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material
- **Contact:** being subjected to harmful online interaction with other users
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.

1.3 Policy Scope

This school believes that online safety is an essential part of safeguarding and acknowledges it is our duty to ensure that all children and staff are protected from potential harm online.

We can identify that the internet and associated devices, such as computers, tablets, mobile phones and games consoles, are an important part of everyday life.

At Coton school, we believe that children should be empowered to build resilience and to develop strategies to manage and respond to risk online. This policy applies to all staff including the governing body, leadership team, teachers, support staff, external contractors, visitors, volunteers and other individuals who work for, or provide services on behalf of the setting (collectively referred to as “staff” in this policy) as well as learners, parents and carers.

This policy applies to all access to the internet and use of technology, including personal devices, or where children, staff or other individuals have been provided with setting issued devices for use off-site, such as a work laptops, tablets or mobile phones.

2. Links with other policies and practices

This policy links with several other policies, practices and action plans including:

- Anti-bullying policy
- Acceptable Use Policies (AUP) and/or the Code of Conduct/staff behaviour policy
- Behaviour Management policy
- Safeguarding **Children** /Child Protection policy
- Confidential Reporting policy
- Curriculum policies, such as: Computing, Personal Social and Health Education (PSHE), Citizenship and Relationships and Sex Education (RSE)
- Data security
- Image use policy
- Mobile phone and social media policies
- Searching, screening and confiscation policy
- Tackling Extremism and Radicalisation policy
- DCC Cybercrime Action Plan
- GDPR

3. Monitoring and Review

- Technology in this area evolves and changes rapidly. This school will review this policy at least annually.
- The policy will also be revised following any national or local policy requirements, any Safeguarding Children/ child protection concerns or any changes to the technical infrastructure
- We will regularly monitor internet use and evaluate online safety mechanisms to ensure that this policy is consistently applied.
- To ensure **the school** have oversight of online safety, the Headteacher will be informed of online safety concerns, as appropriate.
- The named governor for safeguarding will report on a regular basis to the governing body on online safety practice and incidents, including outcomes.
- Any issues identified via monitoring will be incorporated into our action planning.

4. Roles and 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.

The Headteacher will:

- Ensure that online safety is viewed as a safeguarding issue and that practice is in line with national and local recommendations and requirements.
- Ensure there are appropriate and up-to-date policies regarding online safety; including a staff Code of Conduct and Acceptable Use policy, which covers acceptable use of technology. Ensure that suitable and appropriate filtering and monitoring systems are in place and work with technical staff to monitor the safety and security of our systems and networks.
- Ensure that online safety is embedded within a progressive curriculum, which enables all children to develop an age-appropriate understanding of online safety.
- Support the DSL and deputy by ensuring they have sufficient time and resources to fulfil their online safety responsibilities.
- Ensure parents are directed to online safety advice and information
- Provide information on a school's website for parents and the community
- Ensure there are robust reporting channels for the community to access regarding online safety concerns, including internal, local and national support.
- Ensure that appropriate risk assessments are undertaken regarding the safe use of technology.
- Audit and evaluate online safety practice to identify strengths and areas for improvement.

The Designated Safeguarding Lead (DSL) will:

- Act as a named point of contact on all online safeguarding issues and liaise with other members of staff or other agencies, as appropriate.
- Work alongside the deputy DSL to ensure online safety is recognised as part of the schools safeguarding responsibilities and that a coordinated approach is implemented.
- Ensure all members of staff receive regular, up-to-date and appropriate online safety training.
- Access regular and appropriate training and support to ensure they understand the unique risks associated with online safety and have the relevant knowledge and up to date **information** required to keep learners safe online.
- Access regular and appropriate training and support to ensure they recognise the additional risks that learners with SEN and disabilities (SEND) face online.
- Keep up to date with current research, legislation and trends regarding online safety and communicate this with the community, as appropriate.
- Work with staff to coordinate participation in local and national events to promote positive online behaviour, such as Safer Internet Day.
- Ensure that online safety is promoted to parents, carers and the wider community, through a variety of channels and approaches.
- Maintain records of online safety concerns, as well as actions taken, as part of the settings safeguarding recording mechanisms.
- Monitor online safety incidents to identify gaps and trends, and use this data to update the education response, policies and procedures.
- Report online safety concerns, as appropriate, to the Governing Body.
- Work with the leadership team to review and update online safety policies on a regular basis (at least annually) with stakeholder input.

- Meet regularly on a bi-monthly basis with the governor with lead responsibility for safeguarding and online safety.
- Keep parents and carers up to date regarding online safety.

It is the responsibility of all members of staff to:

- Contribute to the development of online safety policies.
- Read and adhere to the online safety and acceptable use policies.
- Take responsibility for the security of setting systems and the data they use or have access to.
- Model good practice when using technology and maintain a professional level of conduct in their personal use of technology, both on and off site.
- Embed online safety education in curriculum delivery, wherever possible.
- Have an awareness of a range of online safety issues and how they may be experienced by the children in their care.
- Identify online safety concerns and take appropriate action by following the settings safeguarding policies and procedures.
- Know when and how to escalate online safety issues, including signposting to appropriate support, internally and externally.
- Take personal responsibility for professional development in this area.
- Identify any children who are involved in cybercrime, or those who are technically gifted and talented and are at risk of becoming involved in cybercrime and make a Cyber Choices referral.

It is the responsibility of staff managing the technical environment to:

- Provide technical support and perspective to the DSL and leadership team, especially in the development and implementation of appropriate online safety policies and procedures.
- Implement appropriate security measures as directed by the DSL and leadership team. All school staff have signed to confirm they will keep passwords safe and all laptops are encrypted to ensure that the school's IT infrastructure/system is secure and not open to misuse or malicious attack, whilst allowing learning opportunities to be maximised.
- Ensure that our filtering policy is applied and updated on a regular basis; responsibility for its implementation is shared with the leadership team.
- Ensure that our monitoring systems are applied and updated on a regular basis; responsibility for its implementation is shared with the leadership team
- Ensure appropriate access and technical support is given to the DSL and deputy to our filtering and monitoring systems, to enable them to take appropriate safeguarding action if/when required.

It is the responsibility of learners (at a level that is appropriate to their individual age and ability) to:

- Engage in age appropriate online safety education opportunities.
- Contribute to the development of online safety policies.
- Read and adhere to the acceptable use policies.
- Respect the feelings and rights of others both on and offline.
- Take responsibility for keeping themselves and others safe online.
- Seek help from a trusted adult, if there is a concern online, and support others that may be experiencing online safety issues.

It is the responsibility of parents and carers to:

- Read the acceptable use policies and encourage their children to adhere to them.
- Support our online safety approaches by discussing online safety issues with their children and reinforcing appropriate and safe online behaviours at home.
- Role model safe and appropriate use of technology and social media.

- Abide by the home-school agreement and acceptable use policies.
- Identify changes in behaviour that could indicate that their child is at risk of harm online.
- Seek help and support from the school, or other appropriate agencies, if they or their child encounter risk or concerns online.
- Contribute to the development of the online safety policies.
- Use our systems, such as learning platforms, and other network resources, safely and appropriately. The school currently uses “teams” for remote learning. Every family has been provided with an email address under the Coton school domain.
- Parents are limited as to which tools they can use e.g., they can receive emails but not send emails.
- Take responsibility for their own awareness in relation to the risks and opportunities posed by new and emerging technologies.

5. Education and Engagement Approaches

5.1 Education and engagement with learners

- The school will establish and embed a progressive online safety curriculum to raise awareness and promote safe and responsible internet use amongst learners by:
 - Ensuring education regarding safe and responsible use precedes internet access.
 - Including online safety in Personal, Social, Health and Economic (PSHE), Relationships and Sex Education (RSE) and computing programmes of study.
 - Coton school follows “PHSE Matters” which is synonymous with the Derbyshire Scheme as stated by Derbyshire County Council. A copy of the school’s policy on RSE can be found on the school website.
 - Reinforcing online safety messages whenever technology or the internet is in use.
 - Educating learners in the effective use of the internet to research; including the skills of knowledge location, retrieval and evaluation.
 - Teaching learners to be critically aware of the materials they read and shown how to validate information before accepting its accuracy.

The setting will support learners to read and understand the acceptable use policies in a way which suits their age and ability by:

- Displaying acceptable use posters in all rooms with internet access.
- Informing learners that network and internet use will be monitored for safety and security purposes and in accordance with legislation.
- Rewarding positive use of technology.
- Implementing appropriate peer education approaches. Reinforcement messages about the safe use of the internet are replicated in all core curriculum sessions Providing online safety education and training as part of the transition programme across the key stages and when moving between establishments.
- Seeking learner voice when writing and developing online safety policies and practices, including curriculum development and implementation.
- Using support, such as external visitors, where appropriate, to complement and support our internal online safety education approaches.

5.2 Vulnerable Learners

- Coton-in-the-Elms school recognises that some learners are more vulnerable online due to a range of factors.

- This may include, but is not limited to children in care, children with Special Educational Needs and Disabilities (SEND) or mental health needs, children with English as an additional language (EAL) and children experiencing trauma or loss.
- The school will ensure that differentiated and ability appropriate online safety education, access and support are provided to vulnerable learners*. It is part of the school's aims to ensure all children are treated equally regardless of any disability and therefore, all children will receive age appropriate online safety training from school staff and outside agencies e.g., NSPPC and Derbyshire County Council staff. When implementing an appropriate online safety policy and curriculum the school will seek input from specialist staff as appropriate, including the SENCO, Child in Care Designated Teacher. Currently the Child in Care teacher is the Headteacher and the SENCO is **Pippa Jones**.
- The school uses a filtering system for all children regardless of EAL or SEND needs. The filtering system has a tiered approach. For example, anything that is inappropriate for children is blocked but, may be available to school staff. Similarly, the Headteacher and school administrator will have greater access.

* See also the schools Remote Learning Policy on the school website.

5.3 Training and engagement with staff

We will:

- Provide and discuss the online safety policy and procedures with all members of staff as part of induction.
- Provide up-to-date and appropriate online safety training for all staff, including governors where relevant to their role on a regular basis, with at least annual updates.
 - The Headteacher as the Designated Safeguarding Lead (DSL) provides annual updating to all school staff. In addition, where staff express a desire to attend specific safeguarding training they will be encouraged to attend. Attendance at specific safeguarding training will be recorded as part of their personal development.
 - This will cover the potential risks posed to learners (Content, Contact and Conduct) as well as our professional practice expectations.
- Recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns and provide opportunities for staff to contribute to and shape online safety policies and procedures.
- Make staff aware that our IT systems are monitored, and that activity can be traced to individual users; staff will be reminded to behave professionally and in accordance with our policies when accessing our systems and devices.
- Make staff aware that their online conduct outside of the setting, including personal use of social media, could have an impact on their professional role and reputation.
- Highlight useful educational resources and tools which staff should use, according to the age and ability of the learners.
For example: www.nationalonlinesafety.com
Examples of a wide range of posters can be found specifying online safety
- Ensure all members of staff are aware of the procedures to follow regarding online safety concerns affecting learners, colleagues or other members of the community.

5.4 Awareness and engagement with parents and carers

The school recognises that parents and carers have an essential role to play in enabling children and young people to become safe and responsible users of the internet and associated technologies.

We will build a partnership approach to online safety with parents and carers by:

- Providing information and guidance on online safety in a variety of formats.
- This will include offering specific online safety awareness training and highlighting online safety at other events such as parent evenings, transition events,
- Drawing their attention to the online safety policy and expectations in newsletters, letters, our prospectus and on our website
- Requesting that they read online safety information as part of joining our community, for example, within our home school agreement
- Requiring them to read our acceptable use policies and discuss the implications with their children

6. Reducing Online Risks

We recognise that the internet is a constantly changing environment with new apps, devices, websites and material emerging at a rapid pace.

We will:

- Regularly review the methods used to identify, assess and minimise online risks.
- Examine emerging technologies for educational benefit and undertake appropriate risk assessments before use in the setting is permitted.
- Ensure that appropriate filtering and monitoring is in place and take all reasonable precautions to ensure that users can only access appropriate material.
- Due to the global and connected nature of the internet, it is not possible to guarantee that unsuitable material cannot be accessed via our computers or devices.

All members of the community are made aware of our expectations regarding safe and appropriate behaviour online and the importance of not posting any content, comments, images or videos which could cause harm, distress or offence to members of the community. This is clearly outlined in our acceptable use policies and highlighted through a variety of education and training approaches.

7. Safer Use of Technology

7.1 Classroom Use

Coton-in-the-Elms school uses a wide range of technology. This includes access to:

- Computers, laptops and other digital devices
- Internet which may include search engines and educational websites
- Learning platform/intranet
- Email
- Games consoles and other games-based technologies
- Digital cameras, web cams and video cameras

All of our devices will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place. This means that all of our devices are password protected and staff have signed to confirm their agreement to change passwords on a regular basis.

Members of staff will always evaluate websites, tools and apps fully before use in the classroom or recommending for use at home.

The setting will use age appropriate search tools following an informed risk assessment, to identify which tool best suits the needs of our community.

We will ensure that the use of internet-derived materials, by staff and learners complies with copyright law and acknowledge the source of information.

Supervision of learners will be appropriate to their age and ability.

- **Early Years Foundation Stage and Key Stage 1**
 - Access to the internet will be by adult demonstration, with occasional directly supervised access to specific and approved online materials, which supports the learning outcomes planned for the learners age and ability.
- **Key Stage 2**
 - Learners will use age-appropriate search engines and online tools.
 - Learners will be directed by the teacher to online materials and resources which support the learning outcomes planned for the learners age and ability.

7.2 Managing Internet Access

We will maintain a written record of users who are granted access to our devices and systems.

All staff, learners and visitors will read and sign an acceptable use policy before being given access to our computer system, IT resources or internet.

We will carry out regular audits and audit activity to help identify pupils trying to access sites to establish any vulnerabilities and offer advice, support and react accordingly

7.3 Filtering and Monitoring

Note: A guide for education settings about establishing 'appropriate levels' of filtering and monitoring can be found at: <https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring>

7.3.1 Decision Making

- The Management Team of Coton-in-the-Elms school have ensured that our setting has age and ability appropriate filtering and monitoring in place, to limit learner's exposure to online risks.
- The governors and leaders are aware of the need to prevent "over blocking", as that may unreasonably restrict what can be taught, with regards to online activities and safeguarding.
- Our decision regarding filtering and monitoring has been informed by a risk assessment, considering our specific needs and circumstances.
- Changes to the filtering and monitoring approach will be risk assessed by staff with educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.
- The leadership team will ensure that regular checks are made to ensure that the filtering and monitoring methods are effective and appropriate.
- All members of staff are aware that they cannot rely on filtering and monitoring alone to safeguard learners; effective classroom management and regular education about safe and responsible use is essential.

7.3.2 Filtering

Education broadband connectivity is provided through "etke".

This blocks sites which can be categorised as: pornography, racial hatred, extremism, gaming and sites of an illegal nature.

The filtering system blocks all sites on the [Internet Watch Foundation](#) (IWF) list.

If learners discover unsuitable sites, they will be required to:

Turn off their monitor/screen and report the concern immediate to a member of staff.

The member of staff will report the concern (including the URL of the site if possible) to the DSL (or deputy) and/or technical staff.

The breach will be recorded and escalated as appropriate.

Parents/carers will be informed of filtering breaches involving their child.

Any material believed to be illegal will be reported immediately to the appropriate agencies, such as the IWF, Derbyshire Police or CEOP.

7.3.3 Monitoring

We will appropriately monitor internet use on all settings owned or provided internet enabled devices. This is achieved by:

- etke – an automatic response inbuilt into the system
- Teaching staff monitor activity during lessons

If a concern is identified via monitoring approaches we will:

- DSL or deputy will respond in line with the Safeguarding Children/child protection policy.
- All users will be informed that use of our systems can be monitored and that all monitoring will be in line with data protection, human rights and privacy legislation.

7.4 Managing Personal Data Online

Personal data will be recorded, processed, transferred and made available online in accordance with General Data Protection Regulations and Data Protection legislation.

- Full information can be found in our privacy notices which can be found on the school website.

7.5 Security and Management of Information Systems

We take appropriate steps to ensure the security of our information systems, including:

- Virus protection being updated regularly.
- Encryption for personal data sent over the Internet or taken off site (such as via portable media storage) or access via appropriate secure remote access systems.
- Not using portable media without specific permission; portable media will be checked by an anti-virus /malware scan before use.
- Not downloading unapproved software to work devices or opening unfamiliar email attachments.
- Regularly checking files held on our network,
- The appropriate use of user logins and passwords to access our network.
 - Specific user logins and passwords will be enforced for all. All children have a pupil log-in. Adults have both a username and password
- All users are expected to log off or lock their screens/devices if systems are unattended.
- Further information about technical environment safety and security can be found in the schools "Acceptable Use policy"

7.5.1 Passwords

All members of staff will have their own unique username and private passwords to access our systems; members of staff are responsible for keeping their password private.

If using online recording systems e.g. a CP record system restricted access will be granted per job role and responsibility with regular reviews of who has access.

All learners are taught how to log on to school devices and have their own individual passwords for online learning platforms e.g. TTRS and Mirodo homework.

7.6 Managing the Safety of our Website

- We will ensure that information posted on our website meets the requirements as identified by the Department for Education (DfE).
- We will ensure that our website complies with guidelines for publications including: accessibility; data protection; respect for intellectual property rights; privacy policies and copyright.
- Staff or learner's personal information will not be published on our website; the contact details on the website will be our setting address, email and telephone number.
- The administrator account for our website will be secured with an appropriately strong password.
- We will post appropriate information about safeguarding, including online safety, on our website for members of the community.

7.7 Publishing Images and Videos Online

We will ensure that all images and videos shared online are used in accordance with the associated policies, including (but not limited to) the: cameras and image use, data security, acceptable use policies, codes of conduct/behaviour, social media and use of personal devices and mobile phones.

7.8 Managing Email

- Access to our email systems will always take place in accordance with data protection legislation and in line with other policies, including confidentiality, acceptable use policies and the code of conduct/Behaviour policy.
 - The forwarding of any chain messages/emails is not permitted.
 - Spam or junk mail will be blocked and reported to the email provider.
 - Any electronic communication which contains sensitive or personal information will only be sent using secure and encrypted email.
 - Setting email addresses and other official contact details will not be used for setting up personal social media accounts.
- Members of the community will immediately inform the Headteacher if they receive offensive communication, and this will be recorded in our safeguarding files/records.
- We will have a dedicated email for reporting wellbeing and pastoral issues. This inbox will be managed by designated and trained staff.

7.8.1 Staff email

- Members of staff are encouraged to have an appropriate work life balance when responding to email, especially if communication is taking place between staff, learners and parents.

- Members of staff will refer to and adhere to the acceptable use policy and any other policy where staff use of mobiles is referred to.

7.8.2 Learner email

- Learners will use provided email accounts for educational purposes.
- Learners will sign an acceptable use policy and will receive education regarding safe and appropriate email etiquette before access is permitted.
- Whole-class or group email addresses may be used for communication outside of the setting.

7.9 Educational use of Videoconferencing and/or Webcams

Coton school recognise that videoconferencing and/or use of webcams can be a challenging activity but brings a wide range of learning benefits. Children do not use video conferencing at Coton school and the use of webcams is seen as a developing opportunity

All videoconferencing and/or webcam equipment will be switched off when not in use and will not be set to auto-answer.

- Video conferencing equipment connected to the educational broadband network will use the national E.164 numbering system and display their H.323 ID name; external IP addresses will not be made available to other sites.
- Videoconferencing contact details will not be posted publicly.
- Videoconferencing equipment will not be taken off the premises without prior permission from the DSL.
- Staff will ensure that external videoconferencing opportunities and/or tools are suitably risk assessed and will ensure that accounts and systems used to access these events are safe and secure.
- Video conferencing equipment and webcams will be kept securely and, if necessary, locked away or disabled when not in use.
- Guidance has been issued to staff regarding the safe use of webcams with parents.

7.9.1 Users

- Parents/carers consent will be obtained prior to learners taking part in videoconferencing activities
- Learners will ask permission from a member of staff before making or answering a videoconference call or message.
- Videoconferencing will be supervised appropriately, according to the learner's age and ability.
 - For further information see the schools Remote Learning Policy.
- Video conferencing will take place via official and approved communication channels following a robust risk assessment.
- Only key administrators will be given access to videoconferencing administration areas or remote-control pages.
- The unique log on and password details for the videoconferencing services will only be issued to members of staff and should be kept securely, to prevent unauthorised access.

7.9.2 Content

- When recording a videoconference lesson, it should be made clear to all parties at the start of the conference and written permission will be obtained from all participants; the reason for the recording must be given and recorded material will be stored securely.
- If third party materials are included, we will check that recording is permitted to avoid infringing the third-party intellectual property rights.
- We will establish dialogue with other conference participants before taking part in a videoconference; if it is a non-educational site, staff will check that the material they are delivering is appropriate for the learners.

7.10 Management of Learning Platforms (LPs)

- Coton school uses a range of platforms e.g., SATs companion, Mirodao, Tapestry and TT Rocks as learning platforms.
- Leaders and staff will regularly monitor the usage of the Learning Platform (LP), including message/communication tools and publishing facilities.
- Only current members of staff, learners and parents will have access to the LP.
- When staff and/or learners leave the setting, their account will be disabled or transferred to their new establishment.
- Learners and staff will be advised about acceptable conduct and use when using the LP.
- All users will be mindful of copyright and will only upload appropriate content onto the LP.
- Any concerns about content on the LP will be recorded and dealt with in the following ways:
 - The user will be asked to remove any material deemed to be inappropriate or offensive.
 - If the user does not comply, the material will be removed by the site administrator.
 - Access to the LP for the user may be suspended.
 - The user will need to discuss the issues with a member of leadership before reinstatement.
 - A learner's parents/carers may be informed.
 - If the content is illegal, we will respond in line with existing Safeguarding Children/child protection procedures.
- Learners may require editorial approval from a member of staff. This may be given to the learner to fulfil a specific aim and may have a limited time frame.
- A visitor may be invited onto the LP by a member of the leadership; in this instance, there may be an agreed focus or a limited time slot.

7.11 Management of Applications (apps) used to Record Children's Progress

- We use Tapestry in Early Years to track learners progress and share appropriate information with parents and carers. Parents can access this via a mobile phone app
- The Headteacher is ultimately responsible for the security of any data or images held of children. As such, they will ensure that the use of tracking systems is appropriately risk assessed prior to use, and that they are used in accordance with data protection legislation, including the General Data Protection Regulations (GDPR) and Data Protection legislation.
- To safeguard learner's data:
 - Only learner issued devices will be used for apps that record and store learners' personal details, attainment or photographs.
 - Personal staff mobile phones or devices will not be used to access or upload content to any apps which record and store learners' personal details, attainment or images.

- Devices will be appropriately encrypted if taken off site, to reduce the risk of a data security breach, in the event of loss or theft.
- All users will be advised regarding safety measures, such as using strong passwords and logging out of systems.
- Parents and carers will be informed of the expectations regarding safe and appropriate use, prior to being given access; for example, not sharing passwords or images.

8. Social Media

8.1 Expectations

- The expectations' regarding safe and responsible use of social media and remote learning platforms applies to all members of Coton-in-the-Elms school community.
- Members of staff will refer to and adhere to the school's social media policy and any other policy where the staff use of social media is referred to.
- We will control learner and staff access to social media whilst using setting provided devices and systems on site. Children do not have access in school. The Head Teacher and school Administrator do have access to the schools Face Book page.
- Concerns regarding the online conduct of any member of Coton-in-the-Elms community on social media, should be reported to the DSL and will be managed in accordance with our anti-bullying, allegations against staff, Behaviour Management and safeguarding **children** /child protection policies.

8.2 Learners Personal Use of Social Media

- Safe and appropriate use of social media will be taught to learners as part of an embedded and progressive education approach, via age appropriate sites and resources.
- We are aware that many popular social media sites state that they are not for children under the age of 13, therefore we will not create accounts specifically for learners under this age.
- Any concerns regarding learner's use of social media will be dealt with in accordance with existing policies, including anti-bullying and Behaviour Management.
 - Concerns will be shared with parents/carers as appropriate, particularly when concerning underage use of social media sites, games or tools.
- Learners will be advised:
 - To consider the benefits and risks of sharing personal details on social media sites which could identify them and/or their location.
 - To only approve and invite known friends on social media sites and to deny access to others by making profiles private.
 - Not to meet any online friends without a parent/carer or other responsible adult's permission and only when a trusted adult is present.
 - To use safe passwords.
 - To use social media sites which are appropriate for their age and abilities.
 - How to block and report unwanted communications.
 - How to report concerns both within the setting and externally.

8.3 Official Use of Social Media

- Coton-in-the -Elms school official social media channel is: Facebook
www.facebook.com/Coton-in-the-Elms-CofE-Primary-school

- The official use of social media sites only takes place with clear educational or community engagement objectives, with specific intended outcomes.
 - The official use of social media as a communication tool has been formally risk assessed and approved by the Headteacher
 - Leadership staff have access to account information and login details for our social media channel, in case of emergency, such as staff absence.
- The official social media channel has been set up as distinct and dedicated social media sites or accounts for educational or engagement purposes only.
 - Staff use setting provided email addresses to register for and manage any official social media channels.
 - The official social media site is suitably protected and, where possible, run and/or linked to/from our website.
 - All communication on official social media platforms will be clear, transparent and open to scrutiny.
- Parents/carers and learners will be informed of any official social media use, along with expectations for safe use and action taken to safeguard the community.
 - Only social media tools e.g., Face Book (see link above) which have been risk assessed and approved as suitable for educational purposes will be used.
- Parents and carers will be informed of any official social media use with learners; written parental consent will be obtained, as required.
- We will ensure that any official social media use does not exclude members of the community who are unable or unwilling to use social media channels.

9. Use of Personal Devices and Mobile Phones

The school recognises that personal communication through mobile technologies is an accepted part of everyday life for learners, staff and parents/carers, but technologies need to be used safely and appropriately within the setting.

9.1 Staff Use of Personal Devices and Mobile Phones

Members of staff will refer to and adhere to the school's acceptable use policy and any other policy where the staff use of personal devices and mobile phones is referred to.

9.2 Learners Use of Personal Devices and Mobile Phones

- Learners will be educated regarding the safe and appropriate use of personal devices and mobile phones and will be made aware of boundaries and consequences.
- The school does not allow children to bring any mobile devices and phones into school. The only exception for a mobile phone is where a child is walking home alone after school.
- In such circumstances the school expects learners' mobile phones to be held by the relevant teacher until end of the school day
- If a learner needs to contact his/her parents or carers they will be allowed to use the office phone.
 - Parents are advised to contact their child via the school office.
 - The use of personal mobile phones or devices for a specific education purpose does not mean that blanket use is permitted.

- If members of staff have an educational reason to allow learners to use their mobile phones or personal devices as part of an educational activity, it will only take place when approved by the Leadership Team.
- If a learner breaches the policy, the phone or device will be confiscated and will be held in a secure place.
 - Staff may confiscate a learner's mobile phone or device if they believe it is being used to contravene our Behaviour Management or Anti Bullying policy or could contain youth produced sexual imagery (sexting).
 - Searches of mobile phone or personal devices will only be carried out in accordance with DfE guidance and our policy. The school adheres to government guidance which can be found at www.gov.uk/government/publications/searching-screening-and-confiscation)
 - Learners mobile phones or devices may be searched by a member of the leadership team, with the consent of the learner or a parent/ carer. Content may be deleted or requested to be deleted, if it contravenes our policies. (**Appropriate for schools only and must link to appropriate policy. See www.gov.uk/government/publications/searching-screening-and-confiscation**)
 - Mobile phones and devices that have been confiscated will be released to parents or carers at the end of the day. If there is suspicion that material on a learner's personal device or mobile phone may be illegal or may provide evidence relating to a criminal offence, the device will be handed over to the police for further investigation.

9.3 Visitors' Use of Personal Devices and Mobile Phones

- Parents/carers and visitors (including volunteers and contractors) must use their mobile phones and personal devices in accordance with our acceptable use policy and other associated policies, such as: anti-bullying, behaviour management, safeguarding children/child protection and image use.
- We will ensure appropriate signage and information is displayed and provided to inform parents, carers and visitors of expectations of use.
- Members of staff are expected to challenge visitors if they have concerns and will always inform the DSL (or deputy) of any breaches to our policy.

9.4 Officially provided mobile phones and devices

- Members of staff will be issued with a work phone number and email address, where contact with learners or parents/ carers is required.
- The school's mobile phones and devices will be suitably protected via a passcode/password/pin and must only be accessed or used by members of staff.
- The school's mobile phones and devices will always be used in accordance with the acceptable use policy and other relevant policies. For more information see our GDPR Policy on the school website.

10. Responding to Online Safety Incidents and Concerns

- All members of the school community will be made aware of the reporting procedure for online safety concerns including: breaches of filtering, youth produced sexual imagery (sexting), cyberbullying and illegal content.
- All members of the school community will be made aware of the availability of the Cyber Choices early intervention programme for individuals who are involved in cybercrime, or those who are gifted and talented and are at risk of becoming involved in cybercrime.

- All members of the community must respect confidentiality and the need to follow the official procedures for reporting concerns.
 - Learners, parents and staff will be informed of our complaints procedure and staff will be made aware of the whistleblowing procedure.
 - We require staff, parents, carers and learners to work in partnership to resolve online safety issues.
 - After any investigations are completed, we will debrief, identify lessons learnt and implement any policy or curriculum changes as required.
 - We will refer to the flow chart on responding to incidents, made available
 - Where there is suspicion that illegal activity has taken place, we will follow the local safeguarding procedures which will include Police using 101, or 999 if there is immediate danger or risk of harm.
 - If an incident or concern needs to be passed beyond our community (for example if other local settings are involved or the public may be at risk), the DSL or Deputy will speak with Call Derbyshire/ Derbyshire Police first to ensure that potential investigations are not compromised.
- See also flowchart for dealing with online infringements - appendix 3

11. Concerns about Learners Welfare

- The DSL (or deputy) will be informed of any online safety incidents involving safeguarding or child protection concerns.
 - The DSL (or deputy) will record these issues in line with our child protection policy.
- The DSL (or deputy) will ensure that online safety concerns are escalated and reported to relevant agencies in line with the Derby and Derbyshire Safeguarding Children Partnership thresholds and procedures.
- We will inform parents and carers of online safety incidents or concerns involving their child, as and when required.

12. Procedures for Responding to Specific Online Incidents or Concerns

12.1 Online Sexual Violence and Sexual Harassment between Children

- Our school has accessed and understood guidance and part 5 of 'Keeping children safe in education'.
- Coton school recognises that sexual violence and sexual harassment between children can take place online. Examples may include; non-consensual sharing of sexual images and videos, sexualised online bullying, online coercion and threats, unwanted sexual comments and messages on social media, and online sexual exploitation.
 - Full details of how we will respond to concerns relating to sexual violence and sexual harassment between children can be found within our safeguarding children/child protection and anti-bullying policy.
- The school recognises that internet brings the potential for the impact of any sexual violence and sexual harassment concerns to extend further than the local community, and for a victim or alleged perpetrator to become marginalised and excluded by online communities.
- The school also recognises the potential for repeat victimisation in the future if abusive content continues to exist somewhere online.
- We will ensure that all members of the community are made aware of the potential social, psychological and criminal consequences of online sexual violence and sexual harassment between children by implementing a range of age and ability appropriate educational methods as part of our PSHE and RSE curriculum. Further information regarding our RSE policy is available on the school

- We will ensure that all members of the community are aware of sources of support regarding online sexual violence and sexual harassment between children.
- We will respond to concerns regarding online sexual violence and sexual harassment between children, regardless of whether the incident took place on our premises or using our equipment.
- If made aware of online sexual violence and sexual harassment, we will:
 - Immediately notify the DSL (or deputy) and act in accordance with our safeguarding children/child protection and anti-bullying policies.
 - If content is contained on learners electronic devices, they will be managed in accordance with the DfE '[searching screening and confiscation](#)' advice.
 - Provide the necessary safeguards and support for all learners involved, such as offering specific advice on blocking, reporting and removing online content, as well as providing appropriate counselling/pastoral support.
 - Implement appropriate sanctions in accordance with our Behaviour policy.
 - Inform parents and carers, if appropriate, about the incident and how it is being managed.
 - If appropriate, make a referral to partner agencies, such as Children's Social Work Service and/or the Police.
 - If the concern involves children and young people at a different educational setting, work in partnership with other DSLs to ensure appropriate safeguarding action is taken in the wider local community.
 - If a criminal offence has been committed, the DSL (or deputy) will discuss this with Derbyshire Police first to ensure that investigations are not compromised.
 - Review the handling of any incidents to ensure that best practice was implemented, and policies/procedures are appropriate.

12.2 Youth Produced Sexual Imagery ("Sexting")

- The school recognises youth produced sexual imagery (known as "sexting") as a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- We will follow the advice as set out in the non-statutory UKCCIS guidance: '[Sexting in schools and colleges: responding to incidents and safeguarding young people](#)' and [KSCB](#) guidance: "Responding to youth produced sexual imagery".
- We will ensure that all members of the community are made aware of the potential social, psychological and criminal consequences of 'sexting' by implementing preventative approaches, via a range of age and ability appropriate educational methods.
- We will ensure that all members of the community are aware of sources of support regarding youth produced sexual imagery.
- We will respond to concerns regarding youth produced sexual imagery, regardless of whether the incident took place on site or using setting provided or personal equipment.
- We will not:
 - View any images suspected of being youth produced sexual imagery, unless there is no other possible option, or there is a clear need or reason to do so.
 - If it is deemed necessary, the image will only be viewed by the DSL (or deputy DSL) and their justification for viewing the image will be clearly documented.
 - Send, share, save or make copies of content suspected to be an indecent image of a child (i.e. youth produced sexual imagery) and will not allow or request learners to do so.
- If made aware of an incident involving the creation or distribution of youth produced sexual imagery, we will:

- Act in accordance with our safeguarding children/child protection policies and Derby and Derbyshire Safeguarding Children Partnership's procedures.
- Ensure the DSL (or deputy) responds in line with the ['Sexting in schools and colleges: responding to incidents and safeguarding young people'](#) guidance.
- Store the device securely.
- If an indecent image has been taken or shared on our network or devices, we will act to block access to all users and isolate the image.
 - Carry out a risk assessment which considers any vulnerability of learners involved; including carrying out relevant checks with other agencies.
 - Inform parents and carers, if appropriate, about the incident and how it is being managed.
 - Make a referral to Children's Social Work Service and/or the Police, as deemed appropriate in line with the UKCCIS : ['Sexting in schools and colleges: responding to incidents and safeguarding young people'](#) guidance.
 - Provide the necessary safeguards and support for learners, such as offering counselling or pastoral support.
 - Implement appropriate sanctions in accordance with our behaviour management policy but taking care not to further traumatise victims where possible.
 - Consider the deletion of images in accordance with the UKCCIS: ['Sexting in schools and colleges: responding to incidents and safeguarding young people'](#) guidance.
 - Images will only be deleted once the DSL has confirmed that other agencies do not need to be involved; and are sure that to do so would not place a child at risk or compromise an investigation.
 - Review the handling of any incidents to ensure that best practice was implemented; the leadership team will also review and update any management procedures, where necessary.

12.3 Online Child Sexual Abuse and Exploitation (including child criminal exploitation)

- Coton-in-the -Elms school will ensure that all members of the community are aware of online child sexual abuse, including: exploitation and grooming; the consequences; possible approaches which may be employed by offenders to target children and how to respond to concerns.
- We recognise online child sexual abuse and exploitation (including criminal exploitation) as a safeguarding issue and, as such, all concerns will be reported to and dealt with by the DSL (or deputy).
- We will implement preventative approaches for online child sexual abuse and exploitation (including criminal exploitation) via a range of age and ability appropriate education for learners, staff and parents/carers.
- We will ensure that all members of the community are aware of the support available regarding online child sexual abuse and exploitation (including criminal exploitation), both locally and nationally.
- We will ensure that the 'Click CEOP' report button is visible and available to learners and other members of our community. This can be easily seen on our website. **This is STOP on our website**
- If made aware of incident involving online child sexual abuse and exploitation (including criminal exploitation), we will:
 - Act in accordance with our safeguarding children/child protection policies and Derby and Derbyshire Safeguarding Children Partnership's procedures.
 - If appropriate, store any devices involved securely.
 - Make a referral to Children's Social Work Service (if required/appropriate) and immediately inform Kent police via 101, or 999 if a child is at immediate risk.
 - Carry out a risk assessment which considers any vulnerabilities of learner(s) involved (including carrying out relevant checks with other agencies).

- Inform parents/carers about the incident and how it is being managed.
- Provide the necessary safeguards and support for learners, such as, offering counselling or pastoral support.
- Review the handling of any incidents to ensure that best practice is implemented; leadership team will review and update any management procedures, where necessary.
- We will respond to concerns regarding online child sexual abuse and exploitation (including criminal exploitation), regardless of whether the incident took place on our premises or using setting provided or personal equipment.
 - Where possible, learners will be involved in decision making and if appropriate, will be empowered to report concerns such as via the Click CEOP report: www.ceop.police.uk/safety-centre/
- If we are unclear whether a criminal offence has been committed, the DSL (or deputy) will obtain advice immediately through the Derbyshire police by using 101.
- If made aware of intelligence or information which may relate to child sexual exploitation (on or offline), it will be passed through to the Derbyshire police using 101 unless immediate concerns and 999 will be used by the DSL (or deputy).
- If learners at other setting are believed to have been targeted, the DSL (or deputy) will seek support from Derbyshire Police first to ensure that potential investigations are not compromised.

12.4 Indecent Images of Children (IIOC)

- Coton-in-the-Elms school will ensure that all members of the community are made aware of the possible consequences of accessing Indecent Images of Children (IIOC).
- We will respond to concerns regarding IIOC on our equipment and/or personal equipment, even if access took place off site.
- We will seek to prevent accidental access to IIOC by using an internet Service provider (ISP) which subscribes to the Internet Watch Foundation block list and by implementing appropriate filtering, firewalls and anti-spam software.
- If we are unclear if a criminal offence has been committed, the DSL (or deputy) will obtain advice immediately through the Derbyshire Police using 101.
- If made aware of IIOC, we will:
 - Act in accordance with our safeguarding children/child protection policy and the relevant Derby and Derbyshire Safeguarding Children Partnership's safeguarding procedures.
 - Store any devices involved securely.
 - Immediately inform appropriate organisations, such as the Internet Watch Foundation (IWF), Derbyshire police or the LADO.
- If made aware that a member of staff or a learner has been inadvertently exposed to indecent images of children, we will:
 - Ensure that the DSL (or deputy) is informed.
 - Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via www.iwf.org.uk .
 - Ensure that any copies that exist of the image, for example in emails, are deleted.
 - Report concerns, as appropriate to parents and carers.
- If made aware that indecent images of children have been found on the setting provided devices, we will:
 - Ensure that the DSL (or deputy) is informed.

- Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via www.iwf.org.uk .
- Ensure that any copies that exist of the image, for example in emails, are deleted.
- Inform the Derbyshire police via 101 (999 if there is an immediate risk of harm) and Children's Services using Call Derbyshire (as appropriate).
- Only store copies of images (securely, where no one else has access to them and delete all other copies) at the request of the police only.
- Report concerns, as appropriate to parents and carers.
- If made aware that a member of staff is in possession of indecent images of children on setting provided devices, we will:
 - Ensure that the Headteacher is informed in line with our managing allegations against staff policy immediately and without any delay.
 - Inform the Local Authority Designated Officer (LADO) and other relevant organisations in accordance with our managing allegations against staff policy.
 - Quarantine any devices until police advice has been sought.

12.5 Cyberbullying

Cyberbullying, along with all other forms of bullying, will not be tolerated at this school. Full details of how we will respond to cyberbullying are set out in our anti-bullying policy which can be found on the school website. In addition, the children themselves have developed a summary leaflet of the anti-bullying policy. Also, the school has an anti-bullying charter which all children and staff are expected to adhere to.

12.6 Online Hate

Online hate content, directed towards or posted by, specific members of the

- community will not be tolerated at Coton school and will be responded to in line with existing policies, including anti-bullying and behaviour management.
- All members of the community will be advised to report online hate in accordance with relevant policies and procedures.
- The Police will be contacted if a criminal offence is suspected.
- If we are unclear on how to respond, or whether a criminal offence has been committed, the DSL (or deputy) will obtain advice through the Derbyshire police and or the safer Derbyshire website <https://www.saferderbyshire.gov.uk/home.aspx>

12.7 Online Radicalisation and Extremism

- We will take all reasonable precautions to ensure that learners and staff are safe from terrorist and extremist material when accessing the internet on site. The school has adopted the current Derbyshire Extremism and Radicalisation policy.
- If we are concerned that a child or parent/carer may be at risk of radicalisation online, the DSL (or deputy) will be informed immediately, and action will be taken in line with our safeguarding children/child protection policy and Derbyshire prevent pathway which may include a referral into Channel.
- If we are concerned that member of staff may be at risk of radicalisation online, the Head-teacher/Deputy will be informed immediately, and action will be taken in line with the safeguarding children/child protection and allegations policies.

12.8 Cybercrime

- Cybercrime incidents and offences will be responded to in line with our existing behaviour management policy.
- We will respond to concerns that our learners are involved, or at risk of becoming involved, in cybercrime, even if it takes place off site.
- We will make a Cyber Choices referral for early intervention, as per the Cyber Choices toolkit.
- If we are concerned that a child is being exploited as a result of their technical skills, we will follow the Children at Risk of Exploitation (CRE) procedure and the CRE Risk Assessment Toolkit
- <https://www.saferderbyshire.gov.uk/what-we-do/cyber-crime/reporting-cybercrime/digital-mot/digital-mot.aspx>

13 Useful Links for Educational Settings

Support and Guidance for Educational Settings

Derby City & Derbyshire Safeguarding Children Partnership online procedures DDCSP:

- <http://derbyshirescbs.proceduresonline.com/>

Derbyshire Police:

- In an emergency (a life is in danger or a crime in progress) dial 999. For other non-urgent enquiries contact Derbyshire Police via 101

LADO

- By referral into Professional.Allegations@derbyshire.gov.uk
- Form found here http://derbyshirescbs.proceduresonline.com/docs_library.html

Call Derbyshire (Starting Point)

- Immediate risk of harm phone 01629 533190
- For all other referrals complete an online form <https://www.derbyshire.gov.uk/social-health/children-and-families/support-for-families/starting-point-referral-form/starting-point-request-for-support-form.aspx>
- For professional advice phone 10629 53535

Logging incidents encountered form

Incidents	Refer to class teacher/tutor	Refer to Head of Department / Principal Teacher / Deputy Head	Refer to Headteacher	Refer to Police/Social Work	Refer to local authority technical support for advice/action	Inform parents/carers	Remove device/ network/internet access rights	Issue a warning	Further sanction, in line with behaviour policy
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on User Actions on unsuitable/inappropriate activities).		X	X	X					
Attempting to access or accessing the school network, using another user's account (staff or learner) or allowing others to access school network by sharing username and passwords									
Corrupting or destroying the data of other users.									
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature									
Unauthorised downloading or uploading of files or use of file sharing.									
Using proxy sites or other means to subvert the school's filtering system.									
Accidentally accessing offensive or pornographic material and failing to report the incident.									
Deliberately accessing or trying to access offensive or pornographic material.									
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act.									

Unauthorised use of digital devices (including taking images)									
Unauthorised use of online services									
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.									
Continued infringements of the above, following previous warnings or sanctions.									

National Links and Resources for Educational Settings

- CEOP:
 - www.thinkuknow.co.uk
 - www.ceop.police.uk
- Childnet: www.childnet.com
- Internet Matters: www.internetmatters.org
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Lucy Faithfull Foundation: www.lucyfaithfull.org
- NSPCC: www.nspcc.org.uk/onlinesafety
 - ChildLine: www.childline.org.uk
 - Net Aware: www.net-aware.org.uk
- The Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- UK Safer Internet Centre: www.saferinternet.org.uk
 - Professional Online Safety Helpline: www.saferinternet.org.uk/about/helpline
- 360 Safe Self-Review tool for schools: www.360safe.org.uk

National Links and Resources for Parents/Carers

- Action Fraud: www.actionfraud.police.uk
- CEOP:
 - www.thinkuknow.co.uk
 - www.ceop.police.uk
- Childnet: www.childnet.com
- Get Safe Online: www.getsafeonline.org
- Internet Matters: www.internetmatters.org
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Lucy Faithfull Foundation: www.lucyfaithfull.org
- NSPCC: www.nspcc.org.uk/onlinesafety
 - ChildLine: www.childline.org.uk
 - Net Aware: www.net-aware.org.uk
- The Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- UK Safer Internet Centre: www.saferinternet.org.uk

Dealing with Online Infringements/Breaches.

