MERIDIAN COMMUNITY PRIMARY SCHOOL AND NURSERY

Learning for Life

Meridian Community Primary School and Nursery

Online Safety Policy

Contents

Adopted by Full Governing Body – September 2017

Review date – September 2018

1. Creating an Online Safety Ethos

1.1. Aims and policy scope

- Meridian Community Primary School and Nursery believe that online safety (e-Safety) is an essential element of safeguarding children and adults in the digital world, when using technology such as computers, tablets, mobile phones or games consoles.
- Meridian Community Primary School and Nursery identify that the internet and information communication technologies are an important part of everyday life, so children must be supported to be able to learn how to develop strategies to manage and respond to risk and be empowered to build resilience online.
- Meridian Community Primary School and Nursery has a duty to provide the school community with quality Internet access to raise education standards, promote pupil achievement, support professional work of staff and enhance the schools management functions.
- Meridian Community Primary School and Nursery identifies that there is a clear duty to ensure that children are protected from potential harm online.
- The purpose of Meridian Community Primary School and Nursery online safety policy is to:
- Clearly identify the key principles expected of all members of the community with regards to the safe and responsible use technology to ensure that Meridian Community Primary School and Nursery is a safe and secure environment.
- Safeguard and protect all members of Meridian Community Primary School and Nursery online.
- Raise awareness with all members of Meridian Community Primary School and Nursery regarding the potential risks as well as benefits of technology.
- To enable all staff to work safely and responsibly, to role model positive behaviour online and be aware of the need to manage their own standards and practice when using technology.
- Identify clear procedures to use when responding to online safety concerns that are known by all members of the community.
- This policy applies to all staff including the governing body, teachers, support staff, external contractors , visitors, volunteers and other individuals who work for or provide services on behalf of the school (collectively referred to as 'staff' in this policy) as well as children and parents/carers.
- This policy applies to all access to the internet and use of information communication devices including personal devices or where children, staff or other individuals have been provided with school issued devices for use off-site, such as a work laptops, tablets or mobile phones.
- This policy must be read in conjunction with other relevant school policies including (but not limited to) safeguarding and child protection, anti-bullying, behaviour, data security, image use, Acceptable Use Policies, confidentiality, screening, searching and confiscation and relevant curriculum policies including computing, Personal Social and Health Education (PSHE), Citizenship and Sex and Relationships Education (SRE).

Writing and reviewing the online policy

The Designated Safeguarding Lead (DSL) is Miss Danielle Maslen. The deputy is Ms Claire Westcott.

The School Online safety (e-Safety) lead for the Governing Body is Janet Anthony.

Policy approved by Head Teacher: Ms C Westcott Date: September 2017

Policy approved by Governing Body: Janet Anthony (Chair of Governors) Date: September 2017

The date for the next policy review is September 2018

- Meridian Community Primary School and Nursery online safety policy has been written by the school, involving staff, pupils and parents/carers, building on the East Sussex County Council (ESCC) online safety policy template, with specialist advice and input as required.
- The policy has been approved and agreed by the Leadership Team and Governing Body.

- The school has appointed the Designated Safeguarding Lead, Ms Danielle Maslen as an appropriate member of the leadership team and the online safety lead.
- The school has appointed (*Janet Anthony, Chair of Governors)* as the member of the Governing Body to take lead responsibility for online safety (e-Safety).
- The online safety (e–Safety) Policy and its implementation will be reviewed by the school/setting at least annually or sooner if required.

1.2 Key responsibilities of the community

All members of school/setting communities have an essential role to play in ensuring the safety and wellbeing of others, both on and offline. It is important that all members of the community are aware of these roles and responsibilities and also how to access and seek support and guidance.

1.2.1 The key responsibilities of the school/setting management and leadership team are:

- Developing, owning and promoting the online safety vision and culture to all stakeholders, in line with national and local recommendations with appropriate support and consultation throughout the school community.
- Ensuring that online safety is viewed by the whole community as a safeguarding issue and proactively developing a robust online safety culture.
- Supporting the DSL by ensuring they have sufficient time and resources to fulfil their online safety role and responsibilities.

- Auditing and evaluating current online safety practice to identify strengths and areas for improvement.
- Ensuring there are appropriate and up-to-date policies and procedures regarding online safety including an Acceptable Use Policy which covers appropriate professional conduct and use of technology.
- To ensure that suitable and appropriate filtering and monitoring systems are in place to protect children from inappropriate content which meet the needs of the school community whilst ensuring children have access to required educational material.
- To work with and support technical staff in monitoring the safety and security of school/setting systems and networks and to ensure that the school/setting network system is actively monitored.
- Ensuring all members of staff receive regular, up-to-date and appropriate training regarding online safety roles and responsibilities and provide guidance regarding safe appropriate communications.
- Ensuring that online safety is embedded within a progressive whole school/setting curriculum which enables all pupils to develop an age-appropriate understanding of online safety and the associated risks and safe behaviours.
- Making appropriate resources available to support the development of an online safety culture.
- Taking responsibility for online safety incidents and liaising with external agencies and support as appropriate.
- Receiving and regularly reviewing online safety incident logs and using them to inform and shape future practice.
- Ensuring there are robust reporting channels for the school/setting 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, including ensuring the safe and responsible use of devices.
- To ensure a member of the Governing Body is identified with a lead responsibility for supporting online safety.

1.2.2 Key responsibilities of the Designated Safeguarding Lead (DSL) /online safety lead

All schools and settings are encouraged to appoint an e-Safety or online safety lead, who is responsible for coordinating the whole school/setting online safety approaches, supporting and raising awareness with the wider community, promoting a safe and responsible online safety culture and acting as the lead for dealing with online safety issues that arise. The online safety lead must have appropriate training, support and authority to carry out the role.

- Acting as a named point of contact on all online safeguarding issues and liaising with other members of staff and other agencies as appropriate.
- Keeping up-to-date with current research, legislation and trends regarding online safety.
- Coordinating participation in local and national events to promote positive online behaviour, e.g. Safer Internet Day.
- Ensuring that online safety is promoted to parents and carers and the wider community through a variety of channels and approaches.
- Work with the school/setting lead for data protection and data security to ensure that practice is in line with current legislation.
- Maintaining a record of online safety concerns/incidents and actions taken as part of the schools safeguarding recording structures and mechanisms.
- Monitor the school/settings online safety incidents to identify gaps/trends and use this data to update the school/settings education response to reflect need
- To report to the school management team, Governing Body and other agencies as appropriate, on online safety concerns and local data/figures.
- Liaising with the local authority and other local and national bodies, as appropriate.
- Reviewing and updating online safety policies, Acceptable Use Policies (AUPs) and other related procedures on a regular basis (at least annually) with stakeholder input.
- Ensuring that online safety is integrated with other appropriate school policies and procedures.
- Leading an online safety team/group with input from all stakeholder groups.

1.2.3 Key responsibilities of staff

All members of staff play an essential role in creating a safe culture within settings, both on and offline. All members of staff should seek to promote safe and responsible online conduct with and by children as part of the curriculum and as part of their safeguarding responsibilities. All members of staff will need to role model positive behaviours when using technologies, either directly with children or in the wider context. All staff should be aware of and ensure they adhere to the school/setting Acceptable Use Policies (AUPs).

- Contributing to the development of online safety policies.
- Reading the school Acceptable Use Policies (AUPs) and adhering to them.
- Taking responsibility for the security of school/setting systems and data.
- Having an awareness of a range of online safety issues and how they relate to the children in their care.
- Modelling good practice when using new and emerging technologies
- Embedding online safety education in curriculum delivery wherever possible.
- Identifying individuals of concern and taking appropriate action by following school safeguarding policies and procedures.
- Knowing when and how to escalate online safety issues, internally and externally.
- Being able to signpost to appropriate support available for online safety issues, internally and externally.
- Maintaining a professional level of conduct in their personal use of technology, both on and off site.

1.2.4. Additional responsibilities for staff managing the technical environment

Members of staff who are responsible for managing the school/setting technical environment have an essential role to play in establishing and maintaining a safe online environment and culture within establishments.

Staff with responsibility for the technical environment should work closely with the school leaders, online safety coordinator, DSL as well as pastoral and curriculum staff (where appropriate) to provide expertise relating to education use of ICT systems and also to ensure that learning opportunities are not unnecessarily restricted by technical safety measures. EMCOR manage the filtering system called IMPERO.

In addition to the above, the key responsibilities for staff managing the technical environment are:

- Providing a safe and secure technical infrastructure which support safe online practices while ensuring that learning opportunities are still maximised.
- Taking responsibility for the implementation of safe security of systems and data in partnership with the leadership and management team.
- To ensure that suitable access controls and encryption is implemented to protect personal and sensitive information held on school-owned devices.
- Ensuring that the schools filtering policy is applied and updated on a regular basis and that responsibility for its implementation is shared with the DSL.
- Ensuring that the use of the school/setting's network is regularly monitored and reporting any deliberate or accidental misuse to the DSL.
- Report any breaches or concerns to the DSL and leadership team and together ensure that they are recorded and appropriate action is taken as advised.
- Developing an understanding of the relevant legislation as it relates to the security and safety of the technical infrastructure.
- Report any breaches and liaising with the local authority (or other local or national bodies) as appropriate on technical infrastructure issues.
- Providing technical support and perspective to the DSL and leadership team, especially in the development and implementation of appropriate online safety policies and procedures.

1.2.5 Key responsibilities of children and young people

The essential role and responsibilities for children and young people themselves in relation to their own online safety should not be underestimated. Children should be encouraged and empowered to develop safe and responsible online behaviours over time which will enable them to manage and respond to online risks as they occur.

It should also be understood that children are more likely to be aware of and understand new developments within technology and may be able to provide schools and settings with an excellent way of keeping up-to-date with the rapidly changing pace of development, especially within social media and the associated apps and games.

The key responsibilities of children and young people are:

- Contributing to the development of online safety policies.
- Reading the school/setting Acceptable Use Policies (AUPs) and adhering to them.
- Respecting the feelings and rights of others both on and offline.
- Seeking help from a trusted adult if things go wrong, and supporting others that may be experiencing online safety issues.

- At a level that is appropriate to their individual age, ability and vulnerabilities:
- Taking responsibility for keeping themselves and others safe online.
- Taking responsibility for their own awareness and learning in relation to the opportunities and risks posed by new and emerging technologies.
- Assessing the personal risks of using any particular technology, and behaving safely and responsibly to limit those risks.

1.2.6. Key responsibilities of parents and carers

Parents /carers play a crucial role in developing children's safe and responsible online behaviours, especially where a majority of children's access will be taking place when they are not on the school/setting site. Schools and settings have a clear responsibility to work in partnership with families to raise awareness of online safety issues. Through this approach, parents/carers can help schools/settings to reinforce online safety messages and promote and encourage safe online behaviours wherever, and whenever, children use technology.

The key responsibilities of parents and carers are:

- Reading the school/setting Acceptable Use Policies, encouraging their children to adhere to them, and adhering to them themselves where appropriate.
- Discussing online safety issues with their children, supporting the school in their online safety approaches, and reinforcing appropriate safe online behaviours at home.
- Role modelling safe and appropriate uses of technology and social media.
- Identifying changes in behaviour that could indicate that their child is at risk of harm online.
- Seeking help and support from the school, or other appropriate agencies, if they or their child encounters online problems or concerns.
- Taking responsibility for their own awareness and learning in relation to the opportunities and risks posed by new and emerging technologies.

2. Online Communication and Safer Use of Technology

Schools and settings will be using a variety of online communication and collaboration tools both informally and formally with children, parents/carers and staff. It will be important that managers and leaders are aware of this use and provide clear boundaries and expectations for safe use.

2.1 Managing the school/setting website

- The school will ensure that information posted on the school website meets the requirements as identified by the Department for Education.
- The contact details on the website will be the school/setting address, email and telephone number. Staff or pupils' personal information will not be published.
- The head teacher will take overall editorial responsibility for online content published by the school and will ensure that content published is accurate and appropriate.
- The school website will comply with the school's guidelines for publications including respect for intellectual property rights, privacy policies and copyright.
- The school will post information about safeguarding, including online safety, on the school website for members of the community.

2.2 Publishing images and videos online

For further information please see: (East Sussex) ICT E-safety Online Safety Education

- The school will ensure that all images and videos shared online are used in accordance with the school image use policy.
- The school/setting will ensure that all use of images and videos take place in accordance other policies and procedures including data security, Acceptable Use Policies, Codes of Conduct, social media, use of personal devices and mobile phones etc.
- In line with the image policy, written permission from parents or carers will always be obtained before images/videos of pupils are electronically published.

2.3 Managing email

Email is an essential method of communication for staff, parents and children. The implications of email use for the school/setting need to be thought through and appropriate safety measures put in place. Unregulated email can provide routes to the school/setting community that bypass traditional boundaries and therefore use of personal email addresses by staff for any official business should not be permitted.

- All members of staff are provided with a specific school/setting email address to use for any official communication.
- The use of personal email addresses by staff for any official school/setting business is not permitted.
- The forwarding of any chain messages/emails etc. is not permitted. Spam or junk mail will be blocked and reported to the email provider.
- Any electronic communication which contains any content which could be subject to data protection legislation (e.g. sensitive or personal information) will only be sent using secure and encrypted email.
- Members of the community must immediately tell a designated member of staff if they receive offensive communication and this will be recorded in the school safeguarding files/records.
- Email sent to external organisations should be written carefully and authorised before sending, in the same way as a letter written on school headed paper would be.
- School email addresses and other official contact details will not be used for setting up personal social media accounts.

2.4 Appropriate and safe classroom use of the internet (and associated devices)

- Internet use is a key feature of educational access and all children will receive age and ability appropriate education to support and enable them to develop strategies to respond to concerns as part of an embedded whole school curriculum. The school/setting's internet access will be designed to enhance and extend education.
- Access levels to the internet will be reviewed to reflect the curriculum requirements and the age and ability of pupils.
- All members of staff are aware that they cannot rely on filtering alone to safeguard children and supervision, classroom management and education about safe and responsible use is essential.
- All school owned devices will be used in accordance with the school Acceptable Use Policy and with appropriate safety and security measure in place.
- Members of staff will always evaluate websites, tools and apps fully before use in the classroom or recommending for use at home.
- Pupils will be educated in the effective use of the Internet in research, including the skills of knowledge location, retrieval and evaluation.
- The school will use age appropriate search tools as decided by the school following an informed risk assessment to identify which tool best suits the needs of our community.
- The school will ensure that the use of Internet-derived materials by staff and pupils complies with copyright law and acknowledge the source of information.
- Pupils will be taught to be critically aware of the materials they read and shown how to validate information before accepting its accuracy.
- The evaluation of online materials is a part of teaching and learning in every subject and will be viewed as a wholeschool/setting requirement across the curriculum.
- The school will use the internet to enable pupils and staff to communicate and collaborate in a safe and secure environment.

2.5 Management of school learning platforms/portals/gateways

An effective learning platform or environment can offer schools and settings a wide range of benefits to staff, children and parents, as well as support for management and administration. It can enable pupils and teachers to collaborate in and across schools, sharing resources and tools for a range of topics. It also enables the creation and management of digital content and pupils can develop online and secure e-portfolios to showcase examples of work. The Learning Platform/Environment (LP) must be used subject to careful monitoring by the Leadership Team. As usage grows then more issues could arise regarding content, inappropriate use and behaviour online by users. Leaders have a duty to review and update the policy regarding the use of the Learning Platform, and all users must be informed of any changes made.

- Leaders/managers and staff will regularly monitor the usage of the Learning Platform (LP) in all areas, in particular message and communication tools and publishing facilities.
- Pupils/staff will be advised about acceptable conduct and use when using the LP.
- Only members of the current pupil, parent/carers and staff community will have access to the LP.
- All users will be mindful of copyright issues and will only upload appropriate content onto the LP.
- When staff, pupils' etc. leave the school their account or rights to specific school areas will be disabled.
- Any concerns about content on the LP will be recorded and dealt with in the following ways:
    a) The user will be asked to remove any material deemed to be inappropriate or offensive.
    b) The material will be removed by the site administrator if the user does not comply.
    c) Access to the LP for the user may be suspended.
    d) The user will need to discuss the issues with a member of leadership before reinstatement. e) A pupil's parent/carer may be informed.

3. Social Medial Policy

3.1 Official use of social media

- Meridian Community Primary School and Nursery official social media channels are:

 **@MeridianCPS a**nd on Facebook *@MeridianCPSchool*

- Official use of social media sites by the school/setting will only take place with clear educational or community engagement objectives with specific intended outcomes e.g. increasing parental engagement.
- Official use of social media sites as communication tools will be risk assessed and formally approved by the headteacher.
- Official school/setting social media channels will be set up as distinct and dedicated social media site or account for educational or engagement purposes.
- Staff will use school/setting provided email addresses to register for and manage any official approved social media channels.
- Members of staff running official social media channels will sign a specific Acceptable Use Policy (AUP) to ensure they are aware of the required behaviours and expectations of use and to ensure that sites are used safely, responsibly and in accordance with local and national guidance and legislation.
- All communication on official social media platforms will be clear, transparent and open to scrutiny.
- Any online publication on official social media sites will comply with legal requirements including the Data Protection Act 1998, right to privacy conferred by the Human Rights Act 1998, or similar duty to protect private information and will not breach any common law duty of confidentiality, copyright etc.
- Official social media use will be in line with existing policies including anti-bullying and child protection and safeguarding.
- Images or videos of children will only be shared on official social media sites/channels in accordance with the image use policy.
- Information about safe and responsible use of social media channels will be communicated clearly and regularly to all members of the community.
- Official social media sites, blogs or wikis will be suitably protected (e.g. password protected) and where possible/appropriate, run and/or linked to from the school/setting website and take place with written approval from the Leadership Team.
- Leadership staff must be aware of account information and relevant details for social media channels in case of emergency, such as staff absence.
- Parents/Carers and pupils will be informed of any official social media use, along with expectations for safe use and action taken to safeguard the community.

3.2 Staff official use of social media

- If members of staff are participating in online activity as part of their capacity as an employee of the school/setting, then they are requested to be professional at all times and that they are an ambassador for the school/setting.
- Staff using social media officially will disclose their official role/position but always make it clear that they do not necessarily speak on behalf of the school.
- Staff using social media officially will be responsible, credible, fair and honest at all times and consider how the information being published could be perceived or shared.
- Staff using social media officially will always act within the legal frameworks they would adhere to within the workplace, including libel, defamation, confidentiality, copyright, data protection as well as equalities laws.
- Staff must ensure that any image posted on any official social media channel have appropriate written parental consent.
- Staff using social media officially will be accountable and must not disclose information, make commitments or engage in activities on behalf of the school unless they are authorised to do so.
- Staff using social media officially will inform their line manager, the Designated Safeguarding Lead and/or the head teache of any concerns such as criticism or inappropriate content posted online.
- Staff will not engage with any direct or private messaging with children or parents/carers through social media and will communicate via official communication channels.
- Staff using social media officially will sign the social media Acceptable Use Policy.

3.3 Pupils' use of social media

Social media is now an everyday form of communication for many children and young and forms a vital part of growing up in today's modern Britain and the wider global society. As a school we block access to social media sites for children using official systems and equipment, it cannot be assumed that they will not access them offsite or when using personal devices. It is therefore essential that children and young people are given age appropriate education regarding safe and responsible use and are also appropriately exposed to social media sites to enable them to develop and build skills and resilience. This approach must be considered in conjunction with other relevant policies, for example with regards to curriculum, filtering and monitoring.

We are aware that many popular social media services such as Facebook, Instagram, Twitter and YouTube have age restrictions of 13+. This limit is however not a legal limit, for example it is not a criminal offence for a child (or indeed a parent) to lie about their age in order to set up an account. The age limit is put in place due to the Children's Online Privacy and Protection Act (COPPA) legislation and is there to protect children's privacy and to prevent them being targeted with unsuitable advertisements. Social media sites cannot guarantee that content posted on them is suitable for children as many of them are not moderated and as such the recommended approaches for child safety are not always in place.

- Pupils will be advised to consider the risks of sharing personal details of any kind on social media sites which may identify them and/or their location. Examples would include real/full name, address, mobile or landline phone numbers, school attended, Instant messenger contact details, email addresses, full names of friends/family, specific interests and clubs etc.
- Pupils will be advised not to meet any online friends without a parent/carer or other responsible adult's permission and only when they can be present.
- Pupils will be advised on appropriate security on social media sites and will be encouraged to use safe and passwords, deny access to unknown individuals and be supported in learning how to block and report unwanted communications.
- Pupils will be encouraged to approve and invite known friends only on social networking sites and to deny access to others by making profiles private/protected.
- Any official social media activity involving pupils will be moderated by the school where possible.

- Any concerns regarding pupils' use of social networking, social media and personal publishing sites, both at home and at school, will be dealt with in accordance with existing school policies including anti-bullying and behaviour.
- Any concerns regarding pupils' use of social networking, social media and personal publishing sites, both at home and at school, will be raised with parents/carers, particularly when concerning any underage use of social media sites
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Use of personal devices and Mobile phones

4. Pupils use of personal devices and mobile phones

At Meridian Community Primary and Nursery we require the children to sign in mobile phones in the school office and the beginning of the day and then collect at the end of school. They are not permitted in classrooms.

4.1 Staff use of personal devices and mobile phones

- Members of staff are not permitted to use their own personal phones or devices for contacting children, young people and their families within or outside of the setting in a professional capacity. Any pre-existing relationships which could compromise this will be discussed with leaders.
- Staff will not use personal devices such as mobile phones, tablets or cameras to take photos or videos of children and will only use work-provided equipment for this purpose.
- Staff will not use any personal devices directly with children and will only use work-provided equipment during lessons/educational activities.
- Members of staff will ensure that any use of personal phones and devices will always take place in accordance with the law e.g. data protection as well as relevant school policy and procedures e.g. confidentiality, data security, Acceptable Use etc
- Staff personal mobile phones and devices will be switched off/switched to 'silent' mode during lesson times.
- Bluetooth or other forms of communication should be "hidden" or switched off during lesson times.
- Personal mobile phones or devices will not be used during teaching periods unless permission has been given by a member of the Leadership Team in emergency circumstances.
- Staff will ensure that any content bought on site via mobile phones and personal devices are compatible with their professional role and expectations.
- If a member of staff breaches the school policy then disciplinary action will be taken.
- If a member of staff is thought to have illegal content saved or stored on a mobile phone or personal device or have committed a criminal offence then the police will be contacted.
- Any allegations against members of staff involving personal use of mobile phone or devices will be responded to following the school allegations management section in the safeguarding and child protection policy.

4.2 Visitors' use of personal devices and mobile phones

- Parents/carers and visitors must use mobile phones and personal devices in accordance with the school acceptable use policy.
- Use of mobile phones or personal devices by visitors and parents/carers to take photos or videos must take place in accordance with the school image use policy.
- Staff will be expected to challenge concerns when safe and appropriate and will always inform the Designated Safeguarding Lead of any breaches of use by visitors.

5. Policy Decisions

5.1. Reducing online risks

Many emerging communications technologies offer the potential to develop new teaching and learning tools, including mobile communications, Internet access, collaboration and multimedia tools. A risk assessment needs to be undertaken on each new technology for effective and safe practice in classroom use to be developed. Virtual online classrooms and communities widen the geographical boundaries of learning. Approaches such as mentoring, online learning and parental access are becoming embedded within school systems and can offer significant benefits for learning, communication, engagement and participation as well as potential hazards. The safest approach is to deny access until a risk assessment has been completed and safety and appropriate action has been established and taken.

- Meridian Community Primary School and Nursery is aware that the Internet is a constantly changing environment with new apps, tools, devices, sites and material emerging at a rapid pace.
- Emerging technologies will be examined for educational benefit and the school leadership team will ensure that appropriate risk assessments are carried out before use in school is allowed.
- The school will ensure that appropriate filtering systems are in place to prevent staff and pupils from accessing unsuitable or illegal content. This system is call IMPERO and is provided by ESCC.
- The school will take all reasonable precautions to ensure that users access only appropriate material. However, due to the global and connected nature of Internet content, it is not always possible to guarantee that access to unsuitable material will never occur via a school/setting computer or device.
- The school will audit technology use to establish if the online safety (e–Safety) policy is adequate and that the implementation of the policy is appropriate.
- Methods to identify, assess and minimise online risks will be reviewed regularly by the school leadership team using the IMPERO system provided by EMCOR. .

5.2 Authorising internet access

Relevant for all settings who facilitate internet access

Guidance:

At Meridian Community Primary School and Nursery we allocate Internet access to staff and children on the basis of educational need.

- All staff, pupils and visitors will read and sign the Acceptable Use Policy before using any school resources.
- Parents will be informed that pupils will be provided with supervised Internet access which is appropriate to their age and ability.
- Parents will be asked to read the Acceptable Use Policy for pupil access and discuss it with their child, where appropriate.
- When considering access for vulnerable members of the community (such as with children with special education needs) the school will make decisions based on the specific needs and understanding of the pupil(s).

6. Engagement Approaches

6.1 Engagement and education of children and young people

Online safety forms an important part of the Computing curriculum programmes of study for children within schools and this highlights the importance for children to use technology safely and respectfully, understand how to keep personal information private and be able identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies from an increasingly early age. Children need to learn digital literacy skills and to refine their own publishing and communications with others via the Internet. Respect for copyright and intellectual property rights, and the correct use of published material should be taught. Critical awareness of the dangers and consequences of plagiarism, copyright, piracy, reliability and bias will need to be explored. Children will need to develop an understanding on

how to become safe and responsible online or digital citizens and this should be developed within an appropriate Personal Social and Health Education (PSHE) curriculum.

Whilst the Computing curriculum will form an essential part of online safety education for children and young people, safe and responsible use of technologies must be embedded throughout the whole school curriculum to ensure children develop the required range of digital literacy and safety skills as well as to develop online resilience to enable them to become safe and responsible internet users.

Keeping Children Safe in Education 2016 has highlighted that governing bodies and proprietors need to '*…ensure that children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum which may include covering relevant issues through personal, social, health and economic education (PSHE), tutorials (in FE colleges) and through sex and relationship education (SRE*)' (Section 68).

Useful online safety (e-Safety) programmes include:

- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- Kidsmart: www.kidsmart.org.uk
- Digital Literacy Scheme of Work: www.digital-literacy.org.uk
- Internet Matters: www.internetmatters.org
- BBC ○ www.bbc.co.uk/webwise ○ www.bbc.co.uk/cbbc/topics/stay-safe ○ www.bbc.co.uk/education

- An online safety (e-Safety) curriculum will be established and embedded throughout the whole school, to raise awareness regarding the importance of safe and responsible internet use amongst pupils.
- Education about safe and responsible use will precede internet access.
- Pupils will be supported in reading and understanding the Acceptable Use Policy in a way which suits their age and ability.
- All users will be informed that network and Internet use will be monitored.
- Online safety (e-Safety) will be included in the PSHE, SRE, Citizenship and Computing programmes of study covering both safe school and home use.
- Safe and responsible use of the Internet and technology will be reinforced across the curriculum and within all subject areas.
- External support will be used to complement and support the schools internal online safety (e-Safety) education approaches.
- The school will implement peer education to develop online safety as appropriate to the needs of the pupils.

6.2 Engagement and education of children and young people who are considered to be vulnerable

Children and young people may be considered to be vulnerable for a variety of reasons. This could include children with special education needs, children with mental health needs, children in care, children who have experienced trauma and abuse, children with low self-esteem, children with English as an additional language etc. Children may also be considered to be vulnerable on a temporary basis for example those experiencing hardship. Whole school/setting strategies should be established in order to protect a wide cohort of children and young people and will need to be able to support the individual needs that vulnerable pupils may display.

It is advisable to consult with the school SENCO and members of the pastoral team for input into the writing of the online safety policy which would provide a specialist perspective to synchronize support with policy.

- Meridian Community Primary School and Nursery is aware that some children may be considered to be more vulnerable online due to a range of factors.
- Meridian Community Primary School and Nursery will ensure that differentiated and ability appropriate online safety (e-Safety) education is given, with input from specialist staff as appropriate (e.g. SENCO, Looked after Child Coordinator).

6.3 Engagement and education of staff

Annex C of Keeping Children Safe in Education 2016 highlights that governors and proprietors should ensure that as part of the requirement for staff to undergo regularly updated safeguarding training (paragraph 64) and the requirement to ensure children are taught about safeguarding, including online (paragraph 68), that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

ICT use is widespread and all staff including administration, midday supervisors, caretakers, governors and volunteers should be included in awareness raising and training on a regular basis. It is recommended that online safety training is revisited as part of safeguarding training for all staff and it is important that leaders and managers attend, facilitate and support training to ensure the online safety culture is clearly established and implemented. It is important that online safety training for staff is not just provided as a reactive approach following concerns and should become a regular feature of staff training and development.

It is important that all members of staff feel confident to use new technologies in teaching and the online safety (e-Safety) policy will only be effective if all staff subscribe to its values and methods. Staff should be given opportunities to discuss the issues and develop appropriate teaching strategies. It would be unreasonable, for instance, if cover or supply staff were asked to take charge of an Internet activity without preparation.

- The online safety (e-Safety) policy will be formally provided to and discussed with all members of staff as part of induction and will be reinforced and highlighted as part of our safeguarding responsibilities.
- Staff will be made aware that our Internet traffic can be monitored and traced to the individual user. Discretion and professional conduct is essential when using school systems and devices.
- Up-to-date and appropriate staff training in safe and responsible Internet use, both professionally and personally, will be provided for all members of staff on a regular (at least annual) basis.
- All members of staff will be made aware that their online conduct out of school could have an impact on their role and reputation within school. Civil, legal or disciplinary action could be taken if they are found to bring the profession or institution into disrepute, or if something is felt to have undermined confidence in their professional abilities.
- Members of staff with a responsibility for managing filtering systems or monitor ICT use will be supervised by the Leadership Team and will have clear procedures for reporting issues or concerns.

6.4 Engagement and education of parents and carers

Parents and carers form a vital element in the approach to teaching and empowering children to become safe and responsible digital citizens.

Internet use in pupils' homes is increasing rapidly, encouraged by low cost access and developments in mobile technology. Unless parents are aware of the dangers, pupils may have unrestricted and unsupervised access to the Internet in the home. Technology can sometimes be seen as a "scary" or "frightening" issue to many adults and using the words such as "ICT" and "Technology" can sometimes put parents/carers off attending e-Safety events as they may be concerned about not having sufficient computer skills to help protect their child. Online safety or "e-Safety" is not about technology skills, it is about keeping children safe online and so parenting skills and communication and not computing/technology are the most important thing.

Sometimes families may think they are doing enough to protect their children by putting filters on search engines, installing antivirus software, having a laptop downstairs and banning children from using certain sites without considering how successful these tools are or if their children could access the internet elsewhere, so it is important to highlight that discussion and education about safe use is the key.

It is important that schools/settings focus on the importance of keeping children safe online and that online safety is not seen as a purely ICT issue. By working together, parents and carers, schools/settings and other professionals can help to reinforce online safety messages and can encourage positive behaviour wherever and whenever children go online.

Awareness-raising with families should focus on:

- The range of different ways children and young people use and access technology e.g. mobile phones, games consoles, tablets and apps etc. not just laptops and computers.
- The many positive uses of technology as otherwise online safety can easily become frightening and scaremongering so be aware that the vast majority of interactions and experiences on the internet are positive!
- The importance of developing risk awareness and risk management by children and young people (according to their age and ability) and resources parents/carers can use to help discuss online safety
- Practical tips for online safety in the home such as using filters, parental controls, creating appropriate user profiles and home computer security

For further information please see: East Sussex LSCB - e-safety for parents and carers

- Meridian Community Primary School and Nursery recognise that parents/carers have an essential role to play in enabling children to become safe and responsible users of the internet and digital technology.
- Parents' attention will be drawn to the school online safety (e-Safety) policy and expectations in newsletters, letters, the school prospectus and on the school website.
- A partnership approach to online safety at home and at school with parents will be encouraged.
- Parents will be requested to read online safety information as part of the Home School Agreement.
- Parents will be encouraged to read the school Acceptable Use Policy for pupils and discuss its implications with their children.
- Information and guidance for parents on online safety will be made available to parents in a variety of formats.
- Parents will be encouraged to role model positive behaviour for their children online.

7. Managing Information Systems

7.1 Managing personal data online

At Meridian Community Primary School and Nursery we recognise and fulfil our obligations under Data Protection Act 1998 (the Act). This section is a reminder that all data from which people can be identified is protected and is not a replacement for a robust data protection or data security policy.

The quantity and variety of data held on pupils, families and on staff is expanding quickly. While this data can be very useful in improving services, data could be mishandled, stolen or misused.

The Act gives individuals the right to know what information is held about them and provides a framework to ensure that personal information is handled properly. It promotes openness in the use of personal information. Under the Act every organisation that processes personal information (personal data) must notify the Information Commissioner's Office, unless they are exempt.

The Act applies to anyone who handles or has access to information concerning individuals. Everyone in the workplace has a legal duty to protect the privacy of information relating to individuals. The Act sets standards (eight data protection principles), which must be satisfied when processing personal data (information that will identify a living individual). The Act also gives rights to the people the information is about i.e. subject access rights let individuals find out what information is held about them. The eight principles are that personal data must be:

- Processed fairly and lawfully
- Processed for specified purposes
- Adequate, relevant and not excessive
- Accurate and up-to-date
- Held no longer than is necessary
- Processed in line with individual's rights
- Kept secure
- Transferred only to other countries with suitable security measures.

If despite the security measures schools take to protect the personal information they hold, a breach of security occurs, it is important that they deal with the security breach effectively. Information security breaches can cause real harm and distress

to the individuals they affect – lives may even be put at risk. Not all security breaches have such grave consequences, of course. Many cause less serious embarrassment or inconvenience to the individuals concerned. High-profile losses of large amounts of personal data have brought attention to the issue of information security; as a result the law was changed to allow the Information Commissioner (ICO) to issue fines of up to £500,000 for serious breaches of the Data Protection Act: legislation.gov.uk

For advice and guidance relating to information governance or a contravention of the Act, contact Amanda Glover: Local Authority Designated Officer, East Sussex County Council amanda.glover@eastsussex.gov.uk 01323 466606

For further information please see: East Sussex Czone School Policies - data protection

Information from the Information Commissioner's Office can be found at ICO

- Personal data will be recorded, processed, transferred and made available according to the Data Protection Act 1998.
- Full information regarding the schools approach to data protection and information governance can be found in the schools information security policy.

7.2 Security and Management of Information Systems

It is important to review the security of the whole system from user to Internet. This is a major responsibility that includes not only the delivery of essential learning services but also the personal safety of staff and pupils.

Local Area Network (LAN) security issues include:

- Users must act reasonably — e.g. the downloading of large files during the working day will affect the service that others receive.
- Users must take responsibility for their network use.
- Workstations should be secured against user mistakes and deliberate actions.
- Servers must be located securely and physical access restricted.
- The server operating system must be secured and kept up to date.
- Virus protection for the whole network must be installed and current.
- Access by wireless devices must be proactively managed and secured with a minimum of WPA2 encryption.

Wide Area Network (WAN) security issues include:

The East Sussex Education Network is protected by a cluster of high performance firewalls at the Internet connecting nodes in The Link Datacentres. These industry leading appliances are monitored and maintained by a specialist enterprise support team.

- The security of the school information systems and users will be reviewed regularly.
- Virus protection will be updated regularly.
- Personal data sent over the Internet or taken off site (such as via portable media storage) will be encrypted or accessed via appropriate secure remote access systems.
- Portable media may not be used without specific permission followed by an anti-virus /malware scan.
- Unapproved software will not be allowed in work areas or attached to email.
- Files held on the school's network will be regularly checked.
- The computing coordinator/network manager will review system capacity regularly.
- The appropriate use of user logins and passwords to access the school network will be enforced for all but the youngest users.
- All users will be expected to log off or lock their screens/devices if systems are unattended. Press *window image button* and *letter l button* at the same time

Password policy

- All users will be informed not to share passwords or information with others and not to login as another user at any time.
- Staff and pupils must always keep their password private and must not share it with others or leave it where others can find it.
- All members of staff will have their own unique username and private passwords to access school systems. Members of staff are responsible for keeping their password private.
- From year *5* all pupils are provided with their own unique username and private passwords to access school systems. Pupils are responsible for keeping their password private.
- We require staff and pupils to use STRONG passwords for access into our system.

7.3 Filtering Decisions

'Keeping Children Safe in Education' 2016 states that Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to online risks and should ensure that their school has appropriate filters and monitoring systems in place.

Internet access controls fall into several overlapping types (commonly described as filtering):

- Blocking strategies prevent access to a list of unsuitable sites. Maintenance of the blocking list is a major task as new sites appear every day.
- A walled garden or "allow list" restricts access to a list of approved sites. Such lists inevitably limit pupils' access to a narrow range of content.
- Dynamic content filtering examines web page content or email for unsuitable words.
- Keyword lists filter search engine searches and URLs for inappropriate results and web addresses.
- Rating systems give each web page a rating for sexual, profane, violent or other unacceptable content. Web browsers can be set to reject rated pages exceeding a threshold.
- URL monitoring records the Internet sites visited by individual users. Reports can be produced to investigate pupil access.
- Key loggers record all text sent by a workstation and analyse it for patterns.

- The governors will ensure that the school has age and ability appropriate filtering and monitoring in place whilst using school devices and systems to limit children's exposure to online risks.
- The school's internet access strategy will be dependent on the need and requirements of our community and will therefore be designed to suit the age and curriculum requirements of our pupils, with advice from technical, educational and safeguarding staff.
- All monitoring of school owned/provided systems will take place to safeguard members of the community.
- All users will be informed that use of school systems can be monitored and that all monitoring will be in line with data protection, human rights and privacy legislation.
- The school uses educational filtered secure broadband connectivity through the East Sussex Education Network which is appropriate to the age and requirement of our pupils
- The school uses Smoothwall filtering systems which block sites that fall into categories such as pornography, racial hatred, extremism, sites of an illegal nature, etc.
- The school will work with Schools ICT to ensure that filtering policy is continually reviewed.
- The school will have a clear procedure for reporting breaches of filtering which all members of the school community (all staff and all pupils) will be made aware of.
- If staff or pupils discover unsuitable sites, the URL will be reported to the School Designated Safeguarding Lead and will then be recorded and escalated as appropriate.
- The school filtering system will block all sites on the Internet Watch Foundation (IWF) list.

- Changes to the school filtering policy will be risk assessed by staff with educational and technical experience prior to any changes and where appropriate with consent from the Leadership Team.
- All changes to the school filtering policy will be logged and recorded.
- The Leadership Team will ensure that regular checks are made to ensure that the filtering methods selected are effective and appropriate.
- Any material that the school believes is illegal will be reported to appropriate agencies such as IWF, East Sussex Police or CEOP immediately.

8. Responding to Online Incidents and Concerns

Internet technologies and electronic communications provide children and young people with exciting opportunities to broaden their learning experiences and develop creativity in and out of school. However it is also important to consider the risks associated with the way these technologies can be used. An online safety policy should recognise and seek to develop the skills that children and young people need when communicating and using technologies enabling them to keep safe and secure and act with respect for others.

Possible statements:

- All members of the community will be made aware of the range of online risks that are likely to be encountered including sexting, online/cyber bullying etc. This will be highlighted within staff training and educational approaches for pupils.
- All members of the school/setting community will be informed about the procedure for reporting online safety (eSafety) concerns, such as breaches of filtering, cyberbullying, illegal content etc.
- The Designated Safeguarding Lead (DSL) will be informed of any online safety (e-Safety) incidents involving child protection concerns, which will then be recorded.
- The DSL will ensure that online safety concerns are escalated and reported to relevant agencies in line with the Local Safeguarding Children Board thresholds and procedures.
- Complaints about Internet misuse will be dealt with under the School's complaints procedure.
- Complaints about online bullying will be dealt with under the School's anti-bullying policy and procedure
- Any complaint about staff misuse will be referred to the head teacher
- Any allegations against a member of staff's online conduct will be discussed with the Local Authority Designated Officer (LADO).
- Pupils, parents and staff will be informed of the schools complaints procedure. Staff will be informed of the whistleblowing procedure.
- All members of the school community will need to be aware of the importance of confidentiality and the need to follow the official school procedures for reporting concerns.
- All members of the school community will be reminded about safe and appropriate behaviour online and the importance of not posting any content, comments, images or videos online which cause harm, distress or offence to any other members of the school community.
- The school will manage online safety (e-Safety) incidents in accordance with the school discipline/behaviour policy where appropriate.
- The school will inform parents/carers of any incidents of concerns as and when required.
- After any investigations are completed, the school will debrief, identify lessons learnt and implement any changes as required.
- Where there is cause for concern or fear that illegal activity has taken place or is taking place then the school will contact the SLES Safeguarding Team or East Sussex Police via 101 or 999 if there is immediate danger or risk of harm.
- The use of computer systems without permission or for inappropriate purposes could constitute a criminal offence under the Computer Misuse Act 1990 and breaches will be reported to East Sussex Police.
- If the school is unsure how to proceed with any incidents of concern, then the incident will be escalated to the SLES Safeguarding Team.

- If an incident of concern needs to be passed beyond the school then the concern will be escalated to the SLES Safeguarding Team to communicate to other schools/settings in East Sussex.
- Parents and children will need to work in partnership with the school to resolve issues.

Appendix A

Procedures for Responding to Specific Online Incidents or Concerns

The following content is provided to enable schools and education settings to make appropriate safeguarding decisions reading online safety concerns and has been based on content written by the Kent e-Safety Strategy Group with input from specialist services and teams. This content is not exhaustive and cannot cover every eventually so professional judgement and support from appropriate agencies such as the SLES Safeguarding Team, Police, and Children's Social Care is encouraged.

Some settings may not feel that these sections are relevant due to the age and ability of children; however it is recommended that designated safeguarding leads ensure that their settings safeguarding policies and procedures are robust and are applicable for a range of safeguarding issues should they occur.

Some schools and settings will wish to place these sections within existing safeguarding and child protection policies and procedures rather than the online safety policy or within other appropriate policies and procedures. Other settings will prefer to keep this content as reference material for DSLs.

Responding to concerns regarding Youth Produced Sexual Imagery or "Sexting"

Guidance:

Youth Produced Sexual Imagery or "Sexting" can be defined as images or videos generated by children under the age of 18 that are of a sexual nature or are considered to be indecent. These images may be shared between children and young people and/or adults via a mobile phone, webcam, handheld device or website.

Children and young people will always look to push the boundaries, especially when they go through puberty and are an age where they are more sexually and socially aware. Children typically do not use the term "sexting", usually referring to the images as "selfies" and may decide to send such pictures or videos for many reasons. For younger children (early years and primary school aged) indecent images or videos may be taken or shared out of curiosity or naivety and for older children, indecent images may be taken or shared as a response to peer pressure, cyberbullying, sexual exploration, impulsive behaviour or even exploitation due to blackmail from a friend, partner, or other on or offline contact. There can also be emotional and reputation damage that can come from having intimate photos forwarded to others or shared online including isolation, bullying, low self-esteem, loss of control, creating of a negative "digital footprint" or online reputation, harassment, mental health difficulties, self-harm, suicide and increased risk of child sexual exploitation.

Whilst is it important for professionals not to condone the creation of youth produced sexual imagery it is important to recognise that many young people (and indeed adults) view sharing sexual images as part of a "normal" relationship in today's modern society.

It is important to be aware that young people involved in sharing sexual videos and pictures may be committing a criminal offence. Specifically, crimes involving indecent photographs (including pseudo images) of a person under 18 years of age, fall under Section 1 of the Protection of Children Act 1978 and Section 160 Criminal Justice Act 1988. Under this legislation it is a crime to take an indecent photograph or allow an indecent photograph to be taken, make an indecent photograph (this includes downloading or opening an image that has been sent via email); distribute or show an indecent image, advertise indecent images and possess an indecent image or possess an indecent image with the intention of distribution. This applies even if the images are sent or shared by someone under the age of 18 with consent. "Sexts" may be viewed as police evidence and it is essential that schools secure devices and seek advice immediately when dealing with concerns.

The current Association of Chief Police Officers (ACPO) position is that…. 'ACPO *does not support the prosecution or criminalisation of children for taking indecent images of themselves and sharing them. Being prosecuted through the criminal justice system is likely to be upsetting and distressing for children especially if they are convicted and punished. The label of sex offender that would be applied to a child or young person convicted of such offences is regrettable, unjust and clearly detrimental to their future health and wellbeing.*'
www.ceop.police.uk/Documents/ceopdocs/externaldocs/ACPO_Lead_position_on_Self_Taken_Images.pdf

It should be noted that prosecution of children for sharing indecent images for a first offence is rare. The decision to criminalise children and young people for sending sexualised images will need to be considered and made on a case by case basis based on a number of factors including age, intent and vulnerability of children involved.

'Keeping Children Safe in Education' 2016 highlights the need for all members of staff to be aware that abuse can be perpetrated by children themselves, including sexting, and there is a need for all members of staff to be aware of concerning behaviour and appropriate safeguarding responses.

It is essential that schools and settings handle 'sexting' incidents as carefully as possible and offer support to all parties involved whilst abiding by the law and also do not compromise police investigations. Should an incident arise which necessitates criminal investigation then it may require the seizure of the phone/device and any other devices involved or identified as potentially having access to the imagery. Schools and settings should ensure the existing policies regarding seizing and searching are robust and up-to-date.

Schools and education settings DSLs should access and consider the guidance as set out in UKCCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people' which can be downloaded here:
https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis

Schools and settings will also want to take as many preventative measures as they can to educate young people about the risks and to support them in maintaining a healthy digital footprint. Early years and primary schools are an essential time for education regarding safe and responsible taking and sharing images as this will them to develop resilience against potential peer and social pressure to take and share sexual imagery when they are older. A range of appropriate educational resources for children and parents can be accessed in the 'Sexting in schools and colleges: responding to incidents and safeguarding young people' document (available as above).

The statement within Appendix B may also help DSLs consider how best to respond to concerns relating to youth produced sexual imagery.

- Meridian Community Primary School and Nursery ensure that all members of the community are made aware of the potential social, psychological and criminal consequences of sharing, possessing and creating youth produced sexual imagery (known as "sexting").
- The school will implement preventative approaches via a range of age and ability appropriate educational approaches for pupils, staff and parents/carers. (**Identify resources as appropriate**)
- Meridian Community Primary School and Nursery views "sexting" as a safeguarding issue and all concerns will be reported to and dealt with by the Designated Safeguarding Lead, Danielle Maslen.
- The school will follow the guidance as set out in the non-statutory UKCCIS advice 'Sexting in schools and colleges:

responding to incidents and safeguarding young people'.

- If the school are made aware of incident involving indecent images of a child the school will:
- Act in accordance with the schools child protection and safeguarding policy and the relevant East Sussex Local Safeguarding Children Boards procedures.
- Immediately notify the designated safeguarding lead.
- Store the device securely.
- Carry out a risk assessment in relation to the children(s) involved.
- Consider the vulnerabilities of children(s) involved (including carrying out relevant checks with other agencies)
- Make a referral to children's social care and/or the police (as needed/appropriate).
- Put the necessary safeguards in place for children e.g. offer counselling support and immediate protection and offer appropriate pastoral support for those involved.
- Inform parents/carers about the incident and how it is being managed.
- Implement appropriate sanctions in accordance with the schools behaviour policy but taking care not to further traumatise victims where possible.
- Review the handling of any incidents to ensure that the school is implementing best practice and the leadership team will review and update any management procedures where necessary.
- The school will not view an image 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 (in these cases the image will only be viewed by the Designated Safeguarding Lead).
- The school will not send, share or save indecent images of children and will not allow or request children to do so.
- If an indecent image has been taken or shared on the school/settings network or devices then the school will take action to block access to all users and isolate the image.
- The school will need to involve or consult the police if images are considered to be illegal.
- The school will take action regarding indecent images, regardless of the use of school/setting equipment or personal equipment, both on and off the premises.
- The school will ensure that all members of the community are aware of sources of support regarding youth produced sexual imagery.

Responding to concerns regarding Online Child Sexual Abuse and Exploitation

Online child sexual abuse within this policy context is specifically defined as when children are sexually abused or exploited via the use of technology and the internet. Typically this is referred to as "online grooming" however this term can sometimes be considered to be too narrow when considering online child sexual abuse as using the term "grooming" may imply that the behaviour has taken place over a period of time whilst an offender has built a relationship and gained the trust of their victim. Whilst this longer term process still occurs, current trends identified nationally (CEOP/NCA) and locally would suggest that the period of engagement between offender and victim can in many cases be extremely brief. In 2015, CEOP identified that the objectives of online child sexual abuse have evolved and can lead to a range of offending outcomes, such as deceiving children into producing indecent images of themselves or engaging in sexual chat or sexual activity over webcam. Online child sexual abuse can also result in offline offending such as meetings between an adult and a child for sexual purposes following online engagement.

OSCE can also be perpetrated by young people themselves and these issues should be viewed and responded to in line with the East Sussex Local Safeguarding Children Board procedures.

Schools must be aware of and understand the law regarding the online sexual abuse and exploitation of children. Specifically (but not limited to):

- The Sexual Offences Act 2003 – Section 15. Meeting a child following sexual grooming.
- The Sexual Offences Act 2003 – Section 8. Causing or inciting a child under 13 to engage in sexual activity The Sexual Offences Act 2003 – Section 10. Causing or inciting a child to engage in sexual activity.
- The Sexual Offences Act 2003 – Section 12. Causing a child to watch a sexual act
- The Sexual Offences Act 2003 – Section 13. Child sex offences (section 10, 11 and 12) but committed by children (offender is under 18).
- The Serious Crime Act 2015 - Part 5. Protection of Children - Section 67. Sending a child sexualised communications.

More information about these offences can be found within the legal framework section of the policy template.

Schools and settings may wish to highlight responses to online child sexual abuse within existing school policies and procedures rather than within the online safety policy.

:

- Meridian Community Primary School and Nursery will ensure that all members of the community are made aware of online child sexual abuse, including exploitation and grooming including the consequences, possible approaches which may be employed by offenders to target children and how to respond to concerns.
- The school will implement preventative approaches for online child sexual abuse via a range of age and ability appropriate educational approaches for pupils, staff and parents/carers.
- Meridian Community Primary School and Nursery views online child sexual abuse as a safeguarding issue and all concerns will be reported to and dealt with by the Designated Safeguarding Lead, Danielle Maslen.
- If the school is unclear if a criminal offence has been committed then the Designated Safeguarding Lead should obtain advice immediately through SPOA or Sussex Police.
- If the school are made aware of incident involving online child sexual abuse of a child then the school will:
    - Act in accordance with the schools child protection and safeguarding policy and the relevant Pan Sussex Child Protection and Safeguarding Procedures ○ Immediately notify the designated safeguarding lead. ○ Store any devices involved securely.
    - Immediately inform East Sussex police via 101 (using 999 if a child is at immediate risk) ○ Where appropriate the school will involve and empower children to report concerns regarding online child sexual abuse e.g. or by using the Click CEOP report form: CEOP Safety Centre
    - Carry out a risk assessment which considers any vulnerabilities of pupil(s) involved (including carrying out relevant checks with other agencies).

- Make a referral to children's social care (if needed/appropriate).
- Put the necessary safeguards in place for pupil(s) e.g. offer counselling support and immediate protection and offer appropriate pastoral support for those involved.
- Inform parents/carers about the incident and how it is being managed.
- Review the handling of any incidents to ensure that the school is implementing best practice and the school leadership team will review and update any management procedures where necessary.

- The school will take action regarding online child sexual abuse regardless of the use of school equipment or personal equipment, both on and off the school premises.
- The school will ensure that all members of the community are aware of sources of support regarding online child sexual abuse.
- If pupils at other schools are believed to have been targeted then the school will seek support from SPOA to enable other schools to take appropriate action to safeguarding their community.
- The school will ensure that the Click CEOP report button is visible and available to pupils and other members of the school community, for example including the CEOP report button the school website homepage and on intranet systems.

Responding to concerns regarding Indecent Images of Children (IIOC)

Meridian Community Primary School and Nursery understand the law regarding indecent images of children. Specifically (but not limited to):

- The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18. The Civic Government (Scotland) Act, 1982 replicates this.
- The Sexual Offences Act 2003 (England and Wales) provides a defence for handling potentially criminal images and this is supported by a Memorandum of Understanding which provides guidance on what is and is not acceptable.

It is an offence to possess, distribute, show and make indecent images of children. Making of and distributing indecent images of children includes printing and viewing them on the internet otherwise known as 'downloading'. More information about these offences can be found within the legal framework section.

Where there is cause for concern or fear that illegal activity has taken place or is taking place involving the use of school computer equipment, then schools should determine the level of response necessary for the offence disclosed. The decision to involve Police should be made as soon as possible if the offence is deemed to be out of the remit of the school to deal with. If schools are unsure if an issue is of a criminal nature then the Designated Safeguarding Lead should seek advice from SPOA or Sussex Police.

Where it is determined that an offence has been committed and that a police investigation is warranted, all measures to preserve evidence should be undertaken. If an officer decides that equipment needs to be seized, then they will need to determine if the equipment is networked. Seizure of the server will have a significant impact on the school. It is essential that schools are aware of this possibility and they should ensure that measures are in place to enable the school's computer network to continue functioning should this situation arise.

In cases where a suspect picture or photograph is discovered it should also be borne in mind that a person could be guilty of the offence to 'Make' and 'Distribute' if they print or forward the image. There is a defence in law for police investigating crimes in these circumstances — in some cases, it may still be necessary for that person, or others (for example a person to whom an accidental find is reported), to knowingly "make" another copy of the photograph or pseudo-photograph in order that it will be reported to the authorities, and clearly it is desirable that they should be able to do so without fear of prosecution. This does not mean that schools should forward, save or print indecent images of children and as soon as schools are made aware that an image may be illegal, appropriate advice must be sough immediately. Schools should be aware that all copies (including digital or printed copies) of indecent images of children will be seized.

In all cases, a detailed statement may be obtained to assist those who investigate the offence. The following information should be included in the statement:

- The identity of any material witnesses
- The name of the Internet service provider (ISP) or mobile telephone service provider in the case of images received through a telephone
- If known, the web address, name of the app or website through which the image was found or received;
- Any passwords or other procedure required to gain access to the website
- If known, the identity of the person who sent the image
- Any details relating to those involved e.g. email address or screen names
- The reason for any delay in reporting the incident to the police (to assist investigators).

Schools and settings may wish to highlight responding to concerns regarding Indecent Images of children within existing policies and procedures rather than within the online safety policy.

- Meridian Community Primary School and Nursery will ensure that all members of the community are made aware of the criminal nature of Indecent Images of Children (IIOC) including the possible consequences.
- The school will take action regarding of Indecent Images of Children (IIOC) regardless of the use of school/setting equipment or personal equipment, both on and off the premises.
- The school will take action to prevent access accidental access to of Indecent Images of Children (IIOC) for example using an internet Service provider (ISP) which subscribes to the Internet Watch Foundation block list, implementing appropriate web filtering, implementing firewalls and anti-spam software.
- If the school is unclear if a criminal offence has been committed then the Designated Safeguarding Lead will obtain advice immediately through SPOA and/or Sussex Police.

- If the school/setting is made aware of Indecent Images of Children (IIOC) then the school will: ○ Act in accordance with the schools child protection and safeguarding policy and the relevant Pan-Sussex Child Protection and Safeguarding procedures.
    - Immediately notify the school Designated Safeguard Lead. ○ Store any devices involved securely.
    - Immediately inform appropriate organisations e.g. the Internet Watch Foundation (IWF), East Sussex police via 101 (using 999 if a child is at immediate risk) and/or the LADO (if there is an allegation against a member of staff).

- If the school are made aware that a member of staff or a pupil has been inadvertently exposed to indecent images of children whilst using the internet then the school will:
    - Ensure that the Designated Safeguard Lead is informed.
    - Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via IWF .
    - Ensure that any copies that exist of the image, for example in emails, are deleted.

- If the school are made aware that indecent images of children have been found on the school's electronic devices then the school will:
    - Ensure that the Designated Safeguard Lead is informed.
    - Ensure that the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via IWF .
    - Ensure that any copies that exist of the image, for example in emails, are deleted.
    - Inform Sussex police via 101 (999 if there is an immediate risk of harm) and children's social services (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.

- If the school are made aware that a member of staff is found in possession of indecent images of children on their electronic device provided by the school, then the school will:

- Ensure that the Designated Safeguard Lead is informed or another member of staff in accordance with the school whistleblowing procedure.
- Contact the police regarding the images and quarantine any devices involved until police advice has been sought.
- Inform the Local Authority Designated Officer (LADO) and other relevant organisations in accordance with the schools managing allegations policy.
- Follow the appropriate school policies regarding conduct.

Responding to concerns regarding radicalisation and extremism online

Meridian Community Primary School and Nursery is mindful of the specific responsibilities and requirements place upon them under the Prevent Duty (gov.uk) Protecting Children from Radicalisation

From 1st July 2015 specified authorities, including all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism" This duty is known as the Prevent duty. The statutory Prevent guidance summarises the requirements on schools as undertaking risk assessment, working in partnership, staff training and IT policies.

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology which includes a range of extremism views including the far right. Schools should have clear procedures in place for protecting children who are identified to be at risk of radicalisation. These procedures may be set out in existing safeguarding policies and it is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty. The online safety policy will be an important part of this role as it will highlight the action that the school will take to ensure that children are safe from terrorist and extremist material when accessing the internet in schools.

'Keeping Children Safe in Education' 2016 highlights that governing bodies and proprietors should ensure that suitable filtering is in place which takes into account the needs of the schools community. Schools should ensure that online safety education highlights the risks of extremist content online, especially regarding the use and power of social media as a tool in radicalisation.

When ensuring appropriate filtering is in place, schools should be mindful to act in accordance with the law, much like when ensuring the filtering blocks other forms of illegal content. It should also be noted that radicalisation and extremist views can be shared and accessed on variety of platforms, including user generated or social media sites such as Facebook and YouTube and schools should make filtering decisions with this in mind. The way in which the monitoring of internet and network use is managed will be down to individual schools to decide and implement so as to meet their specific needs and requirements, for example taking into account the curriculum and also the needs and abilities of the community e.g. pupils or staff with English as an Additional Language. The school (Headteacher and Governing Body) needs to be able to satisfy itself that appropriate safeguarding measures (all reasonable precautions) are being taken to identify any activity which indicates that pupils or staff may be at risk of harm (or indeed putting others at risk). Leaders will need to ensure that appropriate time and resources are available to ensure that this is done sufficiently for a range of risks which will include radicalisation and extremism from a variety of perspectives as well as grooming and child sexual exploitation.

Staff with the responsibility for managing and monitoring the school filtering and network must have appropriate resources available to them as well as training and support to ensure that this can be carried out in both a manageable and a safe way. These decisions must be documented within the appropriate school policies (especially the school AUP) and be supported with training etc. and supervision all staff involved as well as the wider whole school staff and pupil group.

Meridian Community Primary School and Nursery is aware that simply relying on filtering to prevent radicalisation will not be sufficient as children are likely to have access to a range of devices within the home which may not be filtered or monitored, education around safe use if therefore essential. As all safeguarding risks, all members of staff should be alert to changes in children's behaviour which may indicate that they may be at risk or in need of specific help or protection. All members of staff should receive appropriate training to enable them to explore their responsibilities with regards to prevent for safeguarding pupils and adults within the school community.

School staff should also understand when it is appropriate to make a referral to the Channel programme using the Prevent

Referral form (available on Czone at: https://czone.eastsussex.gov.uk/supportingchildren/equality/Documents/Prevent School Toolkit 2015.docx). Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

All Prevent referrals should be made through the Single Point of Advice (SPOA)
https://new.eastsussex.gov.uk/childrenandfamilies/professional-resources/spoa/before-contact/

The Prevent team can be contacted for advice and support. Please contact Lucy Spencer, Community Safety Team

Lucy.spencer@eastsussex.gov.uk

Schools and settings may choose to highlight the overall response to the Prevent duty within existing policies and procedures rather than within the online safety policy.

Useful links regarding online hate, radicalisation and extremism

DfE: www.educateagainsthate.com
Report online hate and terrorism: www.gov.uk/report-terrorism:
NCALT e-learning http://course.ncalt.com/Channel_General_Awareness/01/index.html National helpline: 020 7340 7264 Counter.extremism@education.gsi.gov.uk

- The school will take all reasonable precautions to ensure that children are safe from terrorist and extremist material when accessing the internet in schools and that suitable filtering is in place which takes into account the needs of pupils.
- When concerns are noted by staff that a child may be at risk of radicalisation online then the Designated Safeguarding Lead (DSL) will be informed immediately and action will be taken in line with the school safeguarding policy.
- Online hate content directed towards or posted by specific members of the community will be responded to in line with existing school policies, including anti-bullying, behaviour etc. If the school is unclear if a criminal offence has been committed then the Designated Safeguarding Lead will obtain advice immediately via the SLES Safeguarding Team and/or East Sussex Police.

Responding to concerns regarding cyberbullying

Online or cyberbullying can be defined as the use of Information Communication Technology, particularly mobile phones and the internet to deliberately hurt or upset someone.

Cyberbullying is becoming increasingly prevalent with the rapid advances and use of modern technology. Mobile, internet and wireless technologies have increased the pace of communication and brought significant benefits to users worldwide but their popularity provides increasing opportunity for misuse through 'cyberbullying', with worrying consequences. It's crucial that children and young people as well as adults, use their devices and the internet safely and positively and they are aware of the consequences of misuse. As technology develops, bullying techniques can evolve to exploit it.

When children or adults are the target of bullying via mobiles phones, gaming or the Internet, they can often feel very alone, particularly if those around them do not understand online bullying and its effects. A once previously safe and enjoyable environment or activity can become threatening, harmful and a source of anxiety.

Cyberbullying may not always be intentional and repeated in the same way that traditional offline bullying is. Repeated harassment online could include an initial concern which is then shared or endorsed by others such as by "liking", "sharing" or "commenting". People may not feel that they are bullying by doing this and single issue may become more serious. It is very important that all incidents of online abuse are addressed as early as possible to prevent escalation

Education staff, parents and young people have to be constantly vigilant and work together to prevent this and tackle it wherever it appears. Cyberbullying is a method of bullying and should be viewed and treated the same as "real world" bullying and can happen to any member of the school community.

It is essential that young people, school staff and parents and carers understand how online can affect people and how to respond and combat misuse. Promoting a culture of confident users will support innovation and safety.

There are a number of statutory obligations on schools with regard to behaviour which establish clear responsibilities to respond to bullying. In particular section 89 of the Education and Inspections Act 2006:

- every school must have measures to encourage good behaviour and prevent all forms of bullying amongst pupils. These measures should be part of the school's behaviour policy which must be communicated to all pupils, school staff and parents
- gives headteachers the ability to ensure that pupils behave when they are not on school premises or under the lawful control of school staff.

Where online bullying which takes place outside school is reported then it must be investigated and acted on appropriately by schools.

Under the Children Act 1989 a bullying incident should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' and emotional abuse highlights the impact of online bullying. Where this is the case, the school staff should report their concerns to the SLES Safeguarding Team. Even where safeguarding is not considered to be an issue, schools may need to draw on a range of external services to support the pupil who is experiencing bullying, or to tackle any underlying issue which has contributed to a child doing the bullying.

Although bullying in itself is not a specific criminal offence in the UK, it is important to bear in mind that some types of harassing or threatening behaviour or communications both on and offline could be a criminal offence, for example under the Protection from Harassment Act 1997, the Malicious Communications Act 1988, the Communications Act 2003, and the Public Order Act 1986. If school staff feels that an offence may have been committed they should seek assistance from the police

For more information please read "Preventing and Tackling Bullying: Advice for School Leaders, Staff and Governing Bodies" (gov.uk) Preventing and Tackling Bullying

Childnet International have produced resources and guidance that can be used to give practical advice

Cyberbullying, along with all other forms of bullying, of any member of Meridian Community Primary School and Nursery community will not be tolerated. Full details are set out in the school policies regarding anti-bullying and behaviour.

- All incidents of online bullying reported will be recorded.
- There are clear procedures in place to investigate incidents or allegations and support anyone in the school community affected by online bullying.
- If the school is unclear if a criminal offence has been committed then the Designated Safeguarding Lead will obtain advice immediately through Sussex Police.
- Pupils, staff and parents/carers will be advised to keep a record of the bullying as evidence.
- The school will take steps to identify the bully where possible and appropriate. This may include examining school system logs, identifying and interviewing possible witnesses, and contacting the service provider and the police, if necessary.
- Pupils, staff and parents/carers will be required to work with the school to support the approach to cyberbullying and the schools e-Safety ethos.
- Sanctions for those involved in online or cyberbullying may include: ○ Those involved will be asked to remove any material deemed to be inappropriate or offensive.
    - ○ A service provider may be contacted to remove content if those involved refuse to or are unable to delete content.

- Internet access may be suspended at school for the user for a period of time. Other sanctions for pupils and staff may also be used in accordance to the schools anti-bullying, behaviour policy or Acceptable Use Policy.
- Parent/carers of pupils involved in online bullying will be informed.
- The Police will be contacted if a criminal offence is suspected.

Responding to concerns regarding online hate

Meridian Community Primary School and Nursery is aware that whilst there is likely to be a lot of content on the internet which may be considered to be offensive, very little of it is actually illegal. UK laws have been written to ensure that people can speak and write, even offensive material, without being prosecuted for their views. However there are some situations whereby posting offensive content online may be viewed as illegal as either harassment or possibly as a hate crime. Hate crimes are any crimes that are targeted at a person because of hostility or prejudice towards that person's:

- disability
- race or ethnicity
- religion or belief
- sexual orientation
- transgender identity

Schools must ensure that they respond appropriately regarding online hate and discrimination and support members of the community who may be targeted online.

Useful links
www.report-it.org.uk – Report hate crimes
www.stoponlineabuse.org.uk - Report online Sexism, homophobia, biphobia and transphobia
www.stophateuk.org www.victimsupport.org.uk www.stonewall.org.uk
https://www.gov.uk/report-hate-crime

- Online hate at Meridian Community Primary School and Nursery will not be tolerated. Further details are set out in the school policies regarding anti-bullying and behaviour
- All incidents of online hate reported to the school will be recorded.
- All members of the community will be advised to report online hate in accordance with relevant school policies and procedures e.g. anti-bullying, behaviour etc.
- The Police will be contacted if a criminal offence is suspected. If the school is unclear if a criminal offence has been committed then the Designated Safeguarding Lead will obtain advice immediately through the Sussex Police.

Appendix B

Online Safety (e-Safety) Contacts and References

East Sussex Support and Guidance:

If you are concerned about a child in East Sussex contact SPOA (Single Point of Advice) on:

01323 464222 or **0-19.SPOA@eastsussex.gov.uk**

If you think the child is in immediate danger, you should call the police on 999.

Sussex Police: (for non-urgent Police contact) 101 or 01273 470101

Standards and Learning Effectiveness Service (SLES): Support and Intervention Manager: Safeguarding Victoria Stutt
Victoria.stutt@eastsussex.gov.uk

East Sussex Schools ICT Service: Richard May Richard.may@eastsussex.gov.uk

Local Authority Designated Officer: Amanda Glover Amanda.glover@eastsussex.gov.uk

East Sussex Safeguarding Children Board (LSCB): 01273 481544 or lscbcontact@eastsussex.gov.uk

National Links and Resources:

BBC WebWise: www.bbc.co.uk/webwise

CEOP (Child Exploitation and Online Protection Centre): www.ceop.police.uk

ChildLine: www.childline.org.uk

Childnet: www.childnet.com

Get Safe Online: www.getsafeonline.org

Internet Matters: www.internetmatters.org

Lucy Faithfull Foundation: www.lucyfaithfull.org

Net Aware: www.net-aware.org.uk

NSPCC: www.nspcc.org.uk/onlinesafety

Parent Port: www.parentport.org.uk

Professional Online Safety Helpline: www.saferinternet.org.uk/about/helpline

The Marie Collins Foundation: http://www.mariecollinsfoundation.org.uk/

Think U Know: www.thinkuknow.co.uk

Virtual Global Taskforce: www.virtualglobaltaskforce.com

UK Safer Internet Centre: www.saferinternet.org.uk

360 Safe Self-Review tool for schools: https://360safe.org.uk/

Online Compass (Self review tool for other settings): http://www.onlinecompass.org.uk/