



THE COOPERS' COMPANY  
AND COBORN SCHOOL

*Love as Brethren*

# Online Safety Policy

	Designated Safeguarding Lead (DSL), with lead responsibility for filtering and monitoring	Mrs S King
	Deputy Designated Safeguarding Leads / DSL Team Members	Mr L Bonnett, Mr M Duncan, Mr Ellis, Mrs H Jacobs, Mrs S Kite
	Link governor for safeguarding	Mrs L Forsyth
	Curriculum leads with relevance to online safeguarding and their role	PSHE – Miss A Wood Computing – Mr M Sheehan
	IT Systems Manager	Mr B Kiff
	Date this policy was reviewed and by whom	February 2024 Mrs R Carron
	Date of next review and by whom	February 2025 Mrs R Carron
	Approved by The Headteacher	April 2024

## Contents

Contents	2
What is this policy?	4
Who is it for; when is it reviewed?	4
Who is in charge of online safety?	4
What are the main online safety risks?	4
How will this policy be communicated?	6
Overview	6
Aims	6
Further Help and Support	7
Scope	7
Roles and responsibilities	7
Education and curriculum	7
Handling safeguarding concerns and incidents	8
Appropriate filtering and monitoring	10
Messaging/commenting systems (incl. email, learning platforms & more)	11
Authorised systems	11
Behaviour / usage principles	12
Online storage or learning platforms	12
School website	13
Digital images and video	13
Social media	14
Our SM presence	14
Staff, pupils' and parents' SM presence	15
Device usage	16
Personal devices including wearable technology and bring your own device (BYOD)	16
Use of school devices	17
Trips / events away from school	17
Searching and confiscation	18
Appendix A – Roles	19
All staff	19
Headteacher/Principal – Ms Susan Hay	19

Designated Safeguarding Lead / Online Safety Lead – Mrs Rachna Carron	20
Governing Body, led by Online Safety / Safeguarding Link Governor – Mrs Leighann Forsyth	22
PSHE / RSHE Lead/s – Miss Alison Wood	23
Computing Lead – Mr M Sheehan	23
Subject / aspect leaders	24
Network Manager/other technical support roles – Mr B Kiff	24
Data Protection Officer (DPO) – Mrs Jose Harris	25
Volunteers and contractors (including tutors)	25
Pupils	25
Parents/carers	25
External groups including parent associations	26

## What is this policy?

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. Accordingly, this policy is written in line with 'Keeping Children Safe in Education' 2023 (KCSIE), 'Teaching Online Safety in Schools', statutory RSHE guidance and other statutory documents. It is cross-curricular (with relevance beyond Relationships, Health and Sex Education, Citizenship and Computing) and designed to sit alongside our statutory Child Protection & Safeguarding Policy. Any issues and concerns with online safety must always follow the school's safeguarding and child protection procedures.

## Who is it for; when is it reviewed?

This policy should be a living document, subject to full annual review but also amended where necessary during the year in response to developments in the school and local area. Although many aspects will be informed by legislation and regulations, we will involve staff, governors, pupils and parents in writing and reviewing the policy and make sure the policy makes sense and it is possible to follow it in all respects. This will help ensure all stakeholders understand the rules that are in place and why, and that the policy affects day-to-day practice.

## Who is in charge of online safety?

KCSIE makes clear that "the designated safeguarding lead should take **lead** responsibility for safeguarding and child protection (including online safety)." The DSL can delegate activities but not the responsibility for this area and whilst subject leads, e.g. for RSHE will plan the curriculum for their area, it is important that this ties into a whole-school approach.

## What are the main online safety risks?

### Current Online Safeguarding Trends

In our school over the past year, we have particularly noticed the following in terms of device use and abuse and types of online/devices-based incidents which affect the wellbeing and safeguarding of our students:

- Inappropriate use of social media and WhatsApp groups
- Filming/Taking photos of students or staff without consent on the school site

Nationally, some of the latest trends of the past twelve months are outlined below. These should be reflected in this policy and the acceptable use agreements we use, and seen in the context of the 4 Cs (see KCSIE for more details), a whole-school contextual safeguarding approach that incorporates policy and practice for curriculum, safeguarding and technical teams.

We may be updating this policy during the year to reflect any changes resulting from the Online Safety Bill being passed into law.

Self-generative artificial intelligence has been a significant change, with students having often unfettered access to tools that generate text and images at home or in school. These tools not only represent a

challenge in terms of accuracy when young people are genuinely looking for information, but also in terms of plagiarism for teachers and above all safety: none of the mainstream tools have end-user safety settings, most have an age limit of 13 or even 18 and in spite of basic rude words not delivering results, will easily produce inappropriate material. Schools not only need to tackle this in terms of what comes into school but also educating young people and their parents on use of these tools in the home.

The continued cost-of-living crisis has meant that children have spent more time online and therefore exposed to all manner of online harms as families have had to cut back on leisure activities and the public provision of free activities for young people has reduced further.

Against this background, the Ofcom 'Children and parents: media use and attitudes report 2023' has shown that YouTube remains the most used site or app among all under 18s and the reach of WhatsApp, TikTok and Snapchat increased yet further. As a school we recognise that many of our children and young people are on these apps regardless of age limits, which are often misunderstood or ignored.

This is striking when you consider that over 95 percent of students have their own mobile phone by the end of Year 7, and the vast majority do not have safety controls or limitations to prevent harm of access to inappropriate material. This is particularly pertinent given that 130,556 cases of self-generated child sexual abuse material were found of 11–13-year-olds (Internet Watch Foundation Annual Report). These were predominantly (but importantly not only) girls; it is important also to recognise more and more older teenage boys being financially extorted after sharing intimate pictures online.

In the past year, more and more children and young people used apps such as snapchat as their source of news and information, with little attention paid to the veracity of influencers sharing news. The 2023 Revealing-Reality: Anti-social-Media Report highlights that this content is interspersed with highly regular exposure to disturbing, graphic and illegal content such as fights, attacks, sexual acts and weapons. At the same time, the Children's Commissioner revealed the ever-younger children are regularly consuming pornography and living out inappropriate behaviour and relationships due to 'learning from' pornography. This has coincided with the rise of misogynistic influencers such as Andrew Tate, which had a significant influence on many young boys over the past year which schools have had to counter.

From the many schools that LGfL spoke to over the past year, there was a marked increase in the number of schools having issues with fights being filmed and shared, a disturbing increase in the cases of self-harm and sexual abuse being coerced with threats of violence (many even in primary schools).

There has been a significant increase in the number of fake profiles causing issues in schools, both for schools – where the school logo and/or name have been used to share inappropriate content about students and also spread defamatory allegations about staff, and also for students, including where these are used to bully others (sometimes even pretending to be one student to bully a second student).

## How will this policy be communicated?

This policy can only impact upon practice if it is a (regularly updated) living document. It must be accessible to and understood by all stakeholders. It will be communicated in the following ways:

- Posted on the school website
- Part of school induction pack for all new staff (including temporary, supply and non-classroom-based staff and those starting mid-year)
- Integral to safeguarding updates and training for all staff (especially in September refreshers)
- Clearly reflected in the Acceptable Use Policies (AUPs) for staff, volunteers, contractors, governors, pupils and parents/carers (which must be in accessible language appropriate to these groups), which will be issued to whole school community, on entry to the school, annually and whenever changed, plus displayed in school

## Overview

### Aims

This policy aims to promote a whole school approach to online safety by:

- Setting out expectations for all The Coopers Company and Coborn School community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline).
- Helping safeguarding and senior leadership teams to have a better understanding and awareness of all elements of online safeguarding through effective collaboration and communication with technical colleagues (e.g. for filtering and monitoring), curriculum leads (e.g. RSHE) and beyond.
- Helping all stakeholders to recognise that online/digital behaviour standards (including social media activity) must be upheld beyond the confines of the school gates and school day, regardless of device or platform, and that the same standards of behaviour apply online and offline.
- Facilitating the safe, responsible, respectful and positive use of technology to support teaching & learning, increase attainment and prepare children and young people for the risks and opportunities of today's and tomorrow's digital world, to survive and thrive online
- Helping school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
  - for the protection and benefit of the children and young people in their care, and
  - for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice
  - for the benefit of the school, supporting the school ethos, aims and objectives, and protecting the reputation of the school and profession
- Establishing clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as Behaviour Policy or Anti-Bullying Policy)

## Further Help and Support

Internal school channels should always be followed first for reporting and support, as documented in school policy documents, especially in response to incidents, which should be reported in line with your Child Protection & Safeguarding Policy. The DSL will handle referrals to local authority multi-agency safeguarding hubs (MASH) and normally the headteacher will handle referrals to the LA designated officer (LADO). The local authority, academy trust or third-party support organisations you work with may also have advisors to offer general support.

Beyond this, [reporting.lgfl.net](https://reporting.lgfl.net) has a list of curated links to external support and helplines for both pupils and staff, including the Professionals' Online-Safety Helpline from the UK Safer Internet Centre and the NSPCC Report Abuse Helpline for sexual harassment or abuse, as well as hotlines for hate crime, terrorism and fraud which might be useful to share with parents, and anonymous support for children and young people. Training is also available via [safetraining.lgfl.net](https://safetraining.lgfl.net)

## Scope

This policy applies to all members of The Coopers Company and Coborn School community (including teaching, supply and support staff, governors, volunteers, contractors, students/pupils, parents/carers, visitors and community users) who have access to our digital technology, networks and systems, whether on-site or remotely, and at any time, or who use technology in their school role.

## Roles and responsibilities

This school is a community, and all members have a duty to behave respectfully online and offline, to use technology for teaching and learning and to prepare for life after school, and to immediately report any concerns or inappropriate behaviour, to protect staff, pupils, families and the reputation of the school. We learn together, make honest mistakes together and support each other in a world that is online and offline at the same time.

Depending on their role, all members of the school community should **read the relevant section in Annex A of this document** that describes individual roles and responsibilities. Please note there is one for All Staff which must be read even by those who have a named role in another section. There are also pupil, governor, etc role descriptions in the annex.

In 2023/2024, it is vital that all members understand their responsibilities and those of others when it comes to filtering and monitoring. All staff have a key role to play in feeding back on potential issues.

## Education and curriculum

It is important that schools establish a carefully sequenced curriculum for online safety that builds on what pupils have already learned and identifies subject content that is appropriate for their stage of development.

As well as teaching about the underpinning knowledge and behaviours that can help pupils navigate the online world safely and confidently regardless of the device, platform or app, [Teaching Online Safety in Schools](#) recommends embedding teaching about online safety and harms through a whole school

approach and provides an understanding of these risks to help tailor teaching and support to the specific needs of pupils, including vulnerable pupils – dedicated training around this with curriculum mapping for RSHE/PSHE and online safety leads is available at [safetraining.lgfl.net](https://safetraining.lgfl.net)

RSHE guidance also recommends schools assess teaching to “identify where pupils need extra support or intervention [through] tests, written assignments or self-evaluations, to capture progress.”

The following subjects have the clearest online safety links (see the relevant role descriptors above for more information):

- Relationships education, relationships and sex education (RSE) and health (PSHE)
- Computing

However, as stated in the role descriptors in Appendix A, it is the role of all staff to identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils)

Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc) in school or setting as homework tasks, all staff should encourage sensible use, monitor what pupils/students are doing and consider potential dangers and the age appropriateness of websites (ask your DSL what appropriate filtering and monitoring policies are in place). “Parents and carers are likely to find it helpful to understand what systems schools use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online” (KCSIE 2023).

At The Coopers Company and Coborn School, we recognise that online safety and broader digital resilience must be thread throughout the curriculum.

Annual reviews of curriculum plans / schemes of work (including for SEND pupils) are used as an opportunity to follow this framework more closely in its key areas of Self-image and Identity, Online relationships, Online reputation, Online bullying, Managing online information, Health, Wellbeing and lifestyle, Privacy and security, and Copyright and ownership.

This is done within the context of an annual online safety audit, which is a collaborative effort led by Mrs S King, DSL, Mr R Bell, Deputy Head and Mrs L Forsyth, Governor.

## **Handling safeguarding concerns and incidents**

It is vital that all staff recognise that online safety is a part of safeguarding (as well as being a curriculum strand of Computing, PSHE/RSHE and Citizenship).

General concerns must be handled in the same way as any other safeguarding concern; safeguarding is often referred to as a jigsaw puzzle, so all stakeholders should err on the side of talking to the online-



safety lead / designated safeguarding lead to contribute to the overall picture or highlight what might not yet be a problem.

Support staff will often have a unique insight and opportunity to find out about issues first in the playground, corridors, toilets and other communal areas outside the classroom (particularly relating to bullying and sexual harassment and violence).

School procedures for dealing with online safety will be mostly detailed in the following policies (primarily in the first key document):

- Safeguarding and Child Protection Policy
- Anti-Bullying Policy
- Behaviour Policy (including school sanctions)
- Acceptable Use Policies
- Data Protection Policy, agreements and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc)

This school commits to take all reasonable precautions to ensure safeguarding pupils online, but recognises that incidents will occur both inside school and outside school (and that those from outside school will continue to impact pupils when they come into school or during extended periods away from school). All members of the school are encouraged to report issues swiftly to allow us to deal with them quickly and sensitively through the school's escalation processes.

Any suspected online risk or infringement should be reported to the online safety lead / designated safeguarding lead on the same day – where clearly urgent, it will be made by the end of the lesson.

Any concern/allegation about staff misuse is always referred directly to the Headteacher, unless the concern is about the Headteacher in which case the complaint is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer). Staff may also use the NSPCC Whistleblowing Helpline (you may want to display a poster with details of this / other helplines in the staff room – see [posters.lgfl.net](https://www.lgfl.net/posters) and [reporting.lgfl.net](https://www.lgfl.net/reporting)).

The school will actively seek support from other agencies as needed (i.e. the local authority, LGfL, UK Safer Internet Centre's Professionals' Online Safety Helpline (POSH), NCA CEOP, Prevent Officer, Police, IWF and Harmful Sexual Behaviour Support Service). The DfE guidance [Behaviour in Schools, advice for headteachers and school staff](#) September 2022 provides advice and related legal duties including support for pupils and powers of staff when responding to incidents – see pages 32-34 for guidance on child on child sexual violence and harassment, behaviour incidents online and mobile phones.

We will inform parents/carers of online-safety incidents involving their children, and the Police where staff or pupils engage in or are subject to behaviour which we consider is particularly concerning or breaks the law (particular procedures are in place for sexting and upskirting; see section below).

The school should evaluate whether reporting procedures are adequate for any future closures/lockdowns/isolation etc and make alternative provisions in advance where these might be needed.

All pupils, staff, governors, volunteers, contractors and parents are bound by the school's data protection and cybersecurity policy which can be found here - <https://www.cooperscoborn.org.uk/policies/>. It is important to remember that there is a close relationship between both data protection and cybersecurity and a school's ability to effectively safeguard children. Schools are reminded of this in KCSIE which also refers to the DfE Standards of Cybersecurity for the first time in 2023.

Schools should remember that data protection does not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in *Data protection in schools, 2023*, "It's not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child." And in KCSIE 2023, "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children."

## **Appropriate filtering and monitoring**

Keeping Children Safe in Education has long asked schools to ensure "appropriate" web filtering and monitoring systems which keep children safe online but do not "over block".

Since KCSIE 2023, in recognition of the importance of these systems to keeping children safe, the designated safeguarding lead now has lead responsibility for filtering and monitoring (see page 1 for the DSL name and the named governor with responsibility for filtering and monitoring).

Schools are also asked to follow the new DfE filtering and monitoring standards, which require them to:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

As schools get to grips with these new standards, the challenge for DSLs and SLT is to better understand, review and drive the rationale behind decisions in this area. Tech teams and safeguarding teams will need to work much more closely together for this to be possible and IT Support staff will be charged to carry out regular checks and feed back to DSL teams.

ALL STAFF need to be aware of the changes and renewed emphasis and play their part in feeding back about areas of concern, potential for students to bypass systems and any potential overblocking. They can submit concerns at any point via contacting the IT Support team and Mr R Bell and will be asked for feedback at the time of the regular checks which will now take place

Staff will be reminded of the systems in place and their responsibilities at induction and start of year safeguarding as well as via AUPs and regular training reminders in the light of the annual review and regular checks that will be carried out.

It is very important that schools understand the difference between filtering and monitoring, the meaning of overblocking and other terms, as well as how to get the best out of systems. There are

guidance videos and flyers to help with this at <https://safefiltering.lgfl.net> and training is provided for all staff / safeguarding teams / technical teams as appropriate.

At The Coopers Company and Coborn School:

- web filtering is provided by Impero Education Pro by Impero Solutions Ltd, Fortigate Fortinet Firewall and LGFL Webscreen on the school site and for school devices used in the home Lightspeed Filter and Lightspeed Alert by Lightspeed Systems
- changes can be made by the IT Support Team
- overall responsibility is held by the DSL
- technical support and advice, setup and configuration are from [The IT Support Team
- regular checks are made termly by the DSL to ensure filtering is still active and functioning everywhere.
- an annual review is carried out
- guidance on how the system is 'appropriate' is available at [appropriate.lgfl.net](https://appropriate.lgfl.net)

According to the DfE standards, "a variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users
- live supervision by staff on a console with device management software
- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services

At The Coopers Company and Coborn School we use:

- Impero Education Pro. Provides the ability for live session supervision and log files of internet traffic and application use
- Fortigate Fortinet. Firewall providing web traffic inspection, web category filtering and protocol / port blocking
- LGFL Webscreen. Cloud based firewall providing web and category filtering
- Lightspeed. Agent based client providing Web filtering, alerts and web activity logging

## **Messaging/commenting systems (incl. email, learning platforms & more)**

### **Authorised systems**

- Pupils at this school communicate with each other and with staff using Google Classroom and MDAemon Web Mail (school email system)
- Staff at this school use the email system provided by MDAemon Webmail for all school emails. They never use a personal/private email account (or other messaging platform) to communicate with children or parents, or to colleagues when relating to school/child data, using a non-school-administered system. Staff are permitted to use this email system to communicate with parents, carers, students and external organisations.
- Staff at this school also use Go4Schools and ParentMail to communicate with parents/carers

Any systems above are centrally managed and administered by the school or authorised IT partner (i.e. they can be monitored/audited/viewed centrally; are not private or linked to private accounts). This is for the mutual protection and privacy of all staff, pupils and parents, supporting safeguarding best-practice, protecting children against abuse, staff against potential allegations and in line with UK data protection legislation.

Use of any new platform with communication facilities or any child login or storing school/child data must be approved in advance by the school and centrally managed.

Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member).

Where devices have multiple accounts for the same app, mistakes can happen, such as an email being sent from or data being uploaded to the wrong account. If this a private account is used for communication or to store data by mistake, the DSL/Headteacher/DPO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately.

## **Behaviour / usage principles**

- More detail for all the points below are given in the Social media section of this policy as well as the school's acceptable use agreements, behaviour policy and staff code of conduct.
- Appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff.
- Data protection principles will be followed at all times when it comes to all school communications, in line with the school Data Protection Policy - <https://www.cooperscoborn.org.uk/policies> and only using the authorised systems mentioned above.
- Pupils and staff are allowed to use the email system for reasonable (not excessive, not during lessons) personal use but should be aware that all use is monitored, their emails may be read and the same rules of appropriate behaviour apply at all times. Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination (and will be dealt with according to the appropriate policy and procedure).

## **Online storage or learning platforms**

All the principles outlined above also apply to any system to which you log in online to conduct school business, whether it is to simply store files or data (an online 'drive') or collaborate, learn, teach, etc.

For all these, it is important to consider data protection and cybersecurity before adopting such a platform or service and at all times when using it. The Coopers Company and Coborn School has a clear cybersecurity and data protection policy which staff, governors and volunteers must follow at all times.

## School website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. The Headteacher/Principal and Governors have delegated the day-to-day responsibility of updating the content of the website and ensuring compliance with DfE stipulations to Mr R Bell (Deputy Head) and Mrs J Finlay (Headteachers' PA)

The site is managed by / hosted by LemonGrass Media

Where staff submit information for the website, they are asked to remember that schools have the same duty as any person or organisation to respect and uphold copyright law – schools have been fined thousands of pounds for copyright breaches. Sources must always be credited and material only used with permission. There are many open-access libraries of public-domain images/sounds etc that can be used. Finding something on Google or YouTube does not mean that copyright has been respected. If in doubt, check with Mr R Bell.

## Digital images and video

When a pupil/student joins the school, parents/carers are asked if they give consent for their child's image to be captured in photographs or videos, for what purpose (beyond internal assessment, which does not require express consent) and for how long. Parents answer as follows:

- For displays around the school
- For the newsletter
- For use in paper-based school marketing
- For online prospectus or websites
- For social media
- For a specific high-profile image for display or publication

Whenever a photo or video is taken/made, the member of staff taking it will check the latest database before using it for any purpose.

Any pupils shown in public facing materials are never identified with more than first name (and photo file names/tags do not include full names to avoid accidentally sharing them).

All staff are governed by their contract of employment and the school's Acceptable Use Policy, which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. At The Coopers' Company & Coborn School, members of staff may occasionally use personal phones to capture photos or videos of pupils, but these will be appropriate, linked to school activities, taken without secrecy and not in a one-to-one situation, and always moved to school storage as soon as possible, after which they are deleted from personal devices or cloud services (NB – many phones automatically back up photos). Clear guidance on the process for this is in the Staff Acceptable ICT Use Policy.

Photos are stored on the Administration Network (O drive) inline with the retention schedule of the school Data Protection Policy.

Staff and parents are reminded annually about the importance of not sharing without permission, due to reasons of child protection (e.g. looked-after children often have restrictions for their own protection), data protection, religious or cultural reasons, or simply for reasons of personal privacy. Further detail on this subject and a sample letter to parents for taking photos or videos at school events can be found at [parentfilming.lgfl.net](http://parentfilming.lgfl.net)

We encourage young people to think about their online reputation and digital footprint, so we should be good adult role models by not oversharing (or providing embarrassment in later life – and it is not for us to judge what is embarrassing or not).

Pupils are taught about how images can be manipulated in their online safety education programme and also taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children

Pupils are advised to be very careful about placing any personal photos on social media. They are taught to understand the need to maintain privacy settings so as not to make public, personal information.

Pupils are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location. We teach them about the need to keep their data secure and what to do if they / or a friend are subject to bullying or abuse.

## **Social media**

### **Our SM presence**

The Coopers Company and Coborn School works on the principle that if we don't manage our social media reputation, someone else will.

Online Reputation Management (ORM) is about understanding and managing our digital footprint (everything that can be seen or read about the school online). Few parents will apply for a school place without first Googling the school, and the Ofsted pre-inspection check includes monitoring what is being said online.

Negative coverage almost always causes some level of disruption. Up to half of all cases dealt with by the Professionals Online Safety Helpline (POSH: [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)) involve schools' (and staff members') online reputation.

Accordingly, we manage and monitor our social media footprint carefully to know what is being said about the school and to respond to criticism and praise in a fair, responsible manner.

The School Office is responsible for managing our Facebook and other social media accounts and checking our Wikipedia and Google reviews and other mentions online.

## Staff, pupils' and parents' SM presence

Social media (including all apps, sites and games that allow sharing and interaction between users) is a fact of modern life, and as a school, we accept that many parents, staff and pupils will use it. However, as stated in the acceptable use policies which all members of the school community sign, we expect everybody to behave in a positive manner, engaging respectfully with the school and each other on social media, in the same way as they would face to face.

This positive behaviour can be summarised as not making any posts which are or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which might bring the school or (particularly for staff) teaching profession into disrepute. This applies both to public pages and to private posts, e.g. parent chats, pages or groups.

If parents have a concern about the school, we would urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, the school complaints procedure should be followed. Sharing complaints on social media is unlikely to help resolve the matter, but can cause upset to staff, pupils and parents, also undermining staff morale and the reputation of the school (which is important for the pupils we serve).

Many social media platforms have a minimum age of 13 (note that WhatsApp is 16+), but the school regularly deals with issues arising on social media involving pupils/students under the age of 13. We ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use. It is worth noting that Online Harms regulation is likely to require more stringent age verification measures over the coming years.

However, the school has to strike a difficult balance of not encouraging underage use at the same time as needing to acknowledge reality in order to best help our pupils/students to avoid or cope with issues if they arise. Online safety lessons will look at social media and other online behaviour, how to be a good friend online and how to report bullying, misuse, intimidation or abuse. However, children will often learn most from the models of behaviour they see and experience, which will often be from adults.

Parents can best support this by talking to their children about the apps, sites and games they use (you don't need to know them – ask your child to explain it to you), with whom, for how long, and when (late at night / in bedrooms is not helpful for a good night's sleep and productive teaching and learning at school the next day). You may wish to refer to the [Digital Family Agreement](#) to help establish shared expectations and the [Top Tips for Parents](#) poster along with relevant items and support available from [parentsafe.lgfl.net](http://parentsafe.lgfl.net) and introduce the [Children's Commission Digital 5 A Day](#).

Although the school has an official social media accounts it asks parents/carers not to use these channels, especially not to communicate about their children.

Email is the official electronic communication channel between parents and the school. Social media, including chat apps such as WhatsApp, are not appropriate for school use.

Pupils/students are not allowed\* to be 'friends' with or make a friend request\*\* to any staff, governors, volunteers and contractors or otherwise communicate via social media.

Pupils/students are discouraged from 'following' staff, governor, volunteer or contractor public accounts (e.g. following a staff member with a public Instagram account) as laid out in the AUPs. However, we accept that this can be hard to control (but this highlights the need for staff to remain professional in their private lives). In the reverse situation, however, staff must not follow such public student accounts.

\* Exceptions may be made, e.g. for pre-existing family links, but these must be approved by the Headteacher/Principal, and should be declared upon entry of the pupil or staff member to the school).

\*\* Any attempt to do so may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member).

Staff are reminded that they are obliged not to bring the school or profession into disrepute and the easiest way to avoid this is to have the strictest privacy settings and avoid inappropriate sharing and oversharing online. They should never discuss the school or its stakeholders on social media and be careful that their personal opinions might not be attributed to the school, trust or local authority, bringing the school into disrepute.

The serious consequences of inappropriate behaviour on social media are underlined by the fact that there has been a significant number of Prohibition Orders issued by the Teacher Regulation Agency to teaching staff that involved misuse of social media/technology.

All members of the school community are reminded that particularly in the context of social media, it is important to comply with the school policy on Digital images and video and permission is sought before uploading photographs, videos or any other information about other people.

The statements of the Acceptable Use Policies (AUPs) which all members of the school community have signed are also relevant to social media activity, as is the school's Data Protection Policy.

## **Device usage**

AUPs remind those with access to school devices about rules on the misuse of school technology – devices used at home should be used just like if they were in full view of a teacher or colleague. Please read the following in conjunction with those AUPs and the sections of this document which impact upon device usage, e.g. copyright, data protection, social media, misuse of technology, and digital images and video.

## **Personal devices including wearable technology and bring your own device (BYOD)**

- Pupils/students are not permitted to use a mobile phone on the school site. The only exception to this rule is 6<sup>th</sup> Form Students who are permitted to use them in the three locations, upstairs in the 6<sup>th</sup> Form Centre.
- Important messages and phone calls to or from parents can be made at the school office, which will also pass on messages from parents to pupils in emergencies.



- Students in Year 7-11 are not permitted to use laptops/IPADs etc, unless there is a clear school-led rationale, for example following direction from the SEND Departments.
- Students in the 6<sup>th</sup> Form, may be permitted to use BYOD in lessons (laptops/iPad – not mobile phones), at the discretion of the teacher concerned. These devices are allowed to be used in communal areas in the 6<sup>th</sup> Form Centre, such as the Common Room.
- All staff who work directly with children should leave their mobile phones on silent and only use them in private staff areas during school hours. See also the 'Digital images and video' section of this document and the school data protection cybersecurity policies. Child/staff data should never be downloaded onto a private phone. If a staff member is expecting an important personal call when teaching or otherwise on duty, they may leave their phone with the school office to answer on their behalf or ask for the message to be left with the school office.
- Volunteers, contractors, governors should leave their phones in their pockets and turned off. Under no circumstances should they be used in the presence of children or to take photographs or videos. If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the headteacher should be sought (the headteacher may choose to delegate this) and this should be done in the presence of a member staff.
- Parents are asked to leave their phones in their pockets and turned off when they are on site. They should ask permission before taking any photos, e.g. of displays in corridors or classrooms, and avoid capturing other children. When at school events, please refer to the Digital images and video section of this. Parents are asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office.

## **Use of school devices**

Staff and pupils are expected to follow the terms of the school acceptable use policies for appropriate use and behaviour when on school devices, whether on site or at home.

School devices are not to be used in any way which contravenes AUPs, behaviour policy / staff code of conduct.

Wifi is accessible to staff members only for school-related internet use / limited personal use within the framework of the acceptable use policy. All such use is monitored.

All and any usage of devices and/or systems and platforms may be tracked.

## **Trips / events away from school**

For school trips/events away from school, teachers will be issued a school duty phone and this number used for any authorised or emergency communications with pupils/students and parents. Any deviation from this policy (e.g. by mistake or because the school phone will not work) will be notified immediately to the Headteacher. Teachers using their personal phone in an emergency should ensure that the number is hidden to avoid a parent or student accessing a teacher's private phone number.

## Searching and confiscation

In line with the DfE guidance '[Searching, screening and confiscation: advice for schools](#)', the Headteacher/Principal and staff authorised by them have a statutory power to search pupils/property on school premises. This includes the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material, including but not exclusive to sexual images, pornography, violence or bullying.

Full details of the school's search procedures are available in the school Behaviour Policy <https://www.cooperscoborn.org.uk/policies/>.

## Appendix A – Roles

Please read the relevant roles & responsibilities section from the following pages.

All school staff must read the “All Staff” section as well as any other relevant to specialist roles

Roles:

- All Staff
- Headteacher/Principal
- Designated Safeguarding Lead
- Governing Body, led by Online Safety / Safeguarding Link Governor
- PSHE / RSHE Lead/s
- Computing Lead
- Subject / aspect leaders
- Network Manager / IT Support Staff
- Data Protection Officer (DPO)
- Volunteers and contractors (including tutor)
- Pupils
- Parents/carers
- External groups including parent associations

### All staff

All staff should sign and follow the staff acceptable use policy in conjunction with this policy, the school’s main safeguarding policy, the code of conduct/handbook and relevant parts of Keeping Children Safe in Education to support a whole-school safeguarding approach.

This includes reporting any concerns, no matter how small, to the designated safety lead as named in the AUP, maintaining an awareness of current online safety issues (see the start of this document for issues in 2023) and guidance (such as KCSIE), modelling safe, responsible and professional behaviours in their own use of technology at school and beyond and avoiding scaring, victim-blaming language.

Staff should also be aware of the new DfE standards and relevant changes to filtering and monitoring and play their part in feeding back about overblocking, gaps in provision or pupils bypassing protections.

### Headteacher/Principal – Ms Susan Hay

**Key responsibilities:**

- Foster a culture of safeguarding where online-safety is fully integrated into whole-school safeguarding
- Oversee and support the activities of the designated safeguarding lead team and ensure they work with technical colleagues to complete an online safety audit in line with KCSIE (including technology in use in the school)

- Undertake training in offline and online safeguarding, in accordance with statutory guidance and Local Safeguarding Children Partnership support and guidance
- Ensure ALL staff undergo safeguarding training (including online-safety) at induction and with regular updates and that they agree and adhere to policies and procedures
- Ensure ALL governors and trustees undergo safeguarding and child protection training and updates (including online-safety) to provide strategic challenge and oversight into policy and practice and that governors are regularly updated on the nature and effectiveness of the school's arrangements
- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including remote systems are implemented according to child-safety first principles
- Better understand, review and drive the rationale behind decisions in filtering and monitoring as per the new DfE standards—through regular liaison with technical colleagues and the DSL— in particular understand what is blocked or allowed for whom, when, and how as per KCSIE.
  - In 2023/4 this will involve starting regular checks and annual reviews, upskilling the DSL and appointing a filtering and monitoring governor
- Liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information
- Support safeguarding leads and technical staff as they review protections for pupils in the home and remote-learning procedures, rules and safeguards
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
- Ensure the school website meets statutory requirements

## Designated Safeguarding Lead / Online Safety Lead – Mrs Sarah King

**Key responsibilities** (remember the DSL can delegate certain online-safety duties but not the overall responsibility; this assertion and all quotes below are from Keeping Children Safe in Education):

- The DSL should “take **lead responsibility** for safeguarding and child protection (**including online safety and understanding the filtering and monitoring** systems and processes in place).
- Ensure “An effective whole school approach to online safety as per KCSIE
- In 2023/4 working to take up the new responsibility for filtering and monitoring by working closely with technical colleagues, SLT and the new filtering governor to learn more about this area, better understand, review and drive the rationale behind systems in place and initiate regular checks and annual reviews, including support for devices in the home.

- Where online-safety duties are delegated and in areas of the curriculum where the DSL is not directly responsible but which cover areas of online safety (e.g. RSHE), ensure there is regular review and open communication and that the DSL's clear overarching responsibility for online safety is not compromised or messaging to pupils confused
- Ensure ALL staff and supply staff undergo safeguarding and child protection training (including online-safety) at induction and that this is regularly updated.
  - In 2023/4 this must include filtering and monitoring and help them to understand their roles
  - all staff must read KCSIE Part 1 and all those working with children also Annex B – translations are available in 13 community languages at [kcsietranslate.lgfl.net](https://www.kcsietranslate.lgfl.net) (B the condensed Annex A can be provided instead to staff who do not directly work with children if this is better)
  - cascade knowledge of risks and opportunities throughout the organisation
  - [safecpd.lgfl.net](https://www.safecpd.lgfl.net) has helpful CPD materials including PowerPoints, videos and more
- Ensure that ALL governors and trustees undergo safeguarding and child protection training (including online-safety) at induction to enable them to provide strategic challenge and oversight into policy and practice and that this is regularly updated
- Take day-to-day responsibility for safeguarding issues and be aware of the potential for serious child protection concerns
- Be mindful of using appropriate language and terminology around children when managing concerns, including avoiding victim-blaming language
- Remind staff of safeguarding considerations as part of a review of remote learning procedures and technology, including that the same principles of online-safety and behaviour apply
- Work closely with SLT, staff and technical colleagues to complete an online safety audit (including technology in use in the school)
- Work with the headteacher, DPO and governors to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Stay up to date with the latest trends in online safeguarding and “undertake Prevent awareness training.” – see [safetraining.lgfl.net](https://www.safetraining.lgfl.net) and [prevent.lgfl.net](https://www.prevent.lgfl.net)
- Review and update this policy, other online safety documents (e.g. Acceptable Use Policies) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others) and submit for review to the governors/trustees.
- Receive regular updates in online-safety issues and legislation, be aware of local and school trends – see [safeblog.lgfl.net](https://www.safeblog.lgfl.net) for examples or sign up to the [LGfL safeguarding newsletter](https://www.lgfl.gov.uk/newsletters)
- Ensure that online-safety education is embedded across the curriculum in line with the statutory RSHE guidance (e.g. by use of the updated UKCIS framework ‘[Education for a Connected World – 2020 edition](https://www.ukciscis.org.uk/education-for-a-connected-world-2020-edition)’) and beyond, in wider school life
- Promote an awareness of and commitment to online-safety throughout the school community, with a strong focus on parents, including hard-to-reach parents – dedicated resources at [parentsafelgfl.net](https://www.parentsafelgfl.net)

- Communicate regularly with SLT and the safeguarding governor/committee to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring work and have been functioning/helping.
- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident.
- Ensure adequate provision for staff to flag issues when not in school and for pupils to disclose issues when off site, especially when in isolation/quarantine, e.g. a [survey to facilitate disclosures](#) and an online form on the school home page about ‘something that worrying me’ that gets mailed securely to the DSL inbox
- Ensure staff adopt a zero-tolerance, whole school approach to all forms of child-on-child abuse, and don’t dismiss it as banter (including bullying).
- Pay particular attention to **online tutors**, both those engaged by the school as part of the DfE scheme who can be asked to sign the contractor AUP
- 

## **Governing Body, led by Online Safety / Safeguarding Link Governor – Mrs Leighann Forsyth**

### **Key responsibilities (quotes are taken from Keeping Children Safe in Education)**

- Approve this policy and strategy and subsequently review its effectiveness, e.g. by asking the questions in the helpful document from the UK Council for Child Internet Safety (UKCIS) [Online safety in schools and colleges: Questions from the Governing Board](#)
- Undergo (and signpost all other governors and Trustees to attend) safeguarding and child protection training (including online safety) at induction to provide strategic challenge and into policy and practice, ensuring this is regularly updated
- Ensure that all staff also receive appropriate safeguarding and child protection (including online) training at induction and that this is updated, including filtering and monitoring
- Support the school in encouraging parents and the wider community to become engaged in online safety activities
- Have regular strategic reviews with the online-safety coordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings
- Work with the DPO, DSL and headteacher to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Check all school staff have read Part 1 of KCSIE; SLT and all working directly with children have read Annex B
- “Ensure that children are taught about safeguarding, including online safety [...] as part of providing a broad and balanced curriculum [...] Consider a whole school or college approach to online safety [with] a clear policy on the use of mobile technology.”

## PSHE / RSHE Lead/s – Miss Alison Wood

### Key responsibilities:

- As listed in the 'all staff' section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online as well as raising awareness of the risks and challenges from recent trends in self-generative artificial intelligence, financial extortion and sharing intimate pictures online into the PSHE / Relationships education, relationships and sex education (RSE) and health education curriculum. "This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age appropriate way that is relevant to their pupils' lives."
- Focus on the underpinning knowledge and behaviours outlined in [Teaching Online Safety in Schools](#) in an age appropriate way to help pupils to navigate the online world safely and confidently regardless of their device, platform or app.
- Assess teaching to "identify where pupils need extra support or intervention [through] tests, written assignments or self-evaluations, to capture progress" – to complement the computing curriculum,.
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSHE.
- Note that an RSHE policy should be included on the school website.
- Work closely with the Computing subject leader to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach

## Computing Lead – Mr M Sheehan

### Key responsibilities:

- As listed in the 'all staff' section, plus:
- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum
- Work closely with the RSHE lead to avoid overlap but ensure a complementary whole-school approach
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements

## Subject / aspect leaders

### Key responsibilities:

- As listed in the 'all staff' section, plus:
- Look for opportunities to embed online safety in your subject or aspect, especially as part of the RSHE curriculum, and model positive attitudes and approaches to staff and pupils alike
- Consider how the UKCIS framework Education for a Connected World and Teaching Online Safety in Schools can be applied in your context
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Ensure subject specific action plans also have an online-safety element

## Network Manager/other technical support roles – Mr B Kiff

### Key responsibilities:

- As listed in the 'all staff' section, plus:
- Collaborate regularly with the DSL and leadership team to help them make key strategic decisions around the safeguarding elements of technology.
- Note that KCSIE changes expect a great understanding of technology and its role in safeguarding when it comes to filtering and monitoring and in 2023/4 you will be required to support safeguarding teams to understand and manage these systems and carry out regular reviews and annual checks.
- Support DSLs and SLT to carry out an annual online safety audit as now recommended in KCSIE. This should also include a review of technology, including filtering and monitoring systems (what is allowed, blocked and why and how 'over blocking' is avoided as per KCSIE) to support their role as per the new DfE standards, protections for pupils in the and remote-learning.
- Keep up to date with the school's online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- Work closely with the designated safeguarding lead / online safety lead / data protection officer / LGfL nominated contact / RSHE lead to ensure that school systems and networks reflect school policy and there are no conflicts between educational messages and practice.
- Ensure the above stakeholders understand the consequences of existing services and of any changes to these systems (especially in terms of access to personal and sensitive records / data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms etc
- Maintain up-to-date documentation of the school's online security and technical procedures
- To report online-safety related issues that come to their attention in line with school policy
- Manage the school's systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption and backup for data, including disaster recovery plans, and auditable access controls.



- Monitor the use of school technology, and that any misuse/attempted misuse is identified and reported in line with school policy
- Work with the Headteacher to ensure the school website meets statutory DfE requirements

## Data Protection Officer (DPO) – Mrs Jose Harris

### Key responsibilities:

- Alongside those of other staff, provide data protection expertise and training and support the DP and cybersecurity policy and compliance with those and legislation and ensure that the policies conform with each other and with this policy.
- Not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in *Data protection in schools, 2023*, “It’s not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child.” And in KCSIE 2023, “The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.”
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited

## Volunteers and contractors (including tutors)

### Key responsibilities:

- Read, understand, sign and adhere to an acceptable use policy (AUP)
- Report any concerns, no matter how small, to the designated safety lead
- Maintain an awareness of current online safety issues and guidance
- Model safe, responsible and professional behaviours in their own use of technology at school and as part of remote teaching or any online communications
- Note that as per AUP agreement a contractor will never attempt to arrange any meeting, **including tutoring session**, without the full prior knowledge and approval of the school, and will never do so directly with a pupil. The same applies to any private/direct communication with a pupil.

## Pupils

### Key responsibilities:

Read, understand, sign and adhere to the student/pupil acceptable use policy

## Parents/carers

### Key responsibilities:

- Read, sign and adhere to the school's parental acceptable use policy (AUP), read the pupil AUP and encourage their children to follow it

## **External groups including parent associations**

### **Key responsibilities:**

- Any external individual/organisation will sign an acceptable use policy prior to using technology or the internet within school
- Support the school in promoting online safety and data protection
- Model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers