Online Safety Policy

This policy has been adopted by Pathfinder Multi Academy Trust and is applicable across all schools that make up the Trust. In line with the MAT's Scheme of Delegation, this Policy must be duly applied by each Local Governing Committee and the Headteacher of each school in Pathfinder Multi Academy Trust.

Where there are specific details or any discretions in the policy that apply to an individual school or Local Governing Committee this has been made clear within the wording of the policy.

This policy will be reviewed in line with the agreed timetable for policy review or sooner as events or legislation changes require.

Date Adopted: **October 2026**

Date for Review: **October 2027**

Contents

Introduction.....4
1 Legal framework.....4
2 Roles and responsibilities.....5
3 The curriculum.....6
4 Staff training.....7
5 Educating parents.....8
6 Classroom use.....8
7 Internet access.....9
8 Filtering and monitoring online activity.....9
9 Network security.....10
10 Emails.....10
11 Social networking.....11
12 Online hoaxes and harmful online challenges.....12
13 The school and trust websites.....13
14 Use of school-owned devices.....14
15 Use of personal devices.....14
16 Managing reports of online safety incidents.....15
17 Responding to specific online safety concerns.....15
18 Remote learning.....18

2026-27 changes to this policy:

- Updated legislation dates
- Introduction of the Trust's AI Policy and Mobile Phone policy in related policies
- 15.1 Addition of: Any personal electronic device that is brought into school is the responsibility of the user and to be used in line with the school's Mobile Phone Policy.

Introduction

Pathfinder Multi Academy Trust (PMAT) understands that using online services is an important aspect of raising educational standards, promoting pupil achievement and enhancing teaching and learning.

The use of online services is embedded throughout the Trust's schools; therefore, there are a number of controls in place to ensure the safety of pupils and staff.

The breadth of issues classified within online safety is considerable, but they can be categorised into three areas of risk:

- **Content:** Being exposed to illegal, inappropriate or harmful material, e.g. pornography, fake news, and racist or radical and extremist views.
- **Contact:** Being subjected to harmful online interaction with other users, e.g. commercial advertising and adults posing as children or young adults.
- **Conduct:** Personal online behaviour that increases the likelihood of, or causes, harm, e.g. sending and receiving explicit messages, and cyberbullying.

The measures implemented to protect pupils and staff revolve around these areas of risk. PMAT has created this policy with the aim of ensuring appropriate and safe use of the internet and other digital technology devices by all pupils and staff.

1 Legal framework

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

- Voyeurism (Offences) Act 2019
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2021) 'Harmful online challenges and online hoaxes'
- DfE (2025) 'Keeping children safe in education'
- UK Council for Internet Safety (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2023) 'Teaching online safety in school'
- DfE (2024) 'Searching, screening and confiscation'
- National Cyber Security Centre (2024) 'Cyber Security: Small Business Guide'
- UK Council for Internet Safety (2020) 'Education for a Connected World
- 2024 DfE Filtering and Monitoring Standards for Schools.

1.2. This policy operates in conjunction with the following Trust and school policies:

- Acceptable Use Policy
- Information Policy
- Information Security Policy
- Information Security Incident Reporting Procedure
- Child Protection and Safeguarding Policy
- Anti-Bullying Policy
- RSE and Health Education Policy
- School Behaviour Policy
- Disciplinary Policy and Procedures
- Procedures for dealing with allegations made against staff

- AI Policy
- Mobile Phone Policy

2 Roles and responsibilities

PMAT is responsible for:

- Ensuring that this policy is effective and complies with relevant laws and statutory guidance.
- Ensuring the DSL's remit covers online safety.
- Reviewing this policy on an annual basis.
- Ensuring knowledge of online safety issues is up-to-date.
- Ensuring all staff undergo safeguarding and child protection training, including online safety, at induction.
- Ensuring that there are appropriate filtering and monitoring systems in place.
- Ensuring that all relevant PMAT policies have an effective approach to planning for, and responding to, online challenges and hoaxes embedded within them.

The headteacher is responsible for:

- Supporting the DSL and deputies by ensuring they have enough time and resources to carry out their responsibilities in relation to online safety.
- Ensuring staff receive regular, up-to-date and appropriate online safety training and information as part of their induction and safeguarding training.
- Ensuring online safety practices are audited and evaluated.
- Supporting staff to ensure that online safety is embedded throughout the curriculum so that all pupils can develop an appropriate understanding of online safety.
- Organising engagement with parents to keep them up-to-date with current online safety issues and how the school is keeping pupils safe.
- Taking the lead responsibility for online safety in the school.

The DSL is responsible for:

- Acting as the named point of contact within the school on all online safeguarding issues.
- Undertaking training so they understand the risks associated with online safety and can recognise additional risks that pupils with SEND face online.
- Liaising with relevant members of staff on online safety matters, e.g. the SENDCo and ICT provider.
- Ensuring online safety is recognised as part of the school's safeguarding responsibilities and that a coordinated approach is implemented.
- Ensuring safeguarding is considered in the school's approach to remote learning.
- Ensuring appropriate referrals are made to external agencies, as required.
- Keeping up-to-date with current research, legislation and online trends.
- Coordinating the school's participation in local and national online safety events, e.g. Safer Internet Day.
- Establishing a procedure for reporting online safety incidents and inappropriate internet use, both by pupils and staff.

- Ensuring all members of the school community understand the reporting procedure.
- Maintaining records of reported online safety concerns as well as the actions taken in response to concerns.
- Monitoring online safety incidents to identify trends and any gaps in the school's provision, and using this data to update the school's procedures.

All staff members are responsible for:

- Taking responsibility for the security of ICT systems and electronic data they use or have access to.
- Modelling good online behaviours.
- Maintaining a professional level of conduct in their personal use of technology.
- Having an awareness of online safety issues.
- Reporting concerns in line with the school's reporting procedure.
- Where relevant to their role, ensuring online safety is embedded in their teaching of the curriculum.

Pupils are responsible for:

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

3 The curriculum

3.1 The curriculum and the school's approach to online safety is developed in line with the UK Council for Child Internet Safety's 'Education for a Connected World' framework and the DfE's 'Teaching online safety in school' guidance.

3.2 Pupils are taught the underpinning knowledge and behaviours that can help them to navigate the online world safely and confidently regardless of the device, platform or app they are using.

3.3 Online safety teaching is always appropriate to pupils' ages and developmental stages.

3.4 The underpinning knowledge and behaviours pupils learn through the curriculum include the following:

- How to evaluate what they see online
- How to recognise techniques used for persuasion
- Acceptable and unacceptable online behaviour
- How to identify online risks
- How and when to seek support
- How to identify when something is deliberately deceitful or harmful
- How to recognise when something they are being asked to do puts them at risk or is age-inappropriate

3.5 The online risks pupils may face online are always considered when developing the curriculum.

3.6 The DSL is involved with the development of the school's online safety curriculum.

3.7 The school recognises that, while any pupil can be vulnerable online, there are some pupils who may be more susceptible to online harm or have less support from family and friends in staying safe online, e.g. pupils with SEND and LAC. Relevant members of staff, e.g. the SENDCo and designated teacher for LAC, work together to ensure the curriculum is tailored so these pupils receive the information and support they need.

3.8 Class teachers review external resources prior to using them for the online safety curriculum, to ensure they are appropriate for the cohort of pupils. When reviewing these resources, the following questions are asked:

- Where does this organisation get their information from?
- What is their evidence base?
- Have they been externally quality assured?
- What is their background?
- Are they age appropriate for pupils?
- Are they appropriate for pupils' developmental stage?

3.9 External visitors may be invited into school to help with the delivery of certain aspects of the online safety curriculum. The headteacher and DSL decide when it is appropriate to invite external groups into school and ensure the visitors selected are appropriate.

3.10 Lessons and activities are planned carefully so they do not draw attention to a pupil who is being or has been abused or harmed online, to avoid publicising the abuse.

3.11 During an online safety lesson or activity, the class teacher ensures a safe environment is maintained in which pupils feel comfortable to say what they feel and asking questions, and are not worried about getting into trouble or being judged.

3.12 If a staff member is concerned about anything pupils raise during online safety lessons and activities, they will make a report in line with sections 16 and 17 of this policy.

3.13 If a pupil makes a disclosure to a member of staff regarding online abuse following a lesson or activity, the staff member will follow the reporting procedure outlined in sections 16 and 17 of this policy.

4 Staff training

4.1 All staff receive safeguarding and child protection training, which includes online safety training, during their induction.

4.2 Online safety training for staff is available on the Pathfinder Portal and is delivered in line with advice from the three local safeguarding partners.

4.3 In addition to this training, staff also receive regular online safety updates as required throughout the year.

4.4 The DSL and deputies undergo training to provide them with the knowledge and skills they need to carry out their role, this includes online safety training. This training is updated at least every two years.

4.5 In addition to this formal training, the DSL and deputies receive regular online safety updates to allow them to keep up with any developments relevant to their role. In relation to online safety, these updates allow the DSL and their deputies to:

- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and capability required to keep pupils safe while they are online at school.
- Recognise the additional risks that pupils with SEND face online and offer them support to stay safe online.

4.6 Staff are required to adhere to the policies and procedures within PMAT's Data and Information Governance framework.

4.7 All staff are informed about how to report online safety concerns, in line with sections 16 and 17 of this policy.

4.8 The DSL acts as the first point of contact for staff requiring advice about online safety.

5 Educating parents

5.1 The school works in partnership with parents to ensure pupils stay safe online at school and at home.

5.2 Parents are provided with information about the school's approach to online safety and their role in protecting their children.

5.3 Parents are sent a copy of the Acceptable Use Agreement at the beginning of each academic year and are encouraged to go through this with their child to ensure their child understands the document and the implications of not following it.

5.4 Parents will be made aware of the various ways in which their children may be at risk online, including, but not limited to:

- Child sexual abuse, including grooming.
- Exposure to radicalising content.
- Sharing of indecent imagery of pupils, e.g. sexting.
- Cyberbullying
- Exposure to age-inappropriate content, e.g. pornography.
- Exposure to harmful content, e.g. content that encourages self-destructive behaviour.

5.5 Parents will be informed of the ways in which they can prevent their child from accessing harmful content at home, e.g. by implementing parental controls to block age-inappropriate content.

5.6 Parental awareness regarding how they can support their children to be safe online is raised in the following ways:

- School website
- Newsletters
- Online resources

6 Classroom use

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

- Computers
- Laptops
- Tablets
- Email

- Cameras

6.2 Prior to using any websites, tools, apps or other online platforms in the classroom, or recommending that pupils use these platforms at home, the class teacher always reviews and evaluates the resource.

6.3 Class teachers ensure that any internet-derived materials are used in line with copyright law.

6.4 Pupils are supervised when using online materials during lesson time – this supervision is suitable to their age and ability.

7 Internet access

7.1 Pupils, staff and other members of the school community are only granted access to the school's internet network once they have read and signed the Acceptable Use Agreement.

7.2 All members of the school community are encouraged to use the school's internet network, instead of 3G, 4G and 5G networks, as the network has appropriate filtering and monitoring to ensure individuals are using the internet appropriately.

8 Filtering and monitoring online activity

8.1 PMAT ensures the ICT network has appropriate filters and monitoring systems in place.

8.2 PMAT undertakes a risk assessment to determine what filtering and monitoring systems are required and follows guidance from the DfE Filtering and Monitoring Standards for schools 2024.

8.3 The filtering and monitoring systems are appropriate to pupils' ages, the number of pupils using the network, how often pupils access the network, and the proportionality of costs compared to the risks.

8.4 PMAT ensures 'over blocking' does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding.

8.5 ICT providers undertake checks on the filtering and monitoring systems to ensure they are effective and appropriate.

8.6 Requests regarding making changes to the filtering system are directed to the headteacher and PMAT Operations Team and managed by Vital.

8.7 Any changes made to the system are recorded by ICT provider.

8.8 Reports of inappropriate websites or materials are made to the ICT provider immediately, who investigates the matter and makes any necessary changes.

8.9 Deliberate breaches of the filtering system are reported to the DSL, IT Lead in school and ICT provider, who will escalate the matter appropriately.

8.10 If a pupil has deliberately breached the filtering system, they will be disciplined in line with the school's Behaviour Policy and access may be restricted and monitored.

8.11 If a member of staff has deliberately breached the filtering system, they will be disciplined in line with the Disciplinary Policy and Procedure.

8.12 If material that is believed to be illegal is accessed, inadvertently or deliberately, this material will be reported to the appropriate agency immediately, e.g. the Internet Watch Foundation (IWF), CEOP and/or the police.

8.13 The school's network and school-owned devices are appropriately monitored.

8.14 All users of the network and school-owned devices are informed about how and why they are monitored.

8.15 Concerns identified through monitoring are reported to headteacher and Pathfinder's Operations Team who manage the situation in line with sections 16 and 17 of this policy.

9 Network security

9.1 Technical security features, such as anti-virus software, are kept up-to-date and managed by the ICT provider.

9.2 Firewalls are switched on at all times.

9.3 Staff and pupils are advised not to download or open unfamiliar email attachments.

9.4 Staff members and pupils report all malware and virus attacks to the ICT provider.

9.5 All members of staff have their own unique usernames and private passwords to access the school's systems.

9.6 Pupils are provided with their own unique username and private passwords.

9.7 Staff members and pupils are responsible for keeping their passwords private.

9.8 Passwords have a minimum and maximum length and require a mixture of letters, numbers and symbols to ensure they are as secure as possible.

9.9 Users are not permitted to share their login details with others and are not allowed to log in as another user at any time.

9.10 Users are required to lock access to devices and systems when they are not in use.

9.11 Users inform the ICT provider if they forget their login details, who will arrange for the user to access the systems under different login details.

9.12 If a user is found to be sharing their login details or otherwise mistreating the password system, the headteacher is informed and decides the necessary action to take.

10 Emails

10.1 Access to and the use of emails is managed in line with the PMAT's Acceptable Use Policy and Trust's IT Strategy:

Passwords for employees

"Passwords when accessing systems via the Trust network should be:

- A minimum length of 12 characters
- Containing upper and lower case letters
- Containing at least one number
- Containing at least one symbol
- Avoid sequences e.g. 123

- Avoid words and places identifiable to the user

Although this is more difficult with younger children, password policy should add complexity over time and schools must not use generic passwords for children to log in as this increases risk of system breaches.

- Starting at early years, use 5-8 character passwords that are easy to remember such as colour and animal (for example Reddog, Bluecat, Greenbird), surname and date of birth. For very young children, the teacher may wish to securely retain a list of passwords.

- As children move through the school, increase the length to 8-12 including letters, numbers and a symbol (for example Reddog21!, Bluecat21@, Greenbird10@). “

10.2 Staff and pupils are given approved school email accounts and are only able to use these accounts at school and when doing school-related work outside of school hours.

10.3 Prior to being authorised to use the email system, staff and pupils must agree to and sign the Acceptable Use Agreement.

10.4 Any email that contains sensitive or personal information is only sent using secure and encrypted email.

10.5 Chain letters, spam and all other emails from unknown sources are deleted without being opened.

10.6 Pupils and staff are made aware of what a phishing email and other malicious emails might look like, including:

- How to determine whether an email address is legitimate
- The types of address a phishing email could use
- The importance of asking “does the email urge you to act immediately?”
- The importance of checking the spelling and grammar of an email

10.7 Any cyberattacks initiated through emails are managed in line with PMAT’s Information Security Policy and Information Security Incident Reporting Procedure.

11 Social networking

Personal use

11.1 Access to social networking sites is filtered as appropriate.

11.2 Staff and pupils are not permitted to use social media for personal use during lesson time.

11.3 Staff members are advised that their conduct on social media can have an impact on their role and reputation within the school and PMAT.

11.4 Staff are not permitted to communicate with pupils or parents over social networking sites and are reminded to alter their privacy settings to ensure pupils and parents are not able to contact them on social media.

11.5 Where staff have an existing personal relationship with a parent or pupil, and thus are connected with them on social media, e.g. they are close family friends with a parent at the school, they will disclose this to the DSL and headteacher and will ensure that their social media conduct relating to that parent is appropriate for their position in the school.

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

11.7 Concerns regarding the online conduct of any member of the school community on social media are reported to the DSL and managed in accordance with the relevant policy.

11.8 The Trust does not endorse or support the use of X as a media platform for either staff or pupils.

Use on behalf of the school

11.8 The use of social media on behalf of the school is conducted in line with PMAT's Acceptable Use Policy.

11.9 The PMAT and school's official social media channels are only used for official educational or engagement purposes.

11.10 Staff members must be authorised by the headteacher to access to the school's social media accounts.

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

11.12 PMAT's Acceptable Use Policy contains information on the acceptable use of social media – staff members are required to follow these expectations at all times.

12 Online hoaxes and harmful online challenges

12.1 For the purposes of this policy, an "online hoax" is defined as a deliberate lie designed to seem truthful, normally one that is intended to scaremonger or to distress individuals who come across it, spread on online social media platforms.

12.2 For the purposes of this policy, "harmful online challenges" refers to challenges that are targeted at young people and generally involve users recording themselves participating in an online challenge, distributing the video through social media channels and daring others to do the same. Although many online challenges are harmless, an online challenge becomes harmful when it could potentially put the participant at risk of harm, either directly as a result of partaking in the challenge itself or indirectly as a result of the distribution of the video online – the latter will usually depend on the age of the pupil and the way in which they are depicted in the video.

12.3 The DSL ensures that pupils are taught about how to critically identify when online content is untrue or harmful and how to respond to this content.

12.4 The DSL will work with the SENDCo to assess whether some pupils, e.g. pupils who have been identified as being vulnerable or pupils with SEND, need additional help with identifying harmful online challenges and hoaxes, and tailor support accordingly.

12.5 The school will ensure all pupils are aware of who to report concerns to surrounding potentially harmful online challenges or hoaxes.

12.6 Where staff suspect there may be a harmful online challenge or online hoax circulating amongst pupils in the school, they will report this to the DSL immediately.

12.7 The DSL will conduct a case-by-case assessment for any harmful online content brought to their attention, establishing the scale and nature of the possible risk to pupils, and whether the risk is one that is localised to the school or the local area, or whether it extends more widely across the country.

12.8 Where the harmful content is prevalent mainly in the local area, the DSL will consult with the LA about whether quick local action can prevent the hoax or challenge from spreading more widely.

12.9 The DSL will check the factual basis of harmful online challenges or hoaxes against a known, reliable and trustworthy source, e.g. the UK Safer Internet Centre, and will carefully consider if a challenge or story is a hoax or is harmful prior to providing any direct warnings to pupils or parents.

12.10 The school understands that discussing or naming a specific online hoax can, in some cases, needlessly increase pupils' exposure to distressing content, and will avoid showing pupils distressing content where doing so is not considered absolutely necessary for preventing its spread or easing fears amongst the school community.

12.11 Where the DSL's assessment finds an online challenge to be putting pupils at risk of harm, e.g. it encourages children to participate in age-inappropriate activities that could increase safeguarding risks or become a child protection concern, they will ensure that the challenge is directly addressed to the relevant pupils, e.g. those within a particular age range that is directly affected or even to individual children at risk where appropriate.

12.12 The DSL and headteacher will only implement a school-wide approach to highlighting potential harms of a hoax or challenge when the risk of needlessly increasing pupils' exposure to the risk is considered and mitigated as far as possible.

12.13 Prior to deciding how to respond to a harmful online challenge or hoax, the DSL and the headteacher will decide whether each proposed response is:

- Factual and avoids needlessly scaring or distressing pupils.
- Not inadvertently encouraging pupils to view the hoax or challenge where they would not have otherwise come across it, e.g. where content is explained to younger pupils that is almost exclusively being shared amongst older pupils.
- Proportional to the actual or perceived risk.
- Helpful to the pupils who are, or are perceived to be, at risk.
- Age-appropriate and appropriate for the relevant pupils' developmental stage.
- Supportive.

13 The school and trust websites

13.1 The headteacher is responsible for the overall content of their school's website. With support from PMAT, they will ensure the content is appropriate, accurate, up-to-date and meets government requirements.

13.2 The PMAT IT Lead is responsible for the overall content of the PMAT website. Delegating the maintenance and upkeep of the website to the appropriate member/s of staff, they will ensure all content is relevant, up-to-date and meets all statutory requirements.

13.3 All websites comply with guidelines for publications including accessibility, data protection, respect for intellectual property rights, privacy policies and copyright law.

13.4 Personal information relating to staff and pupils is not published on school websites.

13.5 Images and videos are only posted on the website if consent is gained from the relevant members of staff, pupils and parents.

14 Use of school-owned devices

14.1 Pupils are provided with school-owned devices as necessary to assist in the delivery of the curriculum, e.g. Chromebooks to use during lessons.

14.2 School-owned devices are used in accordance with the Device User Agreement.

14.3 All school-owned devices are password protected.

14.4 All school-owned devices are fitted with software to ensure they can be remotely accessed, in case data on the device needs to be protected, retrieved or erased.

14.5 The ICT provider reviews all school-owned devices to carry out software updates and ensure there is no inappropriate material or malware on the devices.

14.6 No software, apps or other programmes can be downloaded onto a device without authorisation from the ICT provider.

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

15 Use of personal devices

15.1 Any personal electronic device that is brought into school is the responsibility of the user and to be used in line with the school's Mobile Phone Policy.

15.2 Staff members report concerns about their colleagues' use of personal devices on the school premises in line with the procedures for dealing with allegations made against staff.

15.3 If a member of staff is thought to have illegal content saved or stored on a personal device, or to have committed an offence using a personal device, the headteacher will inform the police and action will be taken in line with the procedures for dealing with allegations made against staff.

15.4 If a pupil needs to contact their parents during the school day, they are sent to the school office who will contact their parents.

15.5 Where a pupil uses accessibility features on a personal device to help them access education, e.g. where a pupil who is deaf uses their mobile phone to adjust the settings on an internal hearing aid in response to audible stimuli during class, the arrangements and rules for conduct for this are developed and managed on a case-by-case basis.

15.6 The headteacher may authorise the use of mobile devices by a pupil for safety or precautionary use.

15.7 If a staff member reasonably believes a pupil's personal device has been used to commit an offence or may provide evidence relating to an offence, the device will be handed to the police.

15.8 Any concerns about visitors' use of personal devices on the school premises are reported to the DSL.

16 Managing reports of online safety incidents

16.1 Staff members and pupils are informed about what constitutes inappropriate online behaviour in the following ways:

- Staff training
- The online safety curriculum
- Assemblies

16.2 Concerns regarding a staff member's online behaviour are reported to the headteacher and DSL who decide on the best course of action in line with the relevant policies.

16.3 Concerns regarding a pupil's online behaviour are reported to the headteacher and DSL who will investigate concerns with relevant staff members.

16.4 Concerns regarding a pupil's online behaviour are dealt with in accordance with relevant policies depending on their nature, e.g. school Behaviour Policy and Child Protection and Safeguarding Policy.

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

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

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

17 Responding to specific online safety concerns

Cyberbullying

17.1 Cyberbullying, against both pupils and staff, is not tolerated.

17.2 Any incidents of cyberbullying are dealt with quickly and effectively whenever they occur.

Online sexual violence and sexual harassment between children (peer-on-peer abuse)

17.3 The school recognises that peer-on-peer abuse can take place online. Examples include the following:

- Non-consensual sharing of sexual images and videos
- Sexualised cyberbullying
- Online coercion and threats
- Unwanted sexual comments and messages on social media
- Online sexual exploitation

17.4 The school responds to all concerns regarding online peer-on-peer abuse, whether or not the incident took place on the school premises or using school-owned equipment.

17.5 Concerns regarding online peer-on-peer abuse are reported to the DSL who will investigate the matter in line with the Child Protection and Safeguarding Policy.

17.6 Information about the school's full response to incidents of online peer-on-peer abuse can be found in the Child Protection and Safeguarding Policy.

Upskirting

17.7 Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.

17.8 A "specified purpose" is namely:

- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).
- To humiliate, distress or alarm the victim.

17.9 "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion activated camera.

17.10 Upskirting is not tolerated by PMAT and its schools.

17.11 Incidents of upskirting are reported to the DSL who will then decide on the next steps to take, which may include police involvement, in line with the Child Protection and Safeguarding Policy.

Sexting and the sharing of indecent imagery of pupils

17.12 Sharing indecent imagery is the sending or posting of sexually suggestive images of under-18s via mobile phones or over the internet. Creating and sharing sexual photos and videos of individuals under 18 is illegal.

17.13 All concerns regarding sexting are reported to the DSL.

17.14 The DSL will use their professional judgement, in line with the Child Protection and Safeguarding Policy, to determine whether the incident is experimental, i.e. expected for the developmental stage of the pupils involved, or aggravated, i.e. involves additional or abusive elements, the images are used recklessly or there is an intent to harm the pupil depicted.

17.15 Where the incident is categorised as 'experimental', the pupils involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident.

17.16 Where there is reason to believe the incident will cause harm to the pupil depicted, or where the incident is classified as 'aggravated', the following process is followed:

- The DSL holds an initial review meeting with appropriate school staff
- Subsequent interviews are held with the pupils involved, if appropriate
- Parents are informed at an early stage and involved in the process unless there is a good reason to believe that involving the parents would put the pupil at risk of harm
- At any point in the process if there is a concern a pupil has been harmed or is at risk of harm, a referral will be made to children's social care services and/or the police immediately
- The interviews with staff, pupils and their parents are used to inform the action to be taken and the support to be implemented

17.17 When investigating a report, staff members will not view nude and semi-nude images unless there is a good and clear reason to do so.

17.18 If a staff member believes there is a good reason to view nude or semi-nude imagery as part of an investigation, they discuss this with the DSL and headteacher first.

17.19 The decision to view imagery is based on the professional judgement of the DSL and always complies with the Child Protection and Safeguarding Policy.

17.20 If a decision is made to view the imagery, the DSL will be satisfied that viewing:

- Is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any pupil involved.
- Is necessary in order to report the image to a website or suitable reporting agency to have the image taken down, or to support the pupil in taking down the image or in making a report.
- Is unavoidable because a pupil has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network.

17.21 Where it is necessary to view the imagery the DSL will:

- Never copy, print, share, store or save images; this is illegal.
- Discuss the decision with the headteacher.
- Undertake the viewing themselves, or make sure viewing is undertaken by another member of the safeguarding team with delegated authority from the headteacher.
- Make sure viewing takes place with the headteacher or another member of the SLT in the room; additional people in the room will not view the imagery.
- Only view the imagery on the school premises.
- Record how and why the decision was made to view the imagery in line with the Child Protection and Safeguarding Policy.
- Make sure that images are viewed by a member of staff of the same sex as the pupil, where appropriate.
- Ensure that, if devices need to be passed on to the police, the device is confiscated, disconnected from Wi-Fi and data and turned off immediately to avoid imagery being accessed remotely; the device will be secured until it can be collected by police.

17.22 Imagery will not be purposefully viewed where it will cause significant harm or distress to any pupil involved, in line with the DSL's professional judgement.

17.23 Any accidental or intentional viewing of imagery that is undertaken as part of an investigation is recorded.

17.24 Where a staff member has accidentally viewed a nude or semi-nude image, the DSL will ensure they are provided with the appropriate support, as viewing nude or semi-nude imagery of pupils can be distressing.

Online abuse and exploitation

17.25 Through the online safety curriculum, pupils are taught about how to recognise online abuse and where they can go for support if they experience it.

17.26 The school responds to concerns regarding online abuse and exploitation, whether or not it took place on the school premises or using school-owned equipment.

17.27 All concerns relating to online abuse and exploitation, including child sexual abuse and exploitation and criminal exploitation, are reported to the DSL and dealt with in line with the Child Protection and Safeguarding Policy.

Online hate

17.28 The school does not tolerate online hate content directed towards or posted by members of the school community.

17.29 Incidents of online hate are dealt with in line with the relevant school policy depending on the nature of the incident and those involved.

Online radicalisation and extremism

17.30 The school's filtering system protects pupils and staff from viewing extremist content.

17.31 Concerns regarding a staff member or pupil being radicalised online are dealt with in line with the Child Protection and Safeguarding Policy and Prevent Duty Training.

18 Remote learning

18.1 All staff and pupils using video and audio communication must:

- Communicate in groups
- Wear suitable clothing – this includes others in their household.
- Be situated in a suitable 'public' living area within the home with an appropriate background – 'private' living areas within the home, such as bedrooms, are not permitted during video communication.
- Use appropriate language – this includes others in their household.
- Maintain the standard of behaviour expected in school.
- Use the necessary equipment and computer programs as intended.
- Not record, store, or distribute video material without permission.
- Ensure they have a stable connection to avoid disruption to lessons.
- Always remain aware that they are visible and can be heard.

18.2 Pupils not using devices or software as intended will be disciplined in line with the school's Behaviour Policy.

18.3 The school will risk assess the technology used for remote learning prior to use and ensure that there are no privacy issues or scope for inappropriate use.

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

18.5 The school will communicate to parents about any precautionary measures that need to be put in place if their child is learning remotely using their own/family-owned equipment and technology, e.g. ensuring that their internet connection is secure.

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

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

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