



## **Colfe's School: E-Safety Policy**

### **Aims**

This policy aims to:

- Set out expectations for all Colfe's staff and pupils' online behaviour, attitudes and activities and use of digital technology (including when devices are offline) in conjunction with the IT acceptable use policy
- Help 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, and regardless of device or platform
- Facilitate the safe, responsible and respectful 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
- Help 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
- Establish 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 Harmful and Abusive Behaviours (Anti-Bullying) Policy)
- Set out the school's monitoring and filtering arrangements

### **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 our Safeguarding Policy. The DSL will handle referrals to local authority multi-agency safeguarding hubs (MASH) and the Headteacher or DSL will handle referrals to the LA designated officer (LADO).

### **Scope**

This policy applies to all members of the Colfe's community (including 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.

## **Headteacher**

### **Key responsibilities:**

- Foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding
- Oversee the activities of the designated safeguarding lead and ensure that the DSL responsibilities listed in the section below are being followed and fully supported
- Ensure that policies and procedures are followed by all staff
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and relevant Local Safeguarding Partnerships
- 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
- 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 GDPR-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
- 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 cloud systems are implemented according to child-safety first principles
- Be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles
- 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 that there is a system in place to monitor and support staff (e.g. network manager) who carry out internal technical online-safety procedures

- Ensure governors are regularly updated on the nature and effectiveness of the school's arrangements for online safety
- Ensure the school website meets statutory requirements (see appendices for website audit document)

## **Designated Safeguarding Lead / Online (E) Safety Lead**

**Key responsibilities** (remember the DSL can delegate certain online-safety duties, e.g. to the online-safety coordinator, but not the overall responsibility):

- The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety).
- Where the online-safety coordinator is not the named DSL or deputy DSL, ensure there is regular review and open communication between these roles and that the DSL's clear overarching responsibility for online safety is not compromised
- We should ensure an effective approach to online safety [that] empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.
- Liaise with the local authority, usually Greenwich, and work with other agencies in line with Working together to safeguard children.
- Take day to day responsibility for online safety issues and be aware of the potential for serious child protection concerns
- Work with the Headteacher and governors to ensure a GDPR-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 safety
- 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
- Ensure that online safety education is embedded across the curriculum and beyond, in wider school life
- Promote an awareness and commitment to online safety throughout the school community, with a strong focus on parents, who are often appreciative of school support in this area, but also including hard-to-reach parents
- Liaise with school technical, pastoral, and support staff as appropriate
- Communicate regularly with SMT and the designated safeguarding and online safety governor/committee to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring is ensured.
- 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
- Arrange for annual staff training on online safety

- Oversee and discuss ‘appropriate filtering and monitoring’ with governors and ensure staff are aware.
- Ensure the 2018 DfE guidance on sexual violence and harassment is followed throughout the school and that staff adopt a zero-tolerance approach to this, as well as to bullying
- Facilitate training and advice for all staff:
  - all staff must read KCSIE Part 1 and all those working with children Annex B
  - cascade knowledge of risks and opportunities throughout the organisation

## **Governing Body, led by Online (E) Safety / Safeguarding Link Governor**

### **Key responsibilities**

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](#)

- Ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of DSL with lead responsibility for safeguarding and child protection (including online safety) with the appropriate status and authority and time, funding, training, resources and support.
- 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 co-ordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings
- Where the online-safety coordinator is not the named DSL or deputy DSL, ensure that there is regular review and open communication between these roles and that the DSL’s clear overarching responsibility for online safety is not compromised
- Work with the DPO, DSL and Headteacher to ensure a GDPR-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; SMT and all working directly with children have read Annex B;
- Ensure that all staff undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated in line with advice from the local three safeguarding partners integrated, aligned and considered as part of the overarching safeguarding approach.
- Ensure appropriate filters and appropriate monitoring systems are in place but be careful that ‘over blocking’ does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.
- 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.

- Complete the annual staff cyber security training.
- Read the minutes of the annual meeting reviewing filtering and monitoring procedures.

## All staff

**Key responsibilities** both in lessons and during wraparound care sessions after school:

- Understand that online safety is a core part of safeguarding; as such it is part of everyone's job – never think that someone else will pick it up.
- Know who the Designated Safeguarding Leads (DSL) and E Safety Officers are.
- Read Part I and Annex B of Keeping Children Safe in Education, Further Information. It is statutory for all staff to read Part I and Annex B as they work directly with children. Good practice is to also read Part 5, Child on Child Abuse and Annex C, the role of the Designated Safeguarding Lead
- Read and follow this policy in conjunction with the school's main safeguarding policy
- Record online-safety incidents in the same way as any safeguarding incident and report in accordance with school procedures.
- Understand that safeguarding is often referred to as a jigsaw puzzle – you may have discovered the missing piece so do not keep anything to yourself
- Follow the staff IT acceptable use policy and code of conduct/handbook
- Notify the DSL/E Safety Officer if policy does not reflect practice in your school and follow escalation procedures if concerns are not promptly acted upon
- 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)
- Ensure learners understand and follow the Device Code of Conduct in the Senior school and pupil code of conduct for the use of technology in the Junior school and have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations.
- Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc including mobile phones) in school or setting as homework tasks, 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)
- To carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if relevant), supporting them with search skills, critical thinking (e.g. fake news), age-appropriate materials and signposting, and legal issues such as copyright and data law
- Prepare and check all online source and resources before using within the classroom
- Where lessons take place using live-streaming or video-conferencing, staff must have full regard to national safeguarding guidance and local safeguarding policies and should take note of the guidance contained in the SWGfL Safe Remote Learning Resource.

- Encourage pupils/students to follow their acceptable use policy, remind them about it and enforce school sanctions
- Have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices.
- Notify the DSL/E SAFETY OFFICER of new trends and issues before they become a problem
- Take a zero-tolerance approach to bullying and low-level sexual harassment (your DSL will disseminate relevant information from the new DfE document on this)
- Be aware that you are often most likely to see or overhear online-safety issues (particularly relating to bullying and sexual harassment and violence) in the playground, corridors, toilets and other communal areas outside the classroom. Report online safety incidents in the same way that you would any other safeguarding incidents.
- Report any IT misuse immediately to [esafety@colfes.com](mailto:esafety@colfes.com) in the Senior school or to the DSL in the Junior school.
- Receive regular updates from the DSL/E SAFETY OFFICER and have a healthy curiosity for online safety issues
- Ensure that all digital communications with learners and parents/carers are on a professional level and only carried out using official school systems.
- Model safe, responsible and professional behaviours in their own use of technology. This includes outside the school hours and site, and on social media, in all aspects upholding the reputation of the school and of the professional reputation of all staff. More guidance on this point can be found in this [Online Reputation](#) guidance for schools.

## **PSHEE / Eudaimonia (encompassing RSHE in the senior school) / RSHE (junior school) Lead/s**

### **Key responsibilities:**

- As listed in the 'all staff' section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online into the PSHEE / Relationships education, relationships and sex education (RSHE) 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."
- This will complement the computing curriculum, which covers the principles of online safety at all key stages, with progression in the content to reflect the different and escalating risks that pupils face. This includes how to use technology safely, responsibly, respectfully and securely, and where to go for help and support when they have concerns about content or contact on the internet or other online technologies.
- Work closely with the DSL/E SAFETY OFFICER and all other staff to ensure an understanding of the issues, approaches and messaging within PSHEE / RSHE.

## Computing Leads

### 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 DSL/E SAFETY OFFICER 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

## Network Manager/technician

### Key responsibilities:

- As listed in the 'all staff' section, plus:
- 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
- Ensure that filtering and monitoring meets government standards.
- Work closely with the designated safeguarding lead / e safety lead / data protection officer to ensure that school systems and networks reflect school policy
- 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
- Support and advise on the implementation of 'appropriate filtering and monitoring' as decided by the DSL and senior leadership team
- Maintain up-to-date documentation of the school's online security and technical procedures
- Conduct an annual review of filtering and monitoring compliance and the list of categories to be filtered and monitored with the e-safety officer and digital learning coordinator.
- 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, online platforms and social media presence and that any misuse/attempted misuse is identified and reported in line with school policy
- Ensure IT support team have current knowledge of monitoring and filtering
- Review the privacy notices of third party providers on an annual basis.

## Data Protection Officer (DPO)

### Key responsibilities:

- Ensure that all staff are familiar with the IT acceptable use policy.
- Review and update the IT acceptable use policy at least once every three years.
- Arrange annual cybersecurity and acceptable use training for all staff who use computers and share with designated governor.
- Complete a data protection impact assessment of the technical monitoring system.
- NB – this document is not for general data-protection guidance – see School’s Data Protection Policy and Privacy Notice;
- Be aware of references to the relationship between data protection and safeguarding in key Department for Education documents ‘Keeping Children Safe in Education 23’ and ‘Data protection: a toolkit for schools’ (August 2018), especially this quote from the latter document:
- “GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children’s Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. **The Data Protection Act 2018 introduced ‘safeguarding’ as a reason to be able to process sensitive, personal information, even without consent** (DPA, Part 2, 18; Schedule 8, 4) When Designated Safeguarding Leads in schools are considering whether, or not, to share safeguarding information (especially with other agencies) it is considered best practice for them to record who they are sharing that information with and for what reason. If they have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file. All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children.”

The same document states that the retention schedule for safeguarding records may be required to be set as ‘Very long-term need (until pupil is aged 25 or older)’. However, some local authorities require record retention until 25 for all pupil records.

- Work with the DSL, Headteacher and governors to ensure frameworks are in place for the protection of data and of safeguarding information sharing as outlined above.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited
- The school may keep Safeguarding Incident Reports on record for as long as any living victim may bring a claim (N.B. civil claim limitation periods can be set aside in cases of abuse). Further, whilst the Independent Inquiry into Child Sexual Abuse (IICSA) is ongoing it is essential that all safeguarding, pupil and personnel files are retained.

## Pupils

### Key responsibilities:



- Read, understand, and adhere to the Device Code of conduct in the Senior school or the Pupil code of conduct for the use of technology in the Junior school which is a pupil friendly version of the IT acceptable use policy and review this annually.
- Understand the importance of reporting abuse, misuse or access to inappropriate materials
- Know what action to take if they or someone they know feels worried or vulnerable when using online technology
- To understand the importance of adopting safe and responsible behaviours and good online safety practice when using digital technologies outside of school and realise that the school's acceptable use policies cover actions out of school, including on social media
- Understand the benefits/opportunities and risks/dangers of the online world and know who to talk to at school or outside school if there are problems
- If a pupil has a concern, they should make their teacher or a member of the pastoral team aware (or email [esafety@colfes.com](mailto:esafety@colfes.com) with details of the incident in the Senior school). Concerns may include website content or any communication which makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature. They **must not** respond to any such communication.
- Will understand the need to avoid plagiarism and uphold copyright regulations

## **Parents/carers**

### **Key responsibilities:**

- Support their children in following the Device code of conduct
- Consult with the school if they have any concerns about their children's and others' use of technology
- Promote positive online safety and model safe, responsible 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.

## **External groups including parent associations – PAFA**

### **Key responsibilities:**

- 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

## **Education and curriculum**

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

- PSHEE
- Relationships, Sex Education and Health Education
- Computing
- Eudaimonia

However, as stated in the role descriptors above, 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 including mobile phones) 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).

Equally, all staff should carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if relevant), supporting them with search skills, critical thinking (e.g. fake news), age-appropriate materials and signposting, and legal issues such as copyright and data law.

At Colfe's, we recognise that online safety and broader digital resilience must be thread throughout the curriculum.

## **Handling online-safety concerns and incidents**

As a school we take all reasonable precautions to ensure online safety for all school users but recognise that incidents may occur inside and outside of the school (with impact on the school) which will need intervention.

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

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):

- Child Protection, Safeguarding and Staff Code of Conduct Policy
- Child on Child Abuse Policy
- Harmful and Abusive Behaviours (Anti-Bullying) Policy
- Behaviour Policy
- 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 online safety but recognises that incidents will occur both inside school and outside school (and that those from outside school will have the potential to impact on pupils when they come into 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 in a timely way.

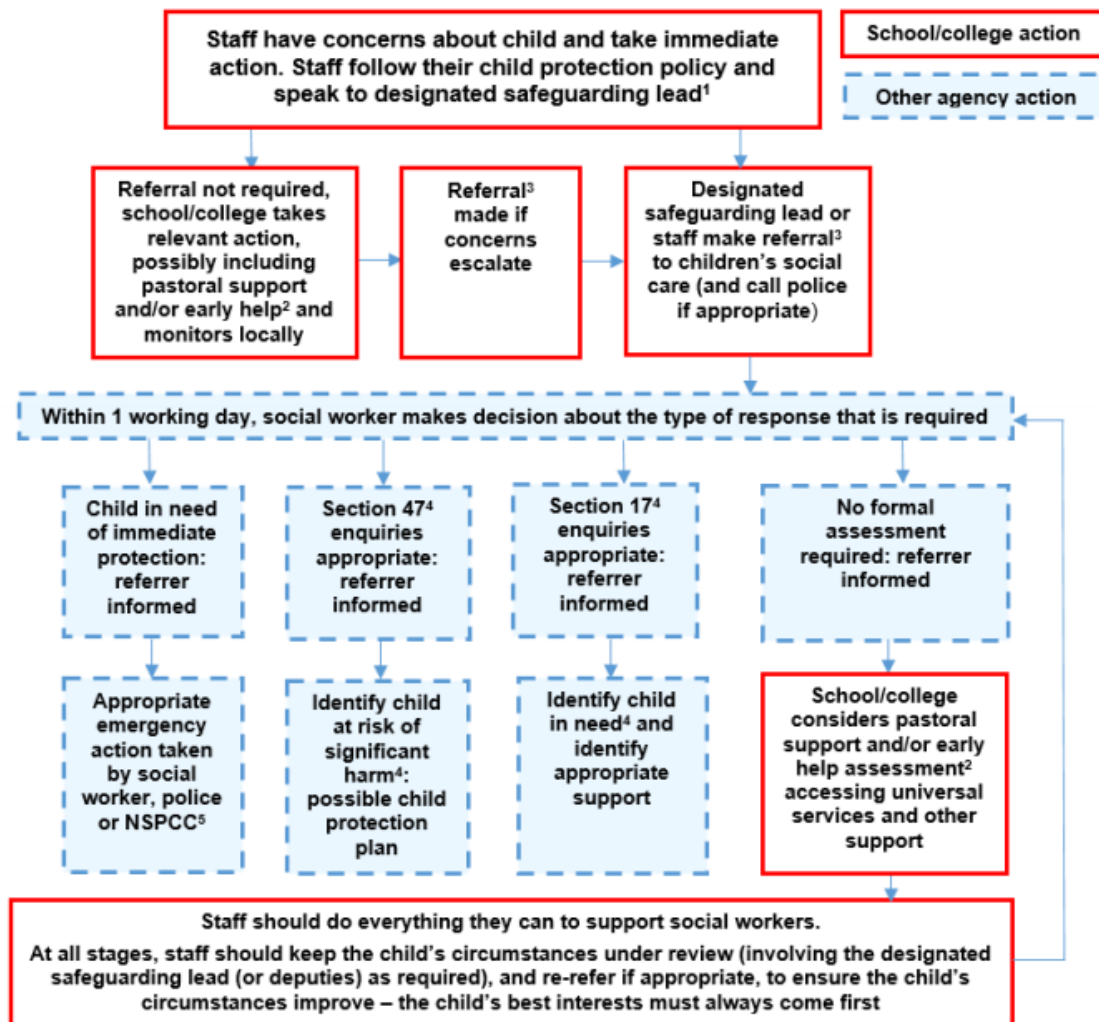
Any concern/allegation about staff misuse is always referred directly to the Headteacher, unless the concern is about the Headteacher in which case the complaint is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer). Staff may also use the NSPCC Whistleblowing Helpline.

The school will actively seek support from other agencies as needed (i.e. the local authority, UK Safer Internet Centre's Professionals' Online Safety Helpline, NCA CEOP, Prevent Officer, Police, IWF). 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 disturbing or breaks the law (particular procedures are in place for sending nudes, semi-nudes and upskirting).

## Actions where there are concerns about a child

The following flow chart is taken from Keeping Children Safe in Education 2023 as the key education safeguarding document.

### Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## **Sending Nudes/ Semi-Nudes**

All schools (regardless of phase) should refer to the UK Council for Internet Safety (UKCIS) guidance on sexting (also referred to as 'youth produced sexual imagery') in schools. NB - where one of the parties is over 18, this is no longer sexting but child sexual abuse.

There is a one-page overview called [Sexting: how to respond to an incident](#) for all staff (not just classroom-based staff) to read, in recognition of the fact that it is mostly someone other than the designated safeguarding lead (DSL) or online safety lead to first become aware of an incident, and it is vital that the correct steps are taken. Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL.

The school DSL will in turn use the full guidance document, [Sharing Nudes and Semi-Nudes](#) to decide next steps and whether other agencies need to be involved.

It is important that everyone understands that whilst sexting is illegal, pupils/students can come and talk to members of staff if they have made a mistake or had a problem in this area.

## **Upskirting**

It is important that everyone understands that upskirting (taking a photo of someone under their clothing) is now a criminal offence, as highlighted in Keeping Children Safe in Education and that pupils/students can come and talk to members of staff if they have made a mistake or had a problem in this area.

## **Bullying**

Online bullying should be treated like any other form of bullying and the Harmful and Abusive Behaviours (Anti-Bullying) Policy should be followed for online bullying, which may also be referred to as cyberbullying. It is important not to treat online bullying separately to offline bullying and to recognise that much bullying will often have both online and offline elements

Sexual violence and harassment

DfE guidance on sexual violence and harassment is referenced in Keeping Children Safe in Education and also a document in its own right. The case studies section provides a helpful overview of some of the issues which may arise.

Any incident of sexual harassment or violence (online or offline) should be reported to the DSL who will follow the full guidance. Staff should work to foster a zero-tolerance culture. The guidance stresses that schools must take all forms of sexual violence and harassment seriously, explaining how it exists on a continuum and that behaviours incorrectly viewed as 'low level' are treated seriously and not allowed to perpetuate. The document makes specific reference to behaviours such as bra-strap flicking and the careless use of language.

## **Misuse of technology in school (devices, systems, networks or platforms)**

Clear and well communicated rules and procedures are essential to govern pupil and adult use of school networks, connections, internet connectivity and devices, cloud platforms and social media (both when on school site and outside of school).

These are defined in the relevant Acceptable Use Policy as well as in this document, for example in the sections relating to the professional and personal use of school platforms/networks/clouds, devices and other technology.

Pupils who are part of the device scheme must read and adhere to the device code of conduct.

Where pupils contravene these rules, the school behaviour policy will be applied.

All pupil misuse identified by staff will be reported through [esafety@colfes.com](mailto:esafety@colfes.com) in the Senior school and to the DSL in the Junior school. Staff may wish to discuss incidents with the safeguarding team in person, but a report should also be submitted via email. If the incident is a safeguarding issue then a Child Welfare Concern Form should be completed and given to the Designated Safeguarding Lead.

- Reports will be dealt with as soon as is practically possible once they are received (1 working day).
- If there is any suspicion that the incident involves any illegal activity or the potential for serious harm (*see flowchart here*), the incident must be escalated through the school's safeguarding procedures.

Further to these steps, the school reserves the right to withdraw – temporarily or permanently – any or all access to such technology, or the right to bring devices onto school property.

Where staff contravene these rules, action will be taken as outlined in the staff code of conduct.

Suspected staff misuse

**Any concern about staff misuse** will be reported to the Headteacher, unless the concern involves the Headteacher, in which case the complaint is referred to the Chair of Governors and the local authority.

Where there is **no suspected illegal activity**, devices may be checked using the following procedures:

- One or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated device that will not be used by learners and, if necessary, can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). Use the same device for the duration of the procedure.
- Ensure that the relevant staff have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed, and attached to the form
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:

- Internal response or discipline procedures.
- Involvement by local authority
- Police involvement and/or action

## Social media incidents

See the social media section later in this document for rules and expectations of behaviour for children and adults at Colfe's. These are also governed by school Acceptable Use Policies.

Breaches will be dealt with in line with the school behaviour policy (for pupils) or code of conduct for staff.

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community, Colfe's will request that the post be deleted and will expect this to be actioned promptly.

Where an offending post has been made by a third party, the school may report it to the platform it is hosted on and may contact the Professionals' Online Safety Helpline (run by the UK Safer Internet Centre) for support or help to accelerate this process.

### All misuse issues continued

- Support is offered for those reporting or affected by an online safety incident.
- Incidents are logged by the esafety team.
- External support and guidance for staff is available at [saferinternet](#), [report harmful content](#) and [CEOP](#).
- those involved in the incident will be provided with feedback about the outcome of the investigation and follow-up actions.
- learning from the incident (or pattern of incidents) will be provided (as relevant and anonymously) to:
  - The esafety team for consideration of updates to policies or education programmes and to review how effectively the report was dealt with.
  - Staff, through regular briefings.
  - Learners, through assemblies/lessons.
  - Parents/carers, through newsletters, school social media, website.
  - Governors, through regular safeguarding updates.
  - Local authority/external agencies, as relevant.

### School actions

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal [behaviour/disciplinary procedures](#).

## Data protection and data security

There are references to the relationship between data protection and safeguarding in key Department for Education documents 'Keeping Children Safe in Education' and 'Data protection: a toolkit for schools' (August 2018), which the DPO and DSL will seek to apply. This quote from the latter document is useful for all staff – note the red and purple highlights:

“GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children’s Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. The Data Protection Act 2018 introduced ‘safeguarding’ as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4) When Designated Safeguarding Leads in schools are considering whether, or not, to share safeguarding information (especially with other agencies) it is considered best practice for them to record who they are sharing that information with and for what reason. If they have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file. All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children.”

All pupils, staff, governors, volunteers, contractors and parents are bound by the school’s data protection policy and agreements.

The Headteacher, data protection officer and governors work together to ensure a GDPR-compliant framework for storing data, but which ensures that child protection is always put first and data-protection processes support careful and legal sharing of information.

Staff are reminded that all safeguarding data is highly sensitive and should be treated with the strictest confidentiality at all times, and only shared via approved channels to colleagues or agencies with appropriate permissions. The use of [ USO-FX / Egress] to encrypt all non-internal emails is compulsory for sharing pupil data. If this is not possible, the DPO and DSL should be informed in advance.

[ Schools may choose to reference some/all of the following topics here but in the light of GDPR they may be better exclusively in in your new data-protection documentation, or simply ensure that the policy for these areas is clear in data-protection documentation:

- CCTV
- Use of personal vs school devices
- Password policy / two-factor authentication
- Reminders to lock devices when leaving unattended
- Device encryption
- Access to and access audit logs for school systems
- Backups
- Security processes and policies
- Disaster recovery
- Access by third parties, e.g. IT support agencies
- BYOD
- Wireless access



- File sharing
- Cloud platform use, access and sharing protocols

## **Appropriate filtering and monitoring**

Keeping Children Safe in Education obliges schools to “ensure appropriate filters and appropriate monitoring systems are in place and not be able to access harmful or inappropriate material but at the same time be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.”

Our internet connection is provided by Nextconnex which is protected with a Sophos XG firewall and multiple layers of security, including a web filtering system designed to protect children in schools. This provides filtering to all devices connected to the school wi-fi. This is fully tested through SWGfL.

The combination of Sophos XG and Senso provides a comprehensive approach to keeping children safe in education, both within the school premises and outside of it. Here's how they complement each other:

Sophos XG Firewall offers multiple layers of security and web filtering. It protects the school's internet connection and provides filtering to all devices. This ensures that children are protected from inappropriate content and potentially harmful websites while using the school's network.

Senso is a tool that safeguards student internet access regardless of their location, ensuring compliance with the Children's Internet Protection Act (CIPA) and maintaining a secure online environment. It follows the student wherever they go, including at home, and provides visibility into high-risk activities. Senso enables the creation of investigative reports necessary for addressing potential risks. It also enforces safe search settings on popular search engines automatically and transparently. This ensures a consistent level of protection and helps identify any potential risks or issues.

Email Filtering: Libra ESVA filters emails to ensure that students do not receive any inappropriate material or content via email. This adds another layer of protection to prevent exposure to harmful or unsuitable content.

Teacher Monitoring: Senso allows teachers to view students' screens in real-time, providing an additional level of monitoring during class. This feature enables teachers to keep an eye on students' device usage and address any potential issues or concerns promptly.

Junior School Supervision: In the case of younger students using iPads, where remote monitoring is not in place, adult supervision is provided to ensure their safe and appropriate device usage. (although filtering is still in place through the school's wifi).

The e-safety officer and network manager will respond to new online safety concerns by blocking sites or categories where appropriate.

By combining the capabilities of Sophos XG and Senso, the school establishes a robust system for protecting children in education. It covers internet access both within the school premises and outside, while also offering real-time monitoring and intervention tools for teachers.

## **Electronic communications**

Please read this section alongside references to pupil-staff communications in the overall school Safeguarding Policy, and in conjunction with the Data Protection Policy. This section only covers electronic communications, but the same principles of transparency, appropriate conduct and audit trail apply.

### **Email**

- Pupils at this school use Microsoft Office 365
- Staff at this school use Microsoft Office 365 for all school emails

Audit logs are turned on to monitor user and admin activity for all of Office 365.

General principles for email use are as follows:

- Email, Microsoft Teams, school cloud and Zoom are the only means of electronic communication to be used between staff and pupils / staff and parents (in both directions). Use of a different platform must be approved in advance by the data-protection officer in advance. 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).
- Email may only be sent using the email systems above. There should be no circumstances where a private email is used; if this happens by mistake, the DSL/Headteacher/DPO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately.
- Staff or pupil personal data should never be sent/shared/stored on email.

- If data needs to be shared with external agencies, this data must be encrypted to AES 256 standards.
- Internally, staff should use the school network, including when working from home when remote access is available via VMWare Horizon and Microsoft Office 365.
- 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.
- 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.

See also the social media section of this policy.

## 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 has been the day-to-day responsibility of updating the content of the website to the Director of Communications and their team. The site is managed by Wordpress and hosted by SiteGround.

The DfE has determined information which must be available on a school website.

Where other staff submit information for the website, they are asked to remember:

- School 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. If in doubt, check with the Director of Communications. There are many open-access libraries of high-quality public-domain images that can be used (e.g. pixabay.com for marketing materials – beware some adult content on this site).
- Where pupil work, images or videos are published on the website, their identities are protected and full names are not published (remember also not to save images with a filename that includes a pupil's full name).

## Cloud platforms

Many schools are recognising the benefits of cloud computing platforms, not just for cost savings but to enhance teaching and learning.

This school adheres to the principles of the DfE document '[Cloud computing services: guidance for school leaders, school staff and governing bodies](#)'.

As more and more systems move to the cloud, it becomes easier to share and access data. It is important to consider data protection before adopting a cloud platform or service. We currently use Microsoft Office 365 and Firefly which are fully GDPR compliant.

For online safety, basic rules of good password hygiene (“Treat your password like your toothbrush – never share it with anyone!”), expert administration and training can help to keep staff and pupils safe, and to avoid incidents. The data protection officer and network manager analyse and document systems and procedures before they are implemented, and regularly review them.

The following principles apply:

- Privacy statements inform parents and children (13+) when and what sort of data is stored in the cloud
- The DPO approves new cloud systems, what may or may not be stored in them and by whom. This is noted in a DPIA (data-protection impact statement) and parental permission is sought
- Regular training ensures all staff understand sharing functionality
- Regular training ensures all staff understand sharing functionality
- Two-factor authentication is being implemented for all staff before the end of Q1 2021
- Pupil images/videos are only made public with parental permission
- Only school-approved platforms are used by students or staff to store pupil work.

## **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 online learning journal Tapestry (password protected)
- For MyColfe’s parent portal (password protected)
- on internal displays (including clips of moving images) on digital and conventional notice boards within the School premises;
- in communications with the School community (parents, pupils, staff, Governors and alumni) including by email, on the School intranet, parent portal and by post;
- on the School’s website and, where appropriate, via the School’s social media channels. Such images would not normally be accompanied by the pupil’s full name without permission;
- in the School’s prospectus; and
- online, press and other external advertisements for the School. Such external advertising would not normally include pupil’s names and, in some circumstances, the School will seek the parent or pupil’s specific consent, depending on the nature of the image or the use.
- The source of these images will predominantly be the School’s staff (who are subject to safeguarding training), or a professional photographer used for marketing and promotional purposes, or occasionally pupils. The School will only use images of pupils in suitable dress and the images will be stored securely and centrally.

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 Colfe's School no member of staff will ever use their personal phone to capture photos or videos of pupils.

Photos are stored on the school network in line 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.

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**

### **Colfe's SM presence**

Colfe's 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/ISI 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.

Kate Bridgman and Nicola Entwistle are responsible for managing our Twitter/Facebook/ Vimeo accounts and checking our Wikipedia and Google reviews.

## **Staff, pupils' and parents' SM presence**

Social media (including here 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 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, but the school does deal with issues arising on social media with 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 following on from the government's Safer Internet Strategy, enforcement and age checking is likely to become more stringent 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).

The school has official Facebook and Twitter accounts (managed by the Director of Communications and their team) and will respond to general enquiries about the school but asks parents/carers not to use these channels to communicate about their children.

Email is the official electronic communication channel between parents and the school, and between staff and pupils.

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). 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.

\*\* 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 have been 200 Prohibition Orders issued to teachers over the past four years related to the misuse of technology/social media.

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.

## **Device usage**

Please read the following in conjunction with acceptable use policies and the following sections of this document which all impact upon device usage: copyright, data protection, social media, misuse of technology, and digital images and video.

### **Personal devices including wearable technology**

- **Pupils/students** are allowed to bring in devices such as mobile phones, but they must not be used once a pupil enters the site until the end of the school day. Junior School pupils bringing

mobile phones into school should deposit these with Junior Office on entry in the morning, collecting these at the end of the school day. In the Senior school during the school day, phones must remain turned off at all times, unless the teacher has given express permission as part of the lesson. Any attempt to use a phone in during the school day without permission or to take illicit photographs or videos will be reported to and followed up by the relevant pastoral leader and could result in a serious consequence (see Behaviour Management Policy). 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.

- **All staff who work directly with children** should be aware of the Digital images and video section and Data protection and data security section. Child/staff data should never be downloaded onto a private phone.
- **Volunteers, contractors, governors** Under no circumstances should phones 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** 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 document. Parents are asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office.

### **Pupil Surface devices**

- Pupil's Microsoft surfaces are enrolled in the school system and therefore are filtered and monitored through both Senso and Sophos.
- Senior school pupils may use their device in the library and in classrooms at break and lunchtime. Duty staff take an appropriate overview of pupil use of devices at this time in addition to the remote monitoring in place.
- Pupils must adhere to the device code of conduct.

### **Network / internet access on school devices**

- **Pupils/students** can also access the school wireless internet network for school-related internet use / limited personal use within the framework of the acceptable use policy. All such use is monitored.
- **Volunteers, contractors, governors** can access the guest wireless network but have no access to networked files/drives, subject to the acceptable use policy. All internet traffic is monitored.
- **Parents** have no access to the school network or wireless internet on personal devices subject to the acceptable use policy. All internet traffic is monitored.



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

For school trips/events away from school, teachers will normally 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 will 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 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 Policies.

## **Related Policies and Useful Information**

1. Harmful and Abusive Behaviours / Incident / CPOMS logs
2. Safeguarding and Child Protection Policy and Staff Code of Conduct
3. Behaviour Policy / Harmful and Abusive Behaviour (Anti-Bullying) Policy
4. Acceptable Use Policies (AUPs) for: Letter to parents about filming/photographing/streaming school events.
5. Working together to safeguard children (DfE)
6. Searching, screening and confiscation advice (DfE)
7. Sexual violence and sexual harassment between children in schools and colleges (DfE advice)
8. Sending Nudes/Semi-Nudes guidance from UKCIS
9. \*Overview for all staff
10. \*Full guidance for school DSLs
11. Prevent Duty Guidance for Schools (DfE and Home Office documents)
12. Data protection and data security advice, procedures etc
13. Preventing and tackling bullying (DfE)
14. Cyber bullying: advice for Headteachers and school staff (DfE)
15. Child on Child Abuse Policy

Policy reviewed annually

Last reviewed September 2023

E-safety office to review policy on an annual basis

