Online safety policy

Rivers Campus - Rivers Academy West London and Space Studio West London

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1. Aims

Our campus aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors

- Deliver an effective approach to online safety, which empowers us to protect and educate the whole campus community in its use of technology, including mobile, wearable and smart technology (which we refer to as 'mobile phones')
- Identify and support groups of pupils who are potentially at greater risk of harm online than others
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, misinformation, disinformation (including fake news), conspiracy theories, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit the user for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

2. Legislation and guidance

This policy is based on the Department for Education's (DfE) statutory safeguarding guidance, Keeping Children Safe in Education, and its advice for schools on:

- Teaching online safety in schools
- Meeting digital and technology standards
- Relationships and sex education (RSE) and health education
- Preventing and tackling bullying and cyber-bullying: advice for headteachers and school staff
- Searching, screening and confiscation

It also refers to the Department's guidance on protecting children from radicalisation.

It reflects existing legislation, including but not limited to the Education Act 1996 (as amended), the Education and Inspections Act 2006 and the Equality Act 2010. In addition, it reflects the Education Act 2011, which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on pupils' electronic devices where they believe there is a 'good reason' to do so.

The policy also takes into account the National Curriculum computing programmes of study.

This policy complies with our funding agreement and articles of association.

3. Roles and responsibilities

3.1 The Regional governing board (RGB)

The regional governing board has overall responsibility for monitoring this policy and holding the principal to account for its implementation.

The RGB will make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.

The governing board will also make sure all staff receive regular online safety updates (via email, e-bulletins and staff meetings), as required and at least annually, to ensure they are continually provided with the relevant skills and knowledge to effectively safeguard children.

The governing board will co-ordinate regular meetings with appropriate staff to discuss online safety and requirements for training, and monitor online safety logs as provided by the designated safeguarding lead (DSL).

The RGB will ensure the campus has appropriate filtering and monitoring systems in place and regularly reviews their effectiveness, at least once every academic year.

All governors will:

- Ensure that they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the campus ICT systems and the internet
- Undergo safeguarding and child protection training (including online safety) at induction to provide strategic challenge and input into policy and practice, ensuring this is regularly updated
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable

3.2 The principal

The principal is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the campus.

The principal will:

- Foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding.
- Ensure each school implements and makes effective use of appropriate ICT systems and services, including school-safe filtering and monitoring, protected email systems and that all technology including remote systems are implemented according to child-safety first principles.
- Better understand, review and drive the rationale behind decisions in filtering and monitoring as per the DfE standards—through regular liaison with technical colleagues and the DSL– in particular, understand what is blocked or allowed for whom, when, and how as per KCSIE.

- 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.
- Ensure suitable risk assessments are undertaken so the curriculum meets the needs of pupils, including the risk of children being radicalised.

3.3 The designated safeguarding lead

Details of the campus DSL (David Booth) are set out in our safeguarding and child protection policy as well as relevant job descriptions.

The DSL takes lead responsibility for online safety in the campus, in particular:

- Supporting the principal in ensuring that staff understand this policy and that it is being implemented consistently throughout the campus
- Working with the principal, ICT lead and other staff, as necessary, to address any online safety issues or incidents
- Ensuring the school is complying with the DfE's standards on Filtering and Monitoring.
- Working with technical teams to carry out an annual review and regular checks on filtering and monitoring to compile the relevant documentation and ensure that safeguarding and technology work together. This will include a decision on relevant YouTube mode and preferred search engine/s etc.
- Where online safety duties are delegated, and in areas of the curriculum where the DSL is not directly responsible, but which cover areas of online safety (e.g. RSHE), ensure there is regular review and open communication, and that the DSL's clear overarching responsibility for online safety is not compromised and that messaging to pupils is not confused.
- Managing all online safety issues and incidents in line with the Safeguarding and Child Protection policy
- Ensuring that any online safety incidents are logged (see appendix 2) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the campus behaviour policy
- Updating and delivering staff training on online safety (appendix 1 contains a self-audit for staff on online safety training needs)
- Staying up to date with the latest trends in online safeguarding, both locally and nationally
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the principal

This list is not intended to be exhaustive.

3.4 The ICT/Computing lead

The ICT lead is responsible for:

- Ensuring there are appropriate filtering and monitoring systems in place, which are updated on a regular basis and keep pupils safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material

- Ensuring that the campus ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring the campus ICT systems on a weekly basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are logged (see appendix 2) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the campus behaviour policy
- Work closely with the RSHE lead to avoid overlap but ensure a complementary whole-school approach
- Work closely with the DSL and all other staff to ensure understanding of the issues, approaches, and messaging within the Computing curriculum
- 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

This list is not intended to be exhaustive.

3.5 All staff and volunteers

All staff, including trainee teachers, contractors and agency staff, and volunteers are responsible for:

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Reporting any concerns, no matter how small, to the Designated Safeguarding Lead as named in the AUP, maintaining an awareness of current online safety issues (see the start of this document for issues) and guidance (such as KCSIE)
- Modelling safe, responsible and professional behaviours in their own use of technology at school and beyond and avoiding scaring, victim-blaming language.
- Being aware of the DfE standards for filtering and monitoring, and feeding back to the DSL about overblocking, gaps in provision or pupils bypassing protections.
- Being responsible for physically monitoring pupils' online devices during any session/class they are working in.
- Agreeing and adhering to the terms on acceptable use of the campus ICT systems and the internet, and ensuring that pupils follow the campus terms on acceptable use
- Working with the DSL to ensure that any online safety incidents are logged (see appendix 2) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the campus behaviour policy

This list is not intended to be exhaustive.

3.6 PSHE / RSHE Lead

Key responsibilities:

As listed in the 'all staff' section, plus:

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

3.6 Parents

Parents are expected to:

- Notify a member of staff or the principal of any concerns or queries regarding this policy
- Ensure their child has read, understood and agreed to the terms on acceptable use of the campus ICT systems and internet

Parents can seek further guidance on keeping children safe online from the following organisations and websites:

- What are the issues? - UK Safer Internet Centre
- Hot topics - Childnet International
- Parent factsheet - Childnet International

3.7 Visitors and members of the community

Visitors and members of the community who use the campus ICT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use.

4. Educating pupils about online safety

4.1 Pupils will be taught about online safety as part of the curriculum:

All schools have to teach:

Relationships education and health education in primary schools

Relationships and sex education and health education in secondary schools

In **Key Stage 3**, pupils will be taught to:

- Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
- Recognise inappropriate content, contact and conduct, and know how to report concerns

Pupils in **Key Stage 4** will be taught:

- To understand how changes in technology affect safety, including new ways to protect their online privacy and identity
- How to report a range of concerns

By the **end of secondary school**, they will know:

- Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- Online risks, including the importance of being cautious about sharing personal information online and of using privacy and location settings appropriately to protect information online. Pupils should also understand the difference between public and private online spaces and related safety issues
- The characteristics of social media, including that some social media accounts are fake, and / or may post things which aren't real / have been created with AI. That social media users may say things in more extreme ways than they might in face-to-face situations, and that some users present highly exaggerated or idealised profiles of themselves online
- Not to provide material to others that they would not want to be distributed further and not to pass on personal material which is sent to them. Pupils should understand that any material provided online might be circulated, and that once this has happened there is no way of controlling where it ends up. Pupils should understand the serious risks of sending material to others, including the law concerning the sharing of images
- That keeping or forwarding indecent or sexual images of someone under 18 is a crime, even if the photo is of themselves or of someone who has consented, and even if the image was created by the child and/or using AI-generated imagery. Pupils should understand the potentially serious consequences of acquiring or generating indecent or sexual images of someone under 18, including the potential for criminal charges and severe penalties including imprisonment. Pupils should know how to seek support and should understand that they will not be in trouble for asking for help, either at school or with the police, if an image of themselves has been shared. Pupils should also understand that sharing indecent images of people over 18 without consent is a crime
- What to do and how to report when they are concerned about material that has been circulated, including personal information, images or videos, and how to manage issues online
- About the prevalence of deepfakes including videos and photos, how deepfakes can be used maliciously as well as for entertainment, the harms that can be caused by deepfakes and how to identify them
- That the internet contains inappropriate and upsetting content, some of which is illegal, including unacceptable content that encourages misogyny, violence or use of weapons. Pupils should be taught where to go for advice and support about something they have seen online. Pupils should understand that online content can present a distorted picture of the world and normalise or glamorise behaviours which are unhealthy and wrong

- That social media can lead to escalations in conflicts, how to avoid these escalations and where to go for help and advice
- How to identify when technology and social media is used as part of bullying, harassment, stalking, coercive and controlling behaviour, and other forms of abusive and/or illegal behaviour and how to seek support about concerns
- That pornography, and other online content, often presents a distorted picture of people and their sexual behaviours and can negatively affect how people behave towards sexual partners. This can affect pupils who see pornographic content accidentally as well as those who see it deliberately. Pornography can also portray misogynistic behaviours and attitudes which can negatively influence those who see it
- How information and data is generated, collected, shared and used online
- That websites may share personal data about their users, and information collected on their internet use, for commercial purposes (e.g. to enable targeted advertising)
- That criminals can operate online scams, for example using fake websites or emails to extort money or valuable personal information. This information can be used to the detriment of the person or wider society. About risks of sextortion, how to identify online scams relating to sex, and how to seek support if they have been scammed or involved in sextortion
- That AI chatbots are an example of how AI is rapidly developing, and that these can pose risks by creating fake intimacy or offering harmful advice. It is important to be able to critically think about new types of technology as they appear online and how they might pose a risk

The safe use of social media and the internet will also be covered in other subjects where relevant.

The campus will use assemblies to raise pupils' awareness of the dangers that can be encountered online and may also invite speakers to talk to pupils about this.

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.

4.2 **Pupils will be taught practical cyber security skills**

All pupils will receive age-appropriate training on safe internet use, including:

- Methods that hackers use to trick people into disclosing personal information
- Password security
- Social engineering
- The risks of removable storage devices (e.g. USBs)
- Multi-factor authentication
- How to report a cyber incident or attack
- How to report a personal data breach

Pupils will also receive age-appropriate education on safeguarding issues such as cyberbullying and the risks of online radicalisation.

5. Educating parents about online safety

The campus will raise parents' awareness of internet safety in letters or other communications home, and in information via our website or virtual learning environment (VLE). This policy will also be shared with parents. Online safety will also be covered during parents' evenings.

The campus will let parents/carers know:

- What systems the school uses to filter and monitor online use
- What their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child will be interacting with online

If parents have any queries or concerns in relation to online safety, these should be raised in the first instance with the principal and/or the DSL.

Concerns or queries about this policy can be raised with any member of staff or the principal.

6. Cyber-bullying

6.1 Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power. (See also the campus behaviour policy.)

6.2 Preventing and addressing cyber-bullying

To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The campus will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Academic Mentors will discuss cyber-bullying with their mentor groups, and the issue will be addressed in assemblies.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.

All staff, governors and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training (see section 11 for more detail).

The campus also sends information/leaflets on cyber-bullying to parents so that they are aware of the signs, how to report it and how they can support children who may be affected.

In relation to a specific incident of cyber-bullying, the campus will follow the processes set out in the campus behaviour policy. Where illegal, inappropriate or harmful material has been spread among pupils, the campus will use all reasonable endeavours to ensure the incident is contained.

The DSL will report the incident and provide the relevant material to the police as soon as is reasonably practicable, if they have reasonable grounds to suspect that possessing that material is illegal. They will also work with external services if it is deemed necessary to do so.

6.3 Examining electronic devices

The Principal, and any member of staff authorised to do so by the Principal, can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or pupils, and/or
- Is identified in the school rules as a banned item for which a search can be carried out, and/or

- Is evidence in relation to an offence

Before a search, if the authorised staff member is satisfied that they have reasonable grounds for suspecting any of the above, they will also:

- Make an assessment of how urgent the search is, and consider the risk to other pupils and staff. If the search is not urgent, they will seek advice from the Principal or DSL
- Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it
- Seek the pupil's cooperation

Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so.

When deciding whether there is a 'good reason' to examine data or files on an electronic device, the staff member should reasonably suspect that the device has, or could be used to:

- Cause harm, and/or
- Undermine the safe environment of the school or disrupt teaching, and/or
- Commit an offence

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL / Principal / other member of the senior leadership team to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response.

When deciding if there is a good reason to erase data or files from a device, staff members will consider if the material may constitute evidence relating to a suspected offence. In these instances, they will not delete the material, and the device will be handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if:

- They reasonably suspect that its continued existence is likely to cause harm to any person, and/or

-The pupil and/or the parent refuses to delete the material themselves

If a staff member suspects a device may contain an indecent image of a child (also known as a nude or semi-nude image), they will:

- Not view the image
- Confiscate the device and report the incident to the DSL (or equivalent) immediately, who will decide what to do next. The DSL will make the decision in line with the DfE's latest guidance on screening, searching and confiscation and the UK Council for Internet Safety (UKCIS) guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people

Any searching of pupils will be carried out in line with:

The DfE's latest guidance on searching, screening and confiscation

UKCIS guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people

Our behaviour policy

Any complaints about searching for or deleting inappropriate images or files on pupils' electronic devices will be dealt with through the campus complaints procedure.

6.4 Artificial intelligence (AI)

Generative AI tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Aspirations Academies Trust recognises that AI has many uses to help pupils learn, but may also have the potential to be used to bully others. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real. This includes deepfake pornography: pornographic content created using AI to include someone's likeness.

We will treat any use of AI to bully pupils very seriously, in line with our anti-bullying/behaviour policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out a risk assessment where new AI tools are being used by thecampus and where existing AI tools are used in cases which may pose a risk to all individuals that may be affected by them, including, but not limited to, pupils and staff.

Any use of artificial intelligence should be carried out in accordance with our AI usage protocols

7. Acceptable use of the internet in school

All pupils, parents, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of the campus ICT systems and the internet. Visitors will be expected to read and agree to the campus terms on acceptable use if relevant.

Use of thecampus internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role.

We will monitor the websites visited by pupils, staff, volunteers, governors and visitors (where relevant).

8. Pupils using mobile devices in school

Pupils may bring mobile devices into the campus, but they must be switched off and kept in bags as soon as they enter the campus site and remain so until they have left the campus site.

Any breach of the Mobile Phone Policy by a pupil may trigger disciplinary action in line with the campus behaviour policy, and will result in the confiscation of their device.

9. Staff using work devices outside school

All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- Keeping the device password-protected – strong passwords are at least 8 characters, with a combination of upper and lower-case letters, numbers and special characters (e.g. asterisk or currency symbol)

- Ensuring their hard drive is encrypted – this means if the device is lost or stolen, no one can access the files stored on the hard drive by attaching it to a new device
- Making sure the device is locked if left inactive for a period of time
- Not sharing the device among family or friends
- Installing anti-virus and anti-spyware software
- Keeping operating systems up to date by always installing the latest updates

Staff members must not use the device in any way which would violate the school's terms of acceptable use.

If staff have any concerns over the security of their device, they must seek advice from the ICT lead.

Work devices must be used solely for work activities.

10. How the academy will respond to issues of misuse

Where a pupil misuses the campus ICT systems or internet, we will follow the procedures set out in our policies on behaviour policy. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the campus ICT systems or the internet, or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with the staff disciplinary procedures. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The campus will consider whether incidents which involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

11. Training

All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation.

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

By way of this training, all staff will be made aware that:

- Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse.

Children can abuse their peers online through:

- Abusive, harassing, and misogynistic messages
- Non-consensual making of or sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
- Sharing of abusive images and pornography, to those who don't want to receive such content

Physical abuse, sexual violence and initiation/hazing type violence can all contain an online element.

Training will also help staff:

- Develop better awareness to assist in spotting the signs and symptoms of online abuse

- Develop the ability to ensure pupils can recognise dangers and risks in online activity and can weigh up the risks
- Develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term

The DSL and deputies will undertake child protection and safeguarding training, which will include online safety, at least every 2 years. They will also update their knowledge and skills on the subject of online safety at regular intervals, and at least annually.

Governors will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

More information about safeguarding training is set out in our safeguarding and child protection policy.

12. Monitoring arrangements

The DSL logs behaviour and safeguarding issues related to online safety on MyConcern. This policy will be reviewed every year by the DSL. At every review, the policy will be shared with the regional governing board.

13. Links with other policies

This online safety policy is linked to our:

- Safeguarding and Child Protection policy
- Behaviour policy
- Staff disciplinary procedures
- Data protection policy and privacy notices
- Complaints procedure
- ICT and internet acceptable use policies

Appendix 1: online safety training needs – self audit for staff

ONLINE SAFETY TRAINING NEEDS AUDIT	
Name of staff member/volunteer:	**Date**:
Question	**Yes/No (add comments if necessary)**
Do you know the name of the person who has lead responsibility for online safety in school?	
Do you know what you must do if a pupil approaches you with a concern or issue?	

Are you familiar with the academy's acceptable use agreement for staff, volunteers, governors and visitors?	
Are you familiar with the academy's acceptable use agreement for pupils and parents?	
Do you regularly change your password for accessing the academy's ICT systems?	
Are you familiar with the academy's approach to tackling cyber-bullying?	
Are there any areas of online safety in which you would like training/further training?	
Are you familiar with the filtering and monitoring systems on the school's devices and networks?	
Do you understand your role and responsibilities in relation to filtering and monitoring?	
Are you aware of the ways pupils can abuse their peers online?	

Appendix 2: online safety incident report log (also record on Arbor or MyConcern if a safeguarding concern)

ONLINE SAFETY INCIDENT LOG				
Date	**Where the incident took place**	**Description of the incident**	**Action taken**	**Name and signature of staff member recording the incident**