

September 2023

Online Safety Policy

Audley Infant School



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This policy applies to all members of the school community (including staff, learners, volunteers, parents and carers, visitors, and community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

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Scope of the Online Safety Policy

This Online Safety Policy outlines the commitment of Audley Infant School to safeguard members of our school community online in accordance with statutory guidance and best practice. Schools should be aware of the legislative framework under which this Online Safety Policy template and guidance has been produced as outlined in the attached 'Legislation' Appendix.

This Online Safety Policy applies to all members of the school community (including staff, learners, volunteers, parents and carers, visitors and community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

Audley Infant School will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents/carers of incidents of inappropriate online safety behaviour that take place out of school.

Policy development, monitoring and review

This Online Safety Policy has been developed by the *Senior Leadership Team*

- *Headteacher/senior leaders*

Schedule for development, monitoring and review

This Online Safety Policy was approved by the <i>school governing body on:</i>	<i>September 2023</i>
The implementation of this Online Safety Policy will be monitored by:	<i>Senior Leadership Team</i>
Monitoring will take place at regular intervals:	<i>Annually, in the autumn term</i>
The <i>governing body</i> will receive updates on the implementation of the Online Safety Policy generated by the SLT. FGB will be informed of any online safety incidents as they occur or at the FGB meeting via the Headteacher's report.	<i>Annually, during the autumn term FGB</i> <i>Termly updates via the HT Report to Governors</i>

The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new technological developments, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	<i>September 2024</i>
Should serious online safety incidents take place, the following external persons/agencies should be informed as appropriate to the issue:	<i>SEO with responsibility for safeguarding. Blackburn with Darwen</i> <i>IT team- Blackburn with Darwen</i> <i>Police-Greenbank Station 101</i>

Process for monitoring the impact of the Online Safety Policy

The school will monitor the impact of the policy using:

- *logs of reported incidents*
- *monitoring logs of internet activity (including sites visited)*
- *Feedback from users*

Policy and leadership

Responsibilities

To ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviours, learning from each other and from good practice elsewhere, reporting inappropriate online behaviours, concerns, and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals¹ and groups within the school.

Headteacher and senior leaders

- The Headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding, though the day-to-day responsibility for online safety may be delegated to the Senior Leadership Team.

¹ In a small school some of the roles described may be combined, though it is important to ensure that there is sufficient 'separation of responsibility' should this be the case.

- The Headteacher and (at least) another member of the senior leadership team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff².
- The Headteacher/senior leaders are responsible for ensuring that the technical staff, and other relevant staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.
- The Headteacher/senior leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role.
- The Headteacher/senior leaders will receive weekly monitoring reports from Blackburn with Darwen IT team via the Fortinet web filter reports.

Governors

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy

This review will be carried out by the Health and Safety Committee whose members will receive regular information about online safety incidents and monitoring reports. A member of the governing body will take on the role of Online Safety Governor to include:

- regular meetings with the Online Safety Lead
- regularly receiving (collated and anonymised) reports of online safety incidents
- checking that provision outlined in the Online Safety Policy (e.g. online safety education provision and staff training is taking place as intended)
- reporting to relevant governors group

The governing body will also support the school in encouraging parents/carers and the wider community to become engaged in online safety activities.

Online Safety Lead

The Online Safety Lead will:

- lead on Online Safety
- work closely on a day-to-day basis with the Designated Safeguarding Lead (DSL), where these roles are not combined
- take day-to-day responsibility for online safety issues, being aware of the potential for serious child protection concerns
- have a leading role in establishing and reviewing the school online safety policies/documents
- promote an awareness of and commitment to online safety education / awareness raising across the school and beyond

² See flow chart on dealing with online safety incidents in 'Responding to incidents of misuse' and relevant local authority/MAT/ HR/other relevant body disciplinary procedures.

- liaise with curriculum leaders to ensure that the online safety curriculum is planned, mapped, embedded and evaluated
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents
- receive reports of online safety incidents³ and create a log of incidents to inform future online safety developments
- provide (or identify sources of) training and advice for staff/governors/parents/carers/learners
- liaise with (school/local authority/MAT/external provider) technical staff, pastoral staff and support staff (as relevant)
- meet regularly with the online safety governor to discuss current issues, review (anonymised) incidents and if possible, filtering and monitoring logs
- attend relevant governing body meetings/groups
- report regularly to senior leadership team.
- liaises with the local authority.

Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead should be trained in online safety issues and be aware of the potential for serious safeguarding issues to arise from:

- sharing of personal data ⁴
- access to illegal/inappropriate materials
- inappropriate online contact with adults/strangers
- potential or actual incidents of grooming
- online bullying.

Curriculum Leads

Curriculum Leads will work with the Online Safety Lead to develop a planned and coordinated online safety education programme

This will be provided through:

- a discrete programme
- PHSE and RE programmes
- A mapped cross-curricular programme
- Assemblies

³ [The school will need to decide how these incidents will be dealt with and whether the investigation/action will be the responsibility of the online safety lead or another member of staff, e.g. headteacher / senior leader / Designated Safeguarding Lead / class teacher / head of year, etc.](#)

⁴ See 'Personal data policy' in the Appendix.

- Through relevant national initiatives and opportunities e.g. [Safer Internet Day](#) and.

Teaching and support staff

School staff are responsible for ensuring that:

- they have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices
- they understand that online safety is a core part of safeguarding
- they have read, understood, and signed the staff acceptable use agreement (AUA)
- they immediately report any suspected misuse or problem to [Helen Nelson, Headteacher](#), for investigation/action, in line with the school safeguarding procedures
- all digital communications with learners and parents/carers should be on a professional level *and only carried out using official school systems*
- online safety issues are embedded in all aspects of the curriculum and other activities
- ensure learners understand and follow the Online Safety Policy and acceptable use agreements, have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they supervise and monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other school activities (where allowed) and implement current policies regarding these devices
- in lessons where internet use is pre-planned learners should be guided to sites checked as suitable for their use *and that processes are in place for dealing with any unsuitable material that is found in internet searches*
- 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](#)
- have a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc
- they model safe, responsible, and professional online behaviours in their own use of technology, including out of school and in their use of social media.

Technical staff

The technical staff is responsible for ensuring that:

- they are aware of and follow the school Online Safety Policy and Technical Security Policy to carry out their work effectively in line with school policy
- the school technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets (as a minimum) the required online safety technical requirements as identified by the local authority or other relevant body
- there is clear, safe, and managed control of user access to networks and devices
- they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- the use of technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported to [Helen Nelson Headteacher](#), for investigation and action

- the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person
- monitoring software/systems are implemented and regularly updated as agreed in school policies

Learners

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement and Online Safety Policy
- should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school, if related to their membership of the school.

Parents and carers

Parents and carers play a crucial role in ensuring that their children understand the need to use the online services and devices in an appropriate way.

The school will take every opportunity to help parents and carers understand these issues through:

- publishing the school Online Safety Policy on the school website
- providing them with a copy of the learners' acceptable use agreement
- publish information about appropriate use of social media relating to posts concerning the school
- seeking their permissions concerning digital images, cloud services etc
- parents'/carers' evenings, newsletters, website, social media and information about national/local online safety campaigns and literature.

Parents and carers will be encouraged to support the school in:

- *reinforcing the online safety messages provided to learners in school*

Community users

Community users who access school systems/website/learning platform as part of the wider school provision will be expected to sign a community user AUA before being provided with access to school systems.

Online Safety

Online Safety is monitored through the Health and Safety Governing Committee:

- Designated Safeguarding Lead
- Senior leaders
- Safeguarding governor
- Computing Lead (teacher)

Members of the Health and Safety committee will assist the DSL/Headteacher with:

- the production/review/monitoring of the school Online Safety Policy/documents

- mapping and reviewing the online safety education provision – ensuring relevance, breadth and progression and coverage
- reviewing network/filtering/monitoring/incident logs, where possible
- encouraging the contribution of learners to staff awareness, emerging trends and the school online safety provision
- consulting stakeholders – including staff/parents/carers about the online safety provision
- monitoring improvement actions identified through use of the 360-degree safe self-review tool.

Professional Standards

There is an expectation that required professional standards will be applied to online safety as in other aspects of school life i.e., policies and protocols are in place for the use of online communication technology between the staff and other members of the school and wider community, using officially sanctioned school mechanisms.

Online Safety Policy

The school Online Safety Policy:

- sets expectations for the safe and responsible use of digital technologies for learning, administration, and communication
- allocates responsibilities for the delivery of the policy
- is regularly reviewed in a collaborative manner, taking account of online safety incidents and changes/trends in technology and related behaviours
- establishes guidance for staff in how they should use digital technologies responsibly, protecting themselves and the school and how they should use this understanding to help safeguard learners in the digital world
- describes how the school will help prepare learners to be safe and responsible users of online technologies
- establishes clear procedures to identify, report, respond to and record the misuse of digital technologies and online safety incidents, including external support mechanisms
- is supplemented by a series of related acceptable use agreements
- is made available to staff at induction and through normal communication channels

Acceptable use

The school has defined what it regards as acceptable/unacceptable use and this is shown in the tables below.

Acceptable use agreements

The Online Safety Policy and acceptable use agreements define acceptable use at the school. The acceptable use agreements will be communicated/re-enforced through:

- staff induction

- posters/notices around where technology is used
- communication with parents/carers
- built into education sessions
- school website
- peer support

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
<p>Users shall not access online content (including apps, games, sites) to make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:</p>	<p>Any illegal activity for example:</p> <ul style="list-style-type: none"> • Child sexual abuse imagery* • Child sexual abuse/exploitation/grooming • Terrorism • Encouraging or assisting suicide • Offences relating to sexual images i.e., revenge and extreme pornography • Incitement to and threats of violence • Hate crime • Public order offences - harassment and stalking • Drug-related offences • Weapons / firearms offences • Fraud and financial crime including money laundering <p>UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges</p>					X
<p>Users shall not undertake activities that might be classed as cyber-crime under the Computer Misuse Act (1990)</p>	<ul style="list-style-type: none"> • Using another individual’s username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised) • Gaining unauthorised access to school networks, data and files, through the use of computers/devices • Creating or propagating computer viruses or other harmful files • Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords) • Disable/Impair/Disrupt network functionality through the use of computers/devices • Using penetration testing equipment (without relevant permission) 					X

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not undertake activities that are not illegal but are classed as unacceptable in school policies:	Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs)				X	
	Promotion of any kind of discrimination	x			X	
	Using school systems to run a private business				X	
	Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school				X	
	Infringing copyright				X	
	Unfair usage (downloading/uploading large files that hinders others in their use of the internet)			X	X	
	Any other information which may be offensive to others or breaches the integrity of the ethos of the school or brings the school into disrepute				X	

Consideration should be given to the following activities when undertaken for non-educational purposes:	Staff and other adults				Learners			
	Not allowed	Allowed	Allowed at certain times	Allowed for selected staff with permission for HT	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission/awareness
Online gaming	X				X			
Online shopping/commerce				X	X			
File sharing		X			X			
Social media				X				X
Messaging/chat			X					X
Entertainment streaming e.g. Netflix, Disney+				X	X			
Use of video broadcasting, e.g. YouTube, Twitch, TikTok				X				X
Mobile phones may be brought to school		X			X			

Use of mobile phones for learning at school		X			X			
Use of mobile phones in social time at school			X		X			
Taking photos on mobile phones/cameras				X	X			
Use of other personal devices, e.g. tablets, gaming devices, watches linked to phones				X				X
Use of personal e-mail in school, or on school network/wi-fi				X	X			
Use of school e-mail for personal e-mails	X				X			

When using communication technologies, the school considers the following as good practice:

- **when communicating in a professional capacity, staff should ensure that the technologies they use are officially sanctioned by the school**
- **watches linked to phones follow the same protocols as mobile phones. They are silent unless at agreed social times or with permission of HT**
- **any digital communication between staff and learners or parents/carers (e-mail, social media, learning platform, etc.) must be professional in tone and content.** *Personal e-mail addresses, text messaging or social media must not be used for these communications.*
- **staff should be expected to follow good practice when using personal social media regarding their own professional reputation and that of the school and its community**
- **users should immediately report to a nominated person – in accordance with the school policy – the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication**
- *relevant policies and permissions should be followed when posting information online e.g., school website and social media. Only school e-mail addresses should be used to identify members of staff and learners.*

Reporting and responding

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

The school will ensure:

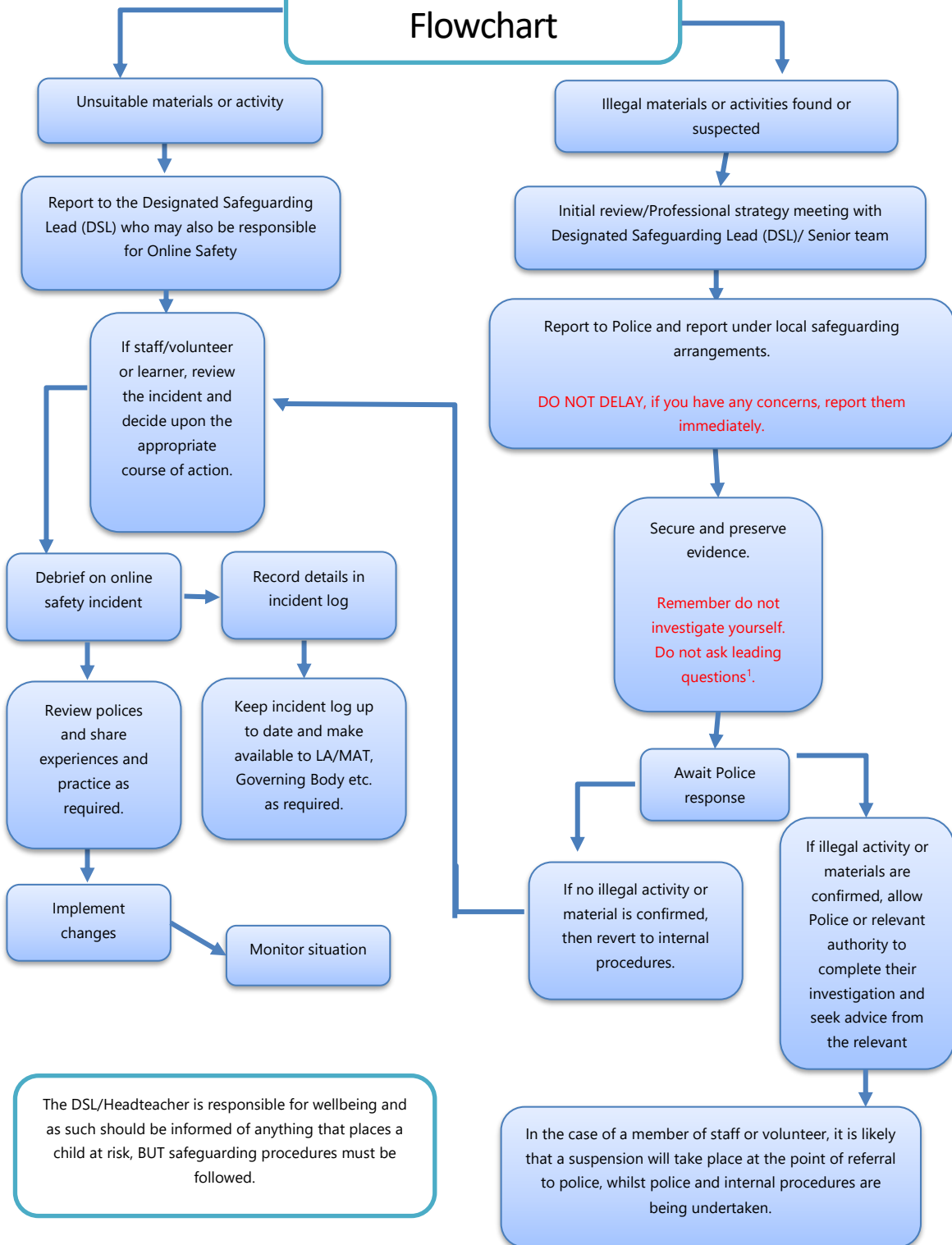
- **there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the school safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies.**
- **all members of the school community will be made aware of the need to report online safety issues/incidents**
- **reports will be dealt with as soon as is practically possible once they are received**
- **the Designated Safeguarding Lead and other responsible staff have appropriate skills and training to deal with online safety risks.**

- **if there is any suspicion that the incident involves any illegal activity or the potential for serious harm the incident must be escalated through the agreed school safeguarding procedures.**
- 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 SLT will 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
- it is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively
- there are support strategies in place e.g., peer support for those reporting or affected by an online safety incident
- incidents should be logged on CPOMS if linked to a child or with the reporting log available on the Shared T drive, Safeguarding folder, Online safety incident log folder
- relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority; police; Professionals Online Safety Helpline; Reporting Harmful Content; CEOP.
- those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions within 5 days of the incident wherever possible
- learning from the incident (or pattern of incidents) will be provided to:
 - *the Health and Safety Governing Body Committee 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*

The school will make the flowchart below available to staff to support the decision-making process for dealing with online safety incidents.

Online Safety Incident Flowchart



The DSL/Headteacher is responsible for wellbeing and as such should be informed of anything that places a child at risk, BUT safeguarding procedures must be followed.

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 as follows

Responding to Learner Actions

Incidents	Refer to class teacher/tutor	Refer to Teacher / Assistant Headteacher	Refer to Headteacher	Refer to Police/Social Work	Refer to local authority technical support for advice/action	Inform parents/carers	Remove device/network/internet access rights	Issue a warning	Further sanction, in line with behaviour policy
Deliberately accessing or trying to access material that could be considered illegal (see list on unsuitable/inappropriate activities).		X	X	X		X		X	
Attempting to access or accessing the school network, using another user's account (staff or learner) or allowing others to access school network by sharing username and passwords		X	X			X		X	
Corrupting or destroying the data of other users.		X	X			X			X
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature		X	X	X		X			X
Unauthorised downloading or uploading of files or use of file sharing.		X	X			X			X
Using proxy sites or other means to subvert the school's filtering system.		X	X			X			X
Accidentally accessing offensive or pornographic material and failing to report the incident.		X	X			X		X	

Deliberately accessing or trying to access offensive or pornographic material.		X	X			X			X
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act.		X	X			X		X	
Unauthorised use of digital devices (including taking images)		X	X			X		X	
Unauthorised use of online services		X	X			X		X	
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.		X	X			X			X
Continued infringements of the above, following previous warnings or sanctions.		X	X	X		X	X		X

Responding to Staff Actions

Incidents	Refer to SLT	Refer to Headteacher	Refer to local authority/HR	Refer to Police	Refer to LA / Technical Support Staff for action re filtering, etc.	Issue a warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities)		X	X	X			X	X
Deliberate actions to breach data protection or network security rules.		X				X		
Deliberately accessing or trying to access offensive or pornographic material		X	X	X			X	X
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software		X	X	X			X	X
Using proxy sites or other means to subvert the school's filtering system.		X	X			X	X	X
Unauthorised downloading or uploading of files or file sharing		X	X	X		X	X	X
Breaching copyright or licensing regulations.		X	X			X	X	X
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account.		X	X			X	X	X
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature		X	X	X		X	X	X
Using personal e-mail/social networking/messaging to carry out digital communications with learners and parents/carers		X				X		

Inappropriate personal use of the digital technologies e.g. social media / personal e-mail		X	X	X		X	X	X
Careless use of personal data, e.g. displaying, holding or transferring data in an insecure manner		X				X		
Actions which could compromise the staff member's professional standing		X	X	X		X	X	X
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.		X	X	X		X	X	X
Failing to report incidents whether caused by deliberate or accidental actions		X				X		X
Continued infringements of the above, following previous warnings or sanctions.		X	X	X			X	X

Online Safety Education Programme

Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways

- A planned online safety curriculum for all year groups matched against a nationally agreed framework e.g. Education for a Connected Work Framework by UKCIS/DCMS and regularly taught in a variety of contexts.
- Lessons are matched to need; are age-related and build on prior learning
- Lessons are context-relevant with agreed objectives leading to clear and evidenced outcomes
- Learner need and progress are addressed through effective planning and assessment
- Digital competency is planned and effectively threaded through the appropriate digital pillars in other curriculum areas e.g. PHSE; RE; Literacy etc.
- it incorporates/makes use of relevant national initiatives and opportunities e.g. [Safer Internet Day](#) and [Anti-bullying week](#)
- the programme will be accessible to learners at different ages and abilities such as those with additional learning needs or those with English as an additional language.
- learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school
- staff should act as good role models in their use of digital technologies the internet and mobile devices

- in lessons where internet use is pre-planned, it is best practice that learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- where learners are allowed to freely search the internet, staff should be vigilant in supervising the learners and monitoring the content of the websites the young people visit
- the online safety education programme should be relevant and up to date to ensure the quality of learning and outcomes.

Contribution of Learners

The school acknowledges, learns from, and uses the skills and knowledge of learners in the use of digital technologies. We recognise the potential for this to shape the online safety strategy for the school community and how this contributes positively to the personal development of young people. Their contribution is recognised through:

- *discussion with pupils about their online use/likes etc.*
- *discussion with parents around their preferences, and knowledge of online use of learners at parent meetings*

Staff/volunteers

All staff will receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- a planned programme of formal online safety and data protection training will be made available to all staff. This will be regularly updated and reinforced.
- the training will be an integral part of the school's annual safeguarding and data protection training for all staff
- all new staff will receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements. It includes explicit reference to classroom management, professional conduct, online reputation and the need to model positive online behaviours
- the Designated Safeguarding Lead (or other nominated person) will receive regular updates through attendance both face to face and virtually at external training events, (e.g. SWGfL / LA / other relevant organisations) and by reviewing guidance documents released by relevant organisations
- this Online Safety Policy and its updates will be presented to and discussed by staff in staff meetings/annual safeguarding training and INSET days
- the DSL (or other nominated person) will provide advice/guidance/training to individuals as required.

Governors

Governors should take part in online safety training/awareness sessions, with particular importance for those who are members of any health and safety/safeguarding committee. This may be offered in several ways such as:

- attendance at training provided by the local authority or other relevant organisation (e.g., SWGfL)
- participation in school training / information sessions for staff or parents
- A higher level of training will be made available to the Safeguarding Governor and Health and Safety Committee.

Families

The school will seek to provide information and awareness to parents and carers through:

- regular communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes
- the learners – who are encouraged to pass on to parents the online safety messages they have learned in lessons and by learners leading sessions at parent/carer evenings.
- letters, newsletters, website
- high profile events / campaigns e.g. [Safer Internet Day](#)
- reference to the relevant web sites/publications, e.g. [SWGfL](#); www.saferinternet.org.uk/; www.childnet.com/parents-and-carers

Adults and Agencies

The school will provide opportunities for local community groups and members of the wider community to gain from the school's online safety knowledge and experience. This may be offered through the following:

- online safety messages targeted towards families and relatives.
- the school will provide online safety information via their website and social media for the wider community

Technology

The school is responsible for ensuring that the school infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. The school should ensure that all staff are made aware of policies and procedures in place on a regular basis and explain that everyone is responsible for online safety and data protection.

Filtering- facilitated by BwD IT department (Fortinet)

- the school filtering policies are agreed by senior leaders and technical staff and are regularly reviewed and updated in response to changes in technology and patterns of online safety incidents/behaviours
- the school manages access to content across its systems for all users. The filtering provided meets the standards defined in the UK Safer Internet Centre [Appropriate filtering](#).
- access to online content and services is managed for all users
- illegal content (e.g., child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list and the police assessed list of unlawful terrorist content, produced on behalf of the Home Office. Content lists are regularly updated
- there are established and effective routes for users to report inappropriate content
- there is a clear process in place to deal with requests for filtering changes
- younger learners will use child friendly/age-appropriate search engines e.g. [SWGfL Swiggle](#)
- filtering logs are regularly reviewed and alert the school to breaches of the filtering policy, which are then acted upon.
- where personal mobile devices have internet access through the school network, content is managed in ways that are consistent with school policy and practice.
- access to content through non-browser services (e.g. apps and other mobile technologies) is managed in ways that are consistent with school policy and practice.

If necessary, the school will seek advice from, and report issues to, the SWGfL [Report Harmful Content](#) site.

Monitoring

The school has monitoring systems in place to protect the school, systems and users:

- The school monitors all network use across all its devices and services.
- An appropriate monitoring strategy for all users has been agreed and users are aware that the network is monitored. The Headteacher is responsible for managing the monitoring strategy and processes.
- There are effective protocols in place to report abuse/misuse. There is a clear process for prioritising response to alerts that require rapid safeguarding intervention. Management of serious safeguarding alerts is consistent with safeguarding policy and practice
- Technical monitoring systems are up to date and managed and logs/alerts are regularly reviewed and acted upon.
- School receive a weekly monitoring report, (Fortinet), for internet use in school by all users.

The school follows the UK Safer Internet Centre [Appropriate Monitoring](#) guidance and protects users and school systems through the use of the appropriate blend of strategies strategy informed by the school's risk assessment. These include:

- physical monitoring (adult supervision in the classroom)

- filtering logs are regularly analysed by the Headteacher and breaches are reported to senior leaders, (weekly Fortinet reports BwD)
- pro-active alerts inform the school of breaches to the filtering policy, allowing effective intervention.

Technical Security

The school technical systems will be managed in ways that ensure that the school meets recommended technical requirements:

- there will be regular reviews and audits of the safety and security of school technical systems
- servers, wireless systems and cabling are securely located in the main office and physical access restricted
- there are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud, (OSMIS)
- all users have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the Network Manager, SLA IT support and will be reviewed, at least annually, by the Health and Safety Committee
- all users (adults and learners) have responsibility for the security of their username and password and must not allow other users to access the systems using their log on details. Users must immediately report any suspicion or evidence that there has been a breach of security
- all school networks and system will be protected by secure passwords. Passwords must not be shared with anyone. All users will be provided with a username and password ComputerServe IT technician Imraan Rawat, who will keep an up-to-date record of users and their usernames
- the master account passwords for the school systems are kept in a secure place.
- passwords should be long.
- records of learner usernames and passwords for learners in Key Stage 1 or younger are kept in an electronic or paper-based form, but are securely kept when not required by the user.
- Helen Nelson, Headteacher, is responsible for ensuring that all software purchased by and used by the school is adequately licenced and that the latest software updates (patches) are applied.
- an appropriate system is in place consisting of an online reporting system that is accessible from all desktop computers on site. This allows users to report any actual/potential technical incident/security breach to Imraan Rawat, IT Technician as agreed
- appropriate security measures are in place. Fortinet filtering system provided by Blackburn with Darwen IT department. It will protect the servers, firewalls, routers, wireless systems and devices from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up-to-date endpoint (anti-virus) software. Fortinet. Portable devices are protected by Lightspeed antivirus software
- Temporary access of 'guests', (e.g., trainee teachers, supply teachers, visitors) onto the school systems is with agreement from the Headteacher or SLT. They are subject to the Online Safety Policy requirements for internet use on school premises

- Staff are forbidden from downloading executable files and installing programmes on school devices unless with the agreement of the Headteacher/Imraan Rawat IT technician
- Staff will use password protected removable hard drives on school hardware.
- systems are in place that prevent the unauthorised sharing of personal data unless safely encrypted or otherwise secured.

Mobile Technologies

The school acceptable use agreements for staff, learners, parents, and carers outline the expectations around the use of mobile technologies.

The school allows:

	School devices			Personal devices		
	School owned for individual use	School owned for multiple users	Authorised device ⁵	Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	No	Yes	Yes
Full network access	Yes	Yes	Yes	NA	No (unless agreed with HT)	No (unless agreed with HT)
Internet only	No	No	No	NA	Yes	Yes
No network access	No	No	No	NA	Yes (unless agreed with HT)	Yes (unless agreed with HT)

School owned/provided devices:

- Permanent teachers will be provided with a laptop Other permanent school based staff as agreed with HT. Mobile phones are not provided to staff. The school has a mobile phone that can be taken on external school outside of school in agreement with the HT

⁵ Authorised device – purchased by the learner/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school.

- Laptops can be used within school for education purposes. School laptops must not be used for personal activity. Software must not be downloaded on to school laptops unless agreed by Headteacher and under the guidance of Imraan Rawat, IT technician
- access to networks/internet is described in the above table
- All management of devices/installation of apps/changing of settings/monitoring will be conducted by Imraan Rawat, IT technician
- technical support will be provided by Imraan Rawat, IT technician
- filtering of devices will be managed by Fortinet, school filtering software
- Laptops have access to OneDrive BwD
- IPad can be used on school trips to take images of children for the purpose of education and supporting pupil learning
- taking/storage/use of images is allowed on Laptops and IPad as they are protected by filtering software and password protected
- When a member of staff leaves school, school devices must be returned in a suitable condition
- Staff members will be liable for damage due to accident or neglect or that is not due to general age
- Relevant staff training will be provided at the annual safeguarding training, training and updates to Online Safeguarding policy and staff meeting safeguarding updates throughout the year

Personal devices

- Staff and visitors are permitted to use personal mobile devices in school with strict adherence to the school Online Safety Policy and in particular the Mobile Technologies section of the Policy
- Mobile phones/smart watches must remain out of sight of pupils and learners and must not be visible in classrooms or on the school corridors.
Mobile phones must not be kept in pockets but should be stored out of sight of pupils, in a secure space such as handbag or coat pocket.
They can be used during break times and lunch times only.
They must not be used during management or PPA time.
They must not be used with pupils present or in sight.
They can be used in empty classrooms and the staff room.
They must not be used in or near toileting facilities or the dining hall or other communal spaces
Smart watches must not be visible to pupils or heard by others. They must be silent when on school premises
- personal devices can be used to access school email but must not be used for other school business unless agreed by the Headteacher
- Personal devices must not access the school internet or networks unless agreed with Headteacher
- No technical support will be made available for personal devices
- If personal devices access the school internet connection, these devices will be monitored and visible by Fortinet. Prohibited use will be evident on the Fortinet weekly report
- Ensure that no pupil data is stored on personal devices in accordance with the data protection requirements

- Do not take or store images of pupils on personal devices, this is prohibited
- School will not be held liable for loss/damage or malfunction following access to the school network
- You are responsible for your own personal devices on school premises. School will not be held liable for loss or damage whilst on school premises
- All visitors will be informed about school requirements and will be directed to the online policy and in particular, mobile technology use. Signs will be evident around school advising visitors that mobile phones must not be visible or used without prior permission
- Misuse of personal devices on school premises will be dealt with in accordance with the school policy for Online Safety and the agreed use of Mobile Technology

Social media

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to learners through:

- ensuring that personal information is not published
- education/training being provided including acceptable use, age restrictions, social media risks, digital and video images policy, checking of settings, data protection and reporting issues
- clear reporting guidance, including responsibilities, procedures and sanctions
- risk assessment, including legal risk
- guidance for learners, parents/carers

School staff should ensure that:

- no reference should be made in social media to learners, parents/carers or school staff
- they do not engage in online discussion on personal matters relating to members of the school community
- personal opinions should not be attributed to the school
- security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information
- they act as positive role models in their use of social media

When official school social media accounts are established, there should be:

- a process for approval by senior leaders
- clear processes for the administration, moderation, and monitoring of these accounts – involving at least two members of staff, this is currently the Senior Leadership Team and Headteacher
- a code of behaviour for users of the accounts
- systems for reporting and dealing with abuse and misuse
- understanding of how incidents may be dealt with under school disciplinary procedures.

Personal use

- personal communications are those made via personal social media accounts. In all cases, where a personal account is used which associates itself with, or impacts on, the school it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy
- personal communications which do not refer to or impact upon the school are outside the scope of this policy
- where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken

Monitoring of public social media

- As part of active social media engagement, the school may pro-actively monitor the Internet for public postings about the school
- the school should effectively respond to social media comments made by others according to a defined policy or process
- when parent's/carers express concerns about the school on social media we will urge them to make direct contact with the school, in private, to resolve the matter. Where this cannot be resolved, parents/carers should be informed of the school complaints procedure.

School use of social media for professional purposes will be checked regularly by a senior leader and the DSL to ensure compliance with the social media, data protection, communications, digital image and video policies. In the event of any social media issues that the school is unable to resolve support may be sought from the Professionals Online Safety Helpline.

Digital and video images

The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- the school may use live-streaming or video-conferencing services in line with national and local safeguarding guidance / policies.
- when using digital images, staff will inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images.
- staff/volunteers must be aware of those learners whose images must not be taken/published. Those images should only be taken on school devices. The personal devices of staff should not be used for such purposes
- in accordance with [guidance from the Information Commissioner's Office](#), parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites,

nor should parents/carers comment on any activities involving other *learners* in the digital/video images

- staff and volunteers are allowed to take digital/video images to support educational aims, but must follow school policies concerning the sharing, storage, distribution and publication of those images
- care should be taken when sharing digital/video images that learners are appropriately dressed
- learners must not take, use, share, publish or distribute images of others without their permission
- photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with Online Safety Policy
- learners' full names will not be used anywhere on a website or blog, particularly in association with photographs
- written permission from parents or carers will be obtained before photographs of learners are taken for use in school or published on the school website/social media.
- parents/carers will be informed of the purposes for the use of images, how they will be stored and for how long – in line with the school data protection policy
- images will be securely stored in line with the school retention policy

Online Publishing

The school communicates with parents/carers and the wider community and promotes the school through:

- Public-facing website
- School Facebook Page
- Online newsletters

The school website is managed/hosted by Primary Site. The school ensures that online safety policy has been followed in the use of online publishing e.g., use of digital and video images, copyright, identification of young people, publication of school calendars and personal information – ensuring that there is least risk to members of the school community, through such publications.

Where learner work, images or videos are published, their identities are protected, and full names are not published.

The school public online publishing provides information about online safety e.g., publishing the schools Online Safety Policy and acceptable use agreements; curating latest advice and guidance; news articles etc., creating an online safety page on the school website.

Data Protection

Personal data will be recorded, processed, transferred and made available according to the current data protection legislation.

The school:

- has a Data Protection Policy. (DPO Lee Gardiner BwD)

- implements the data protection principles and can demonstrate that it does so
- has paid the appropriate fee to the Information Commissioner's Office (ICO)
- has appointed an appropriate Data Protection Officer (DPO) who has effective understanding of data protection law and is free from any conflict of interest. (This is Lee Gardiner Blackburn with Darwen DPO)
- has a 'Record of Processing Activities' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- the Record of Processing Activities lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis is listed
- has an 'information asset register' in place and knows exactly [what personal data is held](#), where, why and which member of staff has responsibility for managing it
- information asset register lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis will have also been listed
- will hold the minimum personal data necessary to enable it to perform its function and will not hold it for longer than necessary for the purposes it was collected for. The school 'retention schedule' supports this
- data held is accurate and up to date and is held only for the purpose it was held for. Systems are in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- provides staff, parents, volunteers, teenagers, and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice (see Privacy Notice section in the appendix)
- has procedures in place to deal with the individual rights of the data subject, *e.g. one of the dozen rights applicable is that of Subject Access which enables an individual to see/have a copy of the personal data held about them*
- carries out Data Protection Impact Assessments (DPIA) where necessary e.g. to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier
- has undertaken appropriate due diligence and has data protection compliant contracts in place with any data processors
- understands how to share data lawfully and safely with other relevant data controllers.
- has clear and understood policies and routines for the deletion and disposal of data
- [reports any relevant breaches to the Information Commissioner](#) within 72hrs of becoming aware of the breach as required by law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents
- has a Freedom of Information Policy which sets out how it will deal with FOI requests

- provides data protection training for all staff at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff

When personal data is stored on any mobile device or removable media the:

- data will be encrypted, and password protected.
- device will be password protected.
- device will be protected by up-to-date endpoint (anti-virus) software
- data will be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete.

Staff must ensure that they:

- at all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse
- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- can help data subjects understand their rights and know how to handle a request whether verbal or written and know who to pass it to in the school
- only use encrypted data storage for personal data
- will not transfer any school personal data to personal devices. Procedures are in place to enable the Senior Leadership Team to work from home. VPN access to the school network is provided by Blackburn with Darwen IT department, or a work laptop is provided to teachers by school.
- use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data
- transfer data using encryption, a secure email account (where appropriate), and secure password-protected devices.

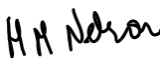
Outcomes

The impact of the Online Safety Policy and practice is regularly evaluated through the review/audit of online safety incident logs; behaviour/bullying reports and is reported to relevant groups:

- there is balanced professional discussion about the evidence taken from the reviews/audits and the impact of preventative work e.g., online safety education, awareness, and training
- there are well-established routes to regularly report patterns of online safety incidents and outcomes to school leadership and Governors
- online safety (and related) policies and procedures are regularly updated in response to the evidence gathered from these reviews/audits/professional debate

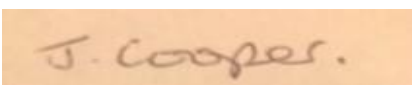
Policy agreed by

H Nelson Headteacher

Signed 

Date 4th September 2023

J Cooper Chair of Governors/Safeguarding Link Governor

Signed 

Date 4th September 2023

Links to other organisations or documents

The following links may help those who are developing or reviewing a school online safety policy and creating their online safety provision:

UK Safer Internet Centre

Safer Internet Centre – <https://www.saferinternet.org.uk/>

South West Grid for Learning - <https://swgfl.org.uk/products-services/online-safety/>

Childnet – <http://www.childnet-int.org/>

Professionals Online Safety Helpline - <http://www.saferinternet.org.uk/about/helpline>

Revenge Porn Helpline - <https://revengepornhelpline.org.uk/>

Internet Watch Foundation - <https://www.iwf.org.uk/>

Report Harmful Content - <https://reportharmfulcontent.com/>

[Harmful Sexual Support Service](#)

CEOP

CEOP - <http://ceop.police.uk/>

ThinkUKnow - <https://www.thinkuknow.co.uk/>

Others

LGfL – [Online Safety Resources](#)

Kent – [Online Safety Resources page](#)

INSAFE/Better Internet for Kids - <https://www.betterinternetforkids.eu/>

UK Council for Internet Safety (UKCIS) - <https://www.gov.uk/government/organisations/uk-council-for-internet-safety>

Tools for Schools / other organisations

Online Safety BOOST – <https://boost.swgfl.org.uk/>

360 Degree Safe – Online Safety self-review tool – <https://360safe.org.uk/>

360Data – online data protection self-review tool: www.360data.org.uk

SWGfL Test filtering - <http://testfiltering.com/>

UKCIS Digital Resilience Framework - <https://www.gov.uk/government/publications/digital-resilience-framework>

[SWGfL 360 Groups – online safety self review tool for organisations working with children](#)

[SWGfL 360 Early Years – online safety self review tool for early years organisations](#)

Bullying/Online-bullying/Sexting/Sexual Harassment

Enable – European Anti Bullying programme and resources (UK coordination/participation through SWGfL & Diana Awards) - <http://enable.eun.org/>

SELMA – Hacking Hate - <https://selma.swgfl.co.uk>

Scottish Anti-Bullying Service, Respectme - <http://www.respectme.org.uk/>

Scottish Government - Better relationships, better learning, better behaviour -

<http://www.scotland.gov.uk/Publications/2013/03/7388>

DfE - Cyberbullying guidance -

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying Advice for Headteachers and School Staff 121114.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf)

Childnet – Cyberbullying guidance and practical PSHE toolkit:

<http://www.childnet.com/our-projects/cyberbullying-guidance-and-practical-toolkit>

[Childnet – Project deSHAME – Online Sexual Harrassment](#)

[UKSIC – Sexting Resources](#)

Anti-Bullying Network – <http://www.antibullying.net/cyberbullying1.htm>

[Ditch the Label – Online Bullying Charity](#)

[Diana Award – Anti-Bullying Campaign](#)

Social Networking

Digizen – [Social Networking](#)

UKSIC - [Safety Features on Social Networks](#)

[Children’s Commissioner, TES and Schillings – Young peoples’ rights on social media](#)

Curriculum

SWGfL Evolve - <https://projectevolve.co.uk>

[UKCCIS – Education for a connected world framework](#)

Department for Education: Teaching Online Safety in Schools

Teach Today – www.teachtoday.eu/

Insafe - [Education Resources](#)

Data Protection

[360data - free questionnaire and data protection self review tool](#)

[ICO Guides for Organisations](#)

[IRMS - Records Management Toolkit for Schools](#)

[ICO Guidance on taking photos in schools](#)

Professional Standards/Staff Training

[DfE – Keeping Children Safe in Education](#)

DfE - [Safer Working Practice for Adults who Work with Children and Young People](#)

[Childnet – School Pack for Online Safety Awareness](#)

[UK Safer Internet Centre Professionals Online Safety Helpline](#)

Infrastructure/Technical Support/Cyber-security

[UKSIC – Appropriate Filtering and Monitoring](#)

[SWGfL Safety & Security Resources](#)

Somerset - [Questions for Technical Support](#)

SWGfL - [Cyber Security in Schools](#).

NCA – [Guide to the Computer Misuse Act](#)

NEN – [Advice and Guidance Notes](#)

Working with parents and carers

[SWGfL – Online Safety Guidance for Parents & Carers](#)

[Vodafone Digital Parents Magazine](#)

[Childnet Webpages for Parents & Carers](#)

[Get Safe Online - resources for parents](#)

[Teach Today - resources for parents workshops/education](#)

[Internet Matters](#)

Prevent

[Prevent Duty Guidance](#)

[Prevent for schools – teaching resources](#)

Childnet – [Trust Me](#)

Research

[Ofcom –Media Literacy Research](#)

Ofsted: Review of sexual abuse in schools and colleges

Further links can be found at the end of the UKCIS [Education for a Connected World Framework](#)

Glossary of Terms

AUP/AUA	Acceptable Use Policy/Agreement – see templates earlier in this document
CEOP	Child Exploitation and Online Protection Centre (part of National Crime Agency, UK Police, dedicated to protecting children from sexual abuse, providers of the Think U Know programmes.
CPD	Continuous Professional Development
FOSI	Family Online Safety Institute
ICO	Information Commissioners Office
ICT	Information and Communications Technology
INSET	In Service Education and Training
IP address	The label that identifies each computer to other computers using the IP (internet protocol)
ISP	Internet Service Provider
ISPA	Internet Service Providers' Association
IWF	Internet Watch Foundation
LA	Local Authority
LAN	Local Area Network
MAT	Multi Academy Trust
MIS	Management Information System
NEN	National Education Network – works with the Regional Broadband Consortia (e.g. SWGfL) to provide the safe broadband provision to schools across Britain.
Ofcom	Office of Communications (Independent communications sector regulator)
SWGfL	South West Grid for Learning Trust – the Regional Broadband Consortium of SW Local Authorities – is the provider of broadband and other services for schools and other organisations in the SW
TUK	Think U Know – educational online safety programmes for schools, young people and parents.
UKSIC	UK Safer Internet Centre – EU funded centre. Main partners are SWGfL, Childnet and Internet Watch Foundation.
UKCIS	UK Council for Internet Safety
VLE	Virtual Learning Environment (a software system designed to support teaching and learning in an educational setting,

WAP Wireless Application Protocol

A more comprehensive glossary can be found at the end of the UKCIS [Education for a Connected World Framework](#)

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