



Online Safety Policy

Responsibility	Students, Parents and Community	
Status	Recommended	
Ratification date	15 03 2022	
Review cycle / date	1	Spring 2023
Reference	049.3	
Last updated	07/09/2021	

1 Introduction

1.1 Key people / dates

Designated Safeguarding Lead (DSL) team	David Jones
Deputy DSL Designated Safeguarding Lead (DDSL)	Pippa Wright
Deputy DSL	Salima Marklew
Deputy DSL	Niki Carrick-Steele
Deputy DSL	Kelly Dooley
Online-safety coordinator	David Jones
Safeguarding link trustee	Sarah Scammell
Online safety link trustee	Rachael Prasher
PSHCE/RSHE lead	Tanzina Tania
Network manager	ClickOn IT London
Data, Systems and IT	Deesh Grewal
RTS website	Head Teacher's PA
RTS Twitter account	Head Teacher's PA
Date this policy was reviewed and by whom	11/02/2021 by Deesh Grewal
Date of next review and by whom	27/02/ 2022 by Deesh Grewal

1.2 What is this policy?

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. Accordingly, this policy is written in line with:

- [Keeping Children Safe in Education](#) 2021 (KCSIE)
- [Teaching Online Safety in Schools 2019](#)
- statutory [RSHE guidance](#) 2019
- and other statutory documents

It complements Health, Relationships and Sex Education, Citizenship and Computing; it is designed to sit alongside our statutory Safeguarding Policy.

Any issues and concerns with online safety must follow the school's safeguarding and child protection procedures.

2.3 Who is it for; when is it reviewed?

This policy is a living document, subject to full annual review but also amended where necessary during the year in response to developments in the school and local area.

Although many aspects of this policy will be informed by legislation and regulations, we involve staff, trustees, students and parents in writing and reviewing the policy (KCSIE stresses making use of teachers' day-to-day experience on the ground). This will help ensure all stakeholders understand the rules that are in place and why, and that the policy affects day-to-day practice.

Acceptable Use Policies (see appendices) for different stakeholders are reviewed alongside this overarching policy.

Any changes to this policy will be immediately disseminated to all the above stakeholders.

2.4 Who is in charge of online safety?

The DSL at RTS will take lead responsibility for online safety, in line with KCSIE:

“the designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety).”

The DSL will monitor and review online safety with the Lead Practitioner responsible for Data, Systems and Computer Science.

2.5 What are the main online safety risks today?

“All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.”

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

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, 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
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams

Many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass their peers via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

In past and potential future remote learning and lockdowns, there is a greater risk for grooming and exploitation (CSE, CCE and radicalisation) as children spend more time at home and on devices. There is a real risk that some students may have missed opportunities to disclose such abuse during the lockdowns or periods of absence.

2.6 How will this policy be communicated?

This policy aims to impact upon practice and is therefore a living document. It is accessible to and must be understood by all stakeholders. It will be communicated in the following ways:

- Posted on the school website
- Available on the Staff Notices classroom
- Part of the RTS induction pack for all new staff (including temporary, supply and non-classroom-based staff)
- Integral to safeguarding updates and training for all staff (especially in September refreshers)

- Clearly reflected in the Acceptable Use Policies (AUPs) for staff, volunteers, contractors, trustees, students and parents/carers (in accessible language appropriate to these groups).
- AUPs issued to whole school community, on entry to the school, with annual reminders of where to find them if unchanged, and reissued if updated after annual review
- AUPs are displayed in all classrooms
- Reviews of this online-safety policy will include input from staff, students and other stakeholders, helping to ensure further engagement

3 Contents

1 Introduction	1
1.1 Key people / dates	1
1.2 What is this policy?	2
2.3 Who is it for; when is it reviewed?	2
2.4 Who is in charge of online safety?	2
2.5 What are the main online safety risks today?	3
2.6 How will this policy be communicated?	3
3 Contents	5
4 Overview	7
4.1 Aims	7
4.2 Further Help and Support	7
4.3 Scope	7
5 Roles and responsibilities	8
5.1 Head Teacher	8
5.2 Designated Safeguarding Lead/ Online Safety Lead	9
5.3 Trust Board, Safeguarding Link Trustees and Online Safety Link Trustee	10
5.4 All staff	11
5.5 PSHCEE / PRE – David Jones	12
5.6 Computing Curriculum Leader	13
5.7 Curriculum and other leaders	13
5.8 Network Manager and technicians – ClickOn IT London	13
5.9 Data Protection Officer (DPO)	14
5.10 LGfL TRUSTnet Nominated contact	15
5.11 Volunteers and contractors	15
5.12 Students	15
5.13 Parents/carers	16
5.14 External groups including parent associations (FoRTS)	16
6 Education and curriculum	17

7 Handling online-safety concerns and incidents	18
7.1 Actions where there are concerns about a child	20
7.2 Sexting - sharing nudes and semi-nudes	21
7.3 Bullying	21
7.3.1 Upskirting	21
7.4 Sexual violence and harassment	22
8 Misuse of school technology (devices, systems, networks or platforms)	22
9 Social media incidents	22
10 Data protection and data security	23
12 Appropriate filtering and monitoring	24
13 Electronic communications	25
13.1 Email (must be read in conjunction with the RTS Communications Policy)	25
14 School website	26
15 Cloud platforms: Google Education, Progresso, Jamf, Civica, Invenry, WisePay, NRS Till system	26
16 Digital images and video	27
17 Social media (SM)	29
17.1 The Richmond upon Thames School's SM presence	29
17.2 Staff, students' and parents' SM presence	29
18 Device usage	31
18.1 Personal devices and bring your own device (BYOD) policy	31
18.2 Network / internet access on school devices	32
18.3 Trips / events away from school	32
18.4 Searching and confiscation	33

4 Overview

4.1 Aims

This policy aims to:

- Set out expectations for all The Richmond upon Thames School (RTS) community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline).
- Help all stakeholders to recognise that online/digital behaviour standards (including social media activity) must be upheld beyond the confines of the school gates and school day, and regardless of device or platform
- Facilitate the safe, responsible and respectful use of technology to support teaching & learning, increase attainment and prepare children and young people for the risks and opportunities of today's and tomorrow's digital world, to survive and thrive online
- Help school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
 - for the protection and benefit of the children and young people in their care, and
 - for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice
 - for the benefit of the school, supporting the school ethos, aims and objectives, and protecting the reputation of the school and profession
- Establish clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as Behaviour Policy or Anti-Bullying Policy)

4.2 Further Help and Support

Internal school channels should always be followed first for reporting and support, as documented in school policy documents, especially in response to incidents, which should be reported in line with our Safeguarding Policy.

The DSL will handle referrals to local authority multi-agency safeguarding hubs (MASH) and normally the Head Teacher will handle referrals to the LA designated officer (LADO).

Beyond this, [reporting.lgfl.net](https://www.reporting.lgfl.net) has a list of curated links to external support and helplines for both students and staff, including the Professionals' Online-Safety Helpline from the UK Safer Internet Centre and the NSPCC Whistleblowing Helpline, as well as hotlines for hate crime, terrorism and fraud which might be useful to share with parents, and anonymous support for children and young people.

4.3 Scope

This policy applies to all members of the Richmond upon Thames School community (including staff, trustees, volunteers, contractors, students, parents/carers, visitors and community users) who have access to our digital technology, networks and systems, whether on-site or remotely, and at any time.

5 Roles and responsibilities

This school is a community and all members have a duty to behave respectfully online and offline, to use technology for teaching and learning and to prepare for life after school, and to immediately report any concerns or inappropriate behaviour, to protect staff, students, families and the reputation of the school.

We learn together, make honest mistakes together and support each other in a world that is online and offline at the same time.

5.1 Head Teacher – Kelly Dooley

Key responsibilities:

- Support safeguarding leads and technical staff as they review protections for **student in the home** and **remote-learning** procedures, rules and safeguards
- Foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding
- Oversee the activities of the designated safeguarding lead and ensure that the DSL responsibilities listed in the section below are being followed and fully supported
- Ensure that policies and procedures are followed by all staff
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and relevant Local Safeguarding Children Board (LSCB) guidance
- Liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and trustees to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Ensure the school implements and makes effective use of appropriate IT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including cloud systems are implemented according to child-safety first principles
- Be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles
- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of students, including risk of children being radicalised
- Ensure that there is a system in place to monitor and support staff (e.g. network manager) who carry out internal technical online-safety procedures
- Ensure trustees are regularly updated on the nature and effectiveness of the school's arrangements for online safety

- Ensure the school website meets statutory DfE requirements (see appendices for website audit document)
- Report all online safety concerns as outlined in the RTS safeguarding policy

5.2 Designated Safeguarding Lead/ Online Safety Lead – David Jones

Key responsibilities

All quotes below are from *Keeping Children Safe in Education*:

- “The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This **lead** responsibility should not be delegated”
- Work with the Head Teacher and technical staff to review protections for **students in the home** and **remote-learning** procedures, rules and safeguards
- Ensure there is regular review and open communication between roles and that the DSL’s clear overarching responsibility for online safety is not compromised
- Ensure “An effective approach to online safety [that] empowers [RTS] to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.”
- “Liaise with staff (especially pastoral support staff, IT Technicians, SENCO, and Senior Mental Health Lead) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.”
- Take day to day responsibility for online safety issues and be aware of the potential for serious child protection concerns
- Remind staff of safeguarding considerations as part of a review of remote learning procedures and technology, including that the same principles of online safety and behaviour apply
- Work with the Head Teacher, DPO and trustees to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Stay up to date with the latest trends in online safety and “undertake Prevent awareness training.”
- Review and update this policy, other online safety documents (e.g. Acceptable Use Policies) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others) and submit for review to the trustee/trustees
- Receive regular updates in online safety issues and legislation, be aware of local and school trends
- Ensure that online safety education is embedded across the curriculum (e.g. by use of the UKCIS framework “[Education for a Connected World – 2020 edition](#)”) and beyond, in wider school life
- Promote an awareness and commitment to online safety throughout the school community, with a strong focus on parents, who are often appreciative of school support in this area, but also including hard-to-reach parents
- Liaise with school technical, pastoral, and support staff as appropriate
- Communicate regularly with SLT and the designated online safety trustee/committee to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring work and have been functioning/helping

- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident
- Ensure adequate provision for staff to flag issues when not in school and for students to disclose issues when off site, especially when in isolation/quarantine/lockdown e.g; using Tootoot
- Oversee and discuss *appropriate filtering and monitoring* with trustees and ensure staff are aware. Whilst IT-Support will do the technical work, key decisions on what should be allowed are the responsibility of the DSL who should be careful to keep children safe but “be careful that ‘over blocking’ does not lead to unreasonable restrictions” (KCSIE)
- Ensure the updated 2021 DfE guidance on Sexual Violence & Sexual Harassment Between Children in Schools & Colleges Guidance is followed throughout the school and that staff adopt a zero-tolerance, whole school approach to this, as well as to bullying
- Facilitate training and advice for all staff, including supply teachers:
 - all staff must read KCSIE Part 1 and all those working with children Annex B
 - it would also be advisable for all staff to be aware of Annex D (online safety)
 - cascade knowledge of risks and opportunities throughout the organisation
 - cpd.lgfl.net has helpful CPD materials including PowerPoints, videos and more
- Pay particular attention to **online tutors** this year, both those engaged by the school as part of the DfE scheme who can be asked to sign the contractor AUP, and those hired by parents - share the Online Tutors – Keeping Children Safe poster at parentsafe.lgfl.net to remind parents of key safeguarding principles

5.3 Trust Board, led by Safeguarding Link Trustees Sarah Scammell and Online Safety Link Trustee Rachael Prasher

Key responsibilities (quotes are taken from Keeping Children Safe in Education 2021):

- Approve this policy and strategy and subsequently review its effectiveness, e.g. by asking the questions in the helpful document from the UK Council Internet Safety (UKCIS) [Online safety in schools and colleges: Questions from the trust board](#)
- Ask about how the school has reviewed protections for **students in the home** (including when, with online tutors) and **remote-learning** procedures, rules and safeguards
- “Ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of DSL [with] lead responsibility for safeguarding and child protection (including online safety) [with] the appropriate status and authority [and] time, funding, training, resources and support...”
- Support the school in encouraging parents and the wider community to become engaged in online safety activities
- Have regular strategic reviews with the online-safety coordinator / DSL and incorporate online safety into standing discussions of safeguarding at trustee meetings
- Where the online-safety coordinator is not the named DSL or deputy DSL, ensure that there is regular review and open communication between these roles and that the DSL’s clear overarching responsibility for online safety is not compromised
- Work with the DPO, DSL and Head Teacher to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information

- Check all school staff have read Part 1 of KCSIE; SLT and all working directly with children have read Annex B; check that Annex D on Online Safety reflects practice in your school
- “Ensure that all staff undergo safeguarding and child protection training (including online safety) at induction [and] regularly updated [...] in line with advice from the LSCB [...] online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.”
- “Ensure appropriate filters and appropriate monitoring systems are in place [but...] be careful that ‘overblocking’ does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding”
- “Ensure that children are taught about safeguarding, including online safety [...] as part of providing a broad and balanced curriculum [...]

5.4 All staff

Key responsibilities:

- Pay particular attention to safeguarding provisions for **home-learning** and **remote-teaching technologies**. There are further details in the staff AUP.
- Recognise that **RSHE** is now statutory and that it is a whole-school subject requiring the support of all staff; online safety has become core to this new subject
- Understand that online safety is a core part of safeguarding; as such it is part of everyone’s job – never think that someone else will pick it up
- Know who the Designated Safeguarding Lead (DSL) and Online Safety Lead (OSL) is (**David Jones**)
- Read *Part 1, Annex B and Annex D of Keeping Children Safe in Education* (whilst *Part 1* is statutory for all staff, *Annex B* for SLT and those working directly with children, it is good practice for all staff to read all three sections).
- Read and follow this policy in conjunction with the school’s main safeguarding policy
- Record online-safety incidents in the same way as any safeguarding incident and report in accordance with school procedures.
- Understand that safeguarding is often referred to as a jigsaw puzzle – you may have discovered the missing piece so do not keep anything to yourself
- Sign and follow the staff [acceptable use policy](#) and code of conduct
- Notify the DSL/OSL if the policy does not reflect practice in your school and follow escalation procedures if concerns are not promptly acted upon
- Identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum, year and subject leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for students)
- Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc) in school or setting as homework tasks, encourage sensible use, monitor what students are doing and consider potential dangers and the age appropriateness of websites (ask your DSL what appropriate filtering and monitoring policies are in place)
- When supporting students remotely, be mindful of additional safeguarding considerations

- Carefully supervise and guide students when engaged in learning activities involving online technology supporting them with search skills, critical thinking, age appropriate materials and signposting, and legal issues such as copyright and GDPR
- Be aware of security best-practice at all times, including password hygiene and phishing strategies
- Prepare and check all online sources and resources before using
- Encourage students to follow their acceptable use policy, remind them about it and enforce school sanctions
- Notify the DSL/OSL of new trends and issues before they become a problem
- Take a zero-tolerance approach to bullying and low-level sexual harassment
- Be aware that you are often most likely to see or overhear online-safety issues (particularly relating to bullying and sexual harassment and violence) in the playground, corridors, toilets and other communal areas outside the classroom – let the DSL/OSL know
- Receive regular updates from the DSL/OSL and have a healthy curiosity for online safety issues – you may find it useful to read at least the headline statistics and conclusions from the LGfL DigiSafe [student survey](#) of 40,000 students (new themes include *self-harm bullying* and *getting undressed on camera*)
- Model safe, responsible and professional behaviours in their own use of technology. This includes outside the school hours and site, and on social media, in all aspects upholding the reputation of the school and of the professional reputation of all staff. More guidance on this point can be found in this [Online Reputation](#) guidance for schools.
- Report all online safety concerns as outlined in the RTS safeguarding policy (via Tootoot)

5.5 PSHCEE / PRE – David Jones

Key responsibilities:

As listed in the ‘all staff’ section, plus:

- Embed consent, mental wellbeing, healthy relationships and staying safe online into the PSHE / Relationships education, relationships and sex education (RSHE) and health education curriculum. “This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age appropriate way that is relevant to their students’ lives.”
- This will complement the computing curriculum, which covers the principles of online safety at all key stages, with progression in the content to reflect the different and escalating risks that students face. This includes how to use technology safely, responsibly, respectfully and securely, and where to go for help and support when they have concerns about content or contact on the internet or other online technologies.
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE /PRE

- Work closely with the Computing Curriculum Leader to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach

5.6 Computing Curriculum Leader – Deesh Grewal

Key responsibilities:

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

- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum
- Work closely with the RSHE lead to avoid overlap but ensure a complementary whole-school approach
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Collaborate with technical staff and others responsible for IT use in school to ensure a common and consistent approach, in line with acceptable-use agreements
- Monitor the use of school technology, online platforms and social media presence and that any misuse/attempted misuse is identified and reported in line with school policy
- Work with the Headteacher to ensure the school website meets statutory DfE requirements

5.7 Curriculum and other leaders

Key responsibilities:

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

- Look for opportunities to embed online safety in your subject or aspect, especially as part of the new RSHE curriculum and model positive attitudes and approaches to staff and students alike
- Consider how the UKCCIS framework Education for a Connected World can be applied in your context
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Ensure subject specific action plans also have an online-safety element
- Report all online safety concerns as outlined in the RTS safeguarding policy (via Tootoot)

5.8 Network Manager and technicians – ClickOn IT London

Key responsibilities:

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

- Support the HT and DSL team as they review protections for **students in the home** and remote-learning procedures, rules and safeguards
- Keep up to date with the school's online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant

- [Meet the RSHE lead to] see how the online-safety curriculum [delivered through this new subject] can complement the school IT system and vice versa, and ensure no conflicts between educational messages and practice.
- Work closely with the designated safeguarding lead / online safety lead / data protection officer / LGfL TRUSTnet nominated contact to ensure that school systems and networks reflect school policy
- Ensure the above stakeholders understand the consequences of existing services and of any changes to these systems (especially in terms of access to personal and sensitive records / data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms etc)
- Support and advise on the implementation of ‘appropriate filtering and monitoring’ as decided by the DSL and senior leadership team
- Maintain up-to-date documentation of the school’s online security and technical procedures
- To report online-safety related issues that come to their attention in line with school policy
- Manage the school’s systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption and backup for data, including disaster recovery plans, and auditable access controls
- Take advantage of LGfL solutions which are part of your package: Sophos Anti-Virus, Sophos Anti-Phish, Sophos InterceptX, Sophos Server Advance, Malware Bytes, Egress and Meraki Mobile Device Management
- Work with the Head Teacher to ensure the school website meets statutory DfE requirements (see appendices for website audit document)
- Report all online safety concerns as outlined in the RTS safeguarding policy (via Tootoot)

5.9 Data Protection Officer (DPO) – David Coy (GROW education partners)

Key responsibilities:

NB – this document is not for general data-protection guidance

- Be aware of references to the relationship between data protection and safeguarding in key Department for Education documents *Keeping Children Safe in Education* and *Data protection: a toolkit for schools (April 2018)*, especially this quote from the latter document:
 - “GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Work with the Headteacher to ensure the school website meets statutory DfE requirements. Lawful and secure information sharing between schools, Children’s Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. **The Data Protection Act 2018 introduced ‘safeguarding’ as a reason to be able to process sensitive, personal information, even without consent** (DPA, Part 2,18; Schedule 8, 4). When Designated Safeguarding Leads in schools are considering whether, or not, to share safeguarding information (especially with other agencies) it is considered best practice for them to record who they are sharing that information with and for what reason. If they have taken a decision not to seek consent from the data subject and/or parent/carer that should also be recorded within the safeguarding file. All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information **must not be**

allowed to stand in the way of promoting the welfare and protecting the safety of children.”

- The same document states that the retention schedule for safeguarding records may be required to be set as ***Very long term need (until student is aged 25 or older)***
- Work with the DSL, Head Teacher and trustees to ensure frameworks are in place for the protection of data and of safeguarding information sharing as outlined above.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited

5.10 LGfL TRUSTnet Nominated contact – Deesh Grewal

Key responsibilities:

- To ensure all LGfL TRUSTnet services are managed on behalf of the school in line with school policies, following data handling procedures as relevant
- Work closely with the DSL and DPO to ensure they understand who the nominated contacts are and what they can do / what data access they have, as well as the implications of all existing services and changes to settings that you might request – e.g. for YouTube restricted mode, internet filtering settings, firewall port changes, student email settings, and sharing settings for any cloud services, including GSuite
- Ensure the DPO is aware of the GDPR information on the relationship between the school and LGfL TRUSTnet at gdpr.lgfl.net

5.11 Volunteers and contractors

Key responsibilities:

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

5.12 Students

Key responsibilities:

- Read, understand, sign and adhere to the student acceptable use policy
- Treat **home learning during any isolation/quarantine or bubble/school lockdown** in the same way as regular learning in school and behave as if a teacher or parent were watching the screen

- Avoid any private communication or use of personal logins/systems to communicate with or arrange meetings with school staff or tutors
- Understand the importance of reporting abuse, misuse or access to inappropriate materials including any concerns about a member of school staff or supply teacher or online tutor
- Know what action to take if they or someone they know feels worried or vulnerable when using online technology, at school, home or anywhere else
- To understand the importance of adopting safe and responsible behaviours and good online safety practice when using digital technologies outside of school and realise that the school's acceptable use policies cover actions out of school, including on social media
- Remember the rules on the misuse of school technology – devices and logins used at home should be used just like if they were in full view of a teacher
- Understand the benefits/opportunities and risks/dangers of the online world and know who to talk to at school or outside school if there are problems

5.13 Parents/carers

Key responsibilities:

- Read, sign and promote the school's parental acceptable use policy (AUP) and read the student AUP and encourage their children to follow it
- Consult with the school if they have any concerns about their children's use of technology
- Promote positive online safety and model safe, responsible and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, trustees, contractors, students or other parents/carers.
- Encourage children to engage fully in home-learning during any period of isolation/quarantine or bubble/school closure and flag any concerns
- Support the child during remote learning to avoid video calls in a bedroom if possible and if not, to ensure the child is fully dressed and not in bed, with the camera pointing away from beds/bedding/personal information etc. and the background blurred or changed where possible.
- If organising private online tuition, remain in the room if possible, ensure the child knows tutors should not arrange new sessions directly with the child or attempt to communicate privately

5.14 External groups including parent associations (FoRTS)

Key responsibilities:

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

6 Education and curriculum

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

- Relationships education, relationships and sex education (RSE) and health (also known as RSHE or PSHE)
- Computing
- Citizenship

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

Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc) in school or setting as homework tasks, all staff should encourage sensible use, monitor what students are doing and consider potential dangers and the age appropriateness of websites (ask your DSL what appropriate filtering and monitoring policies are in place).

Equally, all staff should carefully supervise and guide students when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if relevant and remote teaching), supporting them with search skills, critical thinking (e.g. fake news), age appropriate materials and signposting, and legal issues such as copyright and data law. [saferesources.lgfl.net](https://www.saferesources.lgfl.net) has regularly updated theme-based resources, materials and signposting for teachers and parents.

At The Richmond upon Thames School, we recognise that online safety and broader digital resilience must be thread throughout the curriculum and that is why we are working to adopt the cross-curricular framework *Education for a Connected World* - 2020 edition, from UKCCIS (the UK Council for Internet Safety).

Annual reviews of curriculum plans (including for SEND students) are used as an opportunity to follow this framework more closely in its key areas of:

- Self-image and Identity
- Online relationships
- Online reputation
- Online bullying
- Managing online information
- Health, wellbeing and lifestyle
- Privacy and security
- Copyright and ownership

7 Handling online-safety concerns and incidents

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

General concerns must be handled in the same way as any other safeguarding concern; safeguarding is often referred to as a jigsaw puzzle, so all stakeholders should err on the side of talking to the online-safety lead / designated safeguarding lead to contribute to the overall picture or highlight what might not yet be a problem.

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

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

- Safeguarding and Child Protection (including Sexual Harassment / Peer on Peer Abuse) Policy
- Anti-Bullying Policy
- Behaviour Policy (including school sanctions)
- Acceptable Use Policies
- Prevent Policy
- Data Protection and GDPR policy, agreements and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc)

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

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

Any concern/allegation about staff misuse is always referred directly to the Head Teacher, unless the concern is about the Head Teacher in which case the complaint is referred to the Chair of trustees and the LADO (Local Authority Designated Officer).

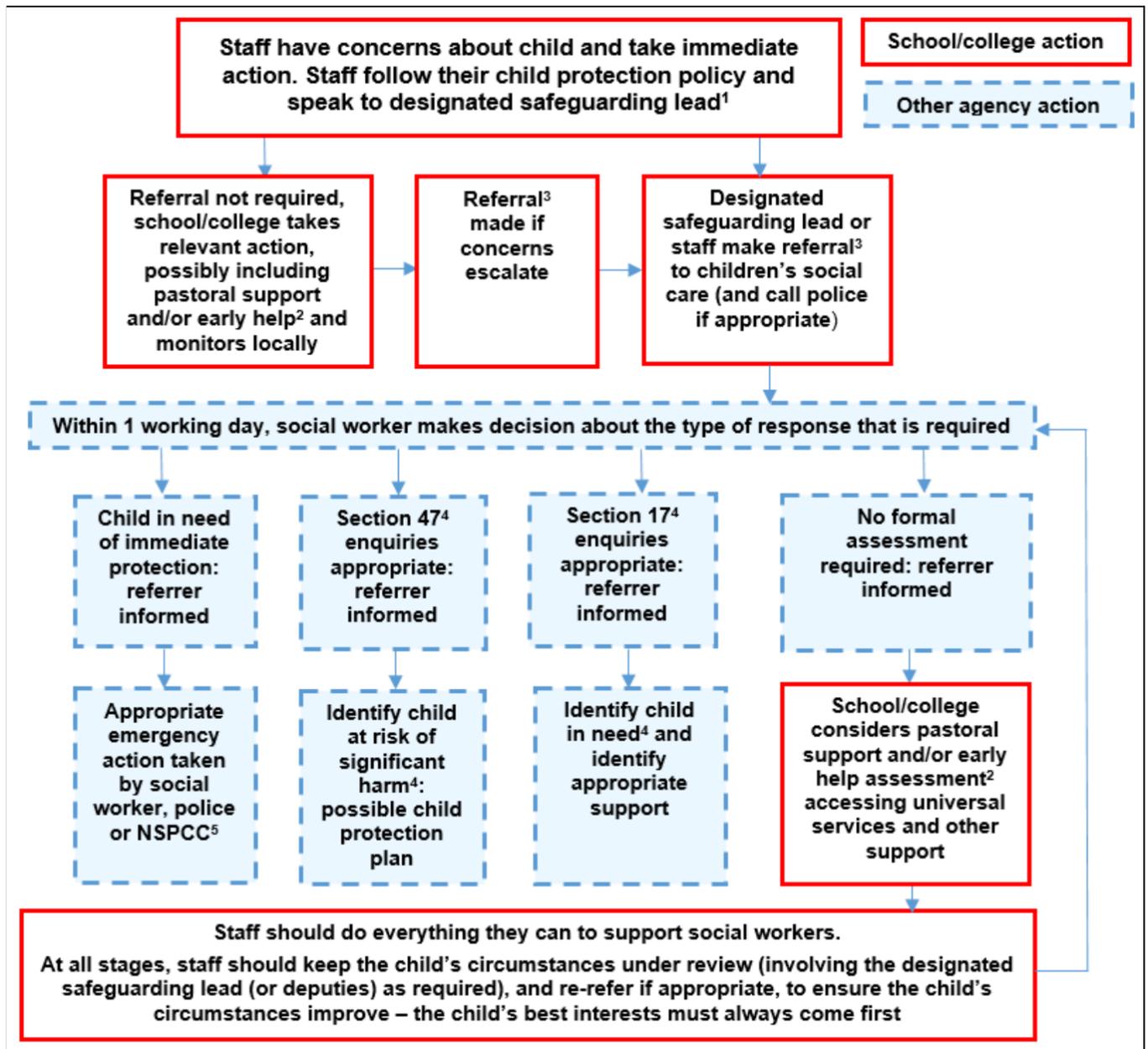
Staff may also use the [NSPCC Whistleblowing Helpline](#) (details of their helpline are displayed in the staff room – see [posters.lgfl.net](#) and [reporting.lgfl.net](#)).

The school will actively seek support from other agencies as needed (i.e. the local authority, LGfL, UK Safer Internet Centre's Professionals' Online Safety Helpline (POSH), NCA CEOP, Prevent Officer, Police, IWF).

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

7.1 Actions where there are concerns about a child

The following flow chart is taken from page 23 of Keeping Children Safe in Education 2021 as the key education safeguarding document. As outlined previously, online safety concerns are no different to any other safeguarding concern.



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

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

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

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

⁵ This could include applying for an Emergency Protection Order (EPO).

7.2 Sexting - sharing nudes and semi-nudes

All schools (regardless of phase) should refer to the *UK Council for Internet Safety (UKCIS)* guidance on sexting - [Sharing nudes and semi-nudes: advice for education settings](#) to avoid unnecessary criminalisation of children.

NB - where one of the parties is over 18, this is no longer sexting but child sexual abuse.

There is a one-page overview called [Sharing nudes and semi-nudes: how to respond to an incident](#) for all staff (not just classroom-based staff) to read, in recognition of the fact that it is mostly someone other than the designated safeguarding lead (DSL) or online safety lead to first become aware of an incident, and it is vital that the correct steps are taken.

Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL.

The DSL will in turn use the full guidance document, [Sharing nudes and semi-nudes – advice for educational settings](#) to decide next steps and whether other agencies need to be involved.

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

7.3 Bullying

Online bullying should be treated like any other form of bullying and the school [anti-bullying policy](#) should be followed for online bullying, which may also be referred to as cyberbullying.

Materials to support teaching about bullying and useful Department for Education guidance and case studies are at [bullying.lgfl.net](#)

7.3.1 Upskirting

It is important that everyone understands that upskirting (taking a photo of someone under their clothing, not necessarily a skirt) is now a criminal offence, as highlighted in Keeping Children Safe in Education and that students can come and talk to members of staff if they have made a mistake or had a problem in this area.

7.4 Sexual violence and harassment

DfE guidance on sexual violence and harassment is referenced in Keeping Children Safe in Education and also a document in its own right. It would be useful for all staff to be aware of this guidance: paragraphs 45-49 cover the immediate response to a report and confidentiality which is highly relevant for all staff; the case studies section provides a helpful overview of some of the issues which may arise.

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

8 Misuse of school technology (devices, systems, networks or platforms)

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

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

Where students contravene these rules, the school behaviour policy will be applied; where staff contravene these rules, action will be taken as outlined in the staff code of conduct.

It will be necessary to reinforce these as usual at the beginning of any school year but also to remind students that **the same applies for any home learning** that may take place in future periods of absence/ closure/quarantine etc.

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

9 Social media incidents

See the social media section later in this document for rules and expectations of behaviour for children and adults in The Richmond upon Thames School community. These are also governed by school Acceptable Use Policies, the school social media policy and behaviour for learning policy.

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

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

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

10 Data protection and data security

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

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

All students, staff, trustees, volunteers, contractors and parents are bound by the school’s data protection policy and agreements, which can be found [here](#).

Rigorous controls on the LGfL TRUSTnet network, USO sign-on for technical services, firewalls and filtering all support data protection. The following data security products are also used to protect the integrity of data, which in turn supports data protection:

- Sophos Anti-Virus, Egress and Jamf Mobile Device Management

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

Staff are reminded that all safeguarding data is highly sensitive and should be treated with the strictest confidentiality at all times, and only shared via approved channels to colleagues or agencies with appropriate permissions.

Staff must not share student data with outside agencies unless it is via School2School, CTF files or USO data exchange.

In the light of GDPR, policies for these areas is clear in data-protection documentation:

- CCTV
- Password policy / 2f authentication
- Reminders to lock devices when leaving unattended
- Device encryption
- Access to and access audit logs for school systems
- Backups
- Security processes and policies
- Disaster recovery
- Access by third parties, e.g. IT support agencies
- Wireless access
- File sharing
- Cloud platform use, access and sharing protocols

12 Appropriate filtering and monitoring

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

At this school, the internet connection is provided by LGfL TRUSTnet. This connection is routed through Smoothwall for filtering and monitoring purposes.

There are three types of appropriate monitoring identified by the Safer Internet Centre. These are:

1. Physical monitoring (adult supervision in the classroom, at all times)
2. Internet and web access
3. Active/Pro-active technology monitoring services

At the Richmond upon Thames School, teachers use Apple Classroom to monitor iPads, in real time. Smoothwall provides reports on individual users.

- At home, student-iPads are switched off at 8pm for students in Y7-10 and 10pm for Y11
- It is an expectation that parents will monitor and control internet use at home

- The LGfL HomeProtect home-filtering browser provides filtered access from LGfL, with access to YouTube and other social platforms

13 Electronic communications

Please read this section alongside references to the RTS Communications Policy. This section only covers electronic communications, but the same principles of transparency, appropriate conduct and audit trail apply.

13.1 Email (must be read in conjunction with the RTS Communications Policy)

- Students can only receive notification emails from classroom.google.com; administrator@rts.sch.uk; senecalearning.co.uk and reception@rts.richmond.sch.uk (Arbor)
- Other email communication for students is not enabled to ensure better-monitored and more transparent communication within classroom.google.com
- Staff at our school use the **school's Google Education Enterprise mail domain** for all school emails, making them **fully** auditable and trackable

This is for the mutual protection and privacy of all staff, students and parents, as well as to support data protection.

General principles for email use are as follows:

- The only means of electronic communication to be used between staff and students / staff and parents (in both directions) is by the **school's Education Google Mail domain**. Use of a non-rts email account must be approved in advance by the Head Teacher. Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Head Teacher (if by a staff member).
- There should be no circumstances where a private email is used to communicate with parents or students - if this happens by mistake, the DSL should be informed. The DSL may refer this to the Headteacher or DPO, depending on the incident
- Messages in Google Classroom are the only permitted electronic communication between staff and students
- RTS Gmail is managed by the school and is not the same as a private Gmail account
- Staff or student personal data should never be sent, shared or stored on email
 - If personal data needs to be shared with external agencies, a secure service must be used. If in doubt, speak to the Data, Systems and CS lead.
 - Internally, staff should use Google Classroom to communicate with individual or groups of students
- students will receive emails about announcements posted in Google Classroom, bulk-emails from administrator@ or reception@ or info@, password-change emails from senecalearning@ but will not be able to receive any other emails
- Students are not able to send emails
- Appropriate behaviour is expected at all times, and the email system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude,

insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff

- Staff are allowed to use the email system for reasonable (not excessive, not during lessons) personal use but should be aware that all use is monitored, their emails may be read and the same rules of appropriate behaviour apply at all times. Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination.
- students will only receive emails from Google Classroom notices and messages. The sending and receiving of all other email is not allowed by students. Staff should report any breaches in this Gmail-Student setting, using the ClickOn IT ticketing system or Tootoot.

See also the social media section of this policy.

14 School website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. The Head Teacher and Trustees have delegated the day-to-day responsibility of updating the content of the website to **the Head Teacher's PA**. The site is managed by and hosted by *E 4 Education*.

The RTS website's LGfL RAG-rating is linked in the appendix.

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

- RTS have the same duty as any person or organisation to respect and uphold copyright law – schools have been fined thousands of pounds for copyright breaches. Sources must always be credited and material only used with permission. If in doubt, check with Deesh Grewal. There are many open-access libraries of high-quality public-domain images that can be used (e.g. pixabay.com for marketing materials – beware some adult content on this site). RTS have access to licences for music, sound effects, art collection images and other content at curriculum.lgfl.net
- Where student work, images or videos are published on the website, their identities are protected and full names are not published (remember also not to save images with a filename that includes a student's full name).

15 Cloud platforms: Google Education, Progresso, Jamf, Civica, Inventory, WisePay, NRS Till system

Staff should work towards a culture of safe-working practices and develop a strong awareness of the consequences to the subject and RTS of personal data-loss or breach.

“Take care of the data as if it were your own”

As more and more systems move to the cloud, it becomes easier to share and access data. The companies we use to provide these services will already be used at other schools, have a strong commitment to data security and ensure compliance with current data protection regulations.

It is important to consider data protection before adopting a cloud platform or service.

When using these services, staff will be issued passwords which may allow access to personal student or staff data. Therefore staff must ensure good security habits:

- ensure a password of at least 8 characters and a combination of symbols, numbers and capitals
- set different passwords for different services, unless google-log-in has been enabled for that service
- never leave a logged-in device unattended, unless locked physically and
- never share a password but if you do have to, change it immediately after the event
 - For online safety, basic rules of good password hygiene *“Treat your password like your toothbrush –never share it with anyone!”*
- never keep downloaded personal data on your computer hard-drive eg Desktop, Downloads, Documents
- Ensure the physical security of your staff laptop, both on and off the school site
- Ensure no passwords are written down and stored in an accessible location

The data protection officer and network manager analyse and document systems and procedures before they are implemented, and regularly review them.

The following principles apply:

- Privacy statements inform parents and children (13+) when and what sort of data is stored in the cloud
- The DPO approves new cloud systems, what may or may not be stored in them and by whom. This is noted in a DPIA (data-protection impact statement) and parental permission is sought
- Regular training ensures all staff understand sharing functionality and this is audited to ensure that student data is not shared by mistake. Open access or widely shared folders are clearly marked as such
- students and staff are only given access and/or sharing rights when they can demonstrate an understanding of what data may be stored and how it can be seen
- Two-factor authentication is to be setup for staff with the highest levels of access to the RTS IT systems
- student images/videos are only made public with parental permission
- Only school-approved platforms are used by students or staff to store student work
- All stakeholders understand the difference between consumer and education products (e.g. a private Gmail account or Google Drive and those belonging to a managed educational domain)

16 Digital images and video

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

- Photo/Video consent:
 - For displays around the school
 - For the newsletter
 - For information videos shared with parents eg Options Evening, Curriculum videos
- Marketing consent:
 - For use in paper-based school marketing
 - For online prospectus or school website
 - For a specific high profile image for display or publication
 - For social media

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

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

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

Photos are stored on Google Drive or Google Photos in line with the retention schedule of the school Data Protection Policy.

Staff and parents are reminded annually about the importance of not sharing without permission, due to reasons of child protection (e.g. looked-after children often have restrictions for their own protection), data protection, religious or cultural reasons, or simply for reasons of personal privacy.

Further detail on this subject and a sample letter to parents for taking photos or videos at school events can be found at parentfilming.lgfl.net

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

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

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

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

17 Social media (SM)

17.1 The Richmond upon Thames School's SM presence

The Richmond upon Thames School works on the principle that if we don't manage our social media reputation, someone else will.

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

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

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

The head-teacher's PA (with Merito), is responsible for managing our Twitter, Instagram and Facebook accounts. She follows the guidance in the LGfL / Safer Internet Centre online-reputation management document [here](#).

17.2 Staff, students' and parents' SM presence

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

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

If parents have a concern about the school, we would urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, the school complaints procedure should be followed. School complaints procedure policy [here](#).

Sharing complaints on social media is unlikely to help resolve the matter, but can cause upset to staff, students and parents, also undermining staff morale and the reputation of the school (which is important for the students we serve).

Many social media platforms have a minimum age of 13 (WhatsApp is 16+), but the school regularly deals with issues arising on social media with students/students under the age of 13. We ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use. It is worth noting that following on from the government's Safer Internet Strategy, enforcement and age checking is likely to become more stringent over the coming years.

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

Parents can best support this by talking to their children about the apps, sites and games they use (you don't need to know them – ask your child to explain it to you), with whom, for how long, and when (late at night / in bedrooms is not helpful for a good night's sleep and productive teaching and learning at school the next day). It is encouraging that 73% of students (from the 40,000 who answered that LGfL DigiSafe student online safety survey) trust their parents on online safety (although only half talk about it with them more than once a year at the moment).

The school has an official Facebook / Twitter / Instagram account (managed by the **Head Teacher's PA** and will respond to general enquiries about the school, but asks parents/carers not to use these channels to communicate about their children.

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

Students are not allowed* to be 'friends' with or make a friend request** to any staff, trustees, volunteers and contractors or otherwise communicate via social media.

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

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

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

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

The serious consequences of inappropriate behaviour on social media are underlined by the fact that of the 131 Prohibition Orders issued to staff in 2017, 73 involved social media/technology (and 27 of the 66 orders by August 2018).

All members of the school community are reminded that particularly in the context of social media, it is important that permission is sought before uploading photographs, videos or any other information about other people.

18 Device usage

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

18.1 Personal devices and bring your own device (BYOD) policy

Devices used at home should be used just like if they were in full view of a teacher or colleague

- **Students** are not allowed to have mobile phones on their person anywhere on the school site. Mobile phones should be switched off and kept in lockers. Any attempt to use a phone or non-school issued internet enabled device on the school site without permission or to take illicit photographs or videos will lead to confiscation of the device [see the school [Behaviour Policy](#) and the [school's guidance on mobile phones use in school](#)], and the withdrawal of privileges. In some cases, the use of prohibited digital devices will lead to further sanctions. Important messages and phone calls to or from parents can be made at the school office, which will also pass on messages from parents to students in emergencies.
- **All staff who work directly with children** should not use their mobile phones for personal use, whilst around students. Some staff may find it easier to take the register on their phone.
 - If this is the case, staff must ensure appropriate security on their phones, in case the phone is lost, stolen or breached.
 - Student or staff data should never be downloaded onto a private phone.
- **Volunteers, contractors, trustees** should keep their phones out of sight e.g. in pockets or briefcases. To take a call, they must move to a location away from the presence of children. Under no circumstances should they be used in the presence of children or to take photographs or videos.

- If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the Head Teacher should be sought (the Head Teacher may choose to delegate this) and this should be done in the presence of a member of RTS staff.
- **Parents** are asked to keep their phones out of sight e.g. in pockets or bags and turned off when they are on site. They should ask permission before taking any photos, e.g. of displays in corridors or classrooms, and under no circumstances are they permitted to capture photos of other children.
 - When at school events, parents must not take videos or pictures of students - we will endeavour to do this and share images/recordings with parents
 - Parents are asked not to call students on their mobile phones during the school day; urgent messages can be passed via the school office. Students are not allowed to use their phones or have them out whilst on the school site.

18.2 Network / internet access on school devices

- **Students** are allowed internet access for educational-use, using school-sanctioned software, services and apps. All use must be in line with the acceptable use policy. All such use is monitored. All infringements will be dealt with in line with the RTS behaviour for learning policy
- **Volunteers, contractors, trustees** can access the guest wireless network and will only have access to the systems and services they are authorised to access. All internet traffic is monitored. Any contractor must be authorised entry to the site in line with the safeguarding and child-protection policy.
- **Parents** have no access to the school network or wireless internet on personal devices.

18.3 Trips / events away from school

Staff may use their personal mobile phones for communication, emergencies and image, sound or video-capture. If such use of a personal device is made:

- photos must only be taken of students for whom parents have given such consent
- staff must ensure they are aware of students who are not allowed to be photographed because their parents have not consented
- the files must be set to import to the RTS Google Photos or Google Drive folders
- the phone should be set to delete these images after upload
- sharing trip-images must be via Celebrate RTS, from where these may be used on our school social media platforms and website only

Staff should work towards a culture of safe-working practices and develop a strong awareness of the consequences to the subject and RTS of personal data-loss or breach.

“Take care of the data as if it were your own”

18.4 Searching and confiscation

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

Full details of the school's search procedures are available in the school [Behaviour Policy](#).