Online Safety Policy

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LGfL Online Safety Policy Template Sept 2024.docx

Responsibility	Students, Parents and Community	
Status	Non-statutory	
Ratification date	04 02 2025	
Review cycle / date	1	Spring 2026
Reference	049	

1 Introduction

1.1 Key people / dates

Designated Safeguarding Lead (DSL) team **Deputy DSL Designated Safeguarding Lead (DDSL)** **Deputy DSL** **Deputy DSL** **Deputy DSL** **Deputy DSL** **Deputy DSL**	David Jones Christopher Briggs Pippa Wright Niki Carrick-Steele Ben Reynolds Emma Oakley Kelly Dooley
Online-safety coordinator	Christopher Briggs
Safeguarding link trustee **Online safety link trustee**	Sarah Scammell Rachael Prasher
PSHE/RSHE lead	Tanzina Tania
Network Management	ClickOn IT London
On-Site Technician	Sami Khalil
RTS website **RTS Twitter account**	Head Teacher's PA Head Teacher's PA
Date this policy was reviewed and by whom	28/01/25 by Christopher Briggs
Date of next review and by whom	Autumn 2026 by Christopher Briggs

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' (KCSIE), 'Teaching Online Safety in Schools', statutory RSHE guidance and other statutory documents. It is cross-curricular (with relevance beyond Relationships, Health and Sex Education, Citizenship and Computing) and designed to sit alongside or be integrated into your school's statutory Child Protection & Safeguarding Policy. Any issues and concerns with online safety must always follow the school's safeguarding and child protection procedures.

1.3 Who is it for; when is it reviewed?

This policy should be 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 will be informed by legislation and regulations, we will involve staff, trustees, students and parents in writing and reviewing the policy and make sure the policy makes sense and it is possible to follow it in all respects. This will help ensure all stakeholders understand the rules that are in place and why, and that the policy affects day-to-day practice

1.4 Who is in charge of online safety?

KCSIE makes clear that "the designated safeguarding lead should take **lead** responsibility for safeguarding and child protection (including online safety)." The DSL can delegate activities but not the responsibility for this area and whilst subject leads, e.g. for RSHE will plan the curriculum for their area, it is important that this ties into a whole-school approach.

1.5 What are the main online safety risks in 2024/2025?

Current Online Safeguarding Trends

In our school over the past year, we have particularly noticed the following in terms of device use and abuse and types of online/device-based incidents which affect the wellbeing and safeguarding of our students:

- Sending or sharing of inappropriate images (Nudes)
- Harmful or unkind messages sent over social media
- Students accessing game websites unsuitable for education

Nationally, some of the latest trends of the past twelve months are outlined below. These should be reflected in this policy and the acceptable use agreements we use, and seen in the context of the 5 Cs (see KCSIE for more details), a whole-school contextual safeguarding approach that incorporates policy and practice for curriculum, safeguarding and technical teams.

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 may 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.

- Self-generative artificial intelligence has become rapidly more accessible, with many students often having unfettered access to tools that generate text and images at home or in school. These tools not only represent a challenge in terms of accuracy when young people are genuinely looking for information (gen AI can be responsible for incorrect and sometime harmful information), but also in terms of plagiarism for teachers and above all safety - none of the mainstream tools have end-user safety settings, most have an age limit of 13 or even 18 and in spite of basic rude words not delivering results, will easily produce inappropriate material. Schools not only need to tackle this in terms of what comes into school but also educating young people and their parents on use of these tools in the home. Self-generative AI has also made it easier than ever to create sexualised images and deepfake videos. Whilst they may not be real, they have a devastating effect on a young person's emotional wellbeing and physical safety, and can also be used to blackmail, humiliate and abuse. The Internet Watch Foundation has reported AI-generated imagery of child sexual abuse progressing at such a worrying rate.

- Ofcom's 'Children and parents: media use and attitudes report 2024' has shown that YouTube remains the most used site or app among all under 18s and the reach of WhatsApp, TikTok and Snapchat increased yet further (especially with the minimum age for use of WhatsApp now 13). With children aged 3 - 17 spending an average 3 hours 5 minutes per day online, four in ten parents report finding it hard to control their child's screen time. Notably, 45% of 8-11s feel that their parents' screen time is too high, underlining the importance of modelling good behaviour.

- Given the 13+ minimum age requirement on most social media platforms, it is notable that half (51%) of children under 13 use them. Despite age restrictions, four in ten admit to giving a fake age online, exposing them to content inappropriate for their age and increasing their risk of harm, with over a third (36%) of parents of all 3-17s saying they would allow their child to have a profile on sites or apps before they had reached the minimum age.

- As a school we recognise that many of our children and young people are on these apps regardless of age limits, which are often misunderstood or ignored. We therefore will remind about best practice while remembering the reality for most of our students is quite different.

- This is striking when you consider that over 95 percent of students have their own mobile phone by the end of Year 7, and the vast majority do not have safety controls or limitations to prevent harm of access to inappropriate material. This is particularly pertinent given that 141, cases of self-generated child sexual abuse material were found of 11–13-year-olds (Internet Watch Foundation Annual Report). These were predominantly (but importantly not only) girls; it is important also to recognise the increasing risk of sextortion, where older teenage boys have been financially exploited after being tricked into sharing intimate pictures online. This resulted in the National Crime Agency releasing an alert to all schools in Spring 2024.

- Growing numbers of children and young people are using social media and apps such as Snapchat as their source of news and information, with little attention paid to the facts or veracity of influencers sharing news. The alarming speed and scale at which misinformation about the attack in Southport (August 2024) was shared, resulting in Islamophobic and racist violence, rioting and looting across England is particularly concerning, with much of it was fuelled by false online accusations about the assailant. Despite attempts by

Police and national news to correct the misleading information, it racked up millions of views on social media sites like X and was actively promoted by several high-profile users with large followings.

- There have also been significant safeguarding concerns where parents have filmed interactions with staff outside the school gates and posted this on social media, putting children and the wider school community at risk of harm. See nofilming.lgfl.net to find out more.

- Cyber Security is an essential component in safeguarding children and now features within KCSIE. Sadly, the education sector remains a clear target for cyber-attacks, with the Cyber Security Breaches Survey 2024 highlighting an increase in school attacks nationally, with 71% of secondary schools reporting a breach or attack in the past year, and 52% of primary schools.

1.6 How will this policy be communicated?

This policy can only impact upon practice if it is a (regularly updated) living document. It must be accessible to and understood by all stakeholders. It will be communicated in the following ways:

- Posted on the school website
- Part of school induction information for all new staff (including temporary, supply and non-classroom-based staff and those starting mid-year)
- 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 (which must be in accessible language appropriate to these groups), which will be issued to whole school community, on entry to the school, annually and whenever changed, plus displayed in school.

2 Contents

3 Overview

3.1 Aims

This policy aims to promote a whole school approach to online safety by:

- Setting out expectations for all the Richmond upon Thames School community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline)
- Helping safeguarding and senior leadership teams to have a better understanding and awareness of all elements of online safeguarding through effective collaboration and communication with technical colleagues (e.g. for filtering and monitoring), curriculum leads (e.g. RSHE) and beyond.
- Helping 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,regardless of device or platform, and that the same standards of behaviour apply online and offline.
- Facilitating the safe, responsible, respectful and positive use of technology to support teaching and 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
- Helping 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
- Establishing 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)

3.2 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 your Child Protection & Safeguarding Policy.

The DSL will handle referrals to local authority multi-agency safeguarding hubs (MASH) and the Head Teacher will handle referrals to the LA designated officer (LADO). The local authority, academy trust or third-party support organisations you work with may also have advisors to offer general support.

Beyond this, **reporting.lgfl.net** has a list of curated links to external support and helplines for both pupils and staff, including the Professionals' Online-Safety Helpline from the UK Safer Internet Centre and the NSPCC Report Abuse Helpline for sexual harassment or abuse, 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. Training is also available via **safetraining.lgfl.net**

3.3 Scope

This policy applies to all members of the the Richmond upon Thames School community (including teaching, supply and support staff, governors, 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, or who use technology in their school role.

4 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, trustees, 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.

Depending on their role, all members of the school community should **read the relevant section in Annex A of this document** that describes individual roles and responsibilities. Please note there is one for All Staff which must be read even by those who have a named role in another section. There are also student, trustee, etc role descriptions in the annex.

In **2024/2025**, it is vital that all members understand their responsibilities and those of others when it comes to filtering and monitoring. All staff have a key role to play in feeding back on potential issues.

5 Education and Curriculum

Despite the risks associated with being online, The Richmond Upon Thames School recognises the opportunities and benefits of children being online. Technology is a fundamental part of our adult lives and so developing the competencies to understand and use it, are critical to children's later positive outcomes. The choice to use technology in school will always be driven by pedagogy and inclusion.

It is important that schools establish a carefully sequenced curriculum for online safety that develops competencies (as well as knowledge about risks) and builds on what pupils have already learned and identifies subject content that is appropriate for their stage of development.

As well as teaching about the underpinning knowledge and behaviours that can help students navigate the online world safely and confidently regardless of the device, platform or app, Teaching Online Safety in Schools recommends embedding teaching about online safety and harms through a whole school approach and provides an understanding of these risks to help tailor teaching and support to the specific needs of students, including vulnerable students – dedicated training around this with curriculum mapping for RSHE/PSHE and online safety leads is available at safetraining.lgfl.net

RSHE guidance also recommends schools assess teaching to *"identify where students need extra support or intervention [through] tests, written assignments or self evaluations, to capture progress."*
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 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. At the Richmond upon Thames School, we use Smoothwall to filter and monitor internet use and operate a "White List" for internet sites that can be accessed. This relies on teaching staff to provide a list of websites and domain which have been approved for educational use with any other domains or websites remaining blocked. We inform parents and carers about the monitoring and filtering of online use we employ.

Curriculum overviews identify what students are being asked to do online, including the sites they will be asked to access. Equally, all staff should carefully supervise and guide students when engaged in learning activities involving online technology (including, extra-curricular, enrichment and where learning, remote teaching/learning), supporting them with search skills, critical thinking (e.g. disinformation, misinformation and fake news), age appropriate materials and signposting, and legal issues such as copyright and data law. 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. The School Development and Improvement plan has prioritised a plan for working towards adopting the cross-curricular framework 'Education for a Connected World – 2020 edition' from UKCIS (the UK Council for Internet Safety). Annual reviews of curriculum overviews and schemes of work are used as an opportunity to align more closely with key areas of this framework: Self-Image and Identity, Online Relationships, Online Reputation, Online Bullying, Managing Online Information, Health, Wellbeing and Lifestyle, Privacy and Security, and Copyright and Ownership. The school's curriculum can be accessed here. This process is conducted within the context of an annual online safety audit, led collaboratively by David Jones (DSL), Christopher Briggs (SLT responsible for Behaviour and Attitudes)and Niki Carrick-Steele (SLT responsible for Personal Development).

6 Handling safeguarding 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, PSHE/RSHE and 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.
Support staff will often have a unique insight and opportunity to find out about issues first in the playground, corridors, toilets and other communal areas outside the classroom (particularly relating to bullying and sexual harassment and violence).

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

- Safeguarding and Child Protection Policy
- Acceptable Use Policies
- Anti-Bullying Policy
- Behaviour for Learning Policy (including school sanctions)
- Data Protection Policy, agreements and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc)

This school commits to take all reasonable precautions to ensure safeguarding students online, but recognises that incidents will occur both inside school and outside school (and that those from outside school will continue to impact pupils when they come into school or during extended periods away from 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 on CPOMS

Any suspected online risk or infringement should be reported to the 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's Designated Officer). Staff may also use the NSPCC Whistleblowing Helpline.

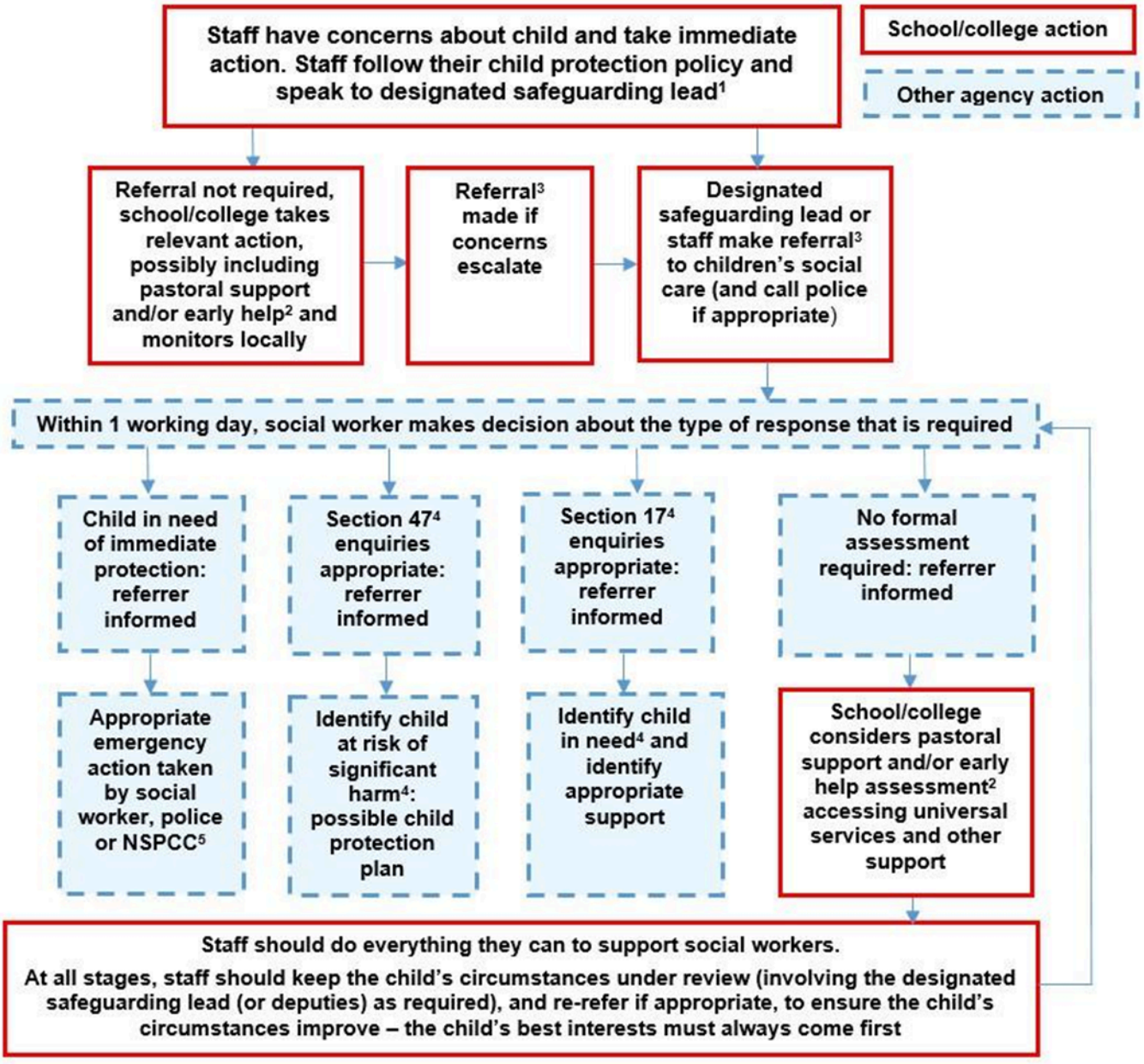
The school will actively seek support from other agencies as needed (i.e. the local authority, LGfL, UK Safer Internet Centre's Professionals' Online Safety Helpline (POSH), NCA CEOP, Prevent Officer, Police, IWF and Harmful Sexual Behaviour Support Service). The DfE guidance Behaviour in Schools, advice for headteachers and school staff September 2022 provides advice and related legal duties including support for students and powers of staff when responding to incidents – see pages 32-34 for guidance on child on child sexual violence and harassment, behaviour incidents online and mobile phones.

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 concerning or breaks the law (particular procedures are in place for sexting and upskirting; see section below).

The school should evaluate whether reporting procedures are adequate for any future closures/lockdowns/isolation etc and make alternative provisions in advance where these might be needed.

7 Actions where there are concerns about a child

The following flow chart is taken from page 22 of Keeping Children Safe in Education as the key education safeguarding document. As outlined previously, online safety concerns are no different to any other safeguarding concern.

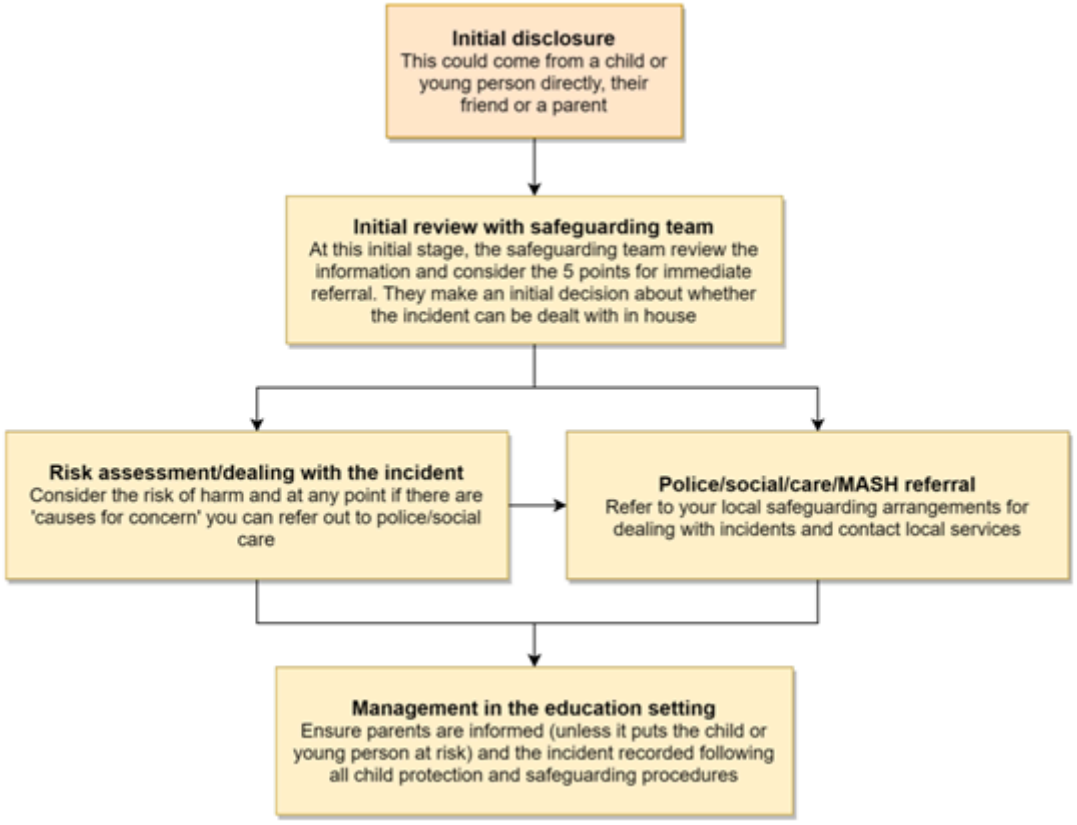


8 Sexting – sharing nudes and semi-nudes

All schools (regardless of phase) should refer to the UK Council for Internet Safety (UKCIS) guidance on sexting - now referred to as 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 school 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.



***Consider the 5 points for immediate referral at initial review:**

1. The incident involves an adult
2. There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
3. What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

4. The images involves sexual acts and any pupil in the images or videos is under 13
5. You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

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

The documents referenced above and materials to support teaching about sexting can be found at sexting.lgfl.net

8.1 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 and constitutes a form of sexual harassment as highlighted in Keeping Children Safe in Education.

As with other forms of child on child abuse pupils/students can come and talk to members of staff if they have made a mistake or had a problem in this area.

9 Bullying

Online bullying, including incidents that take place outside school or from home should be treated like any other form of bullying and the school bullying policy should be followed for online bullying, which may also be referred to as cyberbullying, including issues arising from banter. Details of or Anti-Bullying policy can be found here
It is important to be aware that in the past 12 months there has been an increase in anecdotal reports of fights being filmed and fake profiles being used to bully children in the name of others. When considering bullying, staff will be reminded of these issues.

10 Child-on-child sexual violence and sexual harassment

Part five of Keeping Children Safe in Education covers 'Child-on-child sexual violence and sexual harassment' and it would be useful for all staff to be aware of many aspects outlined there to support a whole-school response; case studies are also helpful for training.
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 and maintain an attitude of 'it could happen here'. 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.

In the online environment, the recent proliferation of misogynistic content is particularly relevant when it comes to considering reasons for and how to combat this kind of behaviour. The Richmond upon Thames school closely monitor the use of devices and systems and has a clear reporting system using our Smoothwall application.

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

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

These are defined in the relevant Acceptable Use Policy accessible from the school's website as well as in the student study planner and staff planner, 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.

The new responsibilities for filtering and monitoring, led by the DSL and following the new DfE standards, may mean that more such incidents will be discovered in the coming year but the school will do its best to remind pupils and staff of this increased scrutiny at the start of the year.

12 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, behaviour for learning policy and the data protection and GDPR 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.

13 CCTV

We use CCTV in various locations around the school sites and premises for the detection and prevention of crime. However, footage may be used for additional reasons specified more fully within our CCTV Policy which can be found within the Data Protection and GDPR policy here. We adhere to the ICO's code of practice for the use of video surveillance and provide training to staff in its use.

14 Extremism

The school has obligations relating to radicalisation and all forms of extremism under the Prevent Duty. Staff will not support or promote extremist organisations, messages or individuals, give them a voice or opportunity to visit the school, nor browse, download or send material that is considered offensive or of an extremist nature. We ask for parents' support in this also, especially relating to social media, where extremism and hate speech can be widespread on certain platforms.

15 Data protection and cybersecurity

All students, staff, trustees, volunteers, contractors and parents/carers are bound by the school's data protection and cybersecurity policy which can be found here. It is important to remember that there is a close relationship between both data protection and cybersecurity and a school's ability to effectively safeguard children. Schools are reminded of this in KCSIE which also refers to the DfE Standards of Cybersecurity for the first time in 2023.

Schools should remember that data protection does not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in Data protection in schools, 2023, "It's not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child." And in KCSIE 2023, "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children."

16 Appropriate filtering and monitoring

Keeping Children Safe in Education has long asked schools to ensure "appropriate" webfiltering and monitoring systems which keep children safe online but do not "overblock".

KCSIE, in recognition of the importance of these systems to keeping children safe, the designated safeguarding lead now has lead responsibility for filtering and monitoring (see page 1 for the DSL name and the named trustee with responsibility for filtering and monitoring).

Schools are also asked to follow the new DfE filtering and monitoring standards, which require them to:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

ALL STAFF need to be aware of the changes and renewed emphasis and play their part in feeding back about areas of concern, potential for students to bypass systems and any potential overblocking. They can submit concerns at any point via CPOMs reporting system or IT Help Desk and will be asked for feedback at the time of the regular checks which will now take place.

Technical and safeguarding colleagues work together closely to carry out annual reviews and check and also to ensure that the school responds to issues and integrates with the curriculum.

Staff will be reminded of the systems in place and their responsibilities at induction and start of year safeguarding as well as via AUPs and regular training reminders in the light of the annual review and regular checks that will be carried out. The Richmond upon Thames School will operate a "White listing" approach to website filtering where only domains and addresses approved by members of staff will be accessible on student devices.

It is very important that schools understand the difference between filtering and monitoring, the meaning of overblocking and other terms, as well as how to get the best out of systems. There are guidance videos and flyers to help with this at https://safefiltering.lgfl.net and training is provided for all staff / safeguarding teams / technical teams as appropriate.

At the Richmond upon Thames School:

- web filtering is provided by Smoothwall on school site and for school devices used in the home we also see Smoothwall
- Whitelisting- only allowing websites approved by the school to be used on student devices
- changes can be made by contacting the DSL via email
- overall responsibility is held by the DSL
- technical support and advice, setup and configuration are from Mr S Khalil
- regular checks are made half termly by Smoothwall to the DSL to ensure filtering is still active and functioning everywhere. These are evidenced through reports
- an annual review is carried out *"as part of the annual safeguarding audit to ensure a whole school approach"* guidance on how the system is 'appropriate' is available here

According to the DfE standards, *"a variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:*

- *physically monitoring by staff watching screens of users*
- *live supervision by staff on a console with device management software*
- *network monitoring using log files of internet traffic and web access*
- *individual device monitoring through software or third-party services*

At the Richmond upon Thames, we use

- physically monitoring by staff watching screens of users
- live supervision by staff on a console with device management software - Apple Classroom

- network monitoring using log files of internet traffic and web access - smoothwall
- individual device monitoring through software or third-party services - JAMF mobile device manage system software, Smoothwall browser install on all iPads

17 Messaging/commenting systems (incl. email, learning platforms & more)

17.1 Authorised systems

- Students at this school communicate with staff using Google Classroom. Students cannot create their own documents or send emails/messages to their classmates/peers or externally. Students use Google Classroom to send comments to their teachers
- Staff at this school use the email system provided by Google Mail for all school emails. They never use a personal/private email account (or other messaging platform) to communicate with children or parents, or to colleagues when relating to school/child data, using a non-school-administered system. Staff are permitted to use this email system to communicate with staff, other schools and relevant external agencies.
- Staff at this school must use Arbor to send emails to parents/carers and do not respond directly within the Google Mail app/platform to emails received from Parents.
- Staff at this school use Arbor and telephone calls to communicate with parents when concerning school/child matter,

Any systems above are centrally managed and administered by the school or authorised IT partner (i.e. they can be monitored/audited/viewed centrally; are not private or linked to private accounts). This is for the mutual protection and privacy of all staff, students and parents, supporting safeguarding best-practice, protecting children against abuse, staff against potential allegations and in line with UK data protection legislation.

Use of any new platform with communication facilities or any child login or storing school/child data must be approved in advance by the school and centrally managed. The Head Teacher or delegated member of SLT approves this.

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).

Where devices have multiple accounts for the same app, mistakes can happen, such as an email being sent from or data being uploaded to the wrong account, e.g. Google Photos or Gmail. If this a private account is used for communication or to store data by mistake, the DSL/Head Teacher/DPO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately.

17.2 Behaviour / usage principles

- More detail for all the points below are given in the Social media section of this policy as well as the school's acceptable use agreements, behaviour policy and staff code of conduct.
- Appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or

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

- Data protection principles will be followed at all times when it comes to all school communications, in line with the school Data Protection Policy and only using the authorised systems mentioned above.
- 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 (and will be dealt with according to the appropriate policy and procedure).

18 Use of generative AI

At The Richmond Upon Thames School, we acknowledge that generative AI platforms (e.g. ChatGPT or Bard for text creation or the use of Co-Pilot or Adobe Firefly to create images and videos) are becoming widespread. We are aware of and follow the DfE's guidance on this. In particular:

- We will talk about the use of these tools with students, staff and parents – their practical use as well as their ethical pros and cons
- We are aware that there will be use of these apps and exposure to AI creations on devices at home for some students – these experiences may be both positive/creative and also negative (inappropriate data use, misinformation, bullying, deepfakes, undressing apps).

- The use of any generative AI in Exams, or to plagiarise and cheat is prohibited, and the Behaviour Policy will be used for any pupil found doing so.

19 Online storage or learning platforms

All the principles outlined above also apply to any system to which you log in online to conduct school business, whether it is to simply store files or data (an online 'drive') or collaborate, learn, teach, etc.

For all these, it is important to consider data protection and cybersecurity before adopting such a platform or service and at all times when using it. The Richmond upon Thames School has a clear cybersecurity and data protection policy which staff, governors and volunteers must follow at all times.

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 Governors have delegated the day-to-day responsibility of updating the content of the website and ensuring compliance with DfE stipulations to The Headteachers PA.

The site is managed by E4Education.

Where staff submit information for the website, they are asked to remember that schools 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. There are many open-access libraries of public-domain images/sounds etc that can be used. Finding something on Google or

YouTube does not mean that copyright has been respected. If in doubt, check with your line manager SLT in charge of Online Safety.

20 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, for what purpose (beyond internal assessment, which does not require express consent) and for how long. Parents answer as follows:

- For displays around the school
- For the newsletter
- For use in paper-based school marketing
- For online prospectus or websites
- For social media
- For a specific high-profile image for display or publication

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

Any student 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, no member of staff will ever use their personal phone to capture photos or videos of students. Staff may use work devices to capture photos or videos of students, and these will be appropriate, linked to school activities, taken without secrecy and not in a one-to-one situation, and always moved to school 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 in Google Drive folders in line with the retention schedule of the school Data Protection Policy. Staff and parents are reminded annually about the importance of not sharing without permission, due to reasons of child protection (e.g. looked-after children often have restrictions for their own protection), data protection, religious or cultural reasons, or simply for reasons of personal privacy.

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

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 / or a friend are subject to bullying or abuse.

21 Social media (SM)

21.1 Our 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.

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 is responsible for managing our Facebook/instagram and other social media accounts and checking our Wikipedia and Google reviews and other mentions online.

21.2 Staff, students' and parents' SM presence

Social media (including 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 [insert link or reword to direct to the relevant person] should be followed. Sharing complaints on social media is unlikely to help resolve the matter, but can cause upset to staff, pupils and parents, also undermining staff morale and the reputation of the school (which is important for the pupils we serve).

Many social media platforms have a minimum age of 13 (note that WhatsApp is 16+), but the school regularly deals with issues arising on social media involving 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 Online Harms regulation is likely to require more stringent age verification measures 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). You may wish to refer to the Digital Family Agreement to help establish shared expectations and the Top Tips for Parents poster along with relevant items and support available from parentsafe.lgfl.net and introduce the Children's Commission Digital 5 A Day.
Although the school has an official Facebook / Instagram account and will respond to general enquiries about the school, it asks parents/carers not to use these channels, especially not to communicate about their children.

Email is the official electronic communication channel between parents and the school. Social media, including chat apps such as WhatsApp, are not appropriate for school use.

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, governor, volunteer or contractor public accounts (e.g. following a staff member with a public Instagram account) as laid out in the AUPs. 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 there has been a significant number of Prohibition Orders issued by the Teacher Regulation Agency to teaching staff that involved misuse of social media/technology.

All members of the school community are reminded that particularly in the context of social media, it is important to comply with the school policy on Digital images and video and permission is sought before uploading photographs, videos or any other information about other people.

The statements of the Acceptable Use Policies (AUPs) which all members of the school community have signed are also relevant to social media activity, as is the school's Data Protection Policy.

22 Device usage

AUPs remind those with access to school devices about rules on the misuse of school technology – devices used at home should be used just like if they were in full view of a teacher or colleague. Please read the following in conjunction with those AUPs and the sections of this document which impact upon device usage, e.g. copyright, data protection, social media, misuse of technology, and digital images and video.

22.1 Personal devices including wearable technology and bring your own device (BYOD)

- **Pupils/students** are encouraged not to bring in phones. However, where students do bring in these devices, they must be switched off before entering the site and locked in lockers. Phones must not be on a students' person or bag(s). Any attempt to use a phone anywhere on the school site or to take illicit photographs or videos will lead to the confiscation of the mobile phone and the incident would be addressed through the behaviour policy. When a locker is unavailable the student must hand their phone into the school reception or an appropriate member of staff at the start of the school day.
- 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 leave their mobile phones on silent and only use them in private staff areas during school hours. See also the 'Digital images and video section of this document and the school data protection cybersecurity policies. Child/staff data should never be downloaded onto a private phone. If a staff member is expecting an important personal call when teaching or otherwise on duty, they may leave their phone with the school office to answer on their behalf or ask for the message to be left with the school office.
- **Volunteers, contractors, trustees** should leave their phones in their pockets/bags and turned off. 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 headteacher should be sought (the headteacher may choose to delegate this) and this should be done in the presence of a member staff.
- **Parents** are asked to leave their phones in their pockets 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 avoid capturing other children. When at school events, please refer to the Digital images and video section of this document on page . Parents are asked not to call students on their mobile phones during the school day; urgent messages can be passed via the school office.

22.2 Use of school devices

Staff and students are expected to follow the terms of the school acceptable use policies for appropriate use and behaviour when on school devices, whether on site or at home.

School devices are not to be used in any way which contravenes AUPs, behaviour policy / staff code of conduct.

Wifi is accessible to students, staff, trustees and some contractors. The guest networks and any restrictions for personal devices permit school-related internet use / limited personal use within the framework of the acceptable use policy. All such use is monitored.

School devices for staff or students are restricted to the apps/software installed by the school, whether for use at home or school, and may be used for learning and reasonable as well as appropriate personal use.

All and any usage of devices and/or systems and platforms may be tracked.

23 Trips / events away from school

For school trips/events away from school, teachers will be issued a school duty phone and this number used for any authorised or emergency communications with students and parents.

Any deviation from this policy (e.g. by mistake or because the school phone will not work) will be notified immediately to the Head Teacher or Deputy Head Teachers in their absence.

Teachers using their personal phone in an emergency will ensure that the number is hidden to avoid a parent or student accessing a teacher's private phone number.

24 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 pupils/property on school premises. This includes the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material, including but not exclusive to sexual images, pornography, violence or bullying.

Full details of the school's search procedures are available in the school Behaviour Policy.