


Paulet High School	School Procedure Document		
Document Title	Online Safety Procedure		
Document Status	Approved	Approved Date	06/23
Document Owner	Headteacher	Review	Annually; updated 09/23
Audience:	Staff <input checked="" type="checkbox"/>	Students <input checked="" type="checkbox"/>	Governors <input checked="" type="checkbox"/> Parents <input checked="" type="checkbox"/>

1. Aims

Our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

2. Legislation and guidance

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

- [Teaching online safety in schools](#)
- [Preventing and tackling bullying](#) and [cyber-bullying: advice for headteachers and school staff](#)
- [Relationships and sex education](#) – remove if not applicable, see section 4]
- [Searching, screening and confiscation](#)

It also refers to the DfE's guidance on [protecting children from radicalisation](#).

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

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


Non-statutory guidance from the Department for Education on sharing nude and semi-nude images is available [here](#) and is used to support section 7 of this procedure.

3. Roles and responsibilities

3.1 The governing board

The governing board has overall responsibility for monitoring this procedure and holding the Headteacher to account for its implementation.

The Designated Safeguarding Lead (DSL) will provide data to the Governing Body as part of the Headteacher' Report on a half termly basis. Online Safety discussions will take place between the DSL and Safeguarding Link Governor.

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All governors will:

- Ensure that they have read and understand this procedure
- Agree and adhere to the terms on acceptable use policy

3.2 The Headteacher

The Headteacher is responsible for ensuring that staff understand this procedure, and that it is being implemented consistently throughout the school.

3.3 The designated safeguarding lead

Details of the school's designated safeguarding lead (DSL) and deputies are set out in our child protection and safeguarding procedure.

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

- Supporting the Headteacher in ensuring that staff understand this procedure and that it is being implemented consistently throughout the school.
- Working with the Headteacher, Strategic IT Lead, IT Support Team and other staff, as necessary, to address any online safety issues or incidents
- Ensuring that any online safety incidents are logged and dealt with appropriately in line with this procedure
- Ensuring that any incidents of cyber-bullying and online abuse are logged and dealt with appropriately in line with the school behaviour procedure
- Delivery of online safety information through Safeguarding CPD programme and Safeguarding updates
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the Headteacher and/or governing board

This list is not intended to be exhaustive.

3.4 The IT Support Team

The IT Support team are responsible for:


- Monitoring and maintaining appropriate filtering and monitoring systems, which are updated on a regular basis and keep pupils safe from potentially harmful and inappropriate content and contact online while at school
- Ensuring that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Monitoring the school's ICT systems regularly
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files

This list is not intended to be exhaustive.

3.5 All staff and volunteers

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

- Maintaining an understanding of this procedure
- Implementing this procedure consistently
- Agreeing and adhering to the terms on the acceptable use policy and ensuring that pupils follow the terms on acceptable use policy

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- Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately in line with this procedure.
- Ensuring that any incidents of cyber-bullying are dealt with appropriately.

This list is not intended to be exhaustive.

3.6 Parents

Parents are expected to:

- Notify a member of staff or the Headteacher of any concerns or queries regarding this procedure
- Ensure their child has read, understood and agreed to the terms on acceptable use policy
- Monitor their child's use of social media and ensure they are safe when using the internet.
- Monitor their child's mobile device and online activity, particularly in reference to online hoax material and online challenges.
- Use social media communications appropriately and positively, especially when making reference to the school or staff specifically, avoiding situations where negative or derogatory comments are posted in the public domain.

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

- What are the issues? – [UK Safer Internet Centre](#)
- Hot topics – [Childnet International](#)
- Parent resource sheet – [Childnet International](#)
- [Healthy relationships – Disrespect Nobody](#)

3.7 Visitors and members of the community

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

4. Educating pupils about online safety

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

The text below is taken from the [National Curriculum computing programmes of study](#).

It is also taken from the [guidance on relationships education, relationships and sex education \(RSE\) and health education](#).

All schools have to teach:

- [Relationships and sex education and health education](#) in secondary schools

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


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

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

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

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

- Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online

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- Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- How information and data is generated, collected, shared and used online
- How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours
- How people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)

All teachers are responsible for ensuring that teaching and delivery is adapted to meet the needs of their students, including those with SEND and those who are vulnerable.

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

5. Educating parents about online safety

The school will raise parents' awareness of internet safety in letters or other communications home, and in information via our website. This procedure will also be shared with parents via our website.

If parents have any queries or concerns in relation to online safety, these should be raised in the first instance with a member of the Safeguarding Team.

Concerns or queries about this procedure can be raised with any member of staff or the Head of School.

6. Cyber-bullying

6.1 Definition


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

6.2 Preventing and addressing cyber-bullying

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

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

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes Tutor Period, Morning Registration and other subjects where appropriate.

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All staff, governors and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding updates.

The school has links to websites that have information about online safety.

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

The DSL will consider whether the incident should be reported to the police if it involves illegal material, and will work with external services if it is deemed necessary to do so.

6.3 Examining electronic devices

School staff have the specific power under the Education and Inspections Act 2006 (which has been increased by the Education Act 2011) to search for and, if necessary, delete inappropriate images or files on pupils' electronic devices, including mobile phones, iPads and other tablet devices, where they believe there is a 'good reason' to do so.

When deciding whether there is a good reason to examine or erase data or files on an electronic device, staff must reasonably suspect that the data or file in question has been, or could be, used to:

- Cause harm, and/or
- Disrupt teaching, and/or
- Break any of the school rules

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL or other member of the senior leadership team to decide whether they should:

- Delete that material (under supervision of a member of staff/parent/carer), or
- Retain it as evidence (of a criminal offence or a breach of school discipline), and/or
- Report it to the police

Where inappropriate material has been reported, found or suspected staff will contact parents/carers who will be required to collect the device from school.

Any searching of pupils will be carried out in line with the DfE's latest guidance on [screening, searching and confiscation](#).

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

7. Sharing nudes and semi-nude images.

Sexting is defined in our Whole School Policy for Safeguarding Incorporating Child Protection.

Non-statutory advice from the Department for Education is available to support education settings.


This guidance will be used in conjunction with this procedure and the school's Safeguarding Policy.

7.1 Information for Staff responding to concerns regarding nude and semi-nude images

- Staff MUST follow the Safeguarding referral process as outlined in the JTMAT Safeguarding Policy.
- Concerns related to nude and semi-nude images MUST be reported to the DSL or Deputies.
- Staff MUST NOT ask to see/view any images or videos

7.2 Information for Safeguarding staff responding to concerns regarding nude and semi-nude images

- Speak to the child/children/young person
- Involve parents/carers
- Determine the classification using fig 1 from the DfE Guidance

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- Determine if a referral to Social Services or the Police is appropriate NOTE: there is clear guidance in relation to contact with the Police and criminalization of children in the DfE Guidance.

7.3 Supporting the child/children/ young person

- Establish if the image has been shared
- Ensure the content has been deleted, supervised by a member of staff or parent/carer
- If the image has been shared signpost the child/children/young person to Childline <https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety sexting/report-nude-image-online/>
- Establish if there are wider risks to the child/children/young person and consider a referral to an outside agency as appropriate.

7.4 Role of Parents/Carers

- Receive information and advice about the sharing of images
- Support your child/children to delete any inappropriate images, including from backups and cloud based storage.
- Support your child/children with contacting Childline to report and remove shared images <https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety sexting/report-nude-image-online/>
- Be aware of the law in relation to sharing materials
- Support school with consent to a referral to external agencies, where appropriate

8. Acceptable use of the internet in school

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

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

We will monitor the websites visited by pupils, staff, volunteers, governors and visitors (where relevant) to ensure they comply with the above.

More information is set out in the acceptable use agreements.

9. Pupils using mobile devices in school


Students who require the use of Laptops or other electronic devices must do so in accordance with the Acceptable User Agreement and with the approval of the IT Support Team and parents/carers consent.

Please read the school's Behaviour for Learning Procedure and Mobile Phone Procedure.

Students in Y7-11 are not permitted to use their mobile devices on school site. The school enforce a see it, hear it, lose it policy. Student's mobile phones are confiscated and returned to them at the end of the day. Students with repeated infringements have their devices collected by a parent / carer.

Where students' mobile devices have been used on school site during school hours to abuse another person, the school will follow the Behaviour for Learning procedure.

Students in the 6th Form are permitted to use their mobile devices in the 6th Form College. Where Sixth Form Students have used their mobile device on school site, during school hours to abuse another person, the school will follow the Behaviour for Learning procedure.

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10. Pupils using school devices off site

All students who are loaned a school device will have to sign an additional agreement and consent form. Students/ Families are liable for costs associated with damage to loaned items.

Students using school devices should be made aware that they are monitored using our monitoring software, inappropriate use could result in pastoral or safeguarding follow up.

Students using school loaned devices should ensure they are not used for purposes other than education or by other members of the household who do not have authorized access to the school's network.

Students must not share username and password details with anyone else to prevent unauthorized access to the school's network.

11. Staff using work devices outside school

Staff members using a work device outside school must not install any unauthorised software on the device and must not use the device in any way which would violate the school's terms of acceptable use.

Staff must ensure that their work device is secure and password-protected, and that they do not share their password with others. They must take all reasonable steps to ensure the security of their work device when using it outside school. Any USB devices containing data relating to the school must be encrypted.

If staff have any concerns over the security of their device, they must seek advice from the IT Support Team. Work devices must be used solely for work activities. Staff should be aware that all laptops and PCs are covered by our monitoring software.

12. Social Media

Paulet High School has the following social media accounts:

Facebook - <https://facebook.com/PauletOnline>

Twitter - <https://twitter.com/pauletonline>

Instagram - <https://instagram.com/pauletonline>

TikTok - <https://tiktok.com/@pauletonline>

LinkedIn - <https://www.linkedin.com/company/paulet-high-school>


Snapchat - <https://www.snapchat.com/add/pauletonline>

YouTube - <https://www.youtube.com/@PauletOnline>

We acknowledge that some individual staff and departments may choose to use social media for teaching and learning purposes in their professional capacity. Staff who do this must ensure that their activity and interactions online meet the expectations of the JTMAT Staff Code of Conduct. Personal activity on social media is also covered in the JTMAT Staff Code of Conduct.

Under no circumstances are any members of our school community permitted to create imitation or impersonation accounts online. Such accounts created will be reported via the Report Harmful Content button on our school website and if such accounts contain any illegal information they will be reported to the Police.

Our social media platforms are not formal methods of communication between stakeholders and school. We ask that you contact the School Office directly to raise any concerns.

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13. How the school will respond to issues of misuse

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

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

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

If there is evidence of misuse of ICT, then a follow up is likely to be implemented.

The school are also able to enforce the Behaviour for Learning and Behaviour Management procedure for incidents related to online abuse. Sanctions can include but are not limited to detentions, extended reflection, suspensions and permanent exclusions.

14. Training

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

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

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

- Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse
- Children can abuse their peers online through:
 - Abusive, harassing, and misogynistic messages
 - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
 - Sharing of abusive images and pornography, to those who don't want to receive such content
- Physical abuse, sexual violence and initiation/hazing type violence can all contain an online element

Training will also help staff:

- develop better awareness to assist in spotting the signs and symptoms of online abuse
- develop the ability to ensure pupils can recognise dangers and risks in online activity and can weigh the risks up
- develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term


The SSSCB Level 1 Training also highlights the risks around Online Safety.

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

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

Volunteers will receive appropriate training and updates, if applicable.

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

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15. Filtering and Monitoring arrangements

15.1 Roles and Responsibilities

All Staff

All staff are responsible for ensuring they are safe online and comply with the JTMAT Acceptable User Policy. All staff are responsible for reporting any concerns about online safety.

Student online safety concerns are reported via MyConcern.

Staff online safety concerns are reported to the Headteacher.

Concerns about filters, including allowing access and blocking access must be logged as a support ticket with the IT Team via <http://it.paulet.co.uk>

Teaching Staff

Teaching staff using computer facilities around school are responsible for ensuring students are using the IT equipment and online facilities in a safe way.

Teaching staff in IT rooms are responsible for physically monitoring the use of IT facilities.

Senior Leadership Team

The SLT are responsible for ensuring that IT provision in school is adequately meeting the needs of staff and students, balancing the need for effective safeguarding, filtering and monitoring with providing high quality teaching and learning.

Governing Body

The Governing Body are responsible for ensuring that the school meet the requirements of KCSIE, 2023 and the published safety standards.

Designated Safeguarding Lead

The DSL has the lead responsibility for Online safety, filtering and monitoring.

Deputy Designated Safeguarding Leads


The DDSLs will support the day-to-day management of online safety referrals.

Pastoral Staff

Pastoral Staff including Heads of Year, Pastoral Support Staff may be involved in supporting and investigating concerns related to online safety, including issuing sanctions in line with the Behaviour Management Procedure where appropriate.

IT Support Staff

- Are responsible for the day-to-day maintenance of the IT infrastructure and filtering in place on the school network.
- Are responsible for running the filtering checks and sharing custom reports with the DSL when required. Monitoring software reports will automatically be sent.
- Are responsible for keeping a record of all tickets logged via the helpdesk related to filtering. The DSL and DDSL must approve if a website can be unblocked.

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15.2 Filtering

There are multiple layers of filtering in place on the PHS Network. The initial layer of filtering is done at source by the internet provider. This filters the most inappropriate material at source.

The Strategic ICT Lead for JTMAT is able to see all Paulet High School Filtering categories.

Filtering is then set up by user group. Student accounts and access is the most restricted across the school network.

Group 1- Students- Most restricted

Group 2- Sixth Form

Group 3- Staff

Group 4- Exams

Group 5- Least restrictive for specialist users (staff)

Some filtering at source is padlocked, this means there is no control for school to adapt or edit the level of filtering.

PHS can select additional filters on top of those added at source.

The IT Support Staff are able to add additional filters on to ensure the safety of the materials being accessed by staff, students and visitors.

If staff require filters being removed to allow access to specific material, this can only be done in consultation with the DSL.

Filters apply to all devices that use the school network.

15.2 Monitoring

The school's IT system is monitored by Smooth Wall. This is a paid service that tracks keystrokes across all IT platforms including Microsoft Office, Online search engines and all other interfaces. The paid service review all captures by staff and students and assign them with a grading 1-5, with 5 being most significant.


The school is notified of all Grade 4 and Grade 5 captures via email. Staff captures are reported to the Headteacher and student captures are reported to the DSL and DDSL.

All Grade 4 and Grade 5 captures are reported on MyConcern, even if they are false positives.

Smoothwall provide a monthly report to the DSL and DDSL. Information will be shared with Heads of Year and Form Tutors to support preventative education around any emerging patterns or trends related to Online Safety.

The DSL and DDSL log behaviour and safeguarding issues related to online safety. Online safety incidents are reported via MyConcern. All staff are responsible for monitoring online safety when using IT facilities in school and reporting student issues via MyConcern.

Pastoral staff may be involved in supporting the investigation of online safety incidents and supporting sanctions in line with the JTMAT Behaviour Policy and Paulet High School Behaviour for Learning Procedure.

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If the monitoring system flags harmful material that is not being filtered the DSL and DDSL will log this with the IT Support Staff via <http://it.paulet.co.uk> to ensure access to these sites are removed.

All staff have a responsibility to log any unfiltered websites with the IT Support Staff where they believe access to this site would pose a risk to children. This must be logged by contacting the IT Help Desk via <http://it.paulet.co.uk>.

The IT Support staff will then record the action taken and keep a record of this.

Each term the DSL will review the filtering lists in school.

The IT Support staff are responsible for running a termly test on the Filtering in place and sharing this report with the DSL as part of the termly review process. This test is to check compliance with recommended safety standards.

In addition to the external monitoring, the IT Support Staff are able to track login information within school and externally, this can be done when school login information is used on school and personal devices.

This procedure will be reviewed annually by the DSL. At every review, the procedure will be shared with the governing board and staff.