# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

## Introduction

### Key people / dates

| | | |
|---|---|---|
| Francis Barber Pupil Referral Unit | Designated Safeguarding Lead (DSL), with lead responsibility for filtering and monitoring | DSL, Deputy DSL, Heads of School, Deputy Headteacher |
| | Deputy Designated Safeguarding Leads / DSL Team Members | DSL, Deputy DSL, Heads of School, Deputy Headteacher |
| | Link governor for safeguarding and web filtering | Chair of Governors |
| | Curriculum leads with relevance to online safeguarding and their role | Assistant Head teacher Curriculum and Standards |
| | Network manager / other technical support | ITS, LGFL |
| | Date this policy was reviewed and by whom | 27th November 2025, DSL, IT Tech, Headteacher, |
| | Date of next review and by whom | 1st October 2026 DSL, IT, Headteacher |

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

## 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' 2025 (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.

## 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 will be informed by legislation and regulations, we will involve staff and governors and pupil and parent feedback will be taken into account in writing and reviewing the policy. We will make sure the policy makes sense and is possible to follow in all respects. This will help all stakeholders to understand the rules that are in place and why, and that the policy affects day-to-day practice. Acceptable Use Policies for different stakeholders help with this – see school website. Any changes to this policy will be immediately disseminated to all the above stakeholders.

## 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 and understanding the filtering and monitoring systems and processes in place)." 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.

## What were 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: unauthorised streaming of music or video and playing games which disrupt the learning of those doing so and those around them. The use of social media platforms by young people and impact this has on their Social, Emotional and Mental Health is a concern.

Nationally, some of the latest trends of the past twelve months are outlined below. These are 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.

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

Last year, we highlighted the rapid rise of generative AI (GenAI). Since then, the trend has exploded. Thousands of sites now offer AI-generated content, including disturbing levels of abusive, pornographic, and even illegal material like child sexual abuse content. Some platforms host AI "girlfriends," unregulated therapy bots, and even chatbots that encourage self-harm or suicide—tools many students can access freely at home or school. Chatbots can also blur reality, offering harmful advice or engaging in sexualised and bullying conversations. Their addictive design and unmoderated nature heighten the risk of overuse and exploitation.

When used for generating text, GenAI presents multiple risks. It can spread misinformation, facilitate plagiarism, and most worryingly, bypass safety settings. Many tools lack effective age controls and produce inappropriate content.

Beyond text, GenAI makes it easier than ever to create sexualised images and deepfake videos. These can have a devastating emotional and physical impact on young people, including blackmail and abuse. The Internet Watch Foundation has warned of a sharp rise in AI-generated child sexual abuse imagery. Alarming reports also show children using nudifying apps to create illegal content of peers.

We regularly see AI searches involving sexualised and harmful content. It's critical to stress that in the UK, *any* CSAM (child sexual abuse material)—AI-generated, photographic, or even cartoon—is illegal to create, possess, or share.

Schools must address this not just in the classroom, but by educating parents and students on safe use at home. For guidance and resources, visit genai.lgfl.net.

Ofcom's 'Children and parents: media use and attitudes report 2025' has shown that YouTube remains the most used site or app among all under 18s, followed by WhatsApp, TikTok, Snapchat and Instagram. With children aged 8-14 spending an average of 2 hours 59 minutes a day online across smartphone, tablet and computer – with girls spending more time online than boys, four in ten parents continue to report finding it hard to control their child's screentime. Notably, 52% of 8-11s feel that their parents' screentime is also too high, underlining the importance of modelling good behaviour.

Given the 13yrs+ minimum age requirement on most social media platforms, it is notable that over half of 3-12-year olds (55%) were reported using at least one app. 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 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.

We have also come across online communications platforms that offer anonymous chat services and connect users with random strangers allowing text and video chats. Most of these are easily accessible to children on devices.

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

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 217,780 cases of self-generated child sexual abuse material were found of 11–13-year-olds (Internet Watch Foundation Annual Report 2025). These were predominantly (but importantly not only) girls; it is important also to recognise the increasing risk of financial sexual extortion, sometimes referred to as '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 new guidance to all schools in Summer 2025.

Growing numbers of children and young people are using social media and apps, primarily TikTok as their source of news and information, with little attention paid to the facts or veracity of influencers sharing news.

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 features within KCSIE. Sadly, the education sector remains a clear target for cyber-attacks, with the Cyber Security Breaches Survey 2025 reporting high levels of schools being attacked nationally, with 60% of secondary schools and 44% of primary schools reporting a breach or attack in the past year.

## 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 pack 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
- Clearly reflected in the Acceptable Use Policies (AUPs) for staff, volunteers, contractors, governors, pupils and parents/carers which are also maintained on the school website and issued to the whole school community: on entry to the school; annually; whenever significantly changed.

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

## Contents


Introduction 1

Key people / dates 1

What is this policy? 2

Who is it for; when is it reviewed? 2

Who is in charge of online safety? 2

What were the main online safety risks in 2024/2025? 2

How will this policy be communicated? 4

Contents 5

Overview 6

Aims 6

Scope 7

Roles and responsibilities 7

Education and curriculum 8

Handling safeguarding concerns and incidents 9

Nudes – sharing nudes and semi-nudes 10

Priority Areas 10

Upskirting 12

Bullying 12

Child-on-child sexual violence and sexual harassment 13

Misuse of school technology (devices, systems, networks or platforms) 13

Social media incidents 14

CCTV 15

Extremism 15

Data protection and cyber security 15

Appropriate filtering and monitoring 15

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

Authorised systems 17

Behaviour / usage principles of messaging/commenting systems 18

Use of generative AI 18

Online storage or learning platforms 19

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26


School website 19

Digital images and video 20

Social media 21

Our SM presence 21

Staff, pupils' and parents' SM presence 22

Device usage 23

Personal devices including wearable technology and bring your own device (BYOD) 24

Use of school devices 25

Trips / events away from school 25

Searching and confiscation 25

Appendix A – Roles 27

All staff 27

Headteacher 28

Designated Safeguarding Lead /Online Safety Lead 29

Governing Body, led by Online Safety / Safeguarding Link Governor 31

PSHE Lead 31

Computing Lead **Error! Bookmark not defined.**

Subject / Curriculum Leads 32

Network Manager/other technical support roles 32

Data Protection Officer (DPO) 34

Volunteers and contractors (including tutor) 34

Pupils 34

Parents/carers 34

External groups (e.g. those hiring the premises) including parent associations 35


## Overview

### Aims

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

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

- Setting out expectations for all Francis Barber 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 & 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)

## Scope

This policy applies to all members of the Francis Barber community (including teaching, supply and support staff, governors, volunteers, contractors, students/pupils, 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.

## 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, pupils, 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 Appendix 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 pupil, governor, etc. role descriptions in the appendix. All staff have a key role to play in feeding back on potential issues.

## Education and curriculum

Despite the risks associated with being online, Francis Barber school recognises the opportunities and benefits to children too. Technology is a fundamental part of adult life 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 pupils 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 pupils, including vulnerable pupils.

RSHE guidance also recommends that schools assess teaching to "identify where pupils need extra support or intervention [through] tests, written assignments or self-evaluations, to capture progress."

The teaching of online safety, features in these particular areas of curriculum delivery:

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

However, as stated previously, 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.

Whenever overseeing the use of technology (devices, the internet, generative AI tools, etc.) in school or setting as homework tasks, all staff should remind/encourage sensible use, monitor what

pupils/students are doing and consider potential risks and the age appropriateness of tasks. This includes supporting them with search skills, reporting and accessing help, critical thinking (e.g. disinformation, misinformation, and conspiracy theories in line with KCSIE 2025), access to 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 Francis Barber, we recognise that online safety and broader digital resilience must be a thread throughout the curriculum.

Annual reviews of curriculum plans / schemes of work (including for SEND pupils) take place and are used as an opportunity to follow this framework more closely in its key areas. This is done within the context of an annual online safety audit, which is a collaborative effort led by the safeguarding team.

We communicate with parents and carers about how we support pupils with their online safety learning, including what their children are being asked to do online and the sites they will be asked to access by sharing this policy and the Acceptable Use Policy. We may also contact parents via email or through Key Workers to share any more specific online safety information

## Handling safeguarding concerns and incidents

It is vital that all staff recognise that online safety is a part of safeguarding and so 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 speak to the safeguarding lead with any concerns (no matter how small these seem) 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.

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
- Behaviour and Anti-Bullying Policy
- Acceptable Use Policies
- Data Protection Policy, agreements and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc)
- Cyber Security Policy

Francis Barber commits to take all reasonable precautions to safeguard pupils 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.

Any suspected online risk or infringement should be reported to the Designated Safeguarding Lead as soon as possible on the same day. The reporting member of staff will ensure that a record is made of the concern on School Pod (SPOD) this includes any concerns raised by the filtering and monitoring systems (see section further on in this policy for more information).

Any concern/allegation about staff misuse is always (similar to any safeguarding allegation) referred directly to the Headteacher, unless the concern is about the Headteacher in which case the complaint is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer). Staff may also use the NSPCC Whistleblowing Helpline.

Francis Barber 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 2024 provides advice and related legal duties including support for pupils and powers of staff when responding to incidents – see pages 31-33 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 pupils engage in or are subject to behaviour which we consider is particularly concerning or breaks the law.

The school should ensure all online safety reporting procedures are sustainable for any unforeseen periods of closure.

For more information on reporting channels for online safety concerns, please visit reporting.lgfl.net.

The following sub-sections provide detail on managing particular types of concern.

## Priority Areas

## Nudes – sharing nudes and semi-nudes

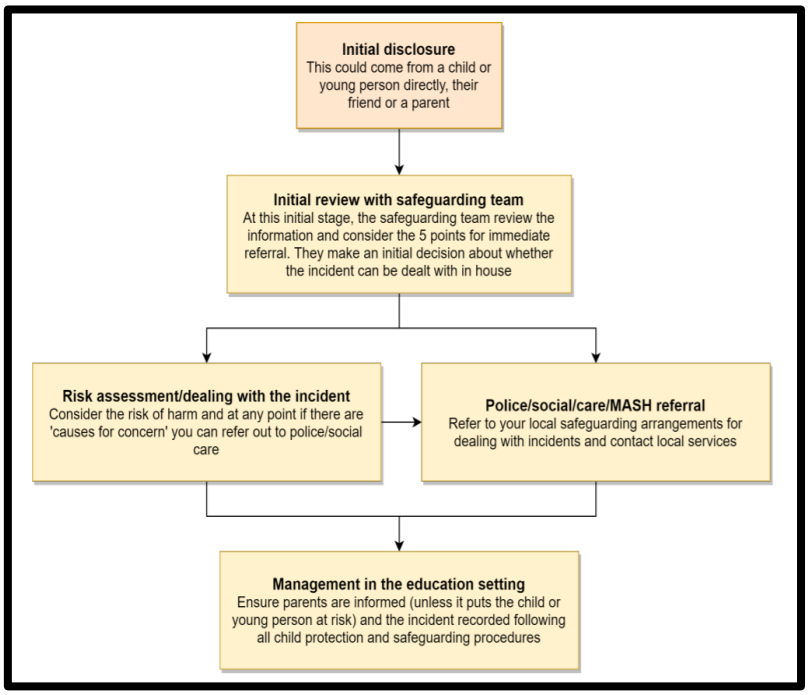
All schools (regardless of phase) should refer to the UK Council for Internet Safety (UKCIS) guidance on sexting - now referred to as Sharing nudes and semi-nudes: advice for education settings.

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,

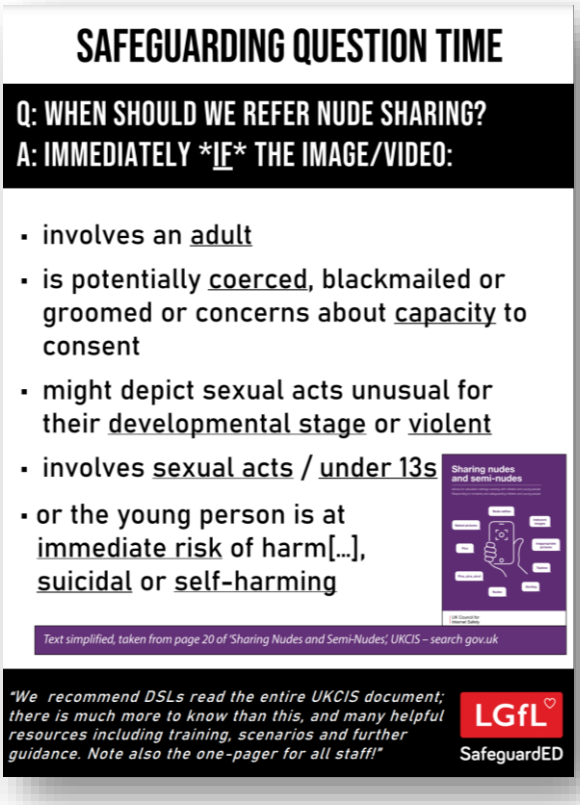
and it is vital that the correct steps are taken. **Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL**.

It is important that everyone understands that whilst the sharing of nudes involving children is illegal, students should be encouraged and supported to talk to members of staff if they have made a mistake or had a problem in this area. The UKCIS guidance seeks to avoid unnecessary criminalisation of children.

The school DSL will 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 (see flow chart below from the UKCIS guidance) and next steps regarding liaising with parents and supporting pupils.




The following LGfL document (available at nudes.lgfl.net) may also be helpful for DSLs in making their decision about whether to refer a concern about sharing of nudes:




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

## Upskirting

It is important that everyone understands that upskirting (taking a photo of someone under their clothing, not necessarily a skirt) is 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.

## Bullying

Online bullying (which may also be referred to as cyberbullying), including incidents that take place outside of school should be treated like any other form of bullying and the school bullying policy (see Behaviour Policy) should be followed. This includes issues arising from banter.

It is important to be aware that sometimes fights are being filmed, live streamed or shared online and fake profiles are used to bully children in the name of others. When considering bullying, staff will be reminded of these issues.

Materials to support teaching about bullying and useful Department for Education guidance and case studies are at bullying.lgfl.net

## Child-on-child sexual violence and sexual harassment

Any incident of sexual harassment or violence (online or offline) should be reported to the DSL who will follow the guidance in KCSIE. 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. This will be discussed in staff training.

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 safeguarding team are aware of contextual safeguarding issues and work closely with multi agency partners to look at current trends, and put sessions in place with relevant professionals/experts as the need changes.

## 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 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, as well as to BYOD (bring your own device) policy.

Where pupils 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/handbook.

It will be necessary to reinforce these as usual at the beginning of any school year but also to remind pupils that **the same applies for any home learning** that may take place.

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 school currently uses HomeProtect and SchoolProtect for content filtering and Senso for content monitoring

## Social media incidents

Social media incidents involving pupils are often safeguarding concerns and should be treated as such and staff should follow the safeguarding policy. Other policies that govern these types of incidents are the school's Acceptable Use Policies /online safety.

Breaches will be dealt with in line with the school behaviour policy (for pupils) or code of conduct/handbook (for staff). See the social media section later in this document for rules and expectations of behaviour for children and adults in the Francis Barber community.

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community (e.g. parent or visitor), Francis Barber 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.

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

## CCTV

CCTV is used significantly around the communal areas of the school both inside and outside of the buildings. CCTV cameras are not generally positioned in classrooms, but some spaces that have CCTV may be used as classrooms for lessons. This is to keep pupils and staff safe at all times. In no instances are cameras positioned in any toilets or changing spaces. All pupils, parent and staff are informed of this in initial interviews (pupils and parents). Tis information about CCTV cameras is in the staff handbook. There are also notices regarding CCTV being in operation at the entrances of the school sites

The administration, premises and IT support staff can view recorded footage, as can Heads of School. The footage is stored on a server in the secure server room at Tooting and the secure office at Westdean.

## 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.

## Data protection and cyber security

All pupils, staff, governors, volunteers, contractors and parents are bound by the school's data protection and cyber security policy which can be found here or for staff they are available on the staff P:. It is important to remember that there is a close relationship between both data protection and cyber security and a school's ability to effectively safeguard children. Schools are reminded of this in KCSIE which also refers to the DfE Standards of Cyber Security for Schools and Colleges.

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 2025, "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."

## Appropriate filtering and monitoring

The designated safeguarding lead (DSL) Nic Gibson has lead responsibility for filtering and monitoring and works closely with the Deputy Designated Safeguarding Lead (DDSL) and the IT Manager to implement the DfE filtering and monitoring standards, which require schools 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.

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

We look to provide 'appropriate filtering and monitoring (as outlined in Keeping Children Safe in Education) at all times through SENSO, SchoolProtect and HomeProtect.

We ensure ALL STAFF are aware of filtering and monitoring systems (SchoolProtect, HomeProtect and Senso) 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 School Pod (SPOD) and IT Helpdesk, and will be asked for feedback at the time of the regular checks which will now take place. [Guidance at safefiltering.lgfl.net]

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.

We carry out half termly checks to ensure filtering is operational, functioning as expected, etc and an annual review as part of an online safety audit of strategy, approach etc. More details of both documents and results are available on request dependent on staff roles from the safeguarding team.

We use LGfL templates for this. https://safefiltering.lgfl.net and https://onlinesafetyaudit.lgfl.net

At our school we recognise that generative AI sites can pose data risks so staff are not allowed to enter child data and where they use them, they must be approved. For children and young people, we block the generative AI category and only allow specific sites; we know that what children input and what the tool outputs cannot be guaranteed as safe and inappropriate content can be generated, so we carefully monitor output and limit their use - also in line with DfE guidelines. Find out more at genaisafe.lgfl.net

Safe Search is enforced on any accessible search engines on all school-managed devices.

We recommend the use of Google Chrome, as its configuration is managed in our school's Google Workspace, extending the managed environment to home browsing when logged into a school account. Children only have access to managed Chromebooks, so other browsers are not available to them.

Strict restricted filtering is enforced in YouTube for pupils but not staff. Where staff identify this is preventing access to required sources for pupils, overrides can be entered into the filtering software. This helps us to limit inappropriate content that is served to pupils.

Filtering and monitoring policies in Senso, SchoolProtect and HomeProtect all run 24/7. Any alert raised is investigated.

Devices provided to pupils for home use are Chromebooks, or laptops repurposed as Chromebooks, and are enrolled into our school's Google Workspace, where they have the same degree of management as devices used in the school.

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.

At Francis Barber we use Senso to monitor pupils' activity for real-time incidents of potentially inappropriate use or content retrieval.

HomeProtect runs at all times for all student accounts, filtering at a strict level.

SchoolProtect runs at all times against all connections made by any device used by any user on the school network out to the internet.

In the case of pupils' use of Chromebooks, this means there are 2 layers of filtering in place while on the school network, and the strictest protocol takes precedence.

The DSL checks monitoring notifications as they arise. Filtering reports are reviewed monthly and takes any necessary action as a result.

In addition staff monitor children's activities when using devices in the classroom.

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

### Authorised systems

- Pupils at Francis Barber may communicate with each other and with staff using Gmail with their school accounts and with staff through Google Classroom. As part of the annual online safety review other apps and services used in the classroom are checked for messaging capabilities.
- Staff at Francis Barber use the email system provided by London Grid for Learning (LGfL) as its primary email and calendar tool. Gmail is used as a messaging layer when sharing resources in the school's Google Workspace environment, with automatic updates sent to the LGfL mailbox. 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 at Francis Barber school use Teachers2Parents to communicate with parents and carers
- 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, pupils 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 or app with communication facilities or any child login or storing school/child data must be approved in advance by the school and centrally managed. This will normally be authorised 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 Headteacher (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. If a private account is used for communication or to store data by mistake, the DSL/Headteacher/DPO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately. This is a particular risk where personal and school email accounts are made through a messaging management app, such as Outlook on a mobile phone. It can also apply where Google credentials are used to log into 3rd party apps so great care must be taken in such scenarios, e.g. to access a Google Photos account. Staff must not use personal mobile numbers to call parents/pupils unless authorised, and then to use 141 to withhold caller ID.

## Behaviour / usage principles of messaging/commenting systems

- 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.
- Pupils and staff should avoid using the school email system for personal use and 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).

## Use of generative AI

At Francis Barber we acknowledge that generative AI platforms (e.g. ChatGPT or Gemini 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 pupils, 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, nudifying apps and inappropriate chatbots).
- The use of any generative AI in Exams, or to plagiarise and cheat is prohibited, and the relevant current exams policies, procedures including the JCQ malpractice procedures and protocols will be applied for any pupil found doing so.
- In school, we allow staff to use AI in a policy-led manner with appropriate safeguards and policy aligned using a webpage set up for this purpose. For pupils, access to AI is currently blocked in HomeProtect. A constant review of this arrangement will take place, based on pupil and staff feedback from the classroom.
- Subjects leaders and class teachers will need to request access for new websites to be unblocked for pupil use.
- If pupils use AI for part of their work they should reference this in the usual way, stating the source of the AI/ website used.

Staff have access to training around AI, they are provided with a policy-aligned website to use AI in as safe a way as possible.

## 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. In Francis Barber this includes the network drive (P:),Google Drive, Schoolpod, Outlook, Gmail, Google Classroom)

For all these, it is important to consider data protection and cyber security before adopting such a platform or service and at all times when using it. Any new platforms will be approved by the Head Teacher.

## 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 Headteacher and Governors have delegated the day-to-day responsibility of updating the content of the website and ensuring compliance with DfE stipulations to the Headteacher, Head of Teaching and Learning, HR Manager, Exams Officer, DSL and IT Support. Francis Barber refers websiterag.lgfl.net for this

The website is hosted by BlueApple Education and content is managed by the school's IT support.

Staff are reminded that information submitted for the website, must respect and uphold copyright law, on penalty of legal action and fines. 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 the Data Protection Officer.

## Digital images and video

When a pupil/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:

- During our visit or ventures we are likely to take pictures and videos. We would like to use these in presentations, displays or in our own booklets, newsletters of publicity.
- In the event of any images of my child/me being taken, I consent to them being used for educational purposes.
- I understand that if my child is/I am easily identifiable (eg a close facial shot) I will be informed first
- I consent to my images being used on the website

Whenever a photo or video is taken/made, the member of staff taking it will check with permissions on SPOD or confirm with a member of the administration team, before using it for any purpose.

Any pupils 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 pupils, and where these are stored. At Francis Barber, no member of staff will ever use their personal phone to capture photos or videos of pupils without the express permission of the Headteacher. In that case 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 **and cloud service backups**

Photos are stored on the school P: drive or Google Drive in line with the retention schedule of the school as noted in the GDPR data audit log. Any concerns about the nature of these images will be reported to the DSL.

Staff and parents are reminded annually about the importance of not sharing images on social media or otherwise without permission, due to reasons of child protection (e.g. children who are looked after by the local authority may have restrictions in place for their own protection), data protection, religious or cultural reasons, or simply for reasons of personal privacy. Further information on managing student image and video content is available here.

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).

Pupils 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 governors, parents or younger children.

Pupils 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.

Pupils 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.

## Social media

### Our SM presence

Francis Barber 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, even though there are no official/active school social media accounts. We conduct regular checks of privacy and security settings on social media accounts to ensure appropriate access. Social media checks will carried out as part of our recruitment safeguards.

Our DPO is responsible for reviewing social media and checking other mentions online.

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

## Staff, pupils' 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 pupils 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 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. 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 but the school regularly deals with issues arising on social media involving pupils/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.

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 pupils/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 parentonlinesafety.lgfl.net and parentsafe.lgfl.net and introduce the Children's Commission Digital 5 A Day.

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 except when authorised by the Headteacher.

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

As outlined in the Acceptable Use Policies, pupils/students are not allowed to be 'friends'* with or make a friend request** to any staff, governors, volunteers and contractors or otherwise communicate via social media.

Pupils/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 Headteacher and should be declared upon entry of the pupil or staff member to the school. A log should be kept on SPOD via a staff safeguarding slip.

** 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 Headteacher (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 considerable 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. Parents must **not** covertly film or make recordings of any interactions with pupils or adults in schools or near the school gates, nor share images of other people's children on social media as there may be cultural or legal reasons why this would be inappropriate or even dangerous (see nofilming.lgfl.net for more information). The school sometimes uses images/video of children for internal purposes such as recording attainment, but it will only do so publicly if parents have given consent on the relevant form.

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.

## 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.

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

- **Pupils/students** are allowed to bring mobile phones in for emergency use only but these must be left in the office. Any attempt to use a phone in lessons without permission or to take illicit photographs or videos will be dealt with via the Behaviour Policy; a meeting with parents/carers will be convened and next steps decided. 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 pupils in emergencies. Our approach to pupils using mobile phones is in line with DfE, Mobile Phone Guidance
- Other personal recording devices such as, and not limited to, smart glasses are not permitted in school without written permission. It is forbidden to take secret photos, videos or recordings of teachers or students, including remotely, with any device.

- **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 cyber security 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 ask for support from the Head of School.
- **Pupils who need a mobile device to help manage a medical condition** will be allowed to have their mobile phone on their person, however there will be a robust risk assessment carried out, in dialogue with parents and other key professionals, and staff will monitor the appropriate use whilst onsite. The phone should not be used onsite for any other purpose, than the medical need identified in the risk assessment.
- **Volunteers, contractors, governors** should leave their phones in their pockets 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/Carers** 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. Please see the Digital images and video section of this document for more information about filming and photography at school events. Parents are asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office. We do not allow Apple AirTags or similar devices in school. Please note that it is against the terms and conditions of these products to use them to track a child.
- Where BYOD is allowed, neither staff nor students are allowed to use a mobile hotspot to provide internet to the device as this would potentially bypass filtering in contravention of AUPs.

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

## Use of school devices

Staff and pupils 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.

Wi-Fi is accessible to everyone on the school's sites school-related internet use / limited personal use within the framework of the acceptable use policy. Visitors and guests must use the Guest Wi-Fi hub. 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 only whilst on school premises and for reasonable as well as appropriate personal use when at home

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

## Trips / events away from school

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

If on trips pupils are encouraged to connect to another organisation's Wi-Fi/network, staff must be aware that other connections may not be as well controlled (e.g. via filtering and monitoring) as the network and systems in school and therefore staff are responsible for risk assessing and managing such situations. Staff should seek advice from the DSL where necessary.

## Searching and confiscation

In line with the DfE guidance '[Searching, screening and confiscation: advice for schools]', the Headteacher 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].

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

## Appendix A – Roles

Please read the relevant roles & responsibilities section from the following pages.

All school staff must read the "All Staff" section as well as any other relevant to specialist roles.

Roles:

- All Staff
- Headteacher
- Designated Safeguarding Lead
- Governing Body, led by Online Safety / Safeguarding Link Governor
- PSHE Lead/s
- Computing Lead
- Subject leaders
- Network Manager/technician
- Data Protection Officer (DPO)
- Volunteers and contractors (including tutor)
- Pupils
- Parents/carers
- External groups including parent associations

## All staff

All staff should sign and follow the staff acceptable use policy in conjunction with this policy, the school's main safeguarding policy, the code of conduct and relevant parts of Keeping Children Safe in Education to support a whole-school safeguarding approach.

They must report any concerns, no matter how small, to the designated safety lead as named in the AUP, maintaining an awareness of current online safety issues (see the start of this document for issues in 2025) and guidance (such as KCSIE), modelling safe, responsible and professional behaviours in their own use of technology at school and beyond and avoiding scaring, victim-blaming language.

Staff should also be aware of the DfE standards for filtering and monitoring and play their part in feeding back to the DSL about overblocking, gaps in provision or pupils bypassing protections. All staff are also responsible for the physical monitoring of pupils' online devices during any session/class they are working within.

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

## Headteacher

**Key responsibilities:**

- Foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding.
- Oversee and support the activities of the designated safeguarding lead team and ensure they work with technical colleagues to complete an online safety audit in line with KCSIE (including technology in use in the school) - refer to onlinesafetyaudit.lgfl.net ]
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and Local Safeguarding Children Partnership support and guidance.
- Ensure ALL staff undergo safeguarding training (including online safety) at induction and with regular updates and that they agree and adhere to policies and procedures.
- Ensure ALL governors and trustees undergo safeguarding and child protection training and updates (including online safety) to provide strategic challenge and oversight into policy and practice and that governors are regularly updated on the nature and effectiveness of the school's arrangements – refer to LGfL's Safeguarding Training for School Governors at safetraining.lgfl.net ]
- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including remote systems are implemented according to child-safety first principles.
- Better understand, review and drive the rationale behind decisions in filtering and monitoring as per the DfE standards—through regular liaison with technical colleagues and the DSL– in particular understand what is blocked or allowed for whom, when, and how as per KCSIE – refer to LGfL's Safeguarding Shorts: Web Filtering for DSLs and SLT video
- 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.
- Support safeguarding leads and technical staff as they review protections for pupils in the home and remote-learning procedures, rules and safeguards [ see remotesafe.lgfl.net ].
- 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 governors to ensure a 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.
- 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 pupils, including risk of children being radicalised.
- Ensure the school website meets statutory requirements refer to websiterag.lgfl.net

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

## Designated Safeguarding Lead /Online Safety Lead

**Key responsibilities** (remember the DSL can delegate certain online safety duties but not the overall responsibility; this assertion and all quotes below are from Keeping Children Safe in Education):

- The DSL should "take **lead responsibility** for safeguarding and child protection (**including online safety and understanding the filtering and monitoring** systems and processes in place).
- Ensure "An effective whole school approach to online safety as per KCSIE.
- Ensure the school is complying with the DfE's standards on Filtering and Monitoring. Refer to LGfL's Safeguarding Shorts: Filtering for DSLs and SLT video, safefiltering.lgfl.net and appropriate.lgfl.net
- As part of this, DSLs will work with technical teams to carry out reviews and checks on filtering and monitoring, to compile the relevant documentation and ensure that safeguarding and technology work together. This will include a decision on relevant YouTube mode and preferred search engine/s etc.
- Where online safety duties are delegated and in areas of the curriculum where the DSL is not directly responsible, but which cover areas of online safety (e.g. RSHE), ensure there is regular review and open communication and that the DSL's clear overarching responsibility for online safety is not compromised or messaging to pupils confused.
- Ensure ALL staff and supply staff undergo safeguarding and child protection training (including online safety) at induction and that this is regularly updated.
    - This must include filtering and monitoring and help them to understand their roles.
    - All staff must read KCSIE Part 1 and all those working with children also Annex B – translations are available in 13 community languages at kcsietranslate.lgfl.net (the condensed Annex A can be provided instead to staff who do not directly work with children if this is better)
    - Cascade knowledge of risks and opportunities throughout the organisation.
    - safecpd.lgfl.net has helpful CPD materials including PowerPoints, videos and more
- Ensure that ALL governors and trustees undergo safeguarding and child protection training (including online safety) at induction to enable them to provide strategic challenge and oversight into policy and practice and that this is regularly updated – refer to LGfL's Safeguarding Training for school governors at safetraining.lgfl.net ].
- Take day-to-day responsibility for safeguarding issues and be aware of the potential for serious child protection concerns.
- Be mindful of using appropriate language and terminology around children when managing concerns, including avoiding victim-blaming language – refer to spotlight.lgfl.net for a CPD resource to use with staff and saferesources.lgfl.net on how to framing things linguistically can have a safeguarding impact, and how some expressions may be unhelpful
- 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 closely with SLT, staff and technical colleagues to complete an online safety audit (including technology in use in the school) – refer to LGfL's onlinesafetyaudit.lgfl.net
- Work with the headteacher, DPO and governors to ensure a 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 safeguarding and "undertake Prevent awareness training." – refer to safetraining.lgfl.net and prevent.lgfl.net
- 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 governors/trustees.
- Receive regular updates about online safety issues and legislation, be aware of local and school trends - refer to LGfL's safeblog.lgfl.net for examples or sign up to the LGfL safeguarding newsletter
- Ensure that online safety education is embedded across the curriculum in line with the statutory RSHE guidance (e.g. by use of the updated UKCIS framework 'Education for a Connected World – 2020 edition') and beyond, in wider school life.
- Promote an awareness of and commitment to online safety throughout the school community, with a strong focus on parents, including hard-to-reach parents – refer to parentonlinesafety and parentsafe.lgfl.net ].
- Communicate regularly with SLT and the safeguarding governor/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 pupils to disclose issues when off site, especially when in isolation/quarantine, e.g. an online form on the Useful Links tab of pupil devices about 'something that worrying me' that gets mailed securely to the DSL inbox.
- Ensure staff adopt a zero-tolerance, whole school approach to all forms of child-on-child abuse, and don't dismiss it as banter (including bullying).
- Pay particular attention to **online tutors**, both those engaged by the school as part of the DfE scheme who can be asked to sign the contractor AUP – refer to LGfL's safepolicies.lgl.net - and those hired by parents. Consider sharing the Online Tutors – Keeping Children Safe poster at parentsafe.lgfl.net to remind parents of key safeguarding principles

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

## Governing Body, led by Online Safety / Safeguarding Link Governor

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

- Approve this policy and strategy and subsequently review its effectiveness, e.g. by asking the questions in the helpful document from the UK Council for Child Internet Safety (UKCIS) Online safety in schools and colleges: Questions from the Governing Board .
- Undergo (and signpost all other governors and Trustees to attend) safeguarding and child protection training (including online safety) at induction to provide strategic challenge and into policy and practice, ensuring this is regularly updated – efer to LGfL's Safeguarding Training for school governors at safetraining.lgfl.net ] .
- Ensure that all staff also receive appropriate safeguarding and child protection (including online) training at induction and that this is updated.
- Appoint a filtering and monitoring governor to work closely with the DSL on the new filtering and monitoring standards - there is guidance for governors at safefiltering.lgfl.net
- 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 governor meetings.
- Work with the DPO, DSL and headteacher to ensure a 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.
- Ensure that all staff undergo safeguarding and child protection training (including online safety and now also reminders about filtering and monitoring.
- "Ensure that children are taught about safeguarding, including online safety […] as part of providing a broad and balanced curriculum […] Consider a whole school or college approach to online safety [with] a clear policy on the use of mobile technology." (You may wish to refer to 'Teaching Online Safety in Schools' and investigate/adopt the UKCIS cross-curricular framework 'Education for a Connected World – 2020 edition' to support a whole-school approach)

## PSHE Lead

**Key responsibilities:**

- As listed in the 'all staff' section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online as well as raising awareness of the risks and challenges from latest trends in self-generative artificial intelligence, financial extortion and sharing intimate pictures online into the PSHE / Relationships education, relationships and sex education (RSE) and health education curriculum. "This will include being

taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age-appropriate way that is relevant to their pupils' lives." – refer to safetraining.lgfl.net

- Focus on the underpinning knowledge and behaviours outlined in Teaching Online Safety in Schools in an age appropriate way to help pupils to navigate the online world safely and confidently regardless of their device, platform or app.
- Assess teaching to "identify where pupils need extra support or intervention [through] tests, written assignments or self-evaluations, to capture progress" – refer to LGfL's SafeSkills Online Safety Quiz and diagnostic teaching tool at safeskillsinfo.lgfl.net to complement the computing curriculum,.
- Work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE
- Work closely with the Computing subject leader to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach.

## Subject / Curriculum Leads

**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 RSHE curriculum, and model positive attitudes and approaches to staff and pupils alike.
- Consider how the UKCIS framework Education for a Connected World and Teaching Online Safety in Schools can be applied in your context.
- Work closely with the DSL 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.

## Network Manager/other technical support roles

**Key responsibilities:**

- As listed in the 'all staff' section, plus:
- Collaborate regularly with the DSL and leadership team to help them make key strategic decisions around the safeguarding elements of technology.

- Support safeguarding teams to understand and manage filtering and monitoring systems and carry out regular reviews and annual checks eg. schoolprotect.lgfl.net, monitoring.lgfl.net and safefiltering.lgfl.net
- Support DSLs and SLT to carry out an annual online safety audit as recommended in KCSIE – refer to https://onlinesafetyaudit.lgfl.net. This should also include a review of technology, including filtering and monitoring systems (what is allowed, blocked and why and how 'over blocking' is avoided as per KCSIE) to support their role as per the DfE standards. Refer to LGfL's Safeguarding Shorts: Web Filtering for DSLs and SLT video which provides a quick overview to help build their understanding, and protections for pupils in the home e.g. https://homeprotect.lgfl.net and remotesafe.lgfl.net
- 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.
- Work closely with the designated safeguarding lead / online safety lead / data protection officer / LGfL nominated contact / RSHE lead to ensure that school systems and networks reflect school policy and there are no conflicts between educational messages and practice.
- 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.
- Ensure filtering and monitoring systems work on new devices and services before releasing them to students and staff.
- 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.
- Ensure the data protection policy and cyber security policy are up to date, easy to follow and practicable [ Network managers/technicians at LGfL schools may want to ensure that you take advantage of the following solutions which are part of your package: Sophos Phish Threat, Sophos Intercept X Advanced, Sophos Intercept X Advanced for Server, ThreatDown Incident Response, Egress, GridStore and Meraki Mobile Device Management. These solutions which are part of your package will help protect the network and users on it ].
- Monitor the use of school technology and online platforms 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 - see websiterag.lgfl.net - alongside any other staff member nominated this responsibility, but the technical team is likely to play at least some role in working with the web content team

# Francis Barber Pupil Referral Unit
# Online Safety Policy - 2025/26

## Data Protection Officer (DPO)

**Key responsibilities:**

- Alongside those of other staff, provide data protection expertise and training and support the DP and cyber security policy and compliance with those and legislation and ensure that the policies conform with each other and with this policy.
- 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, "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."
- Note that retention schedules for safeguarding records may be required to be set as 'Very long-term need (until pupil is aged 25 or older)'. An example of an LA safeguarding record retention policy can be read at safepolicies.lgfl.net. However, some local authorities require record retention until 25 for all pupil records. You should check the requirements in your area.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited.

## Volunteers and contractors (including tutor)

**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.
- Maintain an awareness of current online safety issues and guidance.
- Model safe, responsible and professional behaviours in their own use of technology at school 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 pupil. The same applies to any private/direct communication with a pupil.

## Pupils

**Key responsibilities:**

Read, understand, sign and adhere to the student/pupil acceptable use policy.

## Parents/carers

**Key responsibilities:**

- Read, sign and adhere to the school's parental acceptable use policy (AUP), read the pupil AUP and encourage their children to follow it.

## External groups (e.g. those hiring the premises) including parent associations

**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, governors, contractors, pupils or other parents/carers.