



Leamington Federation

Online Safety Policy 2026-2027

This policy applies to all members of the Federation community, including staff, pupils, governors, volunteers, parents/carers, visitors, contractors and community users who access or use Federation digital systems. It also applies to the use of personal digital technology on either school site where this is permitted.



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Introduction

Online safety is an integral part of safeguarding at Sydenham Primary School and Lighthorne Heath Primary School. The Federation recognises both the considerable educational benefits of digital technology and the need to protect pupils and adults from online harm. This policy sets out a whole-school approach to safe, responsible and purposeful use of technology across both maintained primary schools.

This policy has been reviewed for the 2026-2027 academic year using the August 2026 SWGfL/360safe model and current statutory safeguarding expectations. It applies alongside the Federation's Child Protection and Safeguarding, Positive Behaviour, Anti-Bullying, Data Protection, Staff Behaviour Code of Conduct, Preventing Radicalisation, RSHE and related technology policies.

Statutory and national context

The Federation's approach is informed by Keeping Children Safe in Education 2026, Working Together to Safeguard Children, the Education Act 2002, the Counter-Terrorism and Security Act 2015, the UK GDPR and Data Protection Act 2018 (as amended), the Data (Use and Access) Act 2025, the Computer Misuse Act 1990, DfE digital and technology standards, DfE filtering and monitoring standards, and relevant UKCIS/UK Safer Internet Centre guidance.

Online safety is part of the Federation's wider duty of care. Our approach combines effective leadership, age-appropriate education, safeguarding-led filtering and monitoring, secure technical systems, clear reporting routes, strong professional conduct and constructive partnership with parents and carers.

We use the 360safe self-review tool and other relevant evidence to support regular evaluation and improvement of online safety practice across both schools.

Understanding online risk

Online safety is a running and interrelated theme throughout safeguarding, curriculum, staff training, leadership oversight and parental engagement. Risks are considered in the context of children's age, development, SEND, communication needs, vulnerability and lived experience, and staff maintain professional curiosity when concerns arise.

The Federation reviews this policy at least annually, and sooner where significant changes in technology, safeguarding risk, national guidance or local circumstances make this necessary.

Keeping Children Safe in Education identifies four broad areas of online risk: content, contact, conduct and commerce. These categories inform our curriculum, safeguarding responses, staff training and technical arrangements.

KCSIE (Para 163 – updated July 2026) describes online safety risks across four broad areas:

- Content: - being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
- Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct: behaviour that increases likelihood of harm for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
- Commerce: risks such as gambling, inappropriate advertising, phishing and financial scams

The Prevent duty also requires schools to protect pupils from the risk of radicalisation, including exposure to terrorist and extremist material online. Online safety education therefore supports pupils to think critically, question reliability and seek help when content causes concern.

Our Federation approach

The policy is designed for our two maintained primary schools and is implemented proportionately to the age and needs of our pupils. It is supported by age-appropriate Acceptable Use Agreements, staff expectations, safeguarding procedures and technical standards.

Across Sydenham and Lighthorne Heath, pupils are taught to use technology safely, respectfully and responsibly; to recognise risk; to understand age restrictions and privacy; to report concerns; and to develop the knowledge and resilience needed for their increasingly digital lives.

Throughout this policy, “the Federation” means Sydenham Primary School and Lighthorne Heath Primary School. “Pupil” means a child on roll at either school, and “Executive Headteacher” refers to the Executive Headteacher of the Federation.

Scope of the Online Safety Policy

This Online Safety Policy sets out how Leamington Federation safeguards members of our community online, in line with statutory guidance and recognised good practice. It applies consistently across Sydenham Primary School and Lighthorne Heath Primary School, while allowing proportionate arrangements for the age, context and needs of each school.

This policy applies to all members of the school community who access or use school digital systems, including staff, pupils, governors, volunteers, parents/carers, visitors and community users. It applies to use of school systems both on and off site, and to the use of personal devices on the school site (where permitted).

Where online safety concerns or incidents occur outside school and are known to the Federation, we will respond where there is a safeguarding concern, an impact on pupils or staff, or a clear connection to the school community. Responses will follow this policy and related safeguarding, behaviour and anti-bullying procedures.

Policy development, monitoring and review

This policy is led and monitored through the Federation's safeguarding and senior leadership arrangements, drawing on the expertise of the Executive Headteacher, Designated Safeguarding Leads, curriculum leaders, the Governing Body and the school's contracted IT support. Pupil and parent/carer views are considered through the Federation's wider safeguarding, curriculum and engagement activity.

- Executive Headteacher and Senior Leaders
- Designated Safeguarding Leads (DSLs)
- Online safety / Computing leadership
- Teaching and support staff
- Governing Body
- Pupils and parents/carers
- Contracted IT support and relevant external partners

The Federation seeks to make online safety expectations clear, workable, inclusive and proportionate. Feedback from staff, pupils, parents/carers, governors, safeguarding records and technical reviews is used to refine practice.

Schedule for approval, monitoring and review

Approved by the Governing Body: September 2026

Monitored by: Executive Headteacher, DSL team, Senior Leadership Team and Governing Body

Monitoring frequency: ongoing, with formal review at least annually

Reporting to the Governing Body: through safeguarding and leadership monitoring, at least annually and more frequently where significant issues arise

Policy review cycle: reviewed annually, or sooner in response to significant technological developments, emerging risks, or incidents.

Next planned review date: September 2027

Escalation following serious incidents: the Federation will inform the Local Authority, LADO, children's social care, police, CEOP, DPO or other relevant agency where required by the nature of the concern.

Local arrangements: safeguarding concerns are reported immediately to a DSL and recorded on CPOMS in accordance with the Federation's safeguarding procedures. Staff concerns about adults are managed through the Staff Behaviour Code of Conduct, low-level concerns and allegations procedures.

Monitoring the impact of the policy

The school will evaluate the effectiveness of this policy using evidence such as:

- Logs of reported online safety incidents
- Filtering and monitoring records
- Reviews of the effectiveness of the filtering systems
- Internal network activity monitoring data
- Surveys/questionnaires (as appropriate) of: Pupils, Parents/carers, Staff

Policy and leadership

Responsibilities

Online safety is a shared responsibility. All members of the school community are expected to model safe, responsible behaviour, report concerns promptly and learn from incidents and good practice. The roles below clarify accountability.

Executive Headteacher and senior leaders

Senior leaders set the culture and ensure that systems are effective. In line with [KCSIE](#), the DSL holds day-to-day lead responsibility.

Senior leaders will:

- Ensure the school meets its safeguarding duty of care, including online safety.
- Know and apply procedures for serious allegations involving staff (Executive Headteacher plus at least one senior leader).
- Ensure that the DSL/OSL, IT provider/technical staff and relevant colleagues are trained and able to fulfil their roles.

- Ensure that all staff receive appropriate online safety training which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- ensure that children are taught about how to keep themselves and others safe online, recognising that effective education will be tailored to the specific needs and vulnerabilities of individual children.
- Put in place appropriate oversight and support for internal monitoring activity.
- Establish and receive regular online safety reports and act on emerging risks and themes.
- Establish a nominated SLT Lead to work with the DSL and IT provider on the (at least annual) review of the effectiveness on filtering and monitoring systems and ensure that these are recorded

Governors

Governors approve the Online Safety Policy and challenge its effectiveness. KCSIE requires them to:

- Ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring – at induction and regularly updated
- Ensure that children be taught about safeguarding, including in relation to online safety
- Review the DfE Filtering and Monitoring Standards and discuss with IT staff and service providers what more needs to be done to support the school in meeting this standard

The governing body will nominate an Online Safety Governor who will:

- Meet regularly with the DSL/OSL.
- Receive anonymised incident and monitoring summaries.
- Check delivery of key commitments (e.g., education, reporting, staff training).
- Have an understanding of filtering and monitoring and through regular review, assess the effectiveness of filtering and monitoring with SLT, DSL and IT provider, in line with KCSIE and DfE Filtering and Monitoring standards.

Report to the Governing Body through the Federation's safeguarding monitoring arrangements.

- Undertake basic cyber security awareness training and support school cyber security oversight.
- Participate in the Online Safety Group (where in place).

Governors also support parent/carers and community engagement in online safety.

Designated Safeguarding Lead (DSL)

KCSIE (Para 125) states that the DSL leads safeguarding and child protection, including online safety, and understands filtering and monitoring systems and processes. KCSIE requires this to be explicit in the DSL's job description.

The DSL will:

- Lead safeguarding, including online safety, with clear responsibilities in their job description.
- Maintain up-to-date knowledge of online risks, filtering/monitoring and cyber security.
- Coordinate and record online safety concerns and incidents, escalating and referring in line with safeguarding procedures.
- Liaise with SLT, the Online Safety Governor, the IT provider and relevant external partners as required.

- Review anonymised incident patterns and filtering/monitoring information.
- With the nominated SLT Lead and the IT provider lead the (at least annual) review of the effectiveness on filtering and monitoring systems and ensure that these are recorded
- Report regularly to SLT and drive continuous improvement across relevant policies and practice, using evidence (e.g. incident data, monitoring, self-review such as 360 safe).
- Ensure appropriate support for pupils with SEND.

An Online Safety Lead (OSL) may support delivery; the DSL retains lead responsibility.

Online Safety Lead (OSL)

The OSL will:

- Lead the Online Safety Group and support the DSL day to day.
- Lead development and review of online safety documentation.
- Coordinate awareness, staff confidence and reporting readiness through appropriate training
- Work with curriculum leads to map, embed and evaluate online safety education.
- Liaise with IT and pastoral/support teams.
- Maintain current knowledge of risks across content, contact, conduct and commerce.

Curriculum Leads

Curriculum leads will work with the DSL/OSL to deliver a planned online safety programme (e.g. [ProjectEVOLVE](#)) through appropriate channels, e.g. Computing, PSHE/RSE, other curriculum areas, assemblies/pastoral provision and national initiatives e.g. [Safer Internet Day](#).

Teaching and Support Staff

All staff are expected to uphold professional standards online and contribute to a strong safeguarding culture.

Staff will:

- Follow the Online Safety Policy, Safeguarding/Child Protection Policy, Technical Security Policy and sign/comply with the Staff AUA.
- Maintain professional boundaries (including online/remote learning).
- Supervise pupil use of technology and follow procedures for online safety issues
- Embed online safety where appropriate; teach research skills, copyright and plagiarism awareness.
- Challenge harmful online behaviour and report concerns promptly.
- Use only school-approved digital services and AI tools; protect data, apply UK GDPR, and verify AI outputs for accuracy/bias before use.
- Complete induction and annual training, with updates as needed; contribute to improvement by sharing learning and concerns.

IT service provider / technical staff

The IT provider supports leaders and the DSL to meet DfE filtering, monitoring and technical standards. Where services are outsourced, the school remains accountable.

The IT provider will:

- Maintain secure infrastructure and managed user access.
- Implement, maintain and update filtering and monitoring; provide reports; act on alerts and concerns.

- Support procurement, risk identification, reviews and checks with SLT/DSL.

Monitor systems for misuse and report concerns promptly to the DSL and/or an appropriate member of SLT.

- Follow the school's Online Safety and Technical Security policies and keep technical knowledge current.

Pupils

Pupils will:

- Follow the Pupil AUA and Online Safety Policy (including personal devices where permitted).
- Report concerns and know how to get help.
- Use technology responsibly, respecting others and their copyright and intellectual property.
- Use AI responsibly: protect original work, check accuracy and avoid plagiarism.
- Understand that out-of-school behaviour may be addressed where it affects the school community.

Parents and carers

Parents/carers are key partners in reinforcing safe online behaviour.

The school will:

- Publish the Online Safety Policy and share the pupil AUA
- Provide guidance on the responsible use of online technologies and seek permissions for digital services/images where required.
- Share updates through meetings, newsletters, online channels and campaigns.

Parents/carers will be encouraged to reinforce key messages and support safe use of personal devices (where permitted in school).

Community users

Community users accessing school systems or platforms will sign a Community User AUA before access is provided.

The school welcomes partnership working and shares good practice where appropriate.

Online Safety Oversight

Online safety is overseen through the Federation's safeguarding and senior leadership arrangements rather than relying on a separate standing committee. The DSL retains lead safeguarding responsibility, supported by senior leaders, curriculum leadership, the Governing Body and contracted IT support.

- Core contributors include:
- DSL team and Senior Leaders
- Governor(s) with safeguarding / online safety oversight
- Contracted IT support / technical representative
- Computing and curriculum leaders
- Teaching and support staff
- Pupil voice
- Parents/carers, where appropriate

Core responsibilities

The group supports the DSL/OSL to:

- Draft, review and monitor the Online Safety Policy and related documents.
- Oversee filtering and monitoring, including requests for change.
- Map and review online safety education for breadth, progression and relevance.
- Review anonymised incident data and technical logs to identify trends and emerging risks.
- Gather feedback from pupils, staff and parents/carers and turn this into improvement actions.
- Promote pupil voice, peer support and awareness activity.
- Track and evidence improvement actions (e.g. 360 safe).

Governance and impact

- Operates to agreed Terms of Reference (membership, frequency, reporting lines), reviewed annually.
- Coordinates with Safeguarding, Behaviour, Curriculum, Digital Strategy and Pupil Voice as needed.
- Reports key themes, actions and impact to SLT and governors, and shares appropriate summaries with the wider community.

Policy

Online Safety Policy

The Online Safety Policy is part of the school safeguarding framework and should be read alongside Safeguarding/Child Protection, Behaviour, Anti-Bullying and Data Protection policies.

What the policy does

- Defines responsibilities for online safety.
- Sets expectations for safe, professional and ethical use of technology (including AI).
- Sets out reporting, recording and response procedures for online safety incidents.
- Supports compliance with [KCSIE](#), [DfE Technical Standards](#) and [UK GDPR](#).
- Promotes pupils' digital competence and critical understanding.

Implementation, monitoring and review

- Developed through the Online Safety Group and reviewed at least annually ([KCSIE Para 121](#)), and sooner if risks/technology change.
- Monitored by the DSL/OSL and governors using anonymised incident trends, filtering/monitoring reports and education review activity (e.g. [360 safe](#), [ProjectEVOLVE](#)).
- Findings inform improvement planning and staff training priorities.

Communication and accessibility

- Shared at staff induction and reinforced through training.
- Communicated to pupils and parents/carers through AUAs and awareness activity.
- Published on the school website.

Acceptable use

Acceptable use is defined through the Online Safety Policy and a suite of Acceptable Use Agreements (AUAs) ([see appendices](#)). AUAs matter most when they are understood, reinforced and followed—not simply signed.

Reinforcement

- staff and pupil induction/handbooks
- on-screen reminders (e.g. splash screens), digital signage
- posters in areas where technology is used
- curriculum and awareness sessions
- communications with parents/carers
- school website
- peer support / pupil-led activity

Acceptable/Unacceptable Actions

The Federation defines acceptable and unacceptable use in the tables below, taking account of the age and needs of pupils at Sydenham Primary School and Lighthorne Heath Primary School and the digital systems used across both schools.

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable & illegal
Users must not use online services (apps, games, sites) to create, share, download, upload, transfer or communicate material or comments that are:	Any illegal activity, for example: • Child sexual abuse imagery (CSAM)* • Child sexual abuse/exploitation and grooming • Terrorism-related content • Encouraging, promoting or assisting suicide/self-harm • Sexual image offences (including intimate image abuse/revenge porn and extreme pornography) • Incitement to, or threats of, violence • Hate crime • Public order offences (including harassment and stalking)					X

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable & illegal
	• Drug-related offences • Weapons/firearms offences • Fraud and financial crime (including money laundering) • <i>Note: follow UKSIC and UKCIS guidance when responding to self-generated intimate images (SGII).</i>					
Users must not attempt or support cybercrime (Computer Misuse Act 1990), including:	• Misusing someone else's username/ID or password to access data, software or systems without authorisation • Gaining unauthorised access to school networks, data or files (including bypassing security controls) • Creating, introducing or spreading malware (viruses, ransomware, harmful scripts) • Phishing, credential theft, or attempting to capture passwords or personal data • Revealing, copying or publishing confidential information (e.g., personal/financial data, databases, access codes) • Disabling, impairing or disrupting network/services (e.g., denial of service) • Using penetration-testing tools without explicit permission <i>Note: schools should decide whether incidents are dealt with internally or reported to police. Serious or repeat offences should be reported. The National Crime Agency provides routes to divert young people away from cybercrime and into positive pathways.</i>					X
Unacceptable (not illegal) under school policies, for example:	Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs)			X	X	
	Promoting discrimination, harassment or hateful content				X	
	Using school systems to run a private business or make unauthorised financial gain				X	

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable & illegal
	Using tools/services to bypass filtering, monitoring or other safeguards (e.g., VPN/proxy, anonymisers, alternative DNS)				X	
	Infringing copyright or intellectual property (including via AI tools, stream ripping or unauthorised copying/sharing)				X	
	Unfair usage (downloading/uploading large files that hinders others in their use of the internet)			X	X	
	Sharing content that is offensive, undermines the school's ethos, breaches integrity, or brings the school into disrepute				X	

Consider the following activities when used for non-educational purposes. Add or amend items to reflect current technology, age restrictions and your school's device policy.	Staff and other adults				Pupils			
	Not allowed	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff oversight
Online gaming and in-game chat/voice (e.g. Roblox, Fortnite, Minecraft)			X		X			
Online shopping and digital commerce (including in-app purchases, marketplaces, subscriptions)			X		X			

Cloud storage and file sharing (e.g., Google Drive, OneDrive, Dropbox, WeTransfer, P2P/torrents)		X			X			
Social media and user-generated platforms (e.g. TikTok, Instagram, Snapchat, X, Reddit) and other age-restricted services			X		X			
Messaging, chat and voice (e.g., WhatsApp, iMessage, Snapchat, Discord, Teams personal accounts)			X		X			
Streaming entertainment/media (video, music, podcasts) e.g. Netflix, Disney+, Spotify			X		X			
Video platforms and livestreaming (e.g. YouTube, Twitch, TikTok LIVE, Instagram Live)			X		X			
Personal mobile phones and smart devices on site (phones, smartwatches, earbuds). <i>N.b Smartphone bans in schools in England</i>			X	X	X			
Taking photos/video/audio on devices (including sharing, location data and consent)				X	X			
Other personal devices (e.g., tablets, handheld consoles, VR headsets, wearables)			X		X			
Personal email accounts on site or on the school network/Wi-Fi (e.g., Gmail, Outlook.com)			X		X			
School email used for personal communication (non-work/non-learning)	X				X			

Unapproved AI tools/services (<i>generative AI chatbots and image/video tools, AI companions, browser extensions</i>)		X				X			
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Reporting and responding

Introduction

The school is committed to creating a culture where all members of the community feel confident, safe, and supported in reporting online safety concerns. In line with *Keeping Children Safe in Education (KCSIE)*, the school recognises that online risks may occur in school or outside school and may affect children in any setting. Reporting routes must therefore be clear, accessible, inclusive, and consistently understood by all.

The school recognises national findings, including the [Ofsted Review of Sexual Abuse in Schools and Colleges \(2021\)](#), which highlight that children may not always feel able to report. The school assumes that harmful online behaviours may be occurring, even where none have been disclosed, and responds by maintaining strong systems for reporting, analysing, and addressing concerns. KCSIE suggests that staff should have a professional curiosity and speak to the designated safeguarding lead (or a deputy) if they have concerns about a child

Reporting Concerns

The school will ensure that:

- Clear, accessible reporting routes are in place for all members of the school community, including pupils, staff, governors, parents/carers, and volunteers.
- Reporting processes are fully aligned with safeguarding procedures, including the child protection, whistleblowing, managing allegations and complaints policies.
- Multiple reporting options are available, such as speaking with the Designated Safeguarding Lead (DSL), online or anonymous reporting tools (e.g., Whisper), email contact, or in-person disclosures.
- Reporting routes are well publicised through induction, assemblies, posters, the school website, and digital platforms.
- All users understand that any online safety concern must be reported, including those relating to harmful or illegal behaviour, sexual harassment, bullying, discrimination, grooming, or self-generated sexual imagery.

Responding to Concerns

The school will ensure that:

- Reports are acknowledged and responded to promptly, considering the safety and wellbeing of the person reporting.
- The DSL, Online Safety Lead, and senior leaders have the training and skills needed to recognise, assess, and manage online safety risks.
- Where a report indicates possible illegal activity or serious harm, it is escalated immediately through safeguarding procedures. Examples include (but are not limited to):
 - Child sexual abuse material (CSAM)
 - Non-consensual or self-generated images
 - Grooming, exploitation, or sexual harassment
 - Terrorism or extremism
 - Hate crime, fraud, extortion, stalking
 - Cyber offences under the Computer Misuse Act

- Sale of illegal substances or goods
- Where concerns do not involve suspected illegal activity, devices may be checked using a safe, controlled, and documented process involving senior staff and a designated review device.
- AI-supported monitoring systems, where used, are subject to human oversight to ensure contextual understanding.
- Users who report concerns receive reassurance, appropriate support, and feedback on the outcome.

Recording and Monitoring

The school will:

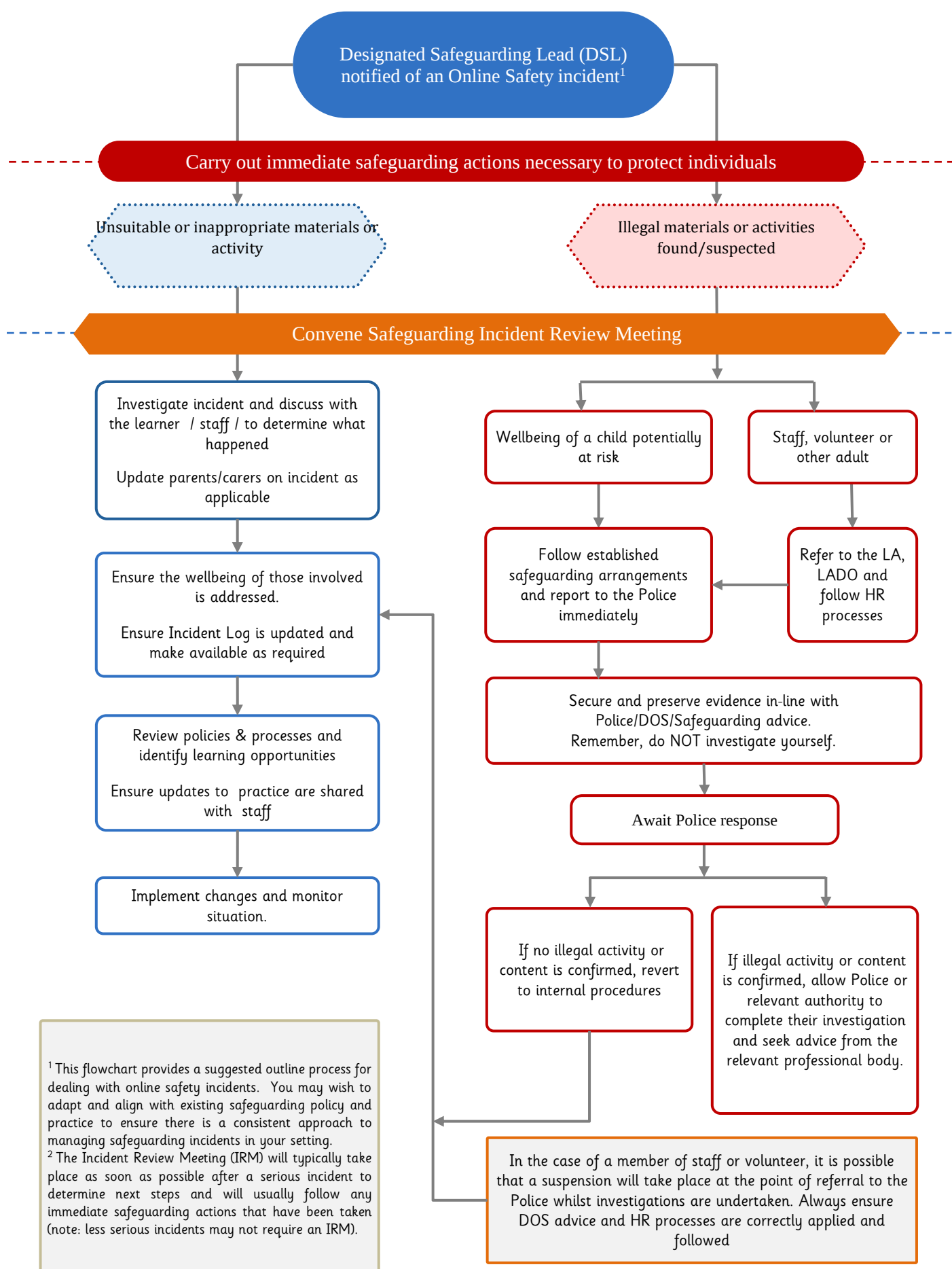
- Maintain a secure and confidential record of all incidents, including actions, decisions, and follow-up.
- Ensure reports are audited and analysed regularly to identify emerging trends, patterns of concern, and the effectiveness of responses.
- Provide anonymised summaries of trends and learning to:
 - The Online Safety Group
 - Senior leaders
 - Governors (via safeguarding reports)
 - *Staff*
 - *Pupils, where appropriate*
 - *Parents/carers through general communications*
 - *Local safeguarding partners where relevant*

External Support and Escalation

The school will work with appropriate external agencies when required, including:

- Local Authority safeguarding teams
- Local Authority Designated Officer (LADO)
- Police / CEOP
- Local Safeguarding Partnership guidance (e.g., harmful sexual behaviour support)
- *UK Safer Internet Centre's Professionals Online Safety Helpline*
- *Reporting Harmful Content service*

The school will make the flowchart below available to staff to support the decision-making process for dealing with online safety incidents. It was updated in January 2025. There is little change to the content, but the flowchart has been re-designed to make it easier for schools to edit. Schools are recommended to replace previous versions with this.



Unauthorised access to the school network , including using another person's account or sharing usernames/passwords.		X	X			X			
Damaging, corrupting or deleting another user's data.		X	X			X			
Sending offensive, harassing or bullying emails, texts or messages.	X	X	X	X		X	X		X
Unauthorised downloading/uploading , file sharing or distribution of files.		X	X			X	X		
Bypassing filtering (e.g. proxy sites, VPNs or similar tools).		X	X						
Failing to report accidental access to offensive or pornographic material		X	X			X			X
Deliberately accessing offensive or pornographic material (or attempting to)		X	X			X			X
Sharing or receiving content that breaches copyright or data protection law.		X	X			X			X
Unauthorised use of devices , including taking photos/videos or audio recordings and using a smartphone in school		X	X			X			X
Unauthorised use of online services (apps, websites or platforms). N.b. this may need to be updated in response to the projected social media ban for U16s.		X	X			X			X
Any online behaviour that could bring the school into disrepute or undermines the school's ethos.		X	X			X			X
Repeated breaches of these rules following previous warnings or sanctions.						X			X

Responding to Staff Actions

Incidents	Refer to line manager	Refer to SLT / Headteacher	Refer to Local Authority	Refer to Police / LADO	Refer to IT Services Provider	Issue a warning	Further Disciplinary action in line with Behaviour Policy
Accessing illegal material (or attempting to), as defined in the earlier “Unsuitable/Inappropriate Activities” section.		X	X	X		X	X
Breaching data protection or cyber-security requirements , including network security rules.		X	X	X		X	X
Accessing offensive or pornographic material (or attempting to).		X	X	X		X	X
Damaging systems or data , including corrupting/deleting others’ data or deliberately damaging hardware/software.		X	X	X		X	X
Bypassing filtering controls (e.g. proxy sites, VPNs or similar methods).		X	X	X		X	X
Unauthorised downloading, uploading or file sharing.		X	X	X		X	X
Breaching copyright, licensing or intellectual property , including misuse of AI systems.		X	X	X		X	X
Unauthorised account/network access , including sharing passwords, using another person’s account, or allowing others access.		X	X	X		X	X
Sending offensive, harassing or bullying emails, texts or messages.		X	X	X		X	X
Use of personal email/social media/messaging to communicate with pupils or parents/carers.		X	X	X		X	X
Inappropriate personal use of school technology , including personal email and		X	X	X		X	X

social media use during work time/using school systems.							
Mishandling personal data , including storing, displaying or transferring it insecurely.		X	X			X	X
Any action that undermines professional conduct or a staff member's professional standing.		X	X			X	X
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.		X	X			X	X
Failing to report incidents , whether accidental or deliberate.		X	X			X	X
Repeated breaches following previous warnings or sanctions.		X	X			X	X

Use of Artificial Intelligence (AI)

*A more detailed AI policy template (Appendix C7) is available, including an **AI risk assessment matrix** and an **AI-specific Staff Acceptable Use Agreement**.*

Generative AI (Gen AI) is developing rapidly and its use in education is increasing. In schools, AI is typically used in three areas: pupil support, teacher support, and school operations. All use must be safe, ethical and responsible.

We recognise that Gen AI can introduce risks. These risks can be reduced through our existing safeguarding, data protection and technical security arrangements, and by updating procedures where needed. Safeguarding of pupils and staff remains central to our approach.

KCSIE 2026 recognises that pupils may be subject to harmful online interaction with other users or generative AI applications that simulate these.

Policy statements

The school will:

- Support appropriate use of AI to enhance learning and teaching, improve outcomes, streamline administration and reduce workload. Staff remain professionally responsible and accountable for any work supported by AI.
- Comply with relevant law and guidance, including Keeping Children Safe in Education (KCSIE) and UK GDPR.
- Provide training and guidance for staff and governors on the benefits, risks and safe use of AI, and identify further development needs.

- Teach about AI through the curriculum where appropriate, helping pupils understand how Gen AI works, its benefits and limitations, and its ethical and social impacts.

Safe use, data protection and security

The school will:

- Protect personal and sensitive data. Staff must not enter personally identifiable or sensitive information into AI tools. Where AI is used, staff should use anonymised data only.
- Require UK GDPR compliance. Staff must ensure any AI tool used meets data protection and security requirements before use.
- Approve tools and accounts. Only school-approved AI tools may be used for schoolwork, and staff should use school-provided AI accounts where available to support oversight and reduce risk.
- Safeguard sensitive information. Internal documents, strategic plans or other sensitive material must not be entered into third-party AI tools unless the tool and purpose have been explicitly approved.

Quality, fairness and integrity

The school will:

- Maintain human oversight. AI may support work but must not replace professional judgement—especially in decisions that affect people. AI outputs must be checked for accuracy before sharing or publishing.
- Promote transparency. Where AI has materially supported an output (e.g. documents, presentations, communications), staff should make this clear where appropriate.
- Address bias and discrimination. We recognise AI outputs may reflect bias. The school will use appropriate safeguards, review processes and procurement checks to prioritise fairness and safety.
- Protect copyright and intellectual property. The school will take steps to avoid copyright infringement and protect the intellectual property of staff and pupils, including ensuring pupils' work is not used to train AI systems without appropriate consent.

Reporting, monitoring and accountability

The school will:

- Require prompt reporting of AI-related concerns, including misuse, data incidents or inappropriate outputs, to **the Designated Safeguarding Lead (DSL), and the Data Protection Officer where relevant.**
- Maintain an inventory of AI tools in use, with purposes and risks recorded, and carry out regular review using the risk assessment matrices in Appendix C7.
- Engage parents/carers with clear information about how AI is used in school (e.g. an “AI in our school” guide).

Use in assessment and feedback

AI tools may be used to support teachers with assessment processes (e.g. identifying areas for improvement and drafting feedback), and to support pupils in improving their work. Teachers remain responsible for outcomes and must ensure accuracy, fairness and appropriate use.

Misuse and disciplinary action

Improper use of AI—including breaches of this policy, data protection failures, misuse of sensitive information, or failure to follow agreed processes—may result in action under the school's Staff Disciplinary Policy.

Education

Online Safety Education Programme

Online safety education is a core part of the school's safeguarding approach and sits alongside effective technical controls (including filtering and monitoring). In line with KCSIE, online safety is a running and interrelated theme reflected across relevant policies and the curriculum.

The school delivers a planned, progressive and inclusive programme of online safety education for all pupils, aligned to nationally recognised guidance and frameworks (including DfE "Teaching Online Safety in Schools", UKCIS "Education for a Connected World", and resources such as SWGfL ProjectEVOLVE). Learning is age-appropriate, builds on prior learning, is matched to need, and is taught through existing curriculum areas (including RSHE/RSE, Health Education, Computing and Citizenship), with assessment and clear intended outcomes.

The programme develops pupils' ability to:

- recognise and manage online risks, including harmful content, contact, conduct and commerce risks;
- understand consent, sexual harassment and sexual violence (including online), supported by safe opportunities for discussion;
- think critically about what they see online, including how to check reliability and accuracy and the role of AI-generated content;
- respect copyright and intellectual property, including when using online material and AI tools;

understand and follow the pupil acceptable use agreement, and act within moral and legal boundaries (including awareness of the Computer Misuse Act 1990).

- understand why online services use minimum-age requirements and how these may support safety, privacy and wellbeing
- make informed decisions about participation in social media, messaging, gaming and other online communities, including services they may not yet be permitted to use
- understand that legal or platform restrictions do not remove the need to learn about online relationships, harmful content, image sharing, scams, exploitation and digital wellbeing
- understand the school's mobile-phone requirements and the safeguarding, behaviour, learning and wellbeing reasons that underpin them.

Where internet use is planned, pupils are guided to appropriate resources and supported if unsuitable content is encountered. Where open searching is permitted, staff supervise and remain vigilant. Filtering may be temporarily adjusted for legitimate curriculum research, with auditable approval and clear rationale.

Pupil voice is actively used to strengthen the school's approach through feedback, pupil representation (e.g. on an Online Safety Group), and opportunities such as digital leaders, peer mentoring, campaigns, and contribution to acceptable use and community-facing online safety activities. Pupils are given appropriate opportunities to discuss

changes affecting their digital lives and to express concerns about friendship, belonging, access, exclusion and wellbeing.

Staff

In line with [DfE Keeping Children Safe in Education \(KCSIE\)](#), all staff and volunteers receive safeguarding and child protection training, including online safety, at induction and through regular updates (at least annually). Online safety training is integrated into the school's whole-school safeguarding approach, wider staff development and curriculum planning.

All staff will receive online safety training and understand their responsibilities under this policy. Training will include:

- A planned programme of online safety, data protection and cybersecurity training for all staff, regularly updated and reinforced. Staff training needs will be reviewed periodically to ensure provision remains relevant and effective.
- staff understand the school's filtering and monitoring requirements, the responsibilities relevant to their role and how concerns or alerts must be reported
- staff understand that filtering and monitoring supports - but does not replace - effective supervision, professional curiosity and safeguarding judgement
- staff are informed of the outcome of the school's annual filtering and monitoring review where relevant to their roles
- staff understand and consistently apply the school's mobile-phone requirements, including expectations for their own professional use of personal devices. They know how authorised exceptions for pupils are approved and managed.
- staff follow cyber security policy and requirements.
- Online safety training is provided for all new staff as part of induction, ensuring understanding of the Online Safety Policy and Acceptable Use Agreements, including classroom management, professional conduct, online reputation and modelling positive online behaviour.
- Regular updates for the Designated Safeguarding Lead and Online Safety Lead (or other nominated staff) through external training and review of relevant guidance (e.g. UK Safer Internet Centre, SWGfL, the Local Authority or other appropriate organisations).
- Support for staff knowledge-building and consistent practice through structured professional learning resources (e.g. [ProjectEVOLVE EDU](#)) and, where appropriate, enhanced pathways (e.g. [ProjectEVOLVE SAFEGUARDING](#)).
- Regular review of this Online Safety Policy and updates through staff meetings, team briefings and/or INSET.
- Targeted advice, guidance and training from the DSL/OSL (or nominated staff) to individuals as required.

Governors

Governors should take part in online safety training and awareness activity. This is particularly important for governors serving on committees with responsibility for safeguarding, online safety, technology or health and safety.

Training and updates may be provided through:

- Attendance at training offered by the Local Authority or other relevant organisations (e.g. SWGfL).
- Participation in school training and information sessions (for example, staff briefings or parent events). This may include attendance at assemblies or lessons where appropriate.
- Regular update meetings with the DSL and/or Online Safety Lead to review key themes, incidents and current priorities.

Enhanced training will be provided for (at least) the Online Safety Governor. This will include:

- Basic cyber security awareness training.
- Training to understand the school's filtering and monitoring provision, enabling effective participation in required checks and reviews.

External Stakeholders

Families, the wider community and external agencies play a vital role in supporting the online safety education and wellbeing of pupils. The school recognises that parents and carers may have limited awareness of online risks so work to ensure parents are kept informed. Schools may also draw on external agencies to supplement the school's safeguarding approach. The school therefore works actively to build strong partnerships, share key messages, and ensure that families and the wider community are equipped to help keep children safe online.

The following principles underpin the school's engagement with external stakeholders:

Working with Parents and Carers

The school will support parents and carers to understand online risks, build confidence, and reinforce safe online behaviours at home. This includes:

- Regular communication and awareness-raising about online safety issues, curriculum content, and reporting routes.
- Providing information through newsletters, the school website, learning platforms, and digital communication tools.
- Offering opportunities such as parent/carers workshops, information events, or drop-ins focused on online safety.
- Involving pupils in sharing online safety messages with parents/carers, including contributing to information events.
- Signposting parents and carers to trusted national resources (e.g. [UK Safer Internet Centre](#), [Internet Matters](#), [Childnet](#), [SWGfL](#)).
- Promoting and participating in key national events such as Safer Internet Day.
- Ensuring parents and carers understand acceptable use expectations and relevant school policies related to online safety.
- clear communication about the school's mobile-phone arrangements, the reasons for the policy, authorised exceptions and the consequences of breaches
- accurate, balanced and age-appropriate information about changes affecting social media and other online services

- guidance and support for parents on managing and supporting their children's online experiences and how to report and manage issues.
- guidance to help parents encourage their children to report online safeguarding concerns, regardless of any restrictions in place
- mechanisms that evaluate the efficacy of school's strategy on mobile phones, online services and family engagement

Wider Community and Agencies

The school recognises the value of working with external organisations to strengthen local online safety awareness and provision. This may include:

- Sharing online safety information, resources or updates with community groups, extended family members and the wider community.
- Providing or supporting family learning opportunities on digital technologies and safe online behaviours.
- Using the school website or social media channels to offer online safety content suitable for the broader community.
- Collaborating with early years settings, childminders, youth and sports groups, libraries, voluntary organisations or other local agencies.
- Drawing on the expertise of external agencies (e.g. UK Safer Internet Centre, CEOP, Local Safeguarding Partnerships, Prevent teams, police and health professionals).
- Participating in shared activities with other schools or settings, including transition projects and multi-school events.
- Supporting external groups to review and improve their own online safety practice, including through recommended tools such as 360 Early Years or 360 Groups.

Technology

Purpose

The school recognises that effective filtering, monitoring, technical security, cyber security and data protection are essential to safeguarding children and protecting the wider school community. These measures support safe and responsible use of technology while enabling effective teaching, learning and administration.

Detailed arrangements are set out in the Appendix C1 - Filtering and Monitoring Policy Template and Appendix C2 - Technical Security Policy Template.

Filtering and Monitoring

The school has appropriate filtering and monitoring systems in place to help protect users from illegal, inappropriate and harmful online content and activity, in line with statutory guidance. (e.g., [DfE Technical Standards](#), DfE [Generative AI: product safety standards](#); [KCSIE](#)) and best practice guidance (e.g., [UKSIC Appropriate Filtering and Monitoring](#)). The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The school ensures that:

- filtering and monitoring arrangements are safeguarding-led, proportionate and regularly reviewed
- filtering blocks illegal content and provides age-appropriate and role-appropriate access
- monitoring supports the rapid identification of safeguarding concerns and enables timely intervention
- all school-owned devices are subject to filtering and monitoring, including when used off-site
- staff and pupils understand that filtering and monitoring are in place, why they are needed, and how concerns are escalated
- where the use of personal devices is allowed, users understand that their use may be filtered and monitored by the school.
- where Generative AI products are used they must effectively and reliably prevent users from accessing harmful or inappropriate content and filtering mechanisms should be embedded within these products
- the technical limitations of the filtering system are understood, including whether the solution can monitor and filter real-time, dynamic, personalised or AI-generated content

Oversight and Review

- Senior leaders, the Designated Safeguarding Lead (DSL), technical staff and governors have clear roles and responsibilities
- Governors will review the DfE Filtering and Monitoring Standards and discuss with IT staff and service providers what needs to be done to support the school in meeting this standard.
- filtering and monitoring effectiveness is reviewed at least annually, and following significant changes or incidents. (e.g., using [Testfiltering](#)). Reviews will be carried out by the SLT member responsible for filtering and monitoring, with the support of the school's designated safeguarding lead and IT support. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. Record of these checks will be kept and will include: when checks were conducted; which devices and environments were tested, issues identified and actions taken.
- log reports provide actionable information for safeguarding decisions.
- no system is relied upon in isolation; reporting routes and professional judgement remain central

Further detail is provided in the Appendix C1 - Filtering and Monitoring Policy Template

Technical Security

The school takes steps to ensure that its technical infrastructure is secure, reliable and well managed and meets its statutory requirements.

The school ensures that:

- access to systems and data is controlled through appropriate authentication and permissions
- devices, networks and systems are protected through secure configuration, patching and malware protection
- backups and recovery arrangements are in place to reduce the impact of system failure or attack
- incidents and weaknesses are reported, recorded and used to inform improvement
- responsibilities for technical security are clearly defined and supported by appropriate expertise
- systems are regularly reviewed and tested, meet statutory requirements and address emerging threats.

Further detail is provided in the Appendix C2 - Technical Security Policy Template.

Cyber Security

The school recognises cyber security as a leadership and governance responsibility and takes steps to reduce the risk and impact of cyber incidents. (KCSIE 2026 refers to the [DfE Cyber Security Standards](#) and recognises cyber security as a safeguarding issue).

The school ensures that:

- a cyber security approach is in place to prevent, detect, respond to and recover from cyber threats
- senior leaders and governors understand cyber risks and their safeguarding implications receive appropriate assurance
- staff and pupils are educated/trained to recognise and report cyber security concerns
- business continuity and incident response arrangements are maintained and reviewed
- cyber security arrangements are kept under regular review and updated in line with emerging risks.

Further detail is provided in the Appendix C3 – Cyber Security Policy Template.

Data Protection

The school is committed to protecting personal data and complying with data protection legislation. ([The Data \(Use and Access\) Act 2025](#) makes additional requirements on schools – particularly that online services accessed by pupils meet higher protection standards)

The school ensures that:

- personal data is processed lawfully, fairly and transparently
- a Data Protection Officer (DPO) is appointed and appropriate governance arrangements are in place
- all staff receive regular training to ensure they are aware of their responsibilities and can respond appropriately to data protection incidents.
- systems are in place to respond effectively to Freedom of Information and Subject Access Requests
- Data Protection Impact Assessments have been conducted on existing and planned use of software and systems.
- privacy notices explain how data is used and how individual rights can be exercised
- data is stored, shared and disposed of securely
- data breaches are reported and managed in line with legal requirements
- data protection is embedded across safeguarding, teaching, learning and administration
- where AI and Automated Decision-Making are in use, human oversight will be maintained for significant decisions, risk assessments will be conducted and the school will ensure automated systems are transparent and explainable.

Further detail is provided in the Appendix C4 – Data Protection Policy Template.

Review

Arrangements for filtering, monitoring, technical/cyber security and data protection are reviewed regularly and updated to reflect:

- changes in technology
- emerging safeguarding risks
- national guidance and statutory expectations

Technology Practice

Purpose

The school recognises that the safe and responsible day-to-day use of technology plays a vital role in safeguarding children, supporting learning, and protecting the school community. Clear expectations, consistent practice and informed users help reduce risk while enabling positive and purposeful use of digital technologies.

This approach supports the safeguarding duties set out in [*Keeping Children Safe in Education*](#), emphasising safeguarding and whole-school responsibility, including the requirement to address online safety through policy, practice, education and staff training. It also supports the DfE digital and technology standards and the school's responsibilities for filtering, monitoring, cyber security and digital leadership.

Detailed arrangements are set out in the relevant policy template appendices, including the Technical Security, Cyber Security, Data Security, Filtering and Monitoring, Device Management and Public Online Communications templates.

Device Management

The school manages the use of digital devices in a way that supports safeguarding, learning and responsible behaviour. This reflects KCSIE's requirement for a clear mobile / smart technology policy and explicitly links device use to behaviour, safeguarding and education

The school ensures that:

- expectations for the use of school-owned and personal devices are clearly defined and communicated
- device use is consistent with safeguarding, behaviour, data protection and acceptable use policies
- appropriate technical and procedural controls are in place to support safe use
- staff, pupils and visitors have been trained/educated/informed and understand their responsibilities when using devices on school premises or systems
- education on the safe and responsible use of devices forms part of the school's online safety education

Pupils do not use personal mobile phones, smartwatches or equivalent connected personal devices during the school day. Any device brought to school must follow the school's agreed storage arrangements and must not be accessed during the school day, except where a specific authorised exception is required for medical, safeguarding, accessibility or SEND-related reasons.

- any exceptions are limited, clearly defined, authorised and managed appropriately, for example where required for medical, safeguarding, accessibility or SEND-related reasons
- staff model the school's requirements and use personal devices only where authorised and professionally appropriate
- procedures cover possession, storage, confiscation, searching and return of devices, in accordance with school policy and current national guidance.

Decisions about device use are informed by risk assessment and reviewed regularly.

Digital Content

The school recognises that multi-modal digital content (inc. AI) can enrich learning and communication when used responsibly. Its approach supports safeguarding requirements in particular, sexual imagery, consent, coercion, privacy and the sharing or manipulation of content.

The school ensures that:

- clear expectations are in place for the creation, use, storage and sharing of digital content
- consent, privacy and safeguarding considerations are applied consistently
- staff and pupils are trained/educated to understand their responsibilities when creating or sharing digital content
- personal data and images are handled securely and lawfully
- school-approved platforms and accounts are used where content includes personal or sensitive information
- staff and pupils understand that content may be copied, altered, republished or distributed beyond its intended audience, including through AI technologies
- AI-generated or AI-assisted content is reviewed for accuracy, legality, appropriateness, bias, transparency, copyright and safeguarding risk before use or publication
- policy and practice are reviewed in the light of emerging technologies and risks.

Public Online Communications

The school uses public online communications to inform, celebrate success and engage with the wider community, while managing associated risks. It supports KCSIE expectations around professional boundaries and staff conduct online, addresses reputational and safeguarding risk from public platforms while reinforcing parental engagement and transparency. It has considered the risks of AI manipulation of images as highlighted in the UK Online Harms Early Warning group guidance on [Protecting your setting's images from AI manipulation and abuse](#)

The school ensures that:

- public online communications are appropriate, accurate and well-managed
- public communications from or regarding the school are monitored and addressed where appropriate
- published content complies with safeguarding, data protection and statutory requirements

to reduce the risk of illegal manipulation of publicly available images of staff and pupils, the school has procedures in place to control how those images are shared online. (Guidance is available from UKSIC)

- publishing public communications is restricted to authorised and trained staff
- AI-assisted public communications are checked by an authorised person before publication and remain subject to human accountability. AI assisted content should be clearly labelled as such.
- online safety information is shared with parents, carers and the wider community
- clear processes exist for managing school online accounts
- staff understand expectations around professional conduct and online behaviour
- the school communicates confirmed changes to policy in line with best practice and Government guidance.

Review

Technology practice is reviewed regularly to reflect:

- changes in technology and online behaviour
- emerging safeguarding risks
- feedback from staff, pupils and parents

- national guidance and statutory expectations
- the school's progress towards meeting the DfE digital and technology standards
- the impact of mobile-phone arrangements and changes affecting children's access to online services.

Outcomes

The impact of the Online Safety Policy and practice is evaluated regularly using evidence such as online safety incident logs, behaviour and bullying records, and surveys of staff, pupils and parents/carers. Evaluating student outcomes as part of their online safety should be defined and evaluated as part of the school's assessment processes (e.g. using ProjectEVOLVE Knowledge Maps assessment and tracking). Findings are reported to relevant groups and used to strengthen practice.

This process ensures that:

- Evidence from audits and reviews is discussed through balanced professional debate, alongside the impact of preventative work (education, awareness and training).
- Clear reporting routes are in place so patterns, themes and outcomes are shared regularly with senior leaders and governors.
- Parents/carers are informed of key patterns and learning through the school's online safety communication and awareness activity.
- Online safety and related policies and procedures are updated in response to evidence and emerging risks.
- Learning and evidence of impact are shared, where appropriate, with other schools, agencies and local authorities to support a consistent local approach to online safety

List of appendices

Copies of the more detailed template policies and agreements, contained in the appendix, can be found in the links and resources section of the relevant aspects in the 360safe self-review tool and online on the [SWGfL website](#). The appendices are as follows:

- A1 - Pupil Acceptable Use Agreement Template – for older pupils
- A2 - Pupil Acceptable Use Agreement Template – KS2
- A3 - Pupil Acceptable Use Agreement Template – for younger pupils (EY/KS1)
- A4 - Parent/Carer Acceptable Use Agreement Template
- A5 - Staff (and Volunteer) Acceptable Use Policy Agreement Template
- A6 - Community Users Acceptable Use Agreement Template
- A7 – Online Safety Policy Statement Template
- A8 - Harmful Sexual Behaviour Policy Template
- A9 - Computer Misuse and Cyber Choices Policy Template
- A10 - Responding to incidents of misuse – flow chart
- A11 - Record of reviewing devices/internet sites (responding to incidents of misuse)
- A12 - Reporting Log
- B1 - Training Needs Audit Log
- C1 – Filtering and Monitoring Policy Template
- C2 - Technical Security Policy Template (including Technical Security and Device Management)
- C3 - Cyber Security Policy Template

C4 - Data Protection Policy Template

C5 - Electronic Devices - Searching Screening and Confiscation Policy Template

C6 – Public Online Communications Policy Template

C7 – Use of Artificial Intelligence (AI) in Schools Policy Template

Legislation

Links to other organisations and resources

SWGfL would like to acknowledge a range of individuals and organisations whose policies, documents, advice, and guidance have contributed to the development of this school Online Safety Policy template and of the 360 safe online safety self-review tool:

Copyright of these policy templates is held by SWGfL. Schools and other educational institutions are permitted free use of the policy templates for the purposes of policy review and development. Any person or organisation wishing to use the document for other purposes should seek consent from SWGfL (onlinesafety@swgfl.org.uk) and acknowledge its use.

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Appendix A1 - Extended Pupil Acceptable Use Agreement (optional for older / more digitally independent pupils)

Sections that include advice or guidance are written in BLUE. Schools should review and amend the contents of this agreement to ensure that it is consistent with their online safety policy and other relevant school policies.

This acceptable use agreement is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other digital technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and will have good access to digital technologies to enhance their learning and will, in return, expect the pupils to agree to be responsible users.

Pupil Acceptable Use Agreement Form

I agree to use the school's digital systems, devices and online services responsibly to protect my safety, the security of the school systems, and others.

Personal Safety

- The school will monitor my use of its digital systems, devices, online services and communications.
- I will keep my usernames and passwords secure and private. If compromised, I will report or change them immediately.
- I will only share personal information, like my name or address, when absolutely necessary and with permission.
- I will be cautious when meeting online contacts in person, only doing so with a trusted adult in a public place.
- I will take responsibility for my actions online, using tools like blocking or ending chats if needed.
- I will share images of myself or others only when it is safe and will ensure the images are appropriate and respectful.
- I will only take or share images of myself, or others, when fully dressed. I understand that sharing nude or semi-nude content can cause distress, may be illegal and could lead to prosecution / criminal records.
- I understand that images and videos can be copied, altered (including using AI) and shared beyond my control.
- I will report harmful or unpleasant material, messages, or anything that worries or upsets me to a trusted adult.

Respecting Others' Work and Information

- I will seek permission before using or adapting someone else's work.
- I will verify information I find online, as it may not always be accurate or truthful.
- I will only use Artificial Intelligence (AI) tools approved by the school and ensure my use is ethical, legal, and transparent.
- When I use generative AI to assist in creating digital content, I will ensure it is labelled as such.
- I will check AI-generated content carefully, recognising that it may be inaccurate, misleading or biased, before using or sharing it.
- I will fact-check and critically evaluate AI-generated content for accuracy, bias, and discrimination before sharing or publishing.
- I will avoid downloading or using copyrighted or protected materials without proper permissions.

Responsible Online Behaviour

- I will be polite and responsible when I communicate with others. I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not bully, harass, threaten, upset or make fun of others.
- I will only use platforms or software approved by the school and will not attempt to bypass the filtering/security systems in place. If I become aware of any such attempts, I will report this to a trusted adult.
- I understand cybersecurity poses a risk to both me, other pupils and the school and will ensure I take precautions before accessing emails, messages or links. I will check with trusted adults if I have any such concerns.
- I will immediately report any damage, faults or failings involving equipment or software, however this may have happened.
- I will follow the school's requirements for using mobile phones and other connected devices.
- I understand that age restrictions are designed to help protect children and young people. If I use online services, I will do so safely, responsibly and in accordance with school requirements.
- I will balance my online and offline activities to promote a healthy lifestyle.
- I will protect my online reputation and that of the school, its staff, and other pupils.
- I will ensure my behaviour reflects positively on the school, both in and out of school settings.
- I understand that some online behaviours might be regarded, by some, as fun but can have serious consequences – this might include taking (or sharing) images/videos of staff, fights, pupils in embarrassing situations or the setting up of fake accounts.
- I know I can talk to a trusted adult if I am worried about anything I see or experience online, even if I think I may have broken one of these rules.

Consequences of Misuse

- I understand that failing to follow this agreement may lead to consequences, including loss of access to the school's systems, detentions, suspensions, contacting parents/carers, or involvement of the police in serious cases.

By following these guidelines, I will contribute to a safe, respectful, and productive online environment.

I have read and understand the above and agree to follow these guidelines when:

- I use the school's systems and devices (both in and out of school)
- I use my own devices in the school (when allowed)
- I use digital technologies out of the school in a way that is related to me being a member of this school e.g. communicating with other members of the school, accessing school email, website etc.

(Schools will need to decide if they require pupils to sign, or whether they wish to simply make them aware of acceptable use through education programmes/awareness raising).

Name of Pupil: Group/Class:

Signed: Date:

Parent/Carer Countersignature (optional)

It is for schools to decide whether or not they require parents/carers to sign the parent/carers acceptable use agreement (see template later in this document). This includes a number of other permission forms (including digital and video images/biometric permission/cloud computing permission).

Some schools may, instead, wish to add a countersignature box for parents/carers to this pupil acceptable use agreement.

Appendix A2 - KS2 Pupil Acceptable Use Agreement

Sections that include advice or guidance are written in BLUE. Schools should review and amend the contents of this agreement to ensure that it is consistent with their online safety policy and other relevant school policies.

This acceptable use agreement is intended:

- to ensure that pupils will have good access to devices and online content, be responsible users and stay safe while using digital technologies for educational, personal and recreational use
- to help pupils understand good online behaviours that they can use in school, but also outside school
- to protect school devices and networks from accidental or deliberate misuse that could put the security of the systems and users at risk.

Acceptable Use Agreement

I agree to use the school's digital systems, devices and online services safely and responsibly to protect me, other pupils and the school.

Keeping Safe Online

- The school will check how I use devices and online services to keep everyone safe.
- I will keep my usernames and passwords private and tell a trusted adult if someone else knows them.
- I will be careful when talking to people online and will only talk to people I know and trust.
- I will not share personal information like my name, address, or photos without asking a trusted adult.
- I will only take or share images of myself, or others, when fully dressed.
- If I see or hear something online that worries or upsets me, I will tell a trusted adult straight away.
- I will only meet people I have spoken to online if a trusted adult is with me.

Using Devices and Online Services Sensibly

- I will only use devices, apps, games and websites that my teacher or parent/carer says are suitable for my age.
- I know that I am not allowed to use some online services and I know what they are.
- I will always ask permission and check with a trusted adult before using someone else's work or pictures.
- I will make sure the information I find online is true by checking carefully.
- I will only use apps or tools, like AI, that my teacher has said are OK, and I will ask for help if I'm unsure.
- I will not copy or use music, videos, or games unless I have permission.
- I will tell a trusted adult about any damage to devices or if anything else goes wrong.
- I will check with trusted adults before clicking on any unexpected messages or links (even if these look as though they are from people that I already know).

Being Respectful and Responsible

- I will treat others kindly online, just as I do in real life.
- I will make good choices about what I share online to protect myself and others.
- I understand that not every app or website is suitable for children my age.
- If I want to join a new app, game or online community, I will speak to a trusted adult first.
- I will spend a healthy amount of time using devices and make time for other activities too.

- I will always think about how my behaviour online could affect me, my friends, and my school.
- If I make a mistake online, I know I can ask a trusted adult for help

What Happens If I Break These Rules?

- If I don't follow these rules, my teacher may stop me from using computers or devices, speak to my parents, or take other actions to help me make better choices in the future.

By following these rules, I can enjoy using technology safely and responsibly.

I have read and understand the above and agree to follow these guidelines when:

- I use the school systems and devices (both in and out of school)
- I use my own devices in the school (when allowed) e.g. mobile phones, gaming devices USB devices, cameras etc.
- I am out of school and involved in any online behaviour that might affect the school or other members of the school.

Name of Pupil: Group/Class:

Signed: Date:

Schools will need to decide if they require pupils to sign, or whether they wish to simply make them aware through education programmes/awareness raising.

Parent/Carer Countersignature (optional)

It is for schools to decide whether or not they require parents/carers to sign the parent/carers acceptable use agreement (see template later in this document in the Parent/Carer AUA). This includes a number of other permission forms (including digital and video images/biometric permission/cloud computing permission).

Some schools may, instead, wish to add a countersignature box for parents/carers to this pupil acceptable use agreement.

Appendix A3 - EYFS / KS1 Pupil Acceptable Use Agreement

Our Technology Rules

I will follow these rules to use computers, tablets and the internet safely at school. These rules help us all stay safe and have fun using computers and tablets at school!

Staying Safe

- My teacher will watch what I do on computers, tablets and the internet to keep me safe.
- I will keep my passwords secret and tell my teacher if I need help.
- I understand that people online are not always who they say they are. I will only talk to people online if my teacher or a trusted adult says it's OK.
- I will not share my name, address, or pictures without asking my teacher or a trusted adult first.
- If I see something that makes me feel worried or upset, I will tell my teacher or a trusted adult straight away.
- I will only use apps, games or websites my teacher says are safe.
- I will only use apps and games that a trusted adult says are right for me.
- If I want to try a new game or app, I will ask a trusted adult first.

Using Technology Kindly

- I will be kind when using technology, just like I am in real life.
- I will take care of the computers and tablets I use.
- I will only look at things my teacher says are OK.

Making Good Choices

- I will ask my teacher before I use someone else's pictures or work.
- I will take breaks from screens and do other fun things too.
- I know that I can say no / please stop to anyone online who makes me feel sad, uncomfortable, embarrassed or upset.
- I will ask for help from a trusted adult if I am not sure what to do or if I think I may have done something wrong.

What Happens If I Forget the Rules

- If I forget the rules, my teacher will help me learn to make better choices next time.

Signed (child): Signed (parent):

(The school will need to decide whether or not they wish the children to sign the agreement – and at which age - for younger children the signature of a parent/carer should be sufficient)

Appendix A4 - Parent/Carer Acceptable Use Agreement

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies provide powerful tools, which open new opportunities for everyone. They can stimulate discussion, promote creativity, and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This acceptable use policy is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that parents and carers are aware of the importance of online safety and are involved in the education and guidance of young people with regard to their on-line behaviour.

The school will try to ensure that pupils have good access to digital technologies to enhance their learning and will, in return, expect the pupils to agree to be responsible users. A copy of the pupil acceptable use agreement is attached to this permission form, so that parents/carers will be aware of the school expectations of the young people in their care.

Parents are requested to sign the permission form below to show their support of the school in this important aspect of the school's work. [\(Schools will need to decide whether they wish parents to sign the acceptable use agreement on behalf of their child\)](#)

Permission Form

Parent/Carers Name:

Pupil Name:

As the parent/carer of the above pupils, I give permission for my son/daughter to have access to the digital technologies at school.

I understand that the school has discussed the acceptable use agreement with my son/daughter and that they have received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet – both in and out of school.

I understand that the school will take every reasonable precaution, including monitoring and filtering systems, to ensure that young people will be safe when they use the internet and systems. I also understand that the school cannot ultimately be held responsible for the nature and content of materials accessed on the internet and using devices.

I understand that my son's/daughter's activity on the systems will be monitored and that the school will contact me if they have concerns about any possible breaches of the acceptable use agreement.

I will encourage my child to adopt safe use of digital technologies at home and will inform the school if I have concerns over my child's online safety.

[As the schools is collecting personal data by issuing this form, it should inform parents/carers as to:](#)

This form (electronic or printed)
Who will have access to this form.

Where this form will be stored.
How long this form will be stored for.
How this form will be destroyed.

Signed:

Date:

Use of Digital/Video Images

The use of digital/video images plays an important part in learning activities. Pupils and members of staff may record evidence of activities in lessons and out of school. These images may then be used in presentations in subsequent lessons.

Images may also be used to celebrate success through their publication in newsletters, on the school website and occasionally in the public media. Where an image is publicly shared by any means, only your child's **delete as relevant** first name/initials will be used.

The school will comply with the Data Protection Act and request parent's/carers's permission before taking images of members of the school. We will also ensure that when images are published that the young people cannot be identified by the use of their names.

In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other pupils in the digital/video images.

Parents/carers are requested to sign the permission form below to allow the school to take and use images of their children and for the parents/carers to agree.

As the school is collecting personal data by issuing this form, it should inform parents/carers as to:

This form (electronic or printed)	The images
Who will have access to this form.	Where the images may be published. Such e.g., Social Media, website, local press, etc. (see relevant section of form below)
Where this form will be stored.	Who will have access to the images.
How long this form will be stored for.	Where the images will be stored and for how long

How this form will be destroyed.	How the images will be destroyed.
	How a request for deletion of the images can be made.

Digital/Video Images Permission Form

Parent/Carers Name:.....Pupil Name:.....

As the parent/carers of the above pupil, I agree to the school taking digital/video images of my child/children.	Yes/No
I agree to these images being used:	
to support learning activities.	Yes/No
in publicity that reasonably celebrates success and promotes the work of the school.	Yes/No
Images may be published only through Federation-approved channels, including the school websites, newsletters, authorised learning platforms and approved social media accounts, and only where the appropriate consent and safeguarding requirements have been met.	Yes/No
I agree that if I take digital or video images at, or of school events which include images of children, other than my own, I will abide by these guidelines in my use of these images.	Yes/No

Signed:

Date:

Use of Cloud Systems Permission Form

Schools that use cloud hosting services may be required to seek parental permission to set up an account for pupils.

Schools will need to review and amend the section below, depending on which cloud hosted services are used.

The Federation uses Microsoft 365 and other school- or Warwickshire-approved cloud services for staff and, where appropriate, pupils. Use is subject to safeguarding, data protection, security and age-appropriate access controls.

The following services are available to each pupil as part of the school's online presence in approved Federation cloud services

Using approved Federation cloud services will enable your child to collaboratively create, edit and share files and websites for school related projects and communicate via email with other pupils and members of staff. These services are entirely online and available 24/7 from any internet-connected computer.

The school believes that use of the tools significantly adds to your child's educational experience.

As the school is collecting personal data and sharing this with a third party, it should inform parents/carers about:

This form (electronic or printed)	The data shared with the service provider
Who will have access to this form.	What data will be shared and with whom
Where this form / data will be stored.	Who will have access to the data.
How long this form will be stored for.	Where the data will be stored and for how long
How this form will be destroyed.	How a request for deletion of the data can be made.

Do you consent to your child to having access to cloud services?

Yes/No

Pupil Name: Parent/Carers Name:.....

Signed: Date:

Pupil Acceptable Use Agreement

On the following pages we have copied, for the information of parents and carers, the pupil acceptable use agreement.

It is suggested that when the pupil AUA is written that a copy should be attached to the parents/carers acceptable use agreement to provide information for parents and carers about the rules and behaviours that pupils have committed to by signing the form.

Appendix A5 - Staff and Volunteer Acceptable Use Agreement

Sections that include advice or guidance are written in BLUE. Schools should review and amend the contents of this agreement to ensure that it is consistent with their Online Safety Policy and other relevant school policies.

School Policy

Digital technologies have become integral to the lives of everyone, including children and young people, both within schools and in their lives outside school. The internet and digital technologies are powerful tools, which can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. They also bring opportunities for staff to be more creative and productive in their work. The school has the right to protect itself and its systems and all users should have an entitlement to safe access to the internet and digital technologies at all times.

This acceptable use policy is intended to ensure:

- that staff and volunteers will be responsible users and stay safe while online and using digital technologies for educational, personal and recreational use
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk
- that staff are protected from potential risk in their use of technology in their everyday work.

The school will try to ensure that staff and volunteers will have good access to digital technology to enhance their work, to enhance learning opportunities and will, in return, expect staff and volunteers to agree to be responsible, informed and professionally competent users.

Acceptable Use Policy Agreement

I understand that I must use school systems in a responsible way, to minimise the risk to the safety, privacy or security of the school community and its systems. I acknowledge the potential of digital technologies for enhancing learning and will endeavour to integrate them in a way that aligns with the school's policy, ethos and values.

For my professional and personal safety:

- I understand that filtering and monitoring are safeguarding measures designed to protect pupils, staff and school systems. Where my role requires it, I will act promptly on concerns or alerts in accordance with the school's safeguarding procedures.
- I understand that the rules set out in this agreement also apply to use of these devices and technologies out of school, and to the transfer of personal / sensitive data (digital or paper based) out of the school
- I understand that the school devices and digital technology systems are primarily intended for educational use and that I will only use them for personal or recreational use within relevant school policies.
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password.
- I will store my passwords securely and in line with the school's relevant security policy.
- I will immediately report any safeguarding, cyber security, filtering, monitoring or data protection concern using the school's agreed reporting procedures.
- I will complete the online safety, safeguarding and cyber security training required by the school and keep my knowledge up to date.

Protecting Pupils, School Systems and Information:

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner. I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and/or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital/video images, and taking account of parental permissions. I will not use my personal equipment to record these images, unless I have permission to do so. Where these images are published (e.g. on the school website) it will not be possible to identify by name, or other personal information, those who are featured.
- I will only use social networking sites in the school in accordance with school policies.
- I will only communicate with pupils and parents/carers using official school systems. Any such communication will be professional in tone and manner.
- I will only communicate with pupils, parents/carers and colleagues using school-approved systems. Any such communication will be professional in tone and manner
- I will not engage in any online activity that may compromise my professional responsibilities.

The school has the responsibility to provide safe and secure access to technologies and ensure the smooth running of the school:

- I will abide by all relevant guidance and legislation (e.g., Keeping Children Safe in Education / UK GDPR)
- I will ensure that I am aware of cyber-security risks and that I will not respond to any communications that might put my / school data or systems at risk from attack
- When using AI systems in my professional role I will use these responsibly and:
 - will only use AI technologies approved by the school
 - will be aware of the risks of bias and discrimination, critically evaluating the outputs of AI systems for such risks
 - to protect personal and sensitive data, I will ensure that I have explicit authorisation when uploading sensitive school-related information into AI systems
 - will take care not to infringe copyright or intellectual property conventions – care will be taken to avoid intellectual property, including that of the pupils, being used to train generative AI models without appropriate consent.
 - ensure that documents, emails, presentations, and other outputs influenced by AI include clear labels or notes indicating AI assistance
 - critically evaluate AI-generated outputs to ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing
 - will use generative AI tools responsibly to create authentic and beneficial content, ensuring respect for individuals' identity and well-being
 - I recognise that AI supports, but does not replace, my professional judgement. I remain responsible for the accuracy, appropriateness and safeguarding implications of any AI-assisted work.
- I will follow the school's expectations for the professional use of mobile phones and other connected devices, ensuring only permitted use
- When communicating in a professional capacity, I will only use technology and systems sanctioned by the school.
- I will not use personal accounts on school systems.
- I will exercise informed safe and secure practice when accessing links to content from outside of my organisation to reduce the risk of cyber security threats.

- I will protect school systems by following the school's cyber security procedures.
- I will not access illegal, inappropriate or harmful content on school systems.
- I will respect filtering, monitoring and other security measures and report any concerns about their effectiveness.
- I understand that some websites or services may be restricted for safeguarding reasons and will use the school's agreed process where access is required for legitimate educational purposes.
- I will not install or attempt to install unauthorised programmes of any type on a school device, nor will I try to alter device settings, unless this is allowed in school policies
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in the school Data Security Policy (or other relevant policy). Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper based documents containing personal data must be held in lockable storage.
- I understand that the data protection policy requires that any staff or pupil data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by school policy to disclose such information to an appropriate authority.
- I will only use school-approved cloud services and digital platforms for storing or sharing school information.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.

When using digital technologies in my professional capacity or for school sanctioned personal use:

- I will ensure that I have appropriate permissions to use the original work of others in my own work and will reflect this with appropriate acknowledgements, particularly where AI has been used to generate content
- Where content is protected by copyright, I will not download or distribute copies (including music and videos).

I understand that I am responsible for my actions in and out of the school:

- I understand that my professional responsibilities extend to my conduct in public online spaces where this could affect pupils, colleagues or the reputation of the school.
- I will ensure my use of technologies and platforms is in line with the school's agreed codes of conduct.
- I will model safe, responsible and balanced use of digital technology in my professional practice.

I understand that if I fail to comply with this acceptable use agreement, I could be subject to disciplinary action. This could include a warning, a suspension, referral to Governors and/or the Local Authority in the event of illegal activities, the involvement of the Police.

I have read and understand the above and agree to use the school digital technology systems (both in and out of the school) and my own devices (in the school and when carrying out communications related to the school) within these guidelines.



Staff/Volunteer Name:

Signed:

Date:

Appendix A6 - Acceptable Use Agreement for Community Users Template

This acceptable use agreement is intended to ensure:

- that community users of school digital technologies will be responsible users and stay safe while using these systems and devices
- that school systems, devices and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that users are protected from potential harm in their use of these systems and devices

Acceptable Use Agreement

I understand that I must use school systems and devices in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems, devices and other users. This agreement will also apply to any personal devices that I bring into the school:

- I understand that my use of school systems and devices will be monitored
- I will not use a personal device that I have brought into school for any activity that would be inappropriate in a school setting.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, terrorist and extremist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.
- I will not access, copy, remove or otherwise alter any other user's files, without permission.
- I will ensure that if I take and/or publish images of others I will only do so with their permission. I will not use my personal equipment to record these images, without permission. If images are published it will not be possible to identify by name, or other personal information, those who are featured.
- I will not publish or share any information I have obtained whilst in the school on any personal website, social networking site or through any other means, unless I have permission from the school.
- I will not, without permission, make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a school device, nor will I try to alter computer settings, unless I have permission to do so.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will immediately report any damage or faults involving equipment or software, whatever the cause.
- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).
- I understand that if I fail to comply with this acceptable use agreement, the school has the right to remove my access to school systems/devices

I have read and understand the above and agree to use the school systems (both in and out of school) and my own devices (in school and when carrying out communications related to the school) within these guidelines.

As the school is collecting personal data by issuing this form, it should inform community users about:

Who will have access to this form.	How this form will be destroyed.
------------------------------------	----------------------------------

Where this form will be stored.

How long this form will be stored for.

Name: Signed: Date:

Appendix A7 - Online Safety Policy Statement

Across Sydenham Primary School and Lighthorne Heath Primary School, we want every pupil and adult to be safe, confident and supported when using technology - whether learning in school, at home or in the wider community. Online safety is part of safeguarding and wellbeing: it is about people, relationships, behaviour, learning and protection, not simply IT systems.

Our online safety strategy is built around four outcomes-focused areas that strengthen day-to-day practice:

- Leadership and policy that make expectations clear
- Education that builds skills, resilience and positive behaviour
- Technology that protects users and supports safe learning
- Impact review that proves what's working and what we will improve

Leadership and policy: clarity, consistency and accountability

- When leadership is strong, online safety becomes part of “how we do things here”—not a one-off initiative.

Clear responsibilities

- We make sure roles are defined and understood across senior leaders, the Designated Safety Lead, an Online Safety Lead, governors and technical staff/providers. This ensures safeguarding decisions and technical safeguards work together.
- What this improves: decisions are quicker, concerns are escalated correctly, and actions don't get “lost” between teams.
- Benefit for users: children and adults get safer, more consistent support.

A joined-up Online Safety Group

- We involve the right voices—leaders, staff, governors, and (where appropriate) pupils and families—to keep online safety responsive to real experiences and emerging risks.
- What this improves: shared ownership and a whole-school approach.
- Benefit for users: safer practice is reinforced across school and home.

A policy that is understood and used

- Our online safety policy is aligned with safeguarding expectations and linked to related policies so that staff and families can see one clear, consistent approach.
- What this improves: fewer grey areas and more confident decision-making.
- Benefit for users: clear boundaries and predictable responses.

Acceptable use expectations that protect everyone

- We set out simple, age-appropriate expectations for pupils and clear professional expectations for staff, so everyone understands what safe and respectful use looks like.
- What this improves: behaviour, consistency, and fairness.
- Benefit for users: safer online spaces and fewer harmful incidents.

Reporting and responding that leads to action

- We promote a culture where people feel able to speak up, and we respond consistently, recording concerns, acting promptly, and learning from patterns and new risks.
- What this improves: early identification and effective safeguarding intervention.
- Benefit for users: children get help sooner; everyone feels listened to and protected.

Education: confident pupils and informed adults

- We teach online safety to build knowledge, skills, attitudes and resilience—so pupils can enjoy the benefits of technology while managing risks.

Planned learning for pupils

- Online safety education is progressive, inclusive and revisited regularly. We use pupil voice to shape what we teach and to keep it relevant.
- What this improves: safer choices, healthier online behaviour, and confident help-seeking.
- Benefit for users: pupils become better prepared for real-life online challenges.

Staff training that supports safeguarding practice

- All staff receive induction and ongoing updates so they can spot concerns, respond appropriately, and model safe practice. Key roles receive enhanced training to lead and make informed decisions.
- What this improves: confidence and consistency across the workforce.
- Benefit for users: concerns are handled calmly, correctly and promptly.

Governors trained to provide challenge and support

- Governors understand their duties and can ask the right questions about policy, training, curriculum, filtering/monitoring, and cyber security.
- What this improves: accountability and sustained improvement.
- Benefit for users: online safety stays a priority over time, not just after incidents.

Strong partnerships with families and agencies

- We communicate practical guidance to families and work with relevant partners. We also share effective practice beyond our school where it supports safer communities.
- What this improves: joined-up messages and earlier support.
- Benefit for users: children experience consistent expectations across school and home.

Technology: protection that enables learning

- We use proportionate technical controls to reduce exposure to harm while supporting teaching and learning.

Effective filtering

- Filtering reduces the risk of access to harmful and illegal content and is reviewed to ensure it stays fit for purpose.
- Benefit for users: safer browsing and research.

Safeguarding-led monitoring

- Monitoring helps identify concerns early and supports timely intervention, handled with appropriate governance and data protection.
- Benefit for users: timely intervention when risk is emerging.

Secure systems and cyber resilience

- We protect networks, devices and accounts, and we prepare for threats like phishing and ransomware—so learning is not disrupted and users are protected.
- Benefit for users: safer services, fewer incidents, faster recovery.

Data protection that builds trust

- We handle personal and sensitive information carefully and lawfully, with clear processes and accountability.
- Benefit for users: privacy is respected and risks from misuse are reduced.

Safe day-to-day practice

- We manage devices consistently (including expectations around personal devices where relevant), apply safeguarding and consent to digital content, and communicate responsibly through our public channels.
- Benefit for users: fewer avoidable mistakes and a safer, more responsible digital culture.

Impact: proving what works and improving what doesn't

- We regularly review how well our policies and practice are working, what the evidence tells us, and what we will improve next. This keeps our approach current, targeted and effective.

How to raise a concern or get help

If something online worries you, we want to know.

- Pupils: talk to a trusted adult, your tutor/class teacher, or the safeguarding team.
- Parents/carers: contact the school office or a member of the Designated Safeguarding Lead team.
- Staff: follow safeguarding procedures and record concerns promptly.

Our commitment

We will keep strengthening leadership, education, technology and impact review so that technology at [Leamington Federation](#) is used safely, respectfully and positively—and so our community can be confident that online safeguarding is robust, consistent, and always improving.

Appendix A8 - Harmful Sexual Behaviour Policy Template

(Including child-on-child sexual harassment and sexual violence)

Purpose

The school recognises that harmful sexual behaviour may be happening but not reported and that it increasingly occurs online involving image sharing, coercion, exploitation and anonymous abuse.

The purpose of this policy is to set out the school's approach to preventing, identifying and responding to **child-on-child harmful sexual behaviour (HSB)**, including sexual harassment and sexual violence, whether occurring online or offline.

This policy forms part of the school's safeguarding framework and should be read alongside other relevant policies.

The school adopts a zero-tolerance approach to harmful sexual behaviour in line with national safeguarding guidance (see list below)

Scope

This policy applies to:

- All pupils, staff, volunteers and governors
- Behaviour occurring within and outside school where it impacts the school community

Legislative and National Context

This policy reflects national guidance including:

- [Keeping Children Safe in Education](#) (KCSIE)
- [Working Together to Safeguard Children](#) (DfE)
- [Violence Against Women and Girls \(VAWG\) strategy](#) (UK Government)
- [Ofsted Review of Sexual Abuse in Schools and Colleges](#)
- [Sharing Nudes and Semi-Nudes: Advice for Education Settings](#)
- [DfE guidance on Relationships, Sex and Health Education](#)

Roles and Responsibilities

- Governors provide strategic oversight, ensure annual review of this policy and monitor safeguarding trends.
- Senior Leaders promote a culture of respect and equality and ensure consistent implementation and staff training.
- The Designated Safeguarding Lead (DSL) leads responses to incidents, ensures safeguarding procedures are followed, completes or oversees risk assessments, liaises with external agencies and ensures the school understands local referral pathways and specialist support available for all children involved.
- All staff must challenge inappropriate behaviour, report concerns immediately to the DSL and respond to disclosures in a calm and supportive manner.

Policy Statement

The school will ensure that:

- A whole-school safeguarding approach is taken to preventing harmful sexual behaviour
- All reports are taken seriously and responded to promptly
- Children making reports are listened to, taken seriously, supported and protected
- Children alleged to have displayed, or displaying, harmful sexual behaviour receive appropriate safeguarding and educational support
- Incidents are managed in line with safeguarding and statutory procedures
- Patterns and trends are monitored to inform prevention strategies
- Sexual harassment and harmful sexual behaviour are never dismissed as “banter”, “part of growing up” or an inevitable part of school life

Prevention and Education

The school will ensure that:

- High-quality Relationships and Sex Education (RSE) is delivered

- Pupils are taught about consent, respectful relationships and healthy boundaries, including coercive and controlling behaviour and abuse within intimate relationships
- Online safety education addresses digital sexual abuse, coercion and image-based harm
- Sexist language, misogyny and harmful gender stereotypes are actively challenged
- Pupils are encouraged to be safe and responsible bystanders and report issues they see
- Reporting systems are accessible, appropriate and clearly communicated

Reporting and Responding

The school will ensure that:

- Multiple reporting routes are available and understood
- All incidents are recorded securely in line with safeguarding and data security procedures
- Risk assessments are completed where appropriate
- The safety and wellbeing of those affected is prioritised
- External specialist agencies are involved where required
- The wishes and feelings of children involved are considered when deciding how to respond, while recognising that safeguarding responsibilities may require information to be shared
- Police and children's social care are involved where appropriate, in accordance with local safeguarding arrangements

Support and Risk Management

The school will ensure that:

- Victims receive appropriate pastoral and safeguarding support
- Children alleged to have displayed, or displaying, harmful sexual behaviour receive appropriate safeguarding, educational and specialist support
- Support and risk management consider the needs and safety of all children involved, while prioritising the protection of the child who has experienced harm
- Risk assessments are dynamic and regularly reviewed
- Supervision and safety planning are proportionate and protective

Online Harmful Sexual Behaviour

Online harmful sexual behaviour—including sexual harassment, coercion, non-consensual image sharing, sexualised bullying and AI-generated or manipulated sexual content—will be treated as a safeguarding concern and managed in accordance with KCSIE and relevant national guidance. The school will preserve evidence where appropriate, avoid unnecessary viewing or sharing of harmful content and use specialist reporting or removal services where required.

Training and Review

The school will ensure that:

- DSLs receive appropriate specialist safeguarding training
- All staff receive training and updates that enable them to recognise HSB, respond appropriately to reports and understand reporting procedures
- Governors receive appropriate training to support oversight training
- This policy is reviewed annually and updated in response to legislative changes, national guidance, local safeguarding arrangements, identified trends or emerging risks

Appendix A9 – Computer Misuse and Cyber Choices Policy Template

Purpose

The purpose of this policy is to set out the school's approach to preventing, identifying and responding to computer misuse and potential cybercrime involving pupils.

Computer misuse is recognised as a safeguarding issue and this policy supports the school's wider safeguarding, Online Safety, Filtering and Monitoring, Technical Security and Cyber Security arrangements.

This policy aligns with [Keeping Children Safe in Education](#) (KCSIE), [the Computer Misuse Act 1990](#), [National Crime Agency \(NCA\) Cyber Choices](#) guidance, and [DfE Filtering and Monitoring and Technical Standards](#).

Scope

This policy applies to:

- All pupils, staff, volunteers and governors
- Behaviour occurring within and outside school where it impacts the school community

Policy Statement

The school will ensure that:

- Pupils understand that some online activity is illegal
- Acceptable Use Agreements clearly outline legal expectations and consequences
- Computer misuse is treated as a safeguarding concern in the first instance
- Staff understand emerging cyber risks and referral routes
- Concerns are referred immediately to the Designated Safeguarding Lead (DSL)
- Appropriate external advice or referral is sought where required

Prevention and Education

The school will ensure that:

- Pupils are taught about the Computer Misuse Act 1990 and cybercrime risks
- Curriculum provision promotes ethical and lawful digital behaviour
- Online safety education addresses hacking, malware, phishing, denial-of-service activity and data misuse
- Pupils are signposted to positive pathways for developing cyber skills
- Staff are aware of NCA Cyber Choices guidance and resources

Roles and Responsibilities

- Governors provide strategic oversight of safeguarding and cybercrime prevention.
- Senior Leaders ensure preventative education is delivered and staff are appropriately trained.
- The Designated Safeguarding Lead (DSL) assesses concerns, completes safeguarding risk assessments, maintains records and seeks external advice where appropriate.
- Technical staff monitor network use in line with the Filtering and Monitoring Policy and report concerns to the DSL.
- All staff must report suspected computer misuse immediately and reinforce legal and ethical expectations.

Identification and Reporting

Computer misuse may include:

- Unauthorised access to systems or accounts
- Attempting to bypass filtering or monitoring controls
- Use of malware or hacking tools
- Denial-of-service activity
- Password harvesting or credential sharing
- Data theft or system interference

Where concerns arise, the matter will be referred to the DSL, a safeguarding risk assessment will be completed, and parents/carers will be informed unless doing so would increase risk.

Referral to Cyber Choices

Where appropriate, the school may consult or refer to the local Cyber Choices team via the Regional Organised Crime Unit (ROCU). [Cyber Choices is recognised as an early-intervention safeguarding pathway designed to divert young people away from cybercrime.](#)

Support and Risk Management

The school will ensure that:

- Risk assessments are proportionate and regularly reviewed
- Educational and behavioural support is provided
- Pupils are supported to redirect technical skills positively
- Safeguarding responses are consistent with the wider safeguarding framework

Training and Awareness

The school will ensure that:

- Staff receive safeguarding updates relating to computer misuse risks
- DSLs understand referral routes and thresholds
- Governors understand oversight responsibilities
- Parents/carers are signposted to relevant guidance where appropriate

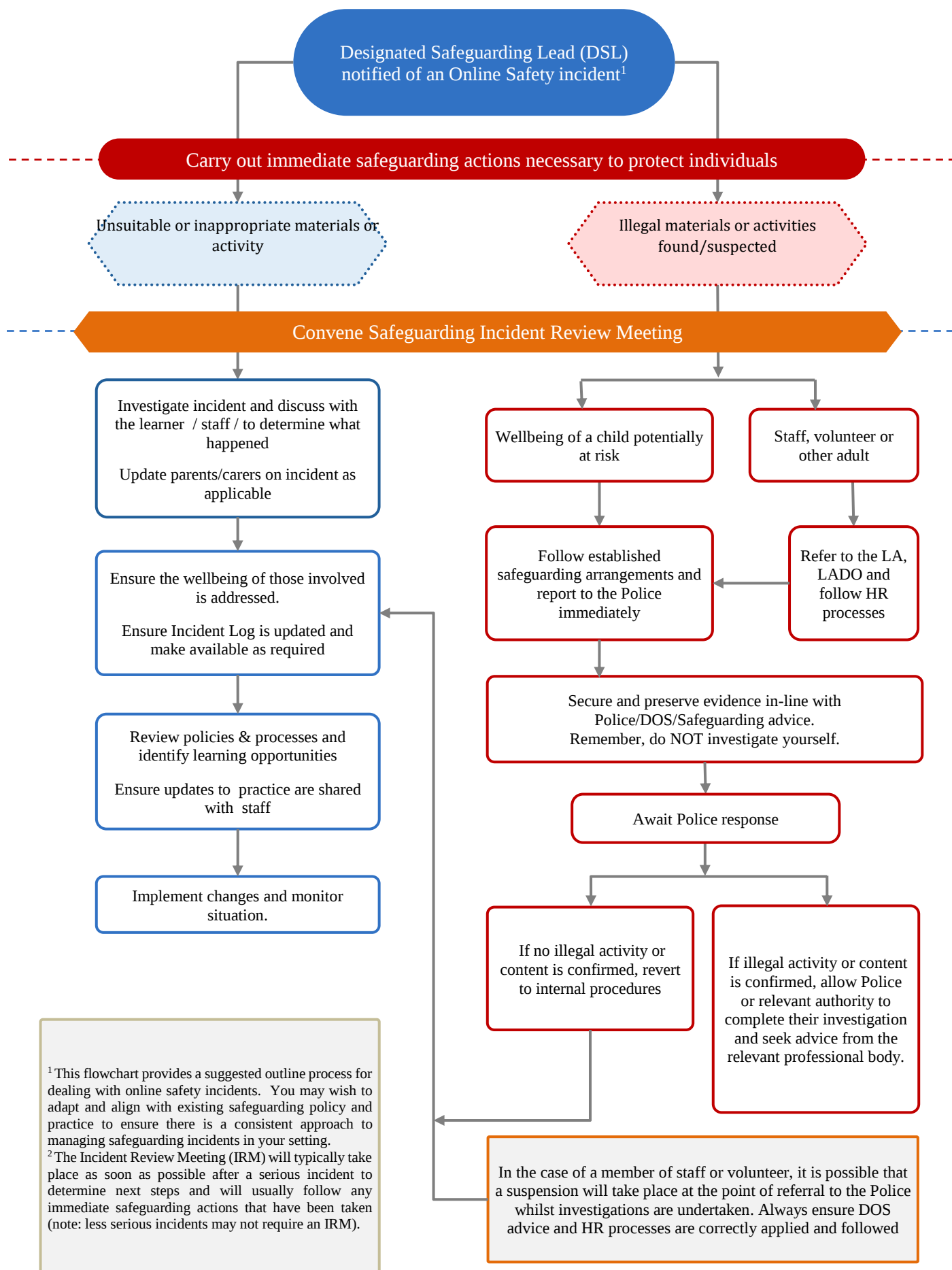
Monitoring and Review

- This policy will be reviewed annually and updated in response to legislative changes, national guidance or emerging risks.
- Incident trends and safeguarding reviews will inform continuous improvement.

This policy template is based on a document for schools published by the South East Regional Organised Crime Unit (SEROCU) and has been amended for use across the UK. SWGfL would like to acknowledge the support of SEROCU for permission to adapt and use the document.

Schools will need to contact their local [ROCU / Cyber Choices](#) team regarding local processes.

Appendix A10 Responding to incidents of misuse – flow chart



Appendix A11 - Record of reviewing devices/internet sites (responding to incidents of misuse)

Group:

Date:

Reason for investigation:

.....

.....

Details of first reviewing person

Name:

Position:

Signature:

Details of second reviewing person

Name:

Position:

Signature:

Name and location of computer used for review (for web sites)

.....

.....

Web site(s) address/device	Reason for concern

Conclusion and Action proposed or taken

Appendix A12 - Reporting Log

Group:

Date	Time	Incident	Action Taken		Incident Reported By	Signature
			What?	By Whom?		

Appendix B1 - Training Needs Audit Log

Group:

Relevant training the last 12 months	Identified Training Need	To be met by	Cost	Review Date

Appendix C1 – Filtering and Monitoring Policy Template

Purpose

The purpose of this policy is to ensure that appropriate filtering and monitoring systems are in place to safeguard pupils and staff from harmful or illegal online content, while enabling safe and effective teaching, learning and professional practice. Filtering and monitoring form part of the school's wider safeguarding responsibilities and are implemented in line with Keeping Children Safe in Education (KCSIE) and the DfE Filtering and Monitoring and Technical Standards.

Scope

This policy applies to:

- All users of the school's IT systems
- All school-owned devices
- Any device accessing the school's network or internet connection
- Filtering and monitoring provided through third-party or managed services

Roles and Responsibilities

- Governors provide strategic oversight and assurance that filtering and monitoring standards are met.
- Senior leaders ensure appropriate systems are in place, reviewed and resourced.
- The DSL leads safeguarding responses arising from filtering or monitoring alerts.
- The IT service provider maintains systems and provides reports as agreed.
- All staff report concerns relating to access, alerts or system effectiveness.

Policy Statement

The school will ensure that:

- Internet access is filtered to block illegal, harmful and inappropriate content
- Monitoring systems are in place to identify safeguarding concerns and enable timely intervention
- Filtering and monitoring are proportionate, transparent and risk-based
- Roles and responsibilities are clearly defined and understood
- Provision is reviewed regularly and improved in response to risk, practice and guidance
- that staff understand the filtering and monitoring arrangements, their purpose, the responsibilities relevant to their role and the procedures for reporting concerns.
- Filtering and monitoring provision will be reviewed at least annually, with the review considering safeguarding risks, emerging technologies, generative AI, changes in pupil behaviour and the effectiveness of technical and procedural controls.
- Governors will receive sufficient information to assure themselves that the DfE Filtering and Monitoring Standard is being met and that identified actions are followed through.

Filtering and monitoring are recognised as supporting safeguarding, not replacing education, supervision or professional judgement.

Filtering

The school will ensure that filtering systems:

- Block access to illegal content, including child sexual abuse material, terrorist material and other unlawful content
- Manage inappropriate and/or harmful content (including search terms and results). These may include:
 - Gambling
 - Hate speech/discrimination
 - Harmful content
 - Mis/Disinformation
 - Piracy and copyright theft
 - Pornography
 - Self-harm and eating disorders
 - Violence against women and girls
 - AI-generated or AI-enabled harmful content, where technically feasible and proportionate
- Are age-appropriate and suitable for an educational environment
- Are applied consistently to all users, devices and internet connections, including backup connections
- Allow the identification of individual users and devices in the event of breaches of the filtering policy
- No user should be able to deactivate or bypass systems that filter illegal content.
- Detect and, where technically possible, prevent unauthorised circumvention through VPNs, proxy services or other methods designed to bypass filtering.
- Support differentiated access for different user groups (e.g. staff and pupils)
- Are reviewed regularly to avoid inappropriate over-blocking that may restrict teaching and learning

The school understands the capabilities and limitations of the system and potential impact on implementation and policy is understood.

The school will use recognised tools and guidance to assure the effectiveness of filtering provision e.g., [testfiltering.com](https://www.testfiltering.com)

Monitoring

The school will ensure that monitoring:

- Enables the identification of safeguarding concerns in a timely manner
- Uses a combination of physical supervision, manual checks and technical systems as appropriate
- Generates alerts that can be prioritised and acted upon by trained staff
- Is subject to human review and professional judgement

- Is clearly communicated to users through policy and acceptable use agreements

Monitoring should be proportionate to the school's risk profile and should not create a culture of surveillance.

Review and Training

Filtering and monitoring provision should be reviewed at least annually and whenever risks or technologies change. Staff, governors and those with specific responsibilities will receive appropriate training.

Appendix C2 - Technical Security Template Policy

(including Access, Device and Incident Management)

Purpose

This policy sets out how the school protects its technical infrastructure, systems and devices to ensure a secure and resilient digital environment. It supports safeguarding, data protection and business continuity and aligns with the [DfE Digital and Technology Standards](#)

Scope

This policy applies to:

- Staff, pupils and governors
- Suppliers of third-party services and solutions
- School networks, servers and cloud systems
- School-owned devices
- User accounts and access controls
- Device configuration and management, including personal devices where permitted

Policy Statement

The school will ensure that its technical systems are managed in a way that:

- Protects users and data from unauthorised access or misuse
- Supports safe and reliable access to digital services
- Enables detection, response and recovery from technical incidents
- Is proportionate to risk and regularly reviewed

Access Control and Authentication

The school will ensure that:

- All users have unique accounts with appropriate access rights
- New user rights are allocated as part of induction
- Access is removed promptly when users leave the school
- Passwords and authentication methods reflect [NCSC](#) and [DfE guidance](#)
- Multi-factor authentication is used in accordance with DfE/NCSC requirements, particularly for privileged, administrative, remote-access and sensitive systems.
- Administrator access is restricted and monitored
- System administrators and those with global/ confidential data system access use a physical security device in addition to MFA to access systems.

System Security and Maintenance

The school will ensure that:

- Systems and software are licensed, supported and kept up to date
- Security patches are applied promptly
- Anti-virus and malware protection is in place across all systems

- Backups are taken regularly, stored securely (both locally and offsite, with rotation) and regularly tested
- Physical access to infrastructure is controlled

Device Management

The school will ensure that:

- Clear expectations exist for the use of school-owned and personal devices
- School-owned devices are centrally managed wherever practicable, allowing control over configuration, software, applications, security updates and access to content.
- Where personal devices are permitted to connect to school networks under an authorised exception, appropriate filtering and monitoring controls will apply where technically possible and proportionate.
- Where personal devices are permitted, their use is clearly authorised, risk-assessed and consistent with the school's Behaviour, Mobile Phone and Acceptable Use policies. Pupils will not normally have access to personal mobile phones or equivalent smart devices during the school day, except where an authorised exception applies.
- Authorised exceptions, including those relating to medical needs, SEND, accessibility or safeguarding, are appropriately managed without weakening wider technical or safeguarding controls.
- School devices are configured securely and managed appropriately, with regular/automatic patches and updates
- Where personal devices are permitted, expectations are clearly defined and risk-assessed
- Acceptable Use Agreements reference responsible device use
- Users receive guidance on safe and appropriate device use

Supplier Management

The school will ensure that:

- Provision of third-party services and solutions are adequately contracted and regularly reviewed
- Suppliers can demonstrate adherence to school policy and alignment with the [DfE Digital and Technology Standards](#)

Incident Management

Technical incidents will be logged, escalated and reviewed. Serious incidents will be managed in line with safeguarding and business continuity procedures.

Review and Training

Technical security arrangements will be reviewed regularly. Staff with specific responsibilities will receive appropriate training, and users will be educated on their responsibilities.

Technical controls will be reviewed in response to changes in legislation or national requirements relating to children's access to online services.

Appendix C3 - Cyber Security Policy Template

Purpose

This policy sets out how the school prevents, detects, responds to and recovers from cyber threats. It supports the school's duty of care to protect users and data and aligns with the DfE Cyber Security Core Standard, current NCSC guidance and Cyber Essentials requirements.

Scope

This policy applies to:

- Cyber threats including phishing, ransomware, malware and unauthorised access
- Staff, pupils and governors
- Suppliers of third-party services and solutions
- Technical systems and cloud services
- Incident response and business continuity

Policy Statement

The school will take a proactive, risk-based approach to cyber security to:

- Reduce the likelihood and impact of cyber incidents
- Ensure timely and effective response to threats
- Build awareness and resilience across the school community

Cyber Security Strategy

The school will maintain a cyber security strategy that:

- Is supported by senior leaders and governors
- Is informed by risk assessment and incident learning
- Is reviewed regularly in line with emerging threats
- Is inclusive of all services and solutions, including those from third-party suppliers

Supplier Management

The school will ensure that suppliers:

- Can demonstrate adherence to school policy and alignment with the [DfE Cyber Security Standards](#)
- Are familiar with school incident response plan and able to respond effectively

Awareness and Education

The school will ensure that:

- Staff receive regular cyber-security training covering phishing, credential theft, malicious links, social engineering, ransomware, AI-enabled scams and other emerging threats.
- Pupils receive age-appropriate education about cyber security, scams, account protection and the lawful and responsible use of systems.
- Pupils receive age-appropriate education on cyber risks
- Governors understand their oversight responsibilities

Incident Response

The school will maintain a clear cyber incident response plan that:

- Defines roles and escalation routes
- Supported by an effective communications strategy
- Supports safeguarding and business continuity
- uses cyber incident exercises periodically to test preparedness and identify improvements.
- Ensures incidents are recorded and reviewed
- identifies responsibilities for safeguarding, technical response, communications, data protection and external reporting.

External Assurance

Where appropriate, the school will engage external expertise to assess cyber resilience and will work towards recognised standards or certifications.

Review

Cyber security arrangements will be reviewed annually, or sooner if required by incidents, guidance or changes in technology. Lessons learned from managing incidents should inform improvements to the strategy.

Appendix C4 - Data Security Policy Template

Purpose

The purpose of this policy is to ensure that personal and sensitive data is handled securely, lawfully and transparently, in line with UK data protection legislation and statutory guidance. The policy supports safeguarding, privacy, and trust across the school community and forms part of the school's wider approach to online safety and information security.

Scope

This policy applies to:

- All personal data processed by the school
- All staff, volunteers, governors and contractors
- Data subjects including staff, pupils and parents/carers

- All digital and paper-based records
- All third parties processing data on behalf of the school

Legislative Context

The school complies with current UK data protection legislation, including UK GDPR as amended and supplemented by applicable UK legislation:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025, where relevant to the school's processing activities
- Freedom of Information Act
- Relevant guidance from [the Information Commissioner's Office](#) (ICO)

Policy Statement

The school recognises its role as a Data Controller and is committed to ensuring that personal data is:

- Processed lawfully, fairly and transparently
- Collected for specified and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Retained only for as long as necessary
- Secured against unauthorised access, loss or misuse

Data security is recognised as a safeguarding responsibility and is embedded across leadership, governance and daily practice.

AI-enabled or automated systems involving personal data are assessed before use, including consideration of lawful basis, transparency, data minimisation, security, accuracy, bias and the need for human oversight.

Personal or sensitive information will only be entered into approved AI systems where the school's data protection and security requirements have been satisfied.

Governance and Roles

Data Protection Officer (DPO)

The school will appoint a Data Protection Officer (internal or external) who:

- Provides independent advice and monitoring of compliance
- Supports Data Protection Impact Assessments (DPIAs)
- Acts as the point of contact with the ICO
- Reports directly to senior leadership and governors

The DPO operates independently and is supported with appropriate time, access and resources.

Governors

Governors:

- Approve and review data protection policies
- Provide strategic oversight of compliance and risk
- Ensure adequate resources are allocated
- Receive reports on data breaches, audits and risks

Senior Leaders and Staff

Senior leaders ensure that:

- Data protection is embedded into systems and culture
- Staff receive appropriate training
- Procedures are implemented consistently
- Data breaches are managed in line with school policy and in accordance with ICO guidance

All staff and governors are responsible for handling personal data securely and reporting concerns or incidents promptly.

Lawful Processing and Transparency

The school will:

- Identify and document lawful bases for processing personal data
- Apply additional conditions for processing special category data
- Maintain clear and accessible Privacy Notices for pupils, parents/carers, staff and governors
- Ensure data subjects understand their rights
- Ensure consent is considered and established with data subjects and used only where appropriate and never as a default where a public task or legal obligation applies.

Records, Mapping and Risk Management

The school will maintain:

- A Record of Processing Activities (RoPA)
- A data asset register, including third-party and cloud services
- Clear retention and disposal schedules
- Data Protection Impact Assessments (DPIAs) for new or high-risk processing

Data protection is considered at the design stage of any new system or process (“data protection by design and default”).

New EdTech and cloud services are subject to appropriate data-protection, security and contractual checks before implementation.

Data Security and Access Controls

The school will ensure that:

- Access to personal data is role-based and restricted
- User accounts are protected by strong authentication
- Devices accessing personal data are secured and encrypted where appropriate
- Personal data is stored only on approved systems
- Cloud services meet UK data protection and security requirements
- Third-party contracts include appropriate data processing clauses
- Paper records are stored securely and disposed of appropriately.

Data Sharing and Transfer

Personal data will only be shared:

- Where there is a lawful basis
- With appropriate safeguards in place
- Using secure transfer methods
- With approved third parties

Additional care is taken when data is accessed remotely or transferred off-site.

Data Subject Rights

The school will uphold all data subject rights, including:

- Right to be informed
- Right of access (Subject Access Requests)
- Right to rectification
- Right to erasure (where applicable)
- Right to restrict or object to processing

Procedures are in place to manage requests within statutory timescales.

Data Breaches and Incident Management

The school will:

- Maintain clear procedures for reporting and managing data breaches
- Assess the risk to individuals' rights and freedoms
- Notify the ICO within 72 hours where required
- Record all breaches and near-misses
- Use learning from incidents to improve practice

Data breaches are treated as serious incidents and may also trigger safeguarding procedures where appropriate.

Training and Awareness

The school will ensure that:

- All staff and governors receive regular data protection training
- New staff receive training as part of induction
- Targeted training is provided where roles require it
- Pupils are taught about privacy and data protection as part of the curriculum, in an age-appropriate way

Monitoring and Review

This policy will be:

- Reviewed at least annually
- Updated in response to changes in legislation, guidance or risk
- Supported by audits and compliance checks

Status

This Data Security Policy should be read alongside the school's:

- Safeguarding and Child Protection Policy
- Online Safety Policy
- Technical Security Policy
- Cyber Security Policy
- Records Management and Retention Policy

Appendix C5 – Electronic Devices: Searching and Confiscation Policy Template

This template has received significant updates following the publication of the [DfE Mobile Phones in Schools statutory guidance](#). The updates are highlighted.

Purpose

The purpose of this policy is to set out the school's lawful and proportionate approach to searching, screening and confiscating electronic devices and examining or deleting data from those devices.

This policy supports the school's safeguarding responsibilities and must be read alongside the Behaviour Policy, Child Protection and Safeguarding Policy, Online Safety Policy, Filtering and Monitoring Policy, Technical Security Policy and Data Security Policy.

This policy reflects [Keeping Children Safe in Education](#) KCSIE), [DfE Searching, Screening and Confiscation guidance](#), [DfE Behaviour in Schools guidance](#), [DfE Mobile Phones in Schools statutory guidance](#) and relevant statutory legislation.

Scope

This policy applies to:

- All pupils
- All authorised staff
- All electronic devices in a pupil's possession, including mobile phones and other personal smart or interactive communication devices
- Devices on school premises or used in connection with school activities, or where the school has lawful control or charge of the pupil
- Behaviour occurring both on and off site where it impacts safeguarding or discipline

Policy Statement

The school will ensure that:

- The Behaviour Policy identifies mobile phones and similar devices as items that may be searched for where the school's rules prohibit or restrict their use
- Searches are lawful, proportionate and necessary
- Safeguarding considerations are prioritised
- Devices are only searched where there are reasonable grounds
- Deletion of data is undertaken only where there is a lawful and justifiable reason
- Suspected criminal evidence is preserved and referred to the police where required or appropriate
- Incidents are recorded securely
- Staff are appropriately trained

Authorised Staff

- The Headteacher will identify staff authorised to conduct searches. Authorised staff may examine or erase data from a confiscated electronic device only where the legal conditions for doing so are met.
- Authorised staff will receive appropriate training including safeguarding, legal thresholds and digital evidence handling.
- Staff cannot be required to undertake searches.

Searching for Electronic Devices

The Headteacher or authorised staff may search a pupil or their possessions where the pupil agrees, or where there are reasonable grounds to suspect that they possess a prohibited item or an item identified in the school's Behaviour Policy as one that may be searched for. This should include mobile phones and similar devices where required by school policy.

Reasonable force may only be used where permitted by law to search for statutory prohibited items; it must not be used solely to search for an item banned under school rules, such as a mobile phone.

Searches will:

- Be conducted by authorised staff
- Be carried out privately where possible
- Normally be conducted by a member of staff of the same sex as the pupil, with another member of staff present, subject to the limited urgent exception permitted by law
- Involve removal of outer clothing only
- Not extend to strip or intimate searches
- Take account of the pupil's age, SEND, disability and other individual circumstances

Examination of Electronic Devices

- Staff may examine data or files on a device confiscated following a lawful search where there is good reason to do so - for example, where they reasonably suspect the data has been or could be used to cause harm, disrupt the safe environment of the school or commit an offence.
- Examination will extend only as far as reasonably necessary to establish the facts.
- Where nude or semi-nude images of a child are suspected, staff must not intentionally view, copy, print, share, store or save the image. The device should be secured and the matter referred immediately to the DSL.
- Where material may constitute a criminal offence, the device will be handed to the police.

Deletion of Data

- Data may only be erased where there is good reason to do so, it is not suspected to be evidence of an offence, and its continued existence is likely to cause harm. Where appropriate, the pupil or parent/carer should first be asked to delete the material.
- Deletion decisions must be proportionate and recorded.
- Data suspected to constitute evidence of an offence must not be deleted; the device should be passed to the police as soon as reasonably practicable.

Safeguarding Response

All incidents involving device searches will:

- The DSL will be informed of searches involving statutory prohibited items and immediately where a search identifies or suggests a safeguarding concern.
- Relevant searches will be recorded within the school's safeguarding/reporting systems.
- Trigger a risk assessment where appropriate
- Parents/carers will be informed of searches and confiscation in accordance with DfE guidance, unless safeguarding considerations require a different approach.

Confiscation

Mobile phones and other devices may be confiscated as a proportionate sanction in accordance with the Behaviour Policy. The length and arrangements for confiscation will take account of the purpose of the sanction and the pupil's individual circumstances, including age, SEND, disability, medical need or other agreed exceptions.

Care of Confiscated Devices

The school will ensure secure storage of confiscated devices, documentation of chain of custody and appropriate return procedures.

Training

The school will ensure that:

- Authorised staff receive specialist training
- DSLs understand legal thresholds
- All staff are aware of reporting expectations
- Governors understand oversight responsibilities

Monitoring and Review

The school will maintain records of searches and data deletion, review trends and update this policy annually or in response to national guidance.

Appendix C6 – Public Online Communications Policy Template

Purpose

The purpose of this policy is to set out how the school manages public online communications in order to reduce risk, promote safeguarding and online safety, celebrate success and communicate effectively with the wider school community.

Public online communications include the school website, newsletters, learning platforms, public messaging systems and official social media accounts.

This policy supports the Online Safety, Filtering and Monitoring, Technical Security, Cyber Security and Data Security policies and reflects Keeping Children Safe in Education (KCSIE), DfE digital and technology standards, UKSIC guidance Best Practices for Managing Images and Videos on School Websites, DfE statutory publication requirements for maintained schools.

Scope

This policy applies to:

- All staff and governors
- All public online communications representing the school
- Official school accounts and platforms
- Personal accounts where their use directly references, represents or could reasonably be associated with the school in a professional context
- School content published at any time, from any location or online platform

Policy Statement

The school will ensure that:

- Public online communications are accurate, lawful and appropriate
- Safeguarding considerations are prioritised
- Personal data is protected in line with the Data Security Policy
- Images and video are published only in line with consent procedures
- Copyright and intellectual property are respected
- Communications reflect professional standards
- Public references to the school are monitored appropriately
- Official public communications are made only through authorised school accounts and platforms.
- AI-generated or AI-assisted content is subject to appropriate human review and transparency labelling before publication.

Roles and Responsibilities

- Governors provide strategic oversight and assurance that public online communications meet safeguarding, data protection and statutory publication requirements.
- Senior leaders approve official accounts and oversee monitoring and moderation processes.
- Account administrators maintain secure access, monitor content regularly and ensure policy compliance.
- All staff must follow this policy, maintain professional standards and report concerns.

Creation of Public Online Accounts

- New public online accounts may only be created following approval by senior leadership.
- Proposals must define purpose, audience, responsible staff members and monitoring arrangements.
- Official accounts will be reviewed regularly and securely transferred, archived or closed when no longer required or when responsibility changes.

Monitoring and Moderation

The school will ensure that:

- Public communications are monitored regularly
- Comments are reviewed and moderated appropriately
- Harmful or inappropriate content is addressed appropriately, including removal, reporting, preservation of evidence or escalation where necessary.
- Safeguarding concerns are reported immediately through the school's safeguarding procedures; other serious incidents are recorded and escalated to senior leaders or relevant external agencies as appropriate.
- Harmful or inappropriate content is removed
- Serious incidents are recorded and escalated where necessary

Professional Standards

All public communications must:

- Be respectful and professional
- Avoid discriminatory, offensive or defamatory content
- Protect confidentiality
- Avoid internal grievance discussions
- Avoid disclosure of sensitive information

Use of Images and Media

The school will ensure that:

- Appropriate consent is obtained
- Images are appropriate and dignified
- Pupils are not identified unnecessarily
- Images are removed where consent is withdrawn

To reduce the risk of images, video, audio or other content featuring staff or pupils being copied, manipulated or misused, including through AI technologies, the school has procedures governing how such content is selected and shared publicly. (n.b., UKSIC guidance Best Practices for Managing Images and Videos on School Websites)

- Staff consider whether location and context published alongside images could increase safeguarding or privacy risks.

Personal Use and Association with the School

Staff may use personal social media accounts; however:

- Where staff identify themselves as associated with the school, they must maintain appropriate professional boundaries and comply with relevant staff conduct and acceptable use expectations.
- Personal use must not impact professional standards nor school reputation
- Staff must not engage with current pupils via personal accounts
- Excessive or inappropriate use during working hours may result in disciplinary action

Handling Complaints and Abuse

Where negative comments are made online:

- The school will respond proportionately
- Abusive, threatening or harmful content will be managed proportionately, including recording, reporting, blocking, removal or referral to relevant platforms or agencies as appropriate.
- Abusive content should be challenged and removed
- Parents'/carers' complaints should be directed to formal complaints procedures
- Serious matters may be escalated to senior leaders or external agencies

Training and Awareness

The school will ensure that:

- Staff responsible for public accounts receive appropriate guidance and training on safeguarding, data protection, account security, moderation, escalation and the responsible use of AI-assisted content.
- Governors understand oversight responsibilities
- The wider community is informed of expected standards

Review and Continuous Improvement

This policy will be reviewed annually and updated in response to legislative changes, national guidance or emerging risks.

Appendix C7 - School Online Safety Policy Template – Artificial Intelligence in Schools

Introduction

The South West Grid for Learning Trust (SWGfL) is a charity that has been at the forefront of supporting schools with online safety and security for 20 years and is recognised as a world leader in online safety innovation

The integration of Artificial Intelligence (AI) in UK schools has evolved significantly over recent years, reflecting both technological advances and the educational community's response to the opportunities and challenges it presents.

A consensus is emerging about the benefits of AI to enhance personalised learning and streamline administrative tasks, while also raising concerns around data privacy, ethical use, and the preparedness of teachers to effectively integrate AI tools into classrooms.

This ongoing dialogue reflects the recognition of AI's transformative potential in education, balanced with a need for careful implementation to protect pupil welfare and promote equitable outcomes. These considerations are shaping a pathway for embedding AI in schools, focusing on teacher training, ethical guidelines, and fostering digital competency among students.

How to Use this Template

This document has been created as a template for school leaders to assist them in creating their own AI Policy.

Within this template, sections which include information or guidance are shown in BLUE. It is anticipated that school would remove these sections from their completed policy document, though this will be a decision for the group that produces the policy.

Where sections in the template are written in ITALICS it is anticipated that schools would wish to consider whether to include that section or statement in their completed policy.

Where sections are highlighted in BOLD, it is suggested that these should be an essential part of a school/school policy.

Legislative Background and Key Documents

The UK Online Safety Act 2023 is designed to make the internet safer, particularly for children and vulnerable users, by regulating online content and holding tech companies accountable for harmful material. It is still yet to be fully understood where there may be gaps in regulation to protect children and young people from possible harm caused by AI. Ofcom is the online safety regulator in

the UK and is responsible for publishing codes of practice and guidance on how companies can comply with their duties.

There is currently little in the way of specific legislation regarding the use of AI in schools, but guidance has been developed and is being regularly updated as the technology evolves. Schools may wish to consult the following:

- [AI Roadmap - GOV.UK](#)
- [DfE Using AI in education settings: support materials](#)
- [National AI Strategy - GOV.UK](#)
- [Ofcom's 2024 Online Nation Report](#)
- [EU Artificial Intelligence Act 2024 - Useful high-level 4-point summary of considerations](#)
- [UNESCO AI Competency Framework for Students \(Guidance\)](#)
- [UNESCO AI Competency Framework for Staff \(Guidance\)](#)
- [Responsible AI Toolkit - GOV.UK](#)
- [Data protection in schools - Artificial intelligence \(AI\) and data protection in schools - Guidance - GOV.UK](#)
- [Understanding AI for school – Tips for School Leaders - ASCL, NAHT, CST, and others](#)
- [SWGfL – Artificial Intelligence and Online Safety](#)
- [HYPERLINK "https://hwb.gov.wales/keeping-safe-online/generative-ai"](https://hwb.gov.wales/keeping-safe-online/generative-ai) [Welsh Government - Generative AI – Hwb guidance - Resources, guidance and information for education practitioners, pupils, and families on generative AI.](#)

Welsh Government - Generative AI: keeping pupils safe online

Context

AI represents a transformative leap in technology, enabling machines to create text, images, audio, and video with remarkable accuracy and creativity. Emerging from advancements in machine learning, particularly deep learning, generative models such as GPT (Generative Pre-trained Transformer) and DALL·E leverage vast datasets to understand and produce content that mimics human expression. Initially text-focused, these models have evolved to become multi-modal, integrating and processing various types of input, such as text and images, to generate cohesive outputs.

Since the debut of early systems like OpenAI's GPT-2 in 2019, the field has rapidly advanced, unlocking opportunities in education while raising critical considerations around ethics, data privacy, and equitable access.

According to [Ofcom's 2024 Online Nation Report](#) more than half of children have used generative AI tools in the past year. Teenagers aged 13-15 are more likely to use AI (66%) than those aged 8-12 (46%) and combining both age groups, over half (53%) have made use of AI to support with homework tasks. There is a broad range of purposes for children using AI including finding

information, creating images/videos, seeking advice and summarising text, with the most popular tool among 8-15s being ChatGPT (37%) followed by Snapchat My AI (30%).

Schools must now navigate this landscape thoughtfully, crafting policies that harness the benefits of AI while prioritising staff and pupils' safety, security and well-being. .

Policy on the use of Artificial Intelligence in Schools

Statement of intent

Artificial Intelligence (AI) technology is already widely used in commercial environments and is gaining greater use in education. We recognise that the technology has many benefits and the potential to enhance outcomes and educational experiences, with the opportunity to support staff in reducing workload.

We also realise that there are risks involved in the use of AI systems, but that these can be mitigated through our existing policies and procedures, amending these as necessary to address AI risks.

We will educate staff and pupils about safe and ethical use of AI, preparing them for a future in which AI technologies are likely to play an increasing role.

The safeguarding of staff and pupils will, as always, be at the forefront of our policy and practice.

Related policies

This policy should be read in conjunction with other school policies:

- Data Protection Policy
- Staff Discipline policies and codes of conduct
- Behaviour policy
- Anti-bullying policy
- Online safety policy
- Acceptable Use Agreements
- Curriculum Policies
- [Add any other policies that may be relevant](#)

Policy Statements

- The school acknowledges the benefits of the use of AI in an educational context - including enhancing teaching and learning and outcomes, improving administrative processes, reducing workload and preparing staff and pupils for a future in which AI technology will be an integral part. Staff are encouraged to use AI based tools to support their work where appropriate, within the frameworks provided below and are required to be professionally responsible and accountable for this area of their work.

- We will comply with all relevant legislation and guidance, with reference to guidance contained in Keeping Pupils Safe
- We will provide relevant training for staff and governors in the advantages, use of and potential risks of AI. We will support staff in identifying training and development needs to enable relevant opportunities.
- We will ensure that, within our education programmes, pupils understand the ethics and use of AI and the potential benefits and risks of its use. The school recognises the importance of equipping pupils with the knowledge, skills and strategies to engage responsibly with AI tools.
- As set out in acceptable use agreements, the school will use AI responsibly and with awareness of data sensitivity. Where used, staff should use AI tools responsibly, ensuring the protection of both personal and sensitive data. Staff should only input anonymized data to avoid the exposure of personally identifiable or sensitive information.
- Staff should always ensure AI tools used comply with UK GDPR and other data protection regulations. They must verify that tools meet data security standards before using them for work related to the school.
- Only those AI technologies approved by the school may be used. Staff should always use school-provided AI accounts for work purposes. These accounts are configured to comply with organisational security and oversight requirements, reducing the risk of data breaches.
- We will protect sensitive information. Staff must not input sensitive information, such as internal documents or strategic plans, into third-party AI tools unless explicitly vetted for that purpose. They must always recognize and safeguard sensitive data.
- The school will ensure that when AI is used, it will not infringe copyright or intellectual property conventions – care will be taken to avoid intellectual property, including that of the pupils, being used to train generative AI models without appropriate consent.
- AI incidents must be reported promptly. Staff must report any incidents involving AI misuse, data breaches, or inappropriate outputs immediately to the relevant internal teams. Quick reporting helps mitigate risks and facilitates a prompt response.
- The school will audit all AI systems in use and assess their potential impact on staff, pupils and the school's systems and procedures, creating an AI inventory listing all tools in use, their purpose and potential risks. [\(Risk assessment matrices are attached as an appendix\)](#)
- We are aware of the potential risk for discrimination and bias in the outputs from AI tools and have in place interventions and protocols to deal with any issues that may arise. When procuring and implementing AI systems, we will follow due care and diligence to prioritise fairness and safety.
- *The school will support parents and carers in their understanding of the use of AI in the school (this could be through an "AI in our school guide")*
- *AI tools may be used to assist teachers in the assessment of pupil's work and identify areas for improvement. Teachers may also support pupils to gain feedback on their own work using AI. Use of these tools should be purposeful, considered and with a clear focus on ensuring impact and understanding and mitigating risk*
- *Maintain Transparency in AI-Generated Content. Staff should ensure that documents, emails, presentations, and other outputs influenced by AI include clear labels or notes*

indicating AI assistance. Clearly marking AI-generated content helps build trust and ensures that others are informed when AI has been used in communications or documents.

- *We will prioritise human oversight. AI should assist, not replace, human decision-making. Staff must ensure that final judgments, particularly those affecting people, are made by humans and critically evaluate AI-generated outputs. They must ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing. This is especially important for external communication to avoid spreading misinformation.*
- Recourse for improper use and disciplinary procedures. Improper use of AI tools, including breaches of data protection standards, misuse of sensitive information, or failure to adhere to this agreement, will be subject to disciplinary action as defined in Staff Disciplinary Policy.

Responsibilities

Headteacher and Senior Leaders

Are responsible for the strategic planning of how AI will be used in the school, establishing AI policies and procedures and ensuring that all staff receive relevant training and have a clear understanding of these.

Designated Safeguarding Person (DSP) / Online Safety Lead

Our Designated Safeguarding Person / Online Safety Lead has responsibility for online safety in the school. They are expected to have knowledge of AI and its safeguarding implications and an in-depth working knowledge of key guidance. We ensure that they receive appropriate specialist training, commensurate with their role and that ongoing training is provided for all school staff.

Data Protection Officer

The DPO will be responsible for providing advice and guidance about data protection obligations in relation to the use of AI, including related Data Protection Impact Assessments (DPIAs).

Technical Staff

Technical staff / IT Leads will be responsible for technical support and guidance, with particular regard to cyber-security and the effectiveness of filtering and monitoring systems. [\(Schools that have external contracts for technical support must ensure that the support provider is aware of the school's requirements regarding AI and comply with school policies. Such schools should also audit these services for compliance\)](#)

Staff

It is the responsibility of all staff to have read and understood this policy and associated Acceptable Use Agreements. All staff must report any incidents or suspected incidents concerning the use of AI in line with school policy. All staff will challenge any inappropriate behaviour. Staff have a duty to ensure that:

- the school environment is safe
- sensitive and confidential data / information is secure

- that their actions do not put the reputation of the school at risk and that
- pupils understand their responsibilities

Governors

We ensure that our Governing Body has a good understanding of how AI is used in a school context and potential benefits and risks of its use. They receive regular training and updates, enabling them to support the school and challenge where necessary. This may include evaluation of the use of AI in the curriculum, administration and communications, ensuring that risks relating to these issues are identified, that reporting routes are available, and that risks are effectively mitigated. (Schools may wish to add here any specific Trust / Governor committee that will take lead responsibility e.g., Risk and Audit Committee)

Parents/carers

We work hard to engage parents and carers by:

- *regular in school sessions*
- *sharing newsletters*
- *sharing information online e.g., website, social media*
- *providing curriculum information*
- [List any other ways you may engage parents and carers](#)

Our parents and carers are made aware of how AI is used in school and receive guidance on both good practice in its use and the risks of misuse that may affect their childrens' learning or safety. They are encouraged to report any concerns to the school and are made aware that all incidents will be handled with care and sensitivity.

Vulnerable groups

We recognise that vulnerable pupils are more likely to be at risk from the misuse of AI (both in their own use or through the actions of others). We ensure that vulnerable pupils are offered appropriate support to allow them to gain full benefit of the use of AI, while being aware of the potential risks.

Children are considered to be vulnerable data subjects and therefore any process involving their personal data is likely to be "high risk". If an AI/ automated process is used to make significant decisions about people, this is likely to trigger the need for a Data Protection Impact Assessment (DPIA).

Reporting

Our reporting systems are well promoted, easily understood and easily accessible for staff, pupils and parents/carers to confidently report issues and concerns, knowing these will be treated seriously. All reports will be dealt with swiftly and sensitively and outcomes shared where appropriate. We also respond to anonymous reports, or reports made by third parties. This can be done via: [\(amend as necessary\)](#)

- nominated member of staff
- established school reporting mechanisms
- online/offline reporting tool
- anonymous/confidential reporting routes
- links to national or local organisations
- *list any other systems here*

Responding to an incident or disclosure

Our response is always based on sound safeguarding principles and follows school safeguarding and disciplinary processes. It is calm, considered and appropriate and puts the pupil at the centre of all decisions made.

- All AI incidents (including data breaches and/or inappropriate outputs) must be reported promptly to the relevant internal teams. Effective reporting helps mitigate risks and facilitates a prompt response.
- Where relevant / required incidents will be reported to external agencies e.g., Police, LADO, DPO, ICO.
- All AI related incidents will be recorded through the school's normal recording systems

In the case of misuse of AI by staff, the normal staff disciplinary processes will be followed.

Risk assessment

It is key that our approach to managing risk aligns with, and complements, our broader safeguarding approach.

The school understands that despite many positive benefits in the use of AI, there are some risks that will need to be identified and managed, including:

- Legal, commercial, security and ethical risks
- Data Protection
- Cyber Security
- Fraud
- Safeguarding and well-being
- Duty of care

The example matrix included at the end of this policy template may be used to evaluate risk within the school and may be edited and adapted accordingly through the normal school procedures

Education

Our school's educational approach seeks to develop knowledge and understanding of emerging digital technologies, including AI.

This policy outlines our commitment to integrating Artificial Intelligence (AI) responsibly and effectively within our school environment. We will use AI responsibly, safely and purposefully to support these aims:

- Enhance academic outcomes: Improve educational experiences and performance for pupils.
- Support teachers: Assist in managing workloads more efficiently and effectively.
- Educate on AI use: Promote safe, responsible, and ethical AI practices among staff and pupils.
- Develop AI literacy: Incorporate AI as a teaching tool to build AI skills and understanding.
- Prepare for the future: Equip staff and pupils for a future where AI is integral.
- Promote educational equity: Use AI to address learning gaps and provide personalised support.

Our school's approach is to deliver this knowledge and understanding wherever it is relevant within the curriculum. This will include: (schools will need to amend as relevant)

- Computing
- PHSE
- Cross curricular programmes
- Discrete subjects (to be defined)
- Schools should list other opportunities to deliver teaching and learning around AI here e.g., assemblies, pastoral/form time, discrete lessons, visits from outside agencies etc

Our approach is given the time it deserves and is authentic i.e., based on current issues nationally, locally and within our school's risk profile. It is shaped and evaluated by pupils and other members of the school community to ensure that it is dynamic, evolving and based on need. We do this through:

- *Pupil assessment*
- *Critical evaluation of emerging trends and research findings*
- *Surveys*
- *Focus groups*
- *Parental engagement*
- *Staff consultation*
- *Engaging with pupils*
- *Staff training*

The following resources are used:

- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (including updated AI reference)
- ProjectEVOLVE - <https://projectevolve.co.uk>
- UKCIS DSIT "Education for a Connected World"

Welsh Government - Generative AI – Hwb guidance - Resources, guidance and information for education practitioners, pupils, and families on generative AI.

- *List other resources which are used to support the curriculum here*

In line with good practice, we have created child-friendly versions of key safeguarding policies, produced and regularly evaluated in consultation with young people. List those that are available below.

Training

As AI becomes an integral part of modern education, it is essential for staff to be trained in its effective use. Training equips educators with the knowledge and skills to integrate AI tools responsibly into teaching, learning, and administrative processes. It ensures that AI is used to enhance educational outcomes, streamline workloads, and promote equity while safeguarding ethical practices and data privacy. By fostering AI literacy, staff can confidently prepare pupils for a future where AI is a key driver of innovation and opportunity.

- We will provide comprehensive training to all staff on the effective, responsible, and ethical use of AI technologies in education, ensuring these tools enhance teaching, learning, and administrative processes.
- We will integrate AI-related risks and safeguards into annual safeguarding training, aligning with statutory guidance, including "Keeping Pupils Safe."
- We will ensure all staff are equipped with the knowledge and skills to confidently integrate AI into their professional practice and to prepare pupils for a future shaped by AI-driven innovation and opportunities.
- We will train staff to identify, assess, and mitigate risks associated with AI technologies, including issues such as biased algorithms, privacy breaches, and harmful content.
- We will train staff on robust data protection practices, ensuring compliance with UK GDPR and other relevant regulations while using AI systems.
- We will promote ethical practices in the use of AI, ensuring that these technologies contribute to equity, fairness, and inclusivity in education.
- We will empower educators to teach pupils about the safe and ethical use of AI, cultivating a culture of awareness, resilience, and informed decision-making in the digital age.
- We will train staff to use AI responsibly as a tool to monitor and address online risks, reinforcing our commitment to a safe learning environment.

The school may wish to add details here of staff training resources

Appendix C6a - Risk Assessment Matrix for Schools Implementing AI

Introduction

The following risk assessment matrix is intended to help schools identify, evaluate, and mitigate risks associated with implementing Artificial Intelligence (AI) in educational processes.

The matrix considers potential risks across various domains, including data protection, ethical considerations, and operational integrity. There is a particular focus on safeguarding and wellbeing issues, highlighting potential risks to student welfare and offers strategies to mitigate these risks effectively. Schools should amend the content of the matrix as necessary and consider the risk profile that is relevant to their own circumstances.

Risk Assessment Matrix

Risk Area	Risk Description	Likelihood (Low/Med/High)	Impact (Low/Med/High)	Risk Level (Low/Med/High)	Mitigation Measures
Data Protection and Privacy Breaches	Unauthorised access to sensitive data or personal information, leading to safeguarding concerns and commercial risk.				Implement strong encryption, regular audits, and GDPR-compliant data management policies and conduct regular privacy audits.
Cyberbullying	Increased potential for bullying through AI-mediated communication tools.				Monitor AI communication tools, implement clear reporting mechanisms, and provide student support.
Over-reliance on AI	Over-reliance on AI tools reducing interpersonal interactions among students. Reduction in teacher autonomy and critical decision-making by overusing AI tools.				Encourage collaborative learning activities and balance AI use with social engagement. Define clear boundaries for AI use and regularly review its impact on pedagogy.

Emotional Manipulation	AI systems unintentionally affecting student mental health through curated content.				Monitor AI-generated content, involve mental health professionals, and promote media literacy.
Inappropriate Content or Conduct	AI exposing pupils to harmful or unsuitable materials / behaviour				Conduct rigorous testing of AI tools, apply effective filtering and monitoring and ensure human oversight.
Mental Health Impacts	Overuse of AI tools causing stress, anxiety, or dependency in pupils.				Monitor usage patterns, provide mental health resources, and set expectations on use of AI systems.
Bias and Discrimination	AI systems propagating biases that impact student wellbeing or inclusion. AI models producing discriminatory or biased outcomes.				Regularly audit AI algorithms for bias and provide inclusive media literacy education and training.
Misuse of AI	Pupils using AI tools for harmful, unethical or illegal purposes (e.g. nudification).				Educate pupils on responsible and appropriate AI use and establish clear usage policies.
Misinformation	Creation or spread of harmful or misleading AI-generated content.				Educate staff and pupils to verify AI outputs and establish clear policies for verifying content authenticity.
Digital Divide	Inequitable access to AI tools among				Provide equitable access to AI

	pupils from diverse demographic groups.				resources and ensure alternative solutions are available.
AI Ethics Awareness	Lack of awareness among staff and pupils about ethical implications of AI.				Provide training and education on AI ethics and its responsible usage. Establish an 'Ethics in AI' group.
Data Accuracy	AI systems generating inaccurate or misleading recommendations.				Regularly validate AI outputs and involve human oversight in decision-making.
Legal Compliance	Non-compliance with laws regarding AI usage and pupil data.				Understand legal requirements. Conduct legal reviews and consult experts on AI-related regulations.
Cyber-Security	Increased use of AI tools in cyberattacks targeting school systems and data.				Strengthen cybersecurity protocols and educate staff and pupils on safe online practices.

Likelihood and Impact Definitions

- **Likelihood:** The likelihood that the identified risk will occur.
 - Low: Unlikely to occur under normal circumstances.
 - Medium: Possible occurrence based on past trends or vulnerabilities.
 - High: Likely to occur without intervention.
- **Impact:** The severity of impact should the risk materialise.
 - Low: Minimal disruption with limited consequences.

- Medium: Moderate disruption affecting key processes.
 - High: Significant disruption with severe consequences.
-

Action Plan

Schools may wish to create an action plan based on the findings of the risk assessment matrix. Your plan should consider a before and after approach to demonstrate the intended impact of your proposed actions. These actions might include (amend as relevant).

1. *Appoint a safeguarding lead to oversee AI implementation and its impact on student welfare.*
 2. *Deliver regular training for staff on online safety, AI ethics, and responsible use.*
 3. *Audit the curriculum to identify where these AI related issues might be incorporated into existing or new curricular programmes.*
 4. *Establish transparent reporting mechanisms for any safeguarding or wellbeing concerns linked to AI.*
 5. *Collaborate with parents and carers to raise awareness about AI risks and best practices.*
 6. *Conduct annual reviews of AI tools and their impact on student wellbeing, updating the risk matrix as needed.*
-

Review and Update

The school will review and update this matrix annually or whenever new AI technologies or safeguarding challenges arise.

Appendix C6b – Staff Use of AI Acceptable Use Agreement

School Policy

Emerging technologies, including Artificial Intelligence (AI), are increasingly integrated into educational settings and the lives of staff and pupils. These technologies have immense potential to enhance creativity, promote personalized learning, and improve operational efficiency. However, their use also presents risks that require clear policies and practices to ensure safety, security, and ethical application.

This acceptable use policy aims to ensure:

- Staff and volunteers are responsible users of AI and emerging technologies, prioritising safety and ethical considerations.

- School systems and users are protected from misuse or harm resulting from the use of AI.
- Staff have a clear understanding of their responsibilities when engaging with AI and emerging technologies in professional and personal contexts.

Acceptable Use Policy Agreement

I understand that I must use AI and emerging technologies responsibly to minimise the risk to the safety, privacy, or security of the school community and its systems. I acknowledge the potential of these technologies for enhancing learning and will endeavour to integrate them in a way that aligns with the school's policy, ethos and values.

For my professional and personal safety:

- I understand that the school will monitor my use of AI tools and technologies.
- I will only use AI tools and technologies for purposes authorized by the school and will ensure compliance with data protection laws (e.g. UK GDPR) when handling personal data.
- I will ensure that any sensitive or personally identifiable information about staff, students, or parents/carers is only entered into AI systems that have explicit approval and robust security measures in place.
- I will report any AI-related incidents or anomalies that could indicate misuse, bias, or harm to the appropriate person immediately.

In my communications and actions:

- I will respect copyright, intellectual property, and ethical standards when uploading content to prompt AI output.
- I will critically evaluate the outputs of AI systems to avoid spreading misinformation or biased content and will ensure that all AI-assisted decisions are made with appropriate human oversight.
- I will communicate professionally and responsibly when using AI systems.
- I will ensure transparency through appropriate attribution where AI has been used.

When engaging with pupils:

- I will support pupils on the safe, ethical, appropriate and effective use of AI.
- I will use AI tools to engage with pupils in ways that uphold and enhance their privacy, wellbeing, and trust.

When using the school's systems and resources:

- I will use AI systems in compliance with established security measures and access protocols.
- I will ensure that any AI applications used in teaching or administration are vetted and comply with the school's policies.
- I will ensure generative AI tools are not used to impersonate others or create deceptive or harmful content.

When handling data:

- I will ensure compliance with the school's data protection policies when using AI for data analysis or reporting.
- I will ensure I have explicit authorisation when uploading sensitive school-related information into generative AI systems.

Responsibility and Accountability:

- I will use generative AI tools responsibly to create authentic and beneficial content, ensuring respect for individuals' identities and well-being.
- I understand that misuse of AI or emerging technologies could lead to disciplinary actions, including warnings, suspension, or referral to the appropriate authorities.
- I acknowledge that this agreement applies to all AI-related activities within and outside of school premises that are connected to my professional responsibilities.

Legislation

Schools should be aware of the legislative framework under which this online safety policy template and guidance has been produced. It is important to note that in general terms an action that is illegal if committed offline is also illegal if committed online.

It is recommended that legal advice is sought in the advent of an online safety issue or situation.

A useful summary of relevant legislation can be found at: [Report Harmful Content: Laws about harmful behaviours](#)

Computer Misuse Act 1990

This Act makes it an offence to:

- Erase or amend data or programs without authority;
- Obtain unauthorised access to a computer;
- “Eavesdrop” on a computer;
- Make unauthorised use of computer time or facilities;
- Maliciously corrupt or erase data or programs;
- Deny access to authorised users.

Schools may wish to view the National Crime Agency website which includes information about the [Cyber Choices programme](#). Each region in England (& Wales) has a Regional Organised Crime Unit (ROCU) Cyber-Prevent team that works with schools to encourage young people to make positive use of their cyber skills. There is a useful [summary of the Act on the NCA site](#).

Data Protection Act 1998

This protects the rights and privacy of individual's data. To comply with the law, information about individuals must be collected and used fairly, stored safely and securely and not disclosed to any third party unlawfully. The Act states that person data must be:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate.
- Not kept longer than necessary.
- Processed in accordance with the data subject's rights.
- Secure.
- Not transferred to other countries without adequate protection.

The Data Protection Act 2018:

Updates the 1998 Act, incorporates the General Data Protection Regulations (GDPR) and aims to:

- Facilitate the secure transfer of information within the European Union.

- Prevent people or organisations from holding and using inaccurate information on individuals. This applies to information regarding both private lives or business.
- Give the public confidence about how businesses can use their personal information.
- Provide data subjects with the legal right to check the information businesses hold about them. They can also request for the data controller to destroy it.
- Give data subjects greater control over how data controllers handle their data.
- Place emphasis on accountability. This requires businesses to have processes in place that demonstrate how they're securely handling data.
- Require firms to keep people's personal data safe and secure. Data controllers must ensure that it is not misused.
- Require the data user or holder to register with the Information Commissioner.

All data subjects have the right to:

- Receive clear information about what you will use their data for.
- Access their own personal information.
- Request for their data to be revised if out of date or erased. These are known as the right to rectification and the right to erasure
- Request information about the reasoning behind any automated decisions, such as if computer software denies them access to a loan.
- Prevent or query about the automated processing of their personal data.

The Data (Use and Access) Act 2025 (DUAA)

Updates, rather than replaces, existing UK data protection law, including UK GDPR and the Data Protection Act 2018. For schools, the fundamental requirements to handle personal data lawfully, fairly, transparently and securely remain, but the Act introduces and clarifies provisions relating to areas such as lawful processing, automated decision-making, data sharing and the handling of data protection complaints. Schools should review their data protection policies, privacy information and procedures to ensure they reflect the changes, paying particular attention to how pupil, staff and parent/carers data is collected, accessed, shared and used, and to the use of emerging technologies and online services that process personal data.

Freedom of Information Act 2000

The Freedom of Information Act gives individuals the right to request information held by public authorities. All public authorities and companies wholly owned by public authorities have obligations under the Freedom of Information Act. When responding to requests, they have to follow a number of set procedures.

Communications Act 2003

Sending by means of the Internet a message or other matter that is grossly offensive or of an indecent, obscene or menacing character; or sending a false message by means of or persistently making use of the Internet for the purpose of causing annoyance, inconvenience or needless anxiety is guilty of an offence liable, on conviction, to imprisonment. This wording is important because an

offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

Malicious Communications Act 1988

It is an offence to send an indecent, offensive, or threatening letter, electronic communication or other article to another person.

Regulation of Investigatory Powers Act 2000

It is an offence for any person to intentionally and without lawful authority intercept any communication. Monitoring or keeping a record of any form of electronic communications is permitted, in order to:

- Establish the facts;
- Ascertain compliance with regulatory or self-regulatory practices or procedures;
- Demonstrate standards, which are or ought to be achieved by persons using the system;
- Investigate or detect unauthorised use of the communications system;
- Prevent or detect crime or in the interests of national security;
- Ensure the effective operation of the system.
- Monitoring but not recording is also permissible in order to:
- Ascertain whether the communication is business or personal;
- Protect or support help line staff.
- The school reserves the right to monitor its systems and communications in line with its rights under this act.

Trade Marks Act 1994

This provides protection for Registered Trade Marks, which can be any symbol (words, shapes or images) that are associated with a particular set of goods or services. Registered Trade Marks must not be used without permission. This can also arise from using a Mark that is confusingly similar to an existing Mark.

Copyright, Designs and Patents Act 1988

It is an offence to copy all, or a substantial part of a copyright work. There are, however, certain limited user permissions, such as fair dealing, which means under certain circumstances permission is not needed to copy small amounts for non-commercial research or private study. The Act also provides for Moral Rights, whereby authors can sue if their name is not included in a work they wrote, or if the work has been amended in such a way as to impugn their reputation. Copyright covers materials in print and electronic form, and includes words, images, and sounds, moving images, TV broadcasts and other media (e.g. YouTube).

Telecommunications Act 1984

It is an offence to send a message or other matter that is grossly offensive or of an indecent, obscene or menacing character. It is also an offence to send a message that is intended to cause annoyance, inconvenience or needless anxiety to another that the sender knows to be false.

Criminal Justice & Public Order Act 1994

This defines a criminal offence of intentional harassment, which covers all forms of harassment, including sexual. A person is guilty of an offence if, with intent to cause a person harassment, alarm or distress, they:

- Use threatening, abusive or insulting words or behaviour, or disorderly behaviour; or
- Display any writing, sign or other visible representation, which is threatening, abusive or insulting, thereby causing that or another person harassment, alarm or distress.

Racial and Religious Hatred Act 2006

This Act makes it a criminal offence to threaten people because of their faith, or to stir up religious hatred by displaying, publishing or distributing written material which is threatening. Other laws already protect people from threats based on their race, nationality or ethnic background.

Protection from Harassment Act 1997

A person must not pursue a course of conduct, which amounts to harassment of another, and which he knows or ought to know amounts to harassment of the other. A person whose course of conduct causes another to fear, on at least two occasions, that violence will be used against him is guilty of an offence if he knows or ought to know that his course of conduct will cause the other so to fear on each of those occasions.

Protection of Children Act 1978

It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is anyone under the age of 18. Viewing an indecent image of a child on your computer means that you have made a digital image. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence may face up to 10 years in prison.

Sexual Offences Act 2003

A grooming offence is committed if you are over 18 and have communicated with a child under 16 at least twice (including by phone or using the Internet) it is an offence to meet them or travel to meet them anywhere in the world with the intention of committing a sexual offence. Causing a child under 16 to watch a sexual act is illegal, including looking at images such as videos, photos or webcams, for your own gratification. It is also an offence for a person in a position of trust to engage in sexual activity with any person under 18, with whom they are in a position of trust. (Typically, teachers, social workers, health professionals, connexions staff fall in this category of trust). Any sexual intercourse with a child under the age of 13 commits the offence of rape.

Public Order Act 1986

This Act makes it a criminal offence to stir up racial hatred by displaying, publishing or distributing written material which is threatening. Like the Racial and Religious Hatred Act 2006 it also makes the possession of inflammatory material with a view of releasing it a criminal offence. Children, Families and Education Directorate page 38 April 2007.

Obscene Publications Act 1959 and 1964

Publishing an “obscene” article is a criminal offence. Publishing includes electronic transmission.

Human Rights Act 1998

This does not deal with any particular issue specifically or any discrete subject area within the law. It is a type of “higher law”, affecting all other laws. In the school context, human rights to be aware of include:

- The right to a fair trial
- The right to respect for private and family life, home and correspondence
- Freedom of thought, conscience and religion
- Freedom of expression
- Freedom of assembly
- Prohibition of discrimination
- The right to education

These rights are not absolute. The school is obliged to respect these rights and freedoms, balancing them against those rights, duties and obligations, which arise from other relevant legislation.

The Education and Inspections Act 2006

Empowers Headteachers, to such extent as is reasonable, to regulate the behaviour of pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour.

The Education and Inspections Act 2011

Extended the powers included in the 2006 Act and gave permission for Headteachers (and nominated staff) to search for electronic devices. It also provides powers to search for data on those devices and to delete data. ([see template policy in these appendices for DfE guidance](#))

The Protection of Freedoms Act 2012

Requires schools to seek permission from a parent/carers to use Biometric systems

The School Information Regulations 2012

Requires schools to publish certain information on its website:

<https://www.gov.uk/guidance/what-maintained-schools-must-publish-online>

DfE guidance: What maintained schools must publish online

Serious Crime Act 2015

Introduced new offence of sexual communication with a child. Also created new offences and orders around gang crime (including CSE)

Criminal Justice and Courts Act 2015

Revenge porn – as it is now commonly known – involves the distribution of private and personal explicit images or video footage of an individual without their consent, with the intention of causing them embarrassment and distress. Often revenge porn is used maliciously to shame ex-partners.

Revenge porn was made a specific offence in the Criminal Justice and Courts Act 2015. The Act specifies that if you are accused of revenge porn and found guilty of the criminal offence, you could be prosecuted and face a sentence of up to two years in prison.

For further guidance or support please contact the [Revenge Porn Helpline](#)

Online Safety Act 2023

The Online Safety Act 2023 is a new set of laws that protects children and adults online. It puts a range of new duties on social media companies and search services, making them more responsible for their users' safety on their platforms. The Act will give providers new duties to implement systems and processes to reduce risks their services are used for illegal activity, and to take down illegal content when it does appear.

Ofcom is the independent regulator of Online Safety. It will set out steps providers can take to fulfil their safety duties in codes of practice. It has a broad range of powers to assess and enforce providers' compliance with the framework.

Links to other organisations or documents

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

UK Safer Internet Centre

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

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

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

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

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

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

Report Harmful Content - [https://reportharmfulcontent.com/Harmful Sexual Support Service](https://reportharmfulcontent.com/Harmful-Sexual-Support-Service)

CEOP

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

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

Others

Kent – [Online Safety Resources page](#)

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

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

Tools / Resources for Schools / other organisations

Whisper Anonymous Reporting Tool - <https://swgfl.org.uk/products/whisper/>

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

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

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

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

Childline – [Report / Remove](#)

SWGfL- [Assisted Monitoring](#)

SWGfL – [Resources for Education](#)

DfE [Using AI in education settings: support materials](#)

Bullying/Online-bullying/Sexting/Sexual Harassment

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

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

Childnet – Cyberbullying guidance and practical PSHE toolkit:

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

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

[UKSIC – Sexting Resources](#)

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

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

Social Networking

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

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

Curriculum

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

SWGfL - [ProjectEvolveEdu](#)

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

[Department for Education: Teaching Online Safety in Schools](#)

Teach Today – www.teachtoday.eu/

Data Protection

[DfE – Data Protection in schools toolkit](#)

[ICO Guides for Organisations](#)

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

Professional Standards/Staff Training

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

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

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

SWGfL – [Online Safety Training](#)

Infrastructure/Technical Support/Cyber-security

DfE – [Technical Standards for Schools and Colleges](#)

[UKSIC – Appropriate Filtering and Monitoring](#)

[SWGfL Safety & Security Resources](#)

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

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

SWGfL- [Assisted Monitoring](#)

Secure Schools – [Cyber Security](#)

Working with parents and carers

[Childnet Webpages for Parents & Carers](#)

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

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

[Internet Matters](#)

Prevent

[Prevent Duty Guidance](#)

Childnet – [Trust Me](#)

Research

[Ofcom – Childrens Media Habits](#)

Ofsted: [Review of sexual abuse in schools and colleges](#)

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

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Policy Approval and Sign-off

Policy	Online Safety Policy 2026-2027
Approved by	Leamington Federation Governing Body
Date approved	September 2026
Executive Headteacher	Juliette Westwood Signature: _____
Chair of Governors	Richard Butler Signature: _____

Review date: September 2027 (or sooner if required by significant changes in legislation, statutory guidance, technology or safeguarding risk).