

St Paschal Baylon Catholic Primary School Online Safety Policy

Introduction

Key people / dates

 St Paschal Baylon Catholic Primary School Following In The Footsteps Of Christ	Designated Safeguarding Lead (DSL) team	Miss L. Kavanagh
	Online-safety lead (if different)	Mr S Felton
	Online-safety / safeguarding link governor	Mr C Reynolds
	Network manager / other technical support	Provided by MGL
	Date this policy was reviewed and by whom	January 2025- Miss L Kavanagh
	Date of next review and by whom	January 2026 – Miss L Kavanagh

What is this policy?

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. Accordingly, this policy is written in line with 'Keeping Children Safe in Education' 2024 (KCSIE), 'Teaching Online Safety in Schools' 2019, statutory RSHE guidance 2019 and other statutory documents. It complements existing and forthcoming subjects including Health, Relationships and Sex Education, Citizenship and Computing; it is designed to sit alongside the school's statutory Safeguarding Policy. Any issues and concerns with online safety must follow the school's safeguarding and child protection procedures.

Who is it for; when is it reviewed?

This policy should be a living document, subject to full annual review but also amended where necessary during the year in response to developments in the school and local area. Although many aspects will be informed by legislation and regulations, staff, governors, pupils and parents are involved in writing and reviewing the policy. This helps to ensure all stakeholders understand the rules that are in place and why, and that the policy affects day-to-day practice. Acceptable Use Policies for different stakeholders also help with this – these are reviewed alongside this overarching policy. Any changes to this policy are immediately disseminated to all the above stakeholders.

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Who is in charge of online safety?

All staff have a responsibility to ensure that they maintain a vigilant attitude towards online safety. The Designated Safeguarding Lead takes lead responsibility for safeguarding and child protection and this includes online safety. At St Paschal Baylon Catholic Primary school the Designated Safeguarding Lead is Miss L Kavanagh who is lead for all aspects of Safeguarding in school including online safety. The school also has a designated Online Safety Lead, Mr S Felton, who liaises closely with the Designated Safeguarding Lead. Both the DSL and OSL report to the Headteacher, Mr E Flood, who has overall responsibility for the school.

What are the main online safety risks today?

Online-safety risks are traditionally categorised as one of the 3 Cs: Content, Contact or Conduct (identified by Professor Tanya Byron's 2008 report "Safer children in a digital world"). These three areas remain a helpful way to understand the risks and potential school response, whether technological or educational. They do not stand in isolation, however, and it is important to understand the interplay between all three.

Many of these new risks are mentioned in KCSIE 2024, e.g. extra-familial harms where children are at risk of abuse or exploitation to multiple harms in situations outside their families including sexual exploitation, criminal exploitation, serious youth violence, upskirting and sticky design.

In past and potential future **remote learning and lockdowns**, there is a greater risk for grooming and exploitation (CSE, CCE and radicalisation) as children spend more time at home and on devices. There is a real risk that some of your pupils may have missed opportunities to disclose such abuse during the lockdowns or periods of absence. The quick audit safeposters.lgfl.net or quiz at digisafedigest.lgfl.net may help to surface some of these issues.

Following the government's investigation into **peer-on-peer sexual abuse** and [Ofsted review](#), schools will need to review their policies to ensure appropriate processes are in place to allow pupils to report sexual harassment and abuse concerns freely, knowing these will be taken seriously and dealt with swiftly and appropriately – ensure pupils are aware of the new [NSPCC helpline](#) and your school's internal reporting channels. Ways we can help you stay up to date with the latest news, risks, opportunities, best-practice and trends include the LGfL DigiSafe [blog](#), [newsletter](#) and our [Twitter](#)/[Facebook](#) channels.

How will this policy be communicated?

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

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- Posted on the school website
- Available on the internal staff network/drive
- Available in paper format in the staffroom
- Part of school induction pack for all new staff (including temporary, supply and non-classroom-based staff)
- Integral to safeguarding updates and training for all staff
- Clearly reflected in the Acceptable Use Policies (AUPs) for staff, volunteers, contractors, governors, pupils and parents/carers (which must be in accessible language appropriate to these groups).
- Reviews of this online-safety policy will include input from staff, pupils and other stakeholders, helping to ensure further engagement

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Overview

Aims

This policy aims to:

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

Further Help and Support

Internal school channels should always be followed first for reporting and support, as documented in school policy documents, especially in response to incidents, which should be reported in line with your Safeguarding Policy. The DSL will handle referrals to local authority multi-agency safeguarding hubs (MASH) and normally the headteacher will handle referrals to the LA designated officer (LADO). The local authority, academy trust or third-party support organisations you work with may also have advisors to offer general support.

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

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Scope

This policy applies to all members of the St Paschal Baylon Catholic Primary School community (including staff, governors, volunteers, contractors, students/pupils, parents/carers, visitors and community users) who have access to our digital technology, networks and systems, whether on-site or remotely, and at any time, or who use technology in their school role.

Roles and responsibilities

This school is a community and all members have a duty to behave respectfully online and offline, to use technology for teaching and learning and to prepare for life after school, and to immediately report any concerns or inappropriate behaviour, to protect staff, pupils, families and the reputation of the school. We learn together, make honest mistakes together and support each other in a world that is online and offline at the same time.

Headteacher – Mr E. Flood

Key responsibilities:

- Support safeguarding leads and technical staff as they review protections for **pupils in the home** and **remote-learning** procedures, rules and safeguards (see remotesafe.lgfl.net for policy guidance and an infographic overview of safeguarding considerations for remote teaching technology).
- Foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding
- Oversee the activities of the designated safeguarding lead and ensure that the DSL responsibilities listed in the section below are being followed and fully supported
- Ensure that policies and procedures are followed by all staff
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and relevant Local Safeguarding Partnerships
- Liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information

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- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including cloud systems are implemented according to child-safety first principles
- Be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles
- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
- Ensure that there is a system in place to monitor and support staff (e.g. network manager) who carry out internal technical online-safety procedures
- Ensure governors are regularly updated on the nature and effectiveness of the school's arrangements for online safety
- Ensure the school website meets statutory requirements (see appendices for website audit document)

Designated Safeguarding Lead / Online Safety Lead – Miss L. Kavanagh / Mr S Felton

Key responsibilities (remember the DSL can delegate certain online-safety duties, e.g. to the online-safety coordinator, but not the overall responsibility; this assertion and all quotes below are from Keeping Children Safe in Education 2024):

- “The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety)...this lead responsibility should not be delegated”
- Work with the HT and technical staff to review protections for **pupils in the home** and **remote-learning** procedures, rules and safeguards (see remotesafe.lgfl.net for guidance to policies and an infographic overview of safeguarding considerations for remote teaching technology.
- Ensure “An effective approach to online safety [that] empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.”
- “Liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs, or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.”
- Take day to day responsibility for online safety issues and be aware of the potential for serious child protection concerns

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- Remind staff of safeguarding considerations as part of a review of remote learning procedures and technology, including that the same principles of online safety and behaviour apply
- Work with the headteacher, DPO and governors to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Stay up to date with the latest trends in online safety and undertake Prevent awareness training
- Review and update this policy, other online safety documents (e.g. Acceptable Use Policies) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others) and submit for review to the governors.
- Receive regular updates in online safety issues and legislation, be aware of local and school trends – see safeblog.lgfl.net for examples or sign up to the [LGfL safeguarding newsletter](https://lgflsafeguarding.net)
- Ensure that online safety education is embedded across the curriculum, in line with statutory RSHE guidance and beyond, in wider school life
- Promote an awareness and commitment to online safety throughout the school community, with a strong focus on parents, who are often appreciative of school support in this area, but also including hard-to-reach parents
- Communicate regularly with SLT and the designated safeguarding and online safety governor/committee to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring work and have been functioning/helping
- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident
- Ensure adequate provision for staff to flag issues when not in school and for pupils to disclose issues when off site, especially when in isolation/quarantine/lockdown through CPOMS or direct email to the DSL
- Oversee and discuss ‘appropriate filtering and monitoring’ with governors (is it physical or technical?) and ensure staff are aware of these systems
- Ensure the updated [2021 DfE guidance on Sexual Violence & Sexual Harassment Between Children in Schools & Colleges](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/86421/2021_DfE_guidance_on_Sexual_Violence_and_Sexual_Harassment_Between_Children_in_Schools_and_Colleges.pdf) Guidance is followed throughout the school and that staff adopt a zero-tolerance, whole school approach to this, as well as to bullying.
- Facilitate training and advice for all staff:
 - all staff must read KCSIE Part 1 and all those working with children Annex B
 - it would also be advisable for all staff to be aware of Annex D (online safety)
 - cascade knowledge of risks and opportunities throughout the organisation
 - cpd.lgfl.net has helpful CPD materials including PowerPoints, videos and more

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Governing Body, led by Online Safety / Safeguarding Link Governor – Mr C Reynolds

Key responsibilities (quotes are taken from Keeping Children Safe in Education 2024):

- Approve this policy and strategy and subsequently review its effectiveness, e.g. by asking the questions in the helpful document from the UK Council for Child Internet Safety (UKCIS) [Online safety in schools and colleges: Questions from the Governing Board](#)
- Ask about how the school has reviewed protections for **pupils in the home** (including when with online tutors) and **remote-learning** procedures, rules and safeguards (see remotesafe.lgfl.net for guidance to policies and an infographic overview of safeguarding considerations for remote teaching technology.
- “Ensure an appropriate **senior member** of staff, from the school or college leadership team, is appointed to the role of DSL [with] **lead responsibility** for safeguarding and child protection (including online safety) [with] the appropriate status and authority [and] time, funding, training, resources and support...”
- Support the school in encouraging parents and the wider community to become engaged in online safety activities
- Have regular strategic reviews with the online-safety co-ordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings
- Where the online-safety coordinator is not the named DSL or deputy DSL, ensure that there is regular review and open communication between these roles and that the DSL’s clear overarching responsibility for online safety is not compromised
- Work with the DPO, DSL and headteacher to ensure a GDPR-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information
- Check all school staff have read Part 1 of KCSIE; SLT and all working directly with children have read Annex B; check that Annex D on Online Safety reflects practice in your school
- “Ensure that all staff undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated, in line with advice from the local safeguarding partners, integrated, aligned and considered as part of the overarching safeguarding approach.” There is further support for this at cpd.lgfl.net
- “Ensure appropriate filters and appropriate monitoring systems are in place but be careful that ‘overblocking’ does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding”. LGfL’s appropriate filtering submission is [here](#)
- “Ensure that children are taught about safeguarding, including online safety as part of providing a broad and balanced curriculum. Consider a whole school approach to online safety with a clear policy on the use of mobile technology.”

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All staff

Key responsibilities:

- Pay particular attention to safeguarding provisions for **home-learning** and **remote-teaching technologies**.
- Recognise that **RSHE** is now statutory and that it is a whole-school subject requiring the support of all staff; online safety has become core to this new subject
- Understand that online safety is a core part of safeguarding; as such it is part of everyone's job – never think that someone else will pick it up
- Know who the Designated Safeguarding Lead (DSL) is: Miss L Kavanagh and the Online Safety Lead: Mr Seth Felton
- Read Part 1, Annex B and Annex D of Keeping Children Safe in Education (whilst Part 1 is statutory for all staff, Annex A for SLT and those working directly with children, it is good practice for all staff to read all three sections).
- Read and follow this policy in conjunction with the school's main safeguarding policy
- Record online-safety incidents in the same way as any safeguarding incident and report in accordance with school procedures.
- Understand that safeguarding is often referred to as a jigsaw puzzle – you may have discovered the missing piece so do not keep anything to yourself
- Sign and follow the staff acceptable use policy and code of conduct/handbook
- Notify the DSL/OSL if policy does not reflect practice in your school and follow escalation procedures if concerns are not promptly acted upon
- Identify opportunities to thread online safety through all school activities as part of a whole school approach in line with the RSHE curriculum, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise (which have a unique value for pupils)
- Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc) in school or setting as homework tasks, encourage sensible use, monitor what pupils/students are doing and consider potential dangers and the age appropriateness of websites (ask your DSL what appropriate filtering and monitoring policies are in place)
- When supporting pupils remotely, be mindful of additional safeguarding considerations
- To carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if relevant), supporting them with search skills, critical thinking (e.g. fake news), age appropriate materials and signposting, and legal issues such as copyright and GDPR
- Be aware of security best-practice at all times, including password hygiene and phishing strategies.

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- Prepare and check all online source and resources before using within the classroom
- Encourage pupils/students to follow their acceptable use policy, remind them about it and enforce school sanctions
- Notify the DSL of new trends and issues before they become a problem
- Take a zero-tolerance approach to bullying and low-level sexual harassment (your DSL will disseminate relevant information from the new DfE document on this)
- Be aware that you are often most likely to see or overhear online-safety issues (particularly relating to bullying and sexual harassment and violence) in the playground, corridors, toilets and other communal areas outside the classroom – let the DSL know
- Receive regular updates from the DSL/OSL and have a healthy curiosity for online safety issues
- Model safe, responsible and professional behaviours in their own use of technology. This includes outside the school hours and site, and on social media, in all aspects upholding the reputation of the school and of the professional reputation of all staff. More guidance on this point can be found On this [Online Reputation](#) guidance for schools.

PSHE / RSHE Lead–Miss E Martin

responsibilities:

- As listed in the ‘all staff’ section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online into the PSHE / Relationships education, relationships and sex education (RSE) and health education curriculum. “This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age appropriate way that is relevant to their pupils’ lives.”
- This will complement the computing curriculum, which covers the principles of online safety at all key stages, with progression in the content to reflect the different and escalating risks that pupils face. This includes how to use technology safely, responsibly, respectfully and securely, and where to go for help and support when they have concerns about content or contact on the internet or other online technologies.
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSHE.
- Note that an RSHE policy should now be included on the school website.
- Work closely with the Computing subject leader to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach

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Computing Lead – Mr S Felton

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements
- Monitor the use of school technology, online platforms and social media presence and that any misuse/attempted misuse is identified and reported in line with school policy

Subject / aspect leaders

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Look for opportunities to embed online safety in your subject or aspect, especially as part of the new RSHE curriculum, and model positive attitudes and approaches to staff and pupils alike
- Consider how the UKCIS framework Education for a Connected World and Teaching Online Safety in Schools can be applied in your context
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing
- Ensure subject specific action plans also have an online-safety element

Network Manager/technician

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Support the HT and DSL team as they review protections for **pupils in the home** and **remote-learning** procedures, rules and safeguards

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- Keep up to date with the school's online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- Meet the RSHE lead to see how the online-safety curriculum delivered through this new subject can complement the school IT system and vice versa, and ensure no conflicts between educational messages and practice.
- Work closely with the designated safeguarding lead / online safety lead / data protection officer to ensure that school systems and networks reflect school policy
- Ensure the above stakeholders understand the consequences of existing services and of any changes to these systems (especially in terms of access to personal and sensitive records / data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms etc
- Support and advise on the implementation of 'appropriate filtering and monitoring' as decided by the DSL and senior leadership team
- Maintain up-to-date documentation of the school's online security and technical procedures
- To report online-safety related issues that come to their attention in line with school policy
- Manage the school's systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption and backup for data, including disaster recovery plans, and auditable access controls
- Work with the Headteacher to ensure the school website meets statutory DfE requirements

Data Protection Officer (DPO)

Key responsibilities:

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

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place a child at risk. Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of children.”

- Work with the DSL, Headteacher and governors to ensure frameworks are in place for the protection of data and safeguarding information sharing as outlined above.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited

Volunteers and contractors

Key responsibilities:

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

Pupils

Key responsibilities:

- Read, understand, sign and adhere to the student/pupil acceptable use policy and review this annually
- Treat **home learning during any isolation/quarantine or bubble/school lockdown** in the same way as regular learning in school and behave as if a teacher or parent were watching the screen
- Avoid any private communication or use of personal logins/systems to communicate with or arrange meetings with school staff or tutors
- Understand the importance of reporting abuse, misuse or access to inappropriate materials including any concerns about a member of school staff or supply teacher or online tutor
- Know what action to take if they or someone they know feels worried or vulnerable when using online technology at school, home or anywhere else
- To understand the importance of adopting safe and responsible behaviours and good online safety practice when using digital technologies outside of school and realise that the school's acceptable use policies cover actions out of school, including on social media

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- Remember the rules on the misuse of school technology – devices and logins used at home should be used just like if they were in full view of a teacher.
- Understand the benefits/opportunities and risks/dangers of the online world and know who to talk to at school or outside school if there are problems

Parents/carers

Key responsibilities:

- Read and promote the school's parental acceptable use policy (AUP) and read the pupil AUP and encourage their children to follow it
- Consult with the school if they have any concerns about their children's and others' use of technology
- Promote positive online safety and model safe, responsible and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers.
- Encourage children to engage fully in home-learning during any period of isolation/quarantine or bubble/school closure and flag any concerns
- Support the child during remote learning to avoid video calls in a bedroom if possible and if not, to ensure the child is fully dressed and not in bed, with the camera pointing away from beds/bedding/personal information etc. and the background blurred or changed where possible.
- If organising private online tuition, remain in the room if possible, ensure the child knows tutors should not arrange new sessions directly with the child or attempt to communicate privately. Further advice available in the [Online Tutors – Guidance for Parents and Carers](#) poster at parentsafe.lgfl.net, which is a dedicated parent portal offering updated advice and resources to help parents keep children safe online

External groups including parent associations

Key responsibilities:

- Any external individual/organisation will sign an acceptable use policy prior to using technology or the internet within school
- Support the school in promoting online safety and data protection
- Model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining

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from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers

Education and curriculum

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

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (KCSIE 2023)

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

- Relationships education, relationships and sex education (RSE) and health
- Computing
- Rights Respecting Schools and citizenship Activities

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

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

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Equally, all staff should carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if relevant), supporting them with search skills, critical thinking (e.g. fake news), age appropriate materials and signposting, and legal issues such as copyright and data law.

At St Paschal Baylon Catholic Primary School, we recognise that online safety and broader digital resilience must be threaded throughout the curriculum. Regular reviews of our curriculum plans (including for SEND pupils) are used as an opportunity to identify where online safety and broader digital resilience can be included in our delivery of the curriculum.

Handling online-safety concerns and incidents

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

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

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

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

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

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

Any suspected online risk or infringement should be reported to the Designated Safeguarding Lead on the same day – where clearly urgent, it will be made by the end of the lesson.

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

The school will actively seek support from other agencies as needed (i.e. the local authority, LGfL, UK Safer Internet Centre's Professionals' Online Safety Helpline, NCA CEOP, Prevent Officer, Police, IWF). We will inform parents/carers of online-safety incidents involving their children, and the Police where staff or pupils engage in or are subject to behaviour which we consider is particularly disturbing or breaks the law (particular procedures are in place for sexting and upskirting; see section below).

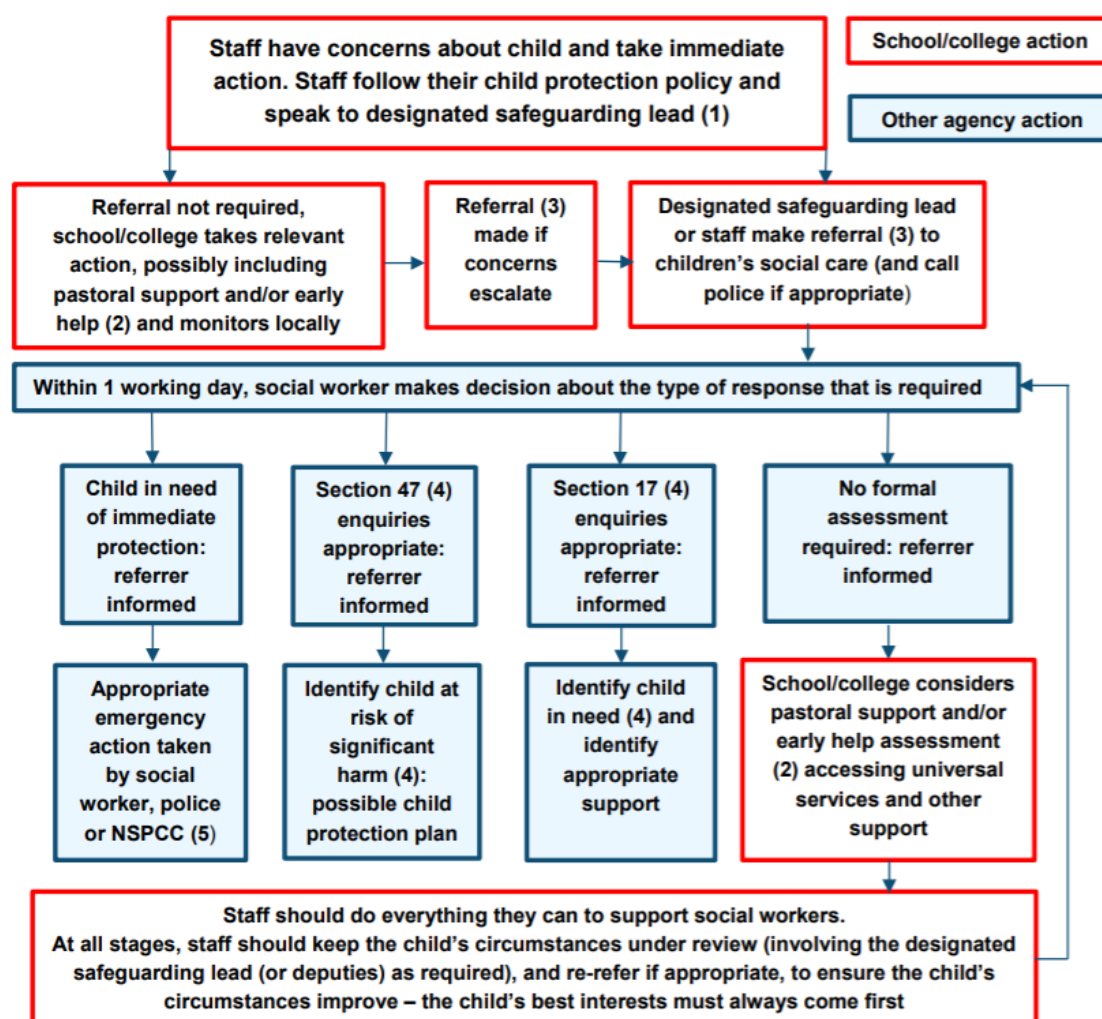
The school will evaluate whether reporting procedures are adequate for any future closures/lockdowns/isolations etc and will make alternative provisions in advance where these might be needed.

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Actions where there are concerns about a child

The following flow chart (it cannot be edited) is taken from page 13 of Keeping Children Safe in Education 2021 as the key education safeguarding document. As outlined previously, online safety concerns are no different to any other safeguarding concern.



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

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

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

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

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

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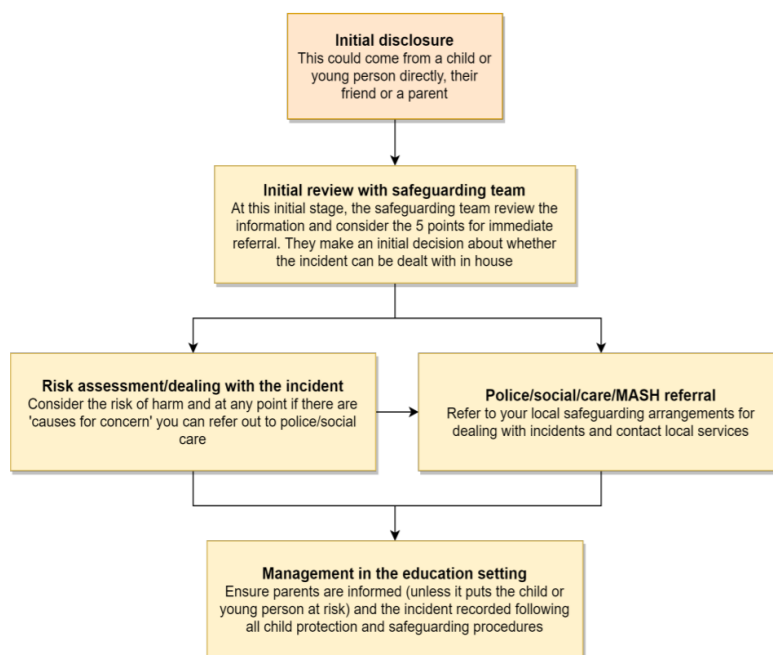
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Sexting – sharing nudes and semi-nudes

All schools (regardless of phase) should refer to the updated UK Council for Internet Safety (UKCIS) guidance on sexting - now referred to as [Sharing nudes and semi-nudes: advice for education settings](#) to avoid unnecessary criminalisation of children. NB - where one of the parties is over 18, this is no longer sexting but child sexual abuse.

There is a one-page overview called [Sharing nudes and semi-nudes: how to respond to an incident](#) for all staff (not just classroom-based staff) to read, in recognition of the fact that it is mostly someone other than the designated safeguarding lead (DSL) or online safety lead to first become aware of an incident, and it is vital that the correct steps are taken. Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL.

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



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

1. The incident involves an adult
2. There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
3. What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
4. The images involves sexual acts and any pupil in the images or videos is under 13

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5. You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

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

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

Upskirting

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

Bullying

Online bullying should be treated like any other form of bullying and the school bullying policy should be followed for online bullying, which may also be referred to as cyberbullying, including issues arising from banter.

The school has an anti-bullying policy which is reviewed regularly and all incidents of bullying, including cyber bullying, are dealt with in accordance with this policy. All incidences of bullying are reported to the Headteacher and shared with the DSL. Incidences are reported along with all actions taken to prevent a continuation of the bullying behaviour, support given to victims and any sanctions and education given to perpetrators of bullying.

Sexual violence and harassment including child on child Abuse

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

The school recognises that many children have access to the use of mobile and smart technology which gives them access to the internet via mobile phone networks. This access means that some children may bully, intimidate, harass or sexually harass their peers via mobile and smart technology, share indecent images and view and share other harmful content. (KCSIE 2023) Children are not allowed access to mobile phones or other forms of smart technology from home in the school setting. However, the school

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recognises that cyber bullying and online abuse and/or harassment can take place between pupils via these devices outside of the school environment and all staff are alert to recognising signs or indicators that this is happening.

The school's Child Protection Policy outlines the school's response to reports of online abuse and harassment and the school is clear in having a zero tolerance approach to any form of abuse or harassment. Any reports or suspicions of abuse or harassment are taken seriously and fed back to the Head Teacher and the Designated Safeguarding Lead where each case is dealt with on an individual basis. Victims of abuse are always listened to and taken seriously. Perpetrators of abuse are always educated to help them understand the nature and impact of their actions and any response or sanction is in line with the age of the pupil and the nature of the incident.

The guidance stresses that schools must take all forms of sexual violence and harassment seriously, explaining how it exists on a continuum and that behaviours incorrectly viewed as 'low level' are treated seriously and not allowed to perpetuate. The document makes specific reference to behaviours such as bra-strap flicking and the careless use of language.

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

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

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

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

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

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

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Social media incidents

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

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

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

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

Data protection and data security

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

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

All pupils, staff, governors, volunteers, contractors and parents are bound by the school’s data protection policy and agreements.

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

Staff are reminded that all safeguarding data is highly sensitive and should be treated with the strictest confidentiality at all times, and only shared via approved channels to colleagues or agencies with appropriate permissions. The use of Egress to encrypt all non-internal emails is compulsory for sharing pupil data. If this is not possible, the DPO and DSL should be informed in advance.

Appropriate filtering and monitoring

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

At this school, the internet connection is provided by MGL. This means we have a dedicated and secure, schoolsafe connection that is protected with firewalls and multiple layers of security, including a web filtering system called Smoothwall, which is made specifically to protect children in schools.

At St Paschal Baylon Catholic Primary School, we carry appropriate monitoring through:

- Physical Monitoring (adult supervision in the classroom)
- Internet and web access monitoring (with a regular report generated and sent to the DSL/OSL)
- Through the use of Smoothwall filtering system

If a pupil has been given a school device to support home learning, these devices are filtered in accordance with the school monitoring and filtering arrangements. Any home learning platforms such as Google Classroom, TT Rockstars, Spelling Shed, have been thoroughly checked and are compliant with our online safety policies and procedures.

Electronic communications

Please read this section alongside references to pupil-staff communications in the overall school Safeguarding Policy, and in conjunction with the Data Protection Policy. This section only covers electronic communications, but the same principles of transparency, appropriate conduct and audit trail apply.

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Email

- Staff at this school use the Gmail system for all school emails

This system is auditable and trackable. This is for the mutual protection and privacy of all staff, pupils and parents, as well as to support data protection.

General principles for email use are as follows:

- Email is the only means of electronic communication to be used between staff for professional purposes. Email can also be used for communication between staff and parents (in both directions). If parents choose to use email as a form of communication with the school, we ask that they use the address: admin@paschalbaylon.org.uk and mark it for the attention of the relevant staff member. Email queries from parents which are directly linked to a child's class can be sent to the individual year group email address through Google Classroom. Use of a different platform must be approved in advance by the data-protection officer / headteacher in advance. Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member).
- Email may only be sent by staff using the email systems above. There should be no circumstances where a private email is used; if this happens by mistake, the DSL/Headteacher/DPO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately.
- Staff or pupil personal data should never be sent/shared/stored on email.
 - If data needs to be shared with external agencies, Egress systems are available.
 - Internally, staff should use the school network, including when working from home when remote access is available.
- Appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff
- Pupils and staff are NOT allowed to use the email system for personal use and should be aware that all use is monitored, their emails may be read and the same rules of appropriate behaviour apply at all times. Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination.

School website

The school website is a key public-facing information portal for the school community with a key reputational value. The Headteacher/Deputy Headteacher and a Designated Administrator have the day-

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to-day responsibility of updating the content of the website. The site is managed by / hosted by Devote (Website Design, Stockport)

The DfE has determined information which must be available on a school website.

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

- School have the same duty as any person or organisation to respect and uphold copyright law – schools have been fined thousands of pounds for copyright breaches. Sources must always be credited and material only used with permission.
- Where pupil work, images or videos are published on the website, their identities are protected and full names are not published.

Cloud platforms

Many schools are recognising the benefits of cloud computing platforms, not just for cost savings but to enhance teaching and learning.

This school adheres to the principles of the DfE document '[Cloud computing services: guidance for school leaders, school staff and governing bodies](#)'.

Data Protection has to be considered before adopting a cloud platform service.

The following principles apply:

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

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Digital images and video

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

- For displays around the school
- For school newsletters
- For online/ paper prospectus and the school website
- For a specific high profile image for display or publication
- For Tapestry Assessment system in EYFS
- For the School Twitter account

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

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

All staff are governed by their contract of employment and the school's Acceptable Use Policy, which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. At St Paschal Baylon Catholic Primary School, no member of staff will ever use their personal phone to capture photos or videos of pupils.

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

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

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

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

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

Pupils are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of

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the file), that reveals the identity of others and their location. We teach them about the need to keep their data secure and what to do if they / or a friend are subject to bullying or abuse.

Social media

St Paschal Baylon Catholic Primary School's SM presence

St Paschal Baylon Catholic Primary School works on the principle that if we don't manage our social media reputation, someone else will.

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

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

Accordingly, we manage and monitor our social media footprint carefully to know what is being said about the school and to respond to criticism and praise in a fair, responsible manner. Mr S Felton is responsible for managing our Twitter account and checking our Wikipedia and Google reviews. He follows recognised guidance when carrying this out.

Staff, pupils' and parents' SM presence

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

Please read the school's Social Media Policy for further detailed information about our policy and expectations around social media use by all members of the school community.

Device usage

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

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

- **Pupils/students** in Years 5 and 6 who walk alone to and from school are allowed to bring mobile phones in for use on their journey to and from school should they need to contact their parents or make an emergency call. These pupils must switch their phone off upon arrival to school and sign it in to the secure storage box in their classroom each day where it will remain until they sign it back out again at the end of the school day. Pupils are not permitted to have mobile phones in lessons or on their person at any point in the school day whilst they are on site. Any attempt to use a phone in lessons without permission or to take illicit photographs or videos will lead to an investigation by the Headteacher and the school behaviour policy will be followed. Important messages and phone calls to or from parents can be made at the school office, which will also pass on messages from parents to pupils in emergencies.
- **All staff who work directly with children** should leave their mobile phones on silent and only use them in private staff areas during school hours. Child/staff data should never be downloaded onto a private phone. If a staff member is expecting an important personal call when teaching or otherwise on duty, they must inform the headteacher of this requirement and obtain his consent to have their phone on loud during the school day. Staff must take the call away from children and ensure appropriate adult supervision is in place for the class whilst they take the call.
- **Volunteers, contractors, governors** should leave their phones on silent in their pockets or bag. Under no circumstances should they be used to take personal calls in the presence of children or to take photographs or videos. If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the headteacher should be sought (the headteacher may choose to delegate this) and this should be done in the presence of a member staff.
- **Parents** are politely asked to be considerate of their environment if they have to take a personal call on their mobile phone whilst on the school site. We ask that parents are mindful of the language they use and of the content of their conversation when they are around children on the school site (e.g. when dropping off or picking up children at the beginning or end of the day). Any parents using offensive or abusive language on the school site may be asked to leave the premises by the headteacher. Parents should ask permission before taking any photos, e.g. of displays in corridors or classrooms, and avoid capturing other children. When at school events, such as school plays or assemblies, the taking of photos or video footage is at the discretion of the headteacher and parents are asked not to put these images onto social media platforms. Parents are requested to support the school in the policy of pupils not having mobile phones with them during the school day.

Network / internet access on school devices

- **Pupils/students** are not allowed networked file access via personal devices. However, they are allowed to access the school wireless internet for school-related internet use within the

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framework of the acceptable use policy. All such use is monitored and take place under the supervision of a member of staff.

- **Home devices** are issued to some students. These are restricted to the apps/software installed by the school and may be used for learning and at home, but all usage may be tracked. The devices are filtered when on home wifi connections.
- **All staff who work directly with children** should leave their mobile phones on silent and only use them in private staff areas during school hours.
- **Volunteers, contractors, governors** can access the guest wireless network but have no access to networked files/drives, subject to the acceptable use policy. All internet traffic is monitored.
- **Parents** have no access to the school network or wireless internet on personal devices

Trips / events away from school

For school trips/events away from school, teachers will be issued a school duty i-pad for photos and sending these to the school Twitter account. Any emergency contact that needs to be made will be carried out via the main school office in consultation with the headteacher. Teachers using their personal phone in an emergency will ensure that the number is hidden to avoid a parent or student accessing the teacher's private phone number.

Searching and confiscation

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

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This policy is reviewed and updated regularly and should be read in conjunction with the following:

- Child Protection/ Safeguarding Policy
- Social Media Policy
- Acceptable User Policies for staff, pupils, parents and other stakeholders
- Anti-bullying Policy
- Behaviour / Well-Being Policy