



HOPEBRIGHT
S C H O O L

Online Safety And Multi-Media Policy

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Online Safety And Multi-Media Policy

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ONLINE SAFETY AND MULTI-MEDIA POLICY

Hopebright School Bolton is committed to safeguarding and promoting the welfare of children and requires all staff to act in the best interests of our children at all times.

1. Introduction

Hopebright School Bolton acknowledges the educational, social and entertainment benefits that the internet, mobile phones, computers, laptops, tablets, games consoles and other technologies offer. We recognise our duty under the Education Act 2002 to make arrangements to ensure that functions are carried out with a view to safeguarding and promoting the welfare of children and comply with The Education (Independent School Standards) Regulations 2014.

Hopebright School Bolton acknowledges the obligations associated with the Children Act 1989, the Human Rights Act 1998 and the Equality Act 2010. We also follow current DfE guidance 'Keeping children safe in education', 'Working together to safeguard children', HM Government advice 'What to do if you're worried a child is being abused' and the Local Safeguarding Children Partnership's policies, procedures, guidance and protocols.

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

- **Content:** Where a child is exposed to biased, extreme, harmful, illegal, sexual or violent content; for example: child abuse images, drug abuse, fake news, hate-speech, pornography, radicalisation, extremism, terrorism and websites promoting eating disorders, self-harm and suicide.
- **Contact:** Where a child engages in harmful online interactions with other users; for example: being bullied or harassed, communicating with strangers, having personal information taken and shared, being pressured into a behaviour e.g., self-harm; and adults posing as children or young adults for the purposes of grooming or exploiting children for criminal, financial, sexual or other purposes.
- **Conduct:** Where a child behaves in a way that increases the likelihood of, or causes, harm; for example, creating, sharing and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing personal information, malicious communications including bullying or harassing others and generating hateful content; creating biased and misleading advice and downloading music or films illegally.
- **Commerce:** Commercial risks may fall into any one of the three categories above. As the following examples illustrate: Content e.g., inappropriate advertising. Contact e.g., commercial advertising, financial information taken and shared (including financial scams and phishing). Conduct e.g., online gambling.

Online safety forms a fundamental part of our safeguarding and child protection measures, and we will ensure that the appropriate action is taken immediately, where we believe a child may be at risk from content, contact, conduct or commerce. Our primary concern, at all times, is the welfare and safety of all members of Hopebright School Bolton's community including children, staff and visitors.

We also have a key role to play in providing online safety education and (pastoral) support to children and identifying those who lack the skills, knowledge, confidence and resilience necessary to keep themselves safe online in and out of Hopebright School Bolton, so that children who need extra help receive it either in the school or through referral to other services.

This policy and all associated procedures apply to all staff (including consultants, agency staff, volunteers, students on placement and any other individual working for, or on behalf of Hopebright School Bolton), children and visitors and should be read in conjunction with other safeguarding and employment policies

including (not an exhaustive list):

- Administration of Medication Policy
- Anti-Bullying Policy
- Child Protection Policy
- Compliments and Complaints Policy
- Curriculum Policy
- Driver and Vehicle Policy
- Drugs, Alcohol and Tobacco Policy
- Equality and Diversity Policy
- Exclusion Policy
- Grievance Procedure
- Health and Safety Policy
- Missing from Education Policy
- Off-Site Visits Policy
- Positive Behaviour Support (PBS) Policy
- Recruitment and Selection Policy
- Restrictive Physical Intervention (RPI) Policy
- Safe Working Practice Policy (Code of Conduct)
- Searching, Screening and Confiscation Policy
- Self-Harm and Suicide Policy
- Use of Quiet/Reflection Rooms Policy
- Whistle Blowing Policy

Failure to comply with these policies and procedures may result in disciplinary action, which might include summary dismissal (and referral to the Disclosure and Barring Service and the Teacher Regulation Agency (TRA), where appropriate) or termination of agreement or contract.

For further information on the new opportunities & potential risks associated with technology, see Appendix 1.



HOPEBRIGHT
SCHOOL

2. Roles and responsibilities

The proprietor/governing body of Hopebright School Bolton endorses this policy; and has delegated responsibility for its effective operation to the Head Teacher.

For further information on the roles and responsibilities of the Head Teacher, Online Safety Lead and Network Manager see Appendix 2.

Children are obliged to read, sign and abide by Hopebright School Bolton's Acceptable Use Agreement for children, as appropriate.

For further information on Hopebright School Bolton's policy on children's use of the internet and mobile technology, see Appendix 3.

All staff are required to read, sign and abide by Hopebright School Bolton's Safe Working Practice Policy (Code of Conduct), which includes reference to a number of issues associated with online safety and multi-media.

3. Education and training

Whilst regulation and technical solutions are very important, their use must be balanced by educating children to take a responsible approach. The education of children in online safety/digital literacy is therefore an essential part of our online safety provision.

The Education for a Connected World framework describes the digital knowledge and skills that children and young people should have the opportunity to develop at different ages and stages of their lives. It highlights what a child should know in terms of current online technology, its influence on behaviour and development, and what skills they need to be able to navigate it.

A key aspect of our approach is to help children learn to manage their own digital footprint, including how to:

- use privacy settings to maintain some control over who they are sharing with.
- block people with whom they are not comfortable communicating or sharing with.
- remove content they have shared online; and
- report content which other people have posted to get it taken down.

In addition, we explore themes such as pornography, consent and the characteristics of healthy and unhealthy relationships, as appropriate through relationships education and/or relationships and sex education.

Clear boundaries are set for the appropriate use of the internet and digital communications and are discussed with children and staff. Children are given the opportunity to explore and discuss online safety issues to build a resilience that equips them to manage their own online safety both in and out of Hopebright School Bolton. Positive and responsible technology use is recognised and rewarded.

All staff receive safeguarding, child protection and, where appropriate, online safety training, in accordance with their roles and responsibilities.

4. Data protection

Personal data will be recorded, processed, transferred and made available in accordance with the General Data Protection Regulation (GDPR) and Data Protection Act 2018. For further information, see Hopebright School Bolton's Data Protection Policy.

All staff receive data protection training in accordance with their roles and responsibilities, as part of their induction programme, and appropriate refresher training thereafter.

5. Harmful content online

Children can come across all sorts of harmful content online, examples of which are outlined in the introduction above. Children can come across it by accident, be shown by a friend or family member or they can deliberately search it out.

At Hopebright School Bolton, we offer direct support to children who have viewed harmful content based, not only on the nature of the incident, but the child's age, experience, strengths, vulnerabilities and circumstances. In addition, we will ensure that children:

- have the opportunity and feel supported to air their views and explore sensitive issues, in a safe and secure environment.
- are supported to explore and manage risks and manage difficult situations online.
- are supported to report and take down content, including helping them to contact providers and/or third parties.
- are aware that what is presented to them online maybe biased, inaccurate, manipulated or misleading and they should consider where the information/images are coming from.
- have access to emotional and psychological support; and
- know where they can go to access advice, guidance, support and resources in relation to online matters including Childline and CEOP.

5.1 Online pornography

Legal adult pornography is readily available online. Many teenagers will at some point seek out pornography because of adolescent curiosity and most are unlikely to suffer any long-term negative effects.

However, there is growing concern that children who routinely access pornography are at an increased risk of:

- normalisation of extreme or risky sexual acts, making them more likely to engage in harmful sexual activity.
- developing discriminatory attitudes, perceiving people (particularly girls and women) as sex objects, rather than caring partners.
- struggling to engage in or enjoy real-life relationships or sexual activity, as pornography has created unrealistic expectations.
- an unhealthy preoccupation with sex, which can interfere with other aspects of their lives.

For more information and advice visit:

Internet Matters - Online pornography resources

Childnet International - Online Pornography

NSPCC - Online porn

5.2 Violent content and gaming

Some adult games, especially those which involve players talking to others can expose children to scenes that:

- feature extreme violence, warfare and criminal activity.
- show explicit sexual acts, which may glamorise rape and assault.
- use racist, homophobic or sexist language and feature swearing.
- depict certain groups, such as women, in derogatory ways.

Although parents and professionals will have a view on whether a child is mature enough to play these games, children can be upset or start to normalise violent and aggressive behaviour and/or adopt beliefs associated with the character or game they play.

It is also important to remember that children can be groomed or bullied through games and introduced to other content and platforms. In extreme cases, some children experience gaming addiction.

For more information and advice visit:

Childnet International - Gaming

Internet Matters - Online gaming - The risks

NSPCC - Online games

5.3 Self harm and pro-suicide sites

There are many apps, websites, forums and online chatrooms that work to support children's mental health. However, there are blogs, forums and websites that can reinforce harmful offline behaviours and encourage self-harm and promote suicide.

The reasons children visit sites like these can be complex, often indicating broader emotional and well-being issues.

5.4 Eating disorder sites

The terms "pro-anorexia", or "pro-ana", and "pro-bulimia", or "pro-mia", refer to content, usually online, that promotes the harmful behaviour and mindset that forms part of some eating disorders. The sites and social media where such content is found often say or imply that this behaviour is a lifestyle choice, rather than symptoms of an illness.

There is an assumption that people who post pro-ana, pro-mia, or "thinspiration" content are being deliberately malicious, are fully aware that they are misrepresenting symptoms as lifestyle choices, and consciously want to encourage people to develop or continue to have eating disorders. But this is often not the case, as many of the people who post this content are suffering from eating disorders themselves.

5.5 Radicalisation and extremism

Extremist groups often target children via the internet and social media. Groups can easily share propaganda via online platforms like Facebook, YouTube and Instagram.

Online radicalisation and extremism can pose a significant threat to the well-being and safety of children, which may involve:

- being groomed online or in person.
- exposure to violent/upsetting material and other inappropriate information.
- psychological manipulation.
- isolation from friends and family.
- sexual and commercial exploitation.
- encouraging children to act in a way that puts them at risk of physical harm or death.

Hopebright School Bolton acknowledges its duty under section 26 of the Counter-Terrorism and Security Act 2015, (the CTSA 2015) to have “due regard to the need to prevent people from being drawn into terrorism”.

This duty is known as the Prevent duty. In meeting our obligations, we:

- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.
- protect children from being drawn into terrorism, by having robust safeguarding policies in place to identify children at risk, and intervene, as appropriate.

Identification, assessment and management of such risks form an integral part of Hopebright School Bolton’s referral and admissions procedures, and any concerns would be recorded and addressed, in accordance with national and local guidance.

- teach a broad and balanced curriculum which promotes the spiritual, moral, cultural, mental and physical development of children and prepares them for the opportunities, responsibilities and experiences of life. We also place a strong emphasis on the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.
- ensure children are safe from terrorist and extremist material when accessing the internet on our site, including by establishing appropriate levels of filtering and monitoring.

For further information, see our ‘Child Protection Policy’.

For more information and advice visit:

Internet Matters - Tackling radicalisation facts & advice

Educate Against Hate This website provides practical advice, support and resources to protect children from extremism and radicalisation.



6. Harmful contact online

6.1 Online grooming and sexual abuse

Sexual grooming is a process through which an offender seeks to build trust with a child for the purpose of sexually abusing them. Grooming can be facilitated by technology and most instances of grooming now contain an online component. Offenders build and exploit a trusting relationship with the child and use that trust to exercise manipulation, coercion and control.

The following examples illustrate the range of techniques offenders use (not an exhaustive list):

- Bribery – offering rewards and gifts
- Emotional blackmail
- Flattery
- Offering and providing emotional support
- Persistent pressure
- Pretending it is a game such as truth or dare
- Pretending to be someone they are not, such as another child
- Threats

Even though a child may never meet the offender face-to-face, children forced, tricked or persuaded to participate in online abuse may be left with long-term trauma from the experience and can suffer just as much harm as those abused by an offender in the 'offline' world. If you become aware of a situation in which a child may have been groomed and/or sexually abused online you must inform the Designated Safeguarding Lead (DSL), the Head Teacher or another Designated Person as a matter of utmost urgency.

For more information and advice visit:

Childline - Online grooming

Childnet International – Online grooming

Internet Matters – Deal with it

6.2 Online bullying

Online bullying (sometimes called cyberbullying) is bullying that happens online via apps, online games, social networks, websites and photo, text and video messaging. It can happen when using any device and takes many forms:

- abusive or threatening texts, emails or messages
- posting abusive comments on social media sites
- modifying and/or sharing humiliating videos or photos of someone else
- stealing someone's online identity
- spreading rumours online



- trolling – sending someone menacing or upsetting messages through social networks, chatrooms or games.
- developing hate sites about another person
- prank calls or messages,
- group bullying or exclusion online
- anonymous messaging
- encouraging a child to self-harm

Anonymous bullying

Sometimes children can hide their identity when they are online using apps and/or sites. This enables them to send messages to others completely anonymously.

Anonymous bullying can include posting offensive comments on someone's profile or sharing negative thoughts. The impact of being bullied anonymously by someone unknown to you can be severe. Children can feel emotionally vulnerable, paranoid and anxious, as they are unaware who the bully is and when they might strike again.

In supporting a child who is experiencing anonymous bullying you should:

- offer emotional support and encourage them not to retaliate.
- show them how to block users on websites and apps.
- encourage them to save the evidence by taking screen shots, printing things off and keeping a record of dates, times and so on.
- discuss what is and what is not acceptable online.
- encourage them to report the bullying to their parents and service providers.

Online bullying is wholly unacceptable and will not be tolerated at Hopebright School Bolton. All incidents will be addressed in accordance with Hopebright School Bolton's Anti-Bullying Policy.

For more information and advice visit:

Childnet International - Cyberbullying

Internet Matters Cyberbullying facts & advice

NSPCC - Bullying and cyberbullying

7. Harmful conduct online

Many children share personal content online including:

- photos and videos of themselves, their friends and things they like
- videos and live streams of themselves talking to camera, performing or gaming
- blogs
- comments on their own and other people's uploaded content

7.1 Youth produced sexual imagery

Youth produced sexual imagery is when children share sexual images that they or another child have created themselves. Adults sometimes refer to this as sexting which can include sending sexually suggestive comments. However, children use many other terms for this behaviour such as nudes, which includes semi-nude images. It is important to remember this when talking to children.

There are many reasons why a child might share a nude image or video. Some situations are more risky than others.

Across the UK it is illegal for anyone, including a child, to make, possess or share an indecent image of someone under 18 years of age.

If a child has been pressured, manipulated or coerced into sharing an explicit image of themselves and/or you become aware of a situation in which a child has shared a youth-produced sexual image with an adult you must inform the Designated Safeguarding Lead (DSL), the Head Teacher or another Designated Person as a matter of utmost urgency.

Be aware that if a child has been groomed, they may not realise they are being abused.

For further information and advice see Department for Digital, Culture, Media & Sport and UK Council for Internet Safety 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

Childnet International - Sexting

Internet Matters - Dealing with sexting

NSPCC - Sexting and sending nudes

8. Safe use of digital images

The term "images" refers to photographs (digital and film), 'video', DVD and webcam recordings.

Staff and children need to be aware of the risks and pressures associated with sharing images and publishing digital images on the internet. Such images may provide avenues for online bullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees.

Hopebright School Bolton will inform and educate users about these risks and pressures and will implement policies to reduce the likelihood of any potential for harm.

- Images published on our website, in our brochure, newsletter, or elsewhere, including those released to local and national media, that include children and staff will be selected carefully and will comply with good practice guidance on the use of such images.
- Written permission from the child, their parents, carers or other responsible adult (e.g., social worker) must be obtained before images of children (and positive examples of their work) are recorded or distributed in any form. Written permission must also be obtained from staff, as appropriate.
- Where a child does not have capacity to give consent, parents and carers cannot give consent. If an image of a child is to be used without their consent, there must be evidence to show that it was in the best interest of the child.
- Original signed consent forms for children and staff must be stored securely in their personal file and copies forwarded to the nominated senior leader/marketing contact, as appropriate.
- Children must be asked if they are happy (if they consent) for their image to be recorded each and every time a photograph or 'video' is to be created. Children should be informed that they can choose whether or not to have their image recorded, how much or little they would like particular images to be shared; and they can change their mind at any time before, during or after the images have been taken.
- Similarly, you must get the permission of anyone in an image, including staff or those who are not part of a crowd and easily recognisable.
- Hopebright School Bolton staff must only use school equipment to take or store images of children. Unless the Head Teacher has given written permission for personal equipment to be used for setting-related purposes. A senior member of staff must be informed when personal equipment is being used each and every time and for what purpose.
- Care should be taken when taking digital/video images that children and staff are appropriately dressed and are not participating in activities that might bring the individuals or Hopebright School Bolton into disrepute.
- It is the responsibility of those using images, to check that consent forms are current, and the child or member of staff is still in agreement. Senior staff must also check that there are no outstanding concerns or issues associated with the individual, which would make the use of their image inappropriate.
- All images created by staff in their capacity as an employee of Hopebright School Bolton remain the property of Hopebright School Bolton and copyright rests with Hopebright School Bolton.
- Images taken by authorised external photographers will be purchased outright as part of the package for unlimited use and thus remain the property of Hopebright School Bolton. Images taken by any child are the property of the child and relevant consents must be obtained before using the images.
- The hiring of authorised external photographers will be approved by the Head Teacher or nominated senior leader. All external photographers will be briefed on the nature of our business and will be obliged to abide by

our safeguarding and child protection procedures. All relevant checks will be conducted, in accordance with our Child Protection Policy.

- All images of children and staff must be stored securely on a password-protected device. Any sharing of images must comply with the General Data Protection Regulation (GDPR) and Data Protection Act 2018.
- Full names and/or personal details of children and staff will not be published anywhere on our website, in our brochure, newsletter or elsewhere, particularly in association with photographs.
- Given the potential for misuse, children are not permitted to use personal digital cameras or other photographic equipment without the express permission of the Head Teacher.
- Photographs can be taken with the full knowledge and consent of the person concerned, but children must not use, share or distribute images of staff, children or visitors under any circumstances.
- When using digital images, staff should inform and educate children about the risks associated with the taking, use, sharing, publication and distribution of images.
- In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at Hopebright School Bolton 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 children in the digital/video images.
- We have CCTV installed in and around our buildings for safeguarding and security reasons. Access to footage captured in this way is strictly limited to authorised members of staff. Images may be viewed by authorised agencies, including police and children's social care, for the investigation of safeguarding concerns and/or criminal behaviour.

9. Reporting and recording online safety incidents

Any inappropriate behaviour, associated with online safety and multi-media devices, (confirmed or otherwise) must be reported to senior staff and recorded, as soon as is reasonably possible (and normally within 24 hours of the incident).

Staff (and children) should also use the CEOP 'panic button' or agreed reporting route available on Hopebright School Bolton computers, to report incidents of abuse directly to the Child Exploitation and Online Protection Centre.

Our response to online safety and multi-media-related incidents always focuses on promoting and safeguarding the welfare of children, and any risks associated with children's use of multi-media/electronic communication are documented and communicated to the adults who work with them. Where appropriate, plans and help will be put in place to reduce the risk of harm or actual harm and there is evidence that these risks are being minimised.

If you have any concerns that a child's behaviour may be associated with any of the following:

- child criminal exploitation (CCE), such as county lines
- child sexual exploitation (CSE)
- female genital mutilation (FGM)
- forced marriage
- involvement in gangs
- radicalisation and/or violent extremism
- peer on peer abuse, including sexual violence and sexual harassment

you must immediately refer the matter to the Designated Safeguarding Lead (DSL), the Head Teacher or another Designated Person, in accordance with our 'Child Protection Policy'. If you feel that there is an immediate danger to the life of the individual or others, then call 999.

10. Monitoring online safety incidents

The proprietor/governing body of Hopebright School Bolton has delegated responsibility for the regular monitoring and evaluation of online safety incidents on a daily, weekly and monthly basis to the Head Teacher. The information generated during this process is shared, as appropriate, with:

- Members of the Leadership Team.
- Hopebright School Bolton's Safeguarding Committee.
- Personal tutors and/or Key Workers.
- The Designated Safeguarding Lead.
- The proprietor/governing body or nominated safeguarding representative; and
- External agencies, where appropriate.

The Safeguarding Committee meets regularly and reviews specific incidents and general trends.

Online safety is also a standing item under 'Safeguarding and Child Protection' on all relevant staff meeting agendas.

11. Responding to incidents of misuse

Given the potential for huge diversity in the nature, circumstances, severity and degree of intent, associated with online safety and multi-media incidents, the definition of prescribed responses in this policy document is considered inappropriate.

However, since many incidents of misuse will reflect situations in the off-line world, they will be addressed in accordance with the aims, principles and practice outlined in one or more of the other safeguarding, behaviour and employment policies.

12. Behaviour management plans and risk assessments

Where a child has been involved in an online safety or multi-media incident, new information will be recorded, as appropriate.

Relevant information will be communicated to other staff, as soon as reasonably possible, and the individual risk assessment and/or behaviour management plan will normally be reviewed and redistributed (where appropriate) within 72 hours.

All relevant staff are obliged to familiarise themselves with the current risk assessment and behaviour management plan, for every child they are likely to have responsibility for educating, engaging, supporting or supervising.

All risk assessments and behaviour management plans are shared with children to enable them to develop the knowledge, understanding and skills necessary to manage their own behaviour effectively.

13. Acceptable use agreement

The purpose of the acceptable use agreement is to provide children with a clear and concise summary of our expectations, and to describe, where appropriate, the potential consequences of any breach.

All staff are required to read, sign and abide by Hopebright School Bolton's Safe Working Practice Policy (Code of Conduct), which includes reference to a number of issues associated with online safety and multi-media.

14. Seeking the views of children, parents, carers, local authorities and staff

Regular enquires are made of all children as to how safe they feel at Hopebright School Bolton and ways in which services and outcomes can be improved. The views of parents, carers, local authorities and staff are also sought through existing mechanisms for consultation and feedback. Records are kept of these enquiries and any actions taken.

15. Safeguarding and child protection

Access to the internet via Hopebright School Bolton's hardware will only be provided on a high adult-to-child ratio, under the supervision of staff who have undertaken safeguarding, child protection and online safety training. We currently use a 'locked down' system, which means inaccessible sites may only be opened upon request from staff or children for legitimate reasons.

All computers at Hopebright School Bolton face into the room, to ensure staff can effectively monitor children's online and offline behaviour, at all times; and every PC has a CEOP 'panic button' or agreed reporting route which enables staff and children to report incidents of abuse, directly to the Child Exploitation and Online Protection Centre.

Hopebright School Bolton will always consider whether a child's behaviour gives cause to suspect that they are suffering, or are likely to suffer, significant harm; or whether their behaviour might be the result of unmet educational or other needs. All child protection concerns will be addressed in accordance with our 'Child Protection Policy'.

16. Online safety outside of Hopebright School Bolton's premises

A decision whether or not to intervene in online safety incidents outside of our premises will be made by the Head Teacher.

17. Police involvement

Careful, child-centred decision-making is made about reporting their behaviour to the police, though appropriate notifications are always made and clearly documented.

If the behaviour could be criminal or poses a serious threat to a member of the public, the police should always be informed.

NPCC When to call the police: Guidance for schools and colleges should help senior staff understand when they should consider calling the police and what to expect when they do.

A decision whether or not to involve the police in an online safety incident will be made by the Head Teacher.

18. Complaints

Children, staff, parents, carers, and any other adult with parental responsibility (e.g., social worker) or other local authority representatives are all able to complain to Hopebright School Bolton if they are unhappy with any aspect of the education or care provided. All complaints are taken seriously and will be dealt with without delay. For further information, see our 'Compliments and Complaints Policy'.

All complaints concerning allegations of child abuse will always be addressed in accordance with our 'Child Protection Policy'.

19. Implementation, monitoring, evaluation and review

The designated senior member of staff with overall responsibility for the implementation, monitoring and evaluation of the 'Online Safety and Multi-Media Policy' is the Head Teacher.

The designated member of staff is also responsible for ensuring that all children, staff, parents, carers and placing local authorities are aware of our policy. Additional support would also be provided to any parent or significant person, wishing to know more about the policy and procedures outlined above. A copy of this policy document is available for inspection on the premises during office hours (term time only) and an electronic copy may be posted on our website.

This policy document will be reviewed and publicised in writing, at least annually and, if necessary, more frequently in response to any significant incidents or new developments in national, local and organisational policy, guidance and practice.

The proprietor/governing body will also undertake an annual review of the school's policies and procedures relating to safeguarding and ensure that all duties have been discharged in accordance with current legislation, regulations and statutory guidance; as well as local authority procedures and practice, including the relevant Local Safeguarding Children Partnership(s).



The proprietor/governing body stringently holds senior leaders to account for all aspects of the school's performance through robust systems of governance, reporting and monitoring.

If you have any comments, questions, concerns or suggestions about the content of this policy document please speak to the Head Teacher.

Alternatively, you can contact:

Designated Safeguarding Lead, Hopebright School Bolton

Sakriye Moallim is DSL] via email [s.moallim@hopebrightschool.co.uk

Deputy Designated Safeguarding Lead, Hopebright School Bolton

[Arshad Ashraf is DDSL via email [a.ashraf@hopebrightschool.co.uk]

Appendix 1

Further Information About Online Safety

1.1. New opportunities and potential risks

Technology offers extraordinary opportunities for all of society - opportunities for learning, play, communication, skill development, creativity and for having fun. However, the use of these technologies can also put children at risk within and outside the setting. Some of the dangers they may face include:

- access to illegal, harmful or inappropriate images or other content.
- unauthorised access to/loss of/sharing of personal information.
- the risk of being 'groomed' or radicalised, by those with whom they make contact on the internet.
- the possibility of arranging to meet strangers.
- the sharing/distribution of personal images, without an individual's consent or knowledge.
- inappropriate communication/contact with others, including strangers.
- the risk of engaging in sexually damaging conversations and video interactions.
- cyberbullying.
- access to unsuitable video/internet games.
- an inability to evaluate the quality, accuracy and relevance of information, on the internet.
- plagiarism and copyright infringement.
- illegal downloading of music or video files; and
- the potential for excessive use, which may impact on the social and emotional development and learning of the child.

Many of these risks reflect situations in the off-line world and it is essential that this policy document is used in conjunction with other relevant policies including Anti-Bullying, Child Protection and Equality and Diversity.

It is also important to acknowledge that the 'probability of risk' is based on a complex interaction between a child's age, experience, strengths, vulnerabilities and circumstances and the properties of the specific technology. A good risk assessment will consider what effect technology has on a child but will place a greater emphasis on considering what the child brings to the technology that might increase the likelihood of harm.

As with all risks, it is impossible to eliminate online safety risks completely; and that is why it is essential, to develop children's risk identification, assessment and management skills, so that they have the confidence and resilience to deal with such risks, if and when they arise.



APPENDIX 2

Roles and responsibilities

2.1. Head Teacher

The Head Teacher has a duty of care for ensuring the safety (including online safety) of all members of Hopebright School Bolton's community, though day to day responsibility for online safety will be delegated to the Online Safety Lead.

The role of the Head Teacher is to:

- ensure that Hopebright School Bolton's network is as safe and secure as is reasonably possible and that the approved policies and procedures are implemented.
- ensure that children are safe from illegal, inappropriate or harmful content when accessing the internet on our site, including by establishing appropriate levels of filtering, such that 'over-blocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.
- ensure that all staff have access to, are aware of and follow Hopebright School Bolton's Online Safety and Multi-Media Policy.
- ensure that the Online Safety Lead and all other relevant staff receive suitable training, in accordance with their roles and responsibilities.
- liaise with the Online Safety Lead on a regular basis, providing guidance and support, as appropriate.
- support the Online Safety Lead in managing serious online safety and multi-media incidents/allegations involving staff and children.
- monitor, analyse and report on the levels and frequency of online safety and multi-media incidents to Hopebright School Bolton's Safeguarding Committee and other interested parties, as appropriate.
- notify the proprietor/governing body or nominated safeguarding representative about all child protection concerns that warrant discussion with parents, carers or an external agency/professional, including the local multi-agency safeguarding hub (or equivalent), Designated Officer, police or children's social care including the allocated social worker; within 24 hours of the concern being reported; and record all relevant information on Hopebright School Bolton's safeguarding records.
- maintain a record of all 'cause for concern' issues and child protection concerns, in accordance with requirements set down by Hopebright School Bolton's safeguarding procedures.

As the Designated Safeguarding Lead (DSL), the Head Teacher, has also attended training in online safety and is aware of the potential for serious child protection issues to arise from:

- sharing of personal data.
- access to illegal/inappropriate materials.
- inappropriate on-line contact with adults/strangers.
- potential or actual incidents of grooming, exploitation and radicalisation.
- online bullying.

The Designated Safeguarding Lead (DSL) (and all other Designated Safeguarding Persons) are aware of the procedures to be followed in the event of a serious online safety allegation made against a member of staff.

2.2. Online Safety Lead

The senior member of staff with day-to-day responsibility for dealing with online safety issues is the Online Safety Lead, [Insert name/role].

The role of the Online Safety Lead is to:

- ensure that all staff know and understand the procedures that need to be followed, in the event of an online safety/multi-media incident taking place.
- take a lead role in managing online safety/multi-media incidents involving staff and children, in accordance with policies, procedures and guidance.
- receive reports on online safety/multi-media incidents and create a log of such events to inform future policy, procedures and practice.
- monitor the levels and frequency of online safety/multi-media incidents and report these findings to the Leadership Team, on a monthly basis.
- provide advice, training and support to staff and children, as appropriate.
- liaise with the Network Manager and other ICT technical staff.

In the absence of the Online Safety Lead, another member of the Leadership Team will adopt the role of Online Safety Lead.

2.3. Network Manager

The Network Manager, [Insert name/role], is responsible for ensuring that:

- Hopebright School Bolton's technical infrastructure is as secure as is reasonably possible and is not open to misuse or malicious attack.
- users may only access Hopebright School Bolton's network through a properly enforced password protection policy, in which passwords are regularly changed.
- children are safe from illegal, inappropriate or harmful content when accessing the internet on our site, including by establishing appropriate levels of filtering, such that 'over-blocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.
- Hopebright School Bolton's filtering policy is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person.
- they keep up to date with online safety technical information, in order to effectively carry out their online safety role and to inform and update others as relevant.
- there is a mechanism by which the use of the network, remote access and email can be regularly monitored and actively managed in order that any misuse/attempted misuse can be addressed by the Online Safety Lead and/or the Head Teacher; and
- monitoring software/systems are implemented and updated as agreed in Hopebright School Bolton's policies.

APPENDIX 3

Hopebright School Bolton's policy on children's use of the internet and mobile technology

3.1 Mobile phones

Children are permitted to use personal mobile phones at Hopebright School Bolton, subject to risk assessment and agreement by parents, carers or another responsible adult (e.g., social worker).

All children bringing a personal mobile phone to Hopebright School Bolton are obliged to read, sign and abide by the multi-media contract for children.

Hopebright School Bolton does not accept responsibility for any loss or damage to any personal mobile phone or associated accessories, unless placed in the care of our staff.

3.2 ICT network and email

When joining Hopebright School Bolton, all children will be allocated a username and password for access to the ICT network (and email system), subject to risk assessment and agreement by parents, carers or another responsible adult (e.g., social worker).

All children are obliged to read, sign and abide by Hopebright School Bolton's multi-media contract for children.

3.3 Social networking websites and apps

Children are not permitted access to social networking websites or apps via Hopebright School Bolton's network.

Equipment and storage

3.4 Personal computers (PCs), laptops and tablets

Children are not permitted to use their own personal computers, laptops or tablets at Hopebright School Bolton.

Entertainment

3.5 Games consoles and hand-held devices e.g., Nintendo Switch

Children are not permitted to use their own games consoles or other hand-held devices at Hopebright School Bolton.