

Be Your BEST

Believe - Excellence - Safe - Team

Online Safety Policy

Policy Owner:	Head Teacher
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1. Aims

Our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Identify and support groups of pupils that are potentially at greater risk of harm online than others
- Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

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

2. Legislation and guidance

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

- Teaching online safety in schools
- Preventing and tackling bullying and cyber-bullying: advice for headteachers and school staff
- Relationships and sex education
- Searching, screening and confiscation

It also refers to the DfE's guidance on protecting children from radicalisation.

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

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

3. Roles and responsibilities

3.1 The governing board

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

The governing board will make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.

The governing board will also make sure all staff receive regular online safety updates (via email, e-bulletins and staff meetings), as required and at least annually, to ensure they are continually provided with the relevant skills and knowledge to effectively safeguard children.

The governing board will co-ordinate regular meetings with appropriate staff to discuss online safety, requirements for training, and monitor online safety logs as provided by the designated safeguarding lead (DSL).

The governing board should ensure children are taught how to keep themselves and others safe, including keeping safe online.

The governing board must ensure the school has appropriate filtering and monitoring systems in place on school devices and school networks, and will regularly review their effectiveness. The board will review the DfE filtering and monitoring standards, and discuss with IT staff and service providers what needs to be done to support the school in meeting those standards, which include:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems;
- Reviewing filtering and monitoring provisions at least annually;
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning;
- Having effective monitoring strategies in place that meet their safeguarding needs.

The governor who oversees online safety is Jane Gow.

All governors will:

- Ensure they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet (appendix 3)
- Ensure that online safety is a running and interrelated theme while devising and implementing their whole-school or college approach to safeguarding and related policies and/or procedures
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable

3.2 The headteacher

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

3.3 The designated safeguarding lead

Details of the school's designated safeguarding lead (DSL) and deputy designated safeguarding leads (DDSL) are set out in our child protection and safeguarding policy, as well as relevant job descriptions. The headteacher is the DSL at The Pines.

The DDSL's takes lead responsibility for online safety in school, in particular:

- Supporting the headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school
- Working with the headteacher and governing board to review this policy annually and ensure the procedures and implementation are updated and reviewed regularly

- The DSL will take the lead on understanding the filtering and monitoring systems and processes in place on school devices and school networks
- The DSL will work with the ICT manager (TSI and SBM) to make sure the appropriate systems and processes are in place
- Working with the headteacher, ICT manager and other staff, as necessary, to address any online safety issues or incidents
- Managing all online safety issues and incidents in line with the school's child protection policy
- Ensuring that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety (appendix 4 contains a self-audit for staff on online safety training needs)
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the headteacher and/or governing board
- Undertaking annual risk assessments that consider and reflect the risks children face
- Providing regular safeguarding and child protection updates, including online safety, to all staff, at least annually, in order to continue to provide them with relevant skills and knowledge to safeguard effectively

This list is not intended to be exhaustive.

3.4 The ICT manager and technical support

The ICT manager is responsible for:

- Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems on school devices and school networks, which are reviewed and updated at least annually to assess effectiveness and ensure pupils are kept safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
- Ensuring that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring the school's ICT systems on a monthly basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

This list is not intended to be exhaustive.

3.5 All staff and volunteers

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

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet (appendix 3), and ensuring that pupils follow the school's terms on acceptable use (appendices 1 and 2)
- Knowing that the DSL is responsible for the filtering and monitoring systems and processes, and being aware of how to report any incidents of those systems or processes failing by emailing DSL/TSI and SBM
- Following the correct procedures by adding to planning if they need to bypass the filtering and monitoring systems for educational purposes
- Working with the DSL to ensure that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy
- Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline, and maintaining an attitude of 'it could happen here'

This list is not intended to be exhaustive.

3.6 Parents/carers

Parents/carers are expected to:

- Notify a member of staff or the headteacher of any concerns or queries regarding this policy
- Ensure their child has read, understood and agreed to the terms on acceptable use of the school's ICT systems and internet (appendices 1 and 2)

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

- What are the issues? – UK Safer Internet Centre
- Hot topics – Childnet International
- Parent resource sheet – Childnet International

3.7 Visitors and members of the community

Visitors and members of the community who use the school's ICT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use (appendix 3).

4. Educating pupils about online safety

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

All schools have to teach:

- Relationships education and health education in primary schools

In **Key Stage 1**, pupils will be taught to:

- Use technology safely and respectfully, keeping personal information private
- Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies

Pupils in **Key Stage 2** will be taught to:

- Use technology safely, respectfully and responsibly
- Recognise acceptable and unacceptable behaviour
- Identify a range of ways to report concerns about content and contact

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

- That people sometimes behave differently online, including by pretending to be someone they are not
- That the same principles apply to online relationships as to face-to-face relationships, including the importance of respect for others online, including when we are anonymous
- The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them
- How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met
- How information and data is shared and used online
- What sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know

The safe use of social media and the internet will also be covered in other subjects where relevant.

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.

5. Educating parents/carers about online safety

The school will raise parents/carers' awareness of internet safety in letters or other communications home, and in information via our website. The school will also send out monthly newsletters produced by *Knowsley* on online safety. This policy will also be shared with parents/carers.

Online safety will also be covered during parents' evenings and other parent events.

The school will let parents/carers know:

- What systems the school uses to filter and monitor online use

- What their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child will be interacting with online

If parents/carers have any queries or concerns in relation to online safety, these should be raised in the first instance with the headteacher and/or the DSL.

Concerns or queries about this policy can be raised with any member of staff or the headteacher.

6. Cyber-bullying

6.1 Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of 1 person or group by another person or group, where the relationship involves an imbalance of power.

6.2 Preventing and addressing cyber-bullying

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

The school will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Class teachers will discuss cyber-bullying with their class in an age appropriate way.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.

All staff, governors and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training (see section 11 for more detail).

The school also sends information/leaflets on cyber-bullying to parents/carers so they are aware of the signs, how to report it and how they can support children who may be affected.

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

The DSL will report the incident and provide the relevant material to the police as soon as is reasonably practicable, if they have reasonable grounds to suspect that possessing that material is illegal. They will also work with external services if it is deemed necessary to do so.

6.3 Examining electronic devices

There must always be 2 adults present

The headteacher, and any member of the leadership team can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or pupils, and/or

- Is identified in the school rules as a banned item for which a search can be carried out, and/or
- Is evidence in relation to an offence

Before a search, if the authorised staff member is satisfied that they have reasonable grounds for suspecting any of the above, they will also:

- Make an assessment of how urgent the search is, and consider the risk to other pupils and staff. If the search is not urgent, they will seek advice from the headteacher / DDSL. Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it
- Seek the pupil's co-operation

Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so.

When deciding whether there is a 'good reason' to examine data or files on an electronic device, the staff member should reasonably suspect that the device has, or could be used to:

- Cause harm, and/or
- Undermine the safe environment of the school or disrupt teaching, and/or
- Commit an offence

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL / headteacher / other member of the senior leadership team to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response.

When deciding if there is a good reason to erase data or files from a device, staff members will consider if the material may constitute evidence relating to a suspected offence. In these instances, they will not delete the material, and the device will be handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if:

- They reasonably suspect that its continued existence is likely to cause harm to any person, and/or
- The pupil and/or the parent/carer refuses to delete the material themselves

If a staff member **suspects** a device **may** contain an indecent image of a child (also known as a nude or semi-nude image), they will:

- **Not** view the image
- Confiscate the device and report the incident to the DSL (or equivalent) immediately, who will decide what to do next. The DSL will make the decision in line with the DfE's latest guidance on screening, searching and confiscation and the UK Council for Internet Safety (UKCIS) guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people

Any searching of pupils will be carried out in line with:

- The DfE's latest guidance on searching, screening and confiscation
- UKCIS guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people
- Our behaviour policy

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

7. Acceptable use of the internet in school

All pupils, parents/carers, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of the school's ICT systems and the internet (appendices 1 to 3). Visitors will be expected to read and agree to the school's terms on acceptable use if relevant.

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

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

More information is set out in the acceptable use agreements in appendices 1 to 3.

8. Pupils using mobile devices in school

Pupils in Years 5 and 6 may bring mobile devices into school, but are not permitted to use them during:

- Lessons
- Clubs before or after school, or any other activities organised by the school

Any use of mobile devices in school by pupils must be in line with the acceptable use agreement (see appendices 1 and 2).

Any breach of the acceptable use agreement by a pupil may trigger disciplinary action in line with the school behaviour policy, which may result in the confiscation of their device.

Pupils MUST hand their phones in at the start of the day and they will be locked away in the classroom.

9. Staff using work devices outside school

All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- Keeping the device password-protected – strong passwords are at least 8 characters, with a combination of upper and lower-case letters, numbers and special characters (e.g. asterisk or currency symbol)
- Ensuring their hard drive is encrypted – this means if the device is lost or stolen, no one can access the files stored on the hard drive by attaching it to a new device
- Making sure the device locks if left inactive for a period of time
- Not sharing the device among family or friends

- Installing anti-virus and anti-spyware software
- Keeping operating systems up to date by always installing the latest updates

Staff members must not use the device in any way that would violate the school's terms of acceptable use, as set out in appendix 3.

Work devices must be used solely for work activities.

If staff have any concerns over the security of their device, they must seek advice from SBM and TSI (and notifying HT).

10. How the school will respond to issues of misuse

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

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

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

11. Training

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

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

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

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

Training will also help staff:

- Develop better awareness to assist in spotting the signs and symptoms of online abuse

- Develop the ability to ensure pupils can recognise dangers and risks in online activity and can weigh up the risks
- Develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term

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

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

Volunteers will receive appropriate training and updates, if applicable.

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

12. Monitoring arrangements

The DSL logs behaviour and safeguarding issues related to online safety. An incident report log can be found in appendix 5.

This policy will be reviewed every year by the Headteacher. At every review, the policy will be shared with the governing board. The review (such as the one available here) will be supported by an annual risk assessment that considers and reflects the risks pupils face online. This is important because technology, and the risks and harms related to it, evolve and change rapidly.

13. Links with other policies

This online safety policy is linked to our:

- Child protection and safeguarding policy
- Behaviour policy
- Staff disciplinary procedures
- Data protection policy and privacy notices
- Complaints procedure
- ICT and internet acceptable use policy
- Code of Conduct
- Low Level Concerns

Appendix 1: EYFS and KS1 acceptable use agreement (pupils and parents/carers)

ACCEPTABLE USE OF THE SCHOOL'S ICT SYSTEMS AND INTERNET: AGREEMENT FOR PUPILS AND PARENTS/CARERS	
Name of pupil:	

When I use the school's ICT systems (like computers) and get onto the internet in school I will:
• Ask a teacher or adult if I can do so before using them
• Only use websites that a teacher or adult has told me or allowed me to use
• Tell my teacher immediately if:
  ○ I click on a website by mistake
  ○ I receive messages from people I don't know
  ○ I find anything that may upset or harm me or my friends
• Use school computers for school work only
• Be kind to others and not upset or be rude to them
• Look after the school ICT equipment and tell a teacher straight away if something is broken or not working properly
• Only use the username and password I have been given
• Try my hardest to remember my username and password
• Never share my password with anyone, including my friends
• Never give my personal information (my name, address or telephone numbers) to anyone without the permission of my teacher or parent/carer
• Save my work on the school network
• Check with my teacher before I print anything
• Log off or shut down a computer when I have finished using it
I agree that the school will monitor the websites I visit and that there will be consequences if I don't follow the rules.	

Signed (pupil):	**Date:**
Parent/carer agreement: I agree that my child can use the school's ICT systems and internet when appropriately supervised by a member of school staff. I agree to the conditions set out above for pupils using the school's ICT systems and internet, and will make sure my child understands these.	
Signed (parent/carer):	**Date:**

Appendix 2: KS2 (pupils and parents/carers)

ACCEPTABLE USE OF THE SCHOOL'S ICT SYSTEMS AND INTERNET: AGREEMENT FOR PUPILS AND PARENTS/CARERS	
Name of pupil:	
I will read and follow the rules in the acceptable use agreement policy. **When I use the school's ICT systems (like computers) and get onto the internet in school I will:** • Always use the school's ICT systems and the internet responsibly and for educational purposes only • Only use them when a teacher is present, or with a teacher's permission • Keep my usernames and passwords safe and not share these with others • Keep my private information safe at all times and not give my name, address or telephone number to anyone without the permission of my teacher or parent/carer • Tell a teacher (or sensible adult) immediately if I find any material which might upset, distress or harm me or others • Always log off or shut down a computer when I've finished working on it **I will not:** • Access any inappropriate websites including: social networking sites, chat rooms and gaming sites unless my teacher has expressly allowed this as part of a learning activity • Open any attachments in emails, or follow any links in emails, without first checking with a teacher • Use any inappropriate language when communicating online, including in emails • Create, link to or post any material that is pornographic, offensive, obscene or otherwise inappropriate • Log in to the school's network using someone else's details • Arrange to meet anyone offline without first consulting my parent/carer, or without adult supervision **If I bring a personal mobile phone or other personal electronic device into school:** • I will not use it during lessons, clubs or other activities organised by the school, without a teacher's permission • I will use it responsibly, and will not access any inappropriate websites or other inappropriate material or use inappropriate language when communicating online **I agree that the school will monitor the websites I visit and that there will be consequences if I don't follow the rules.**	
Signed (pupil):	**Date:**

ACCEPTABLE USE OF THE SCHOOL'S ICT SYSTEMS AND INTERNET: AGREEMENT FOR PUPILS AND PARENTS/CARERS	
Parent/carer's agreement: I agree that my child can use the school's ICT systems and internet when appropriately supervised by a member of school staff. I agree to the conditions set out above for pupils using the school's ICT systems and internet, and for using personal electronic devices in school, and will make sure my child understands these.	
Signed (parent/carer):	**Date:**

Appendix 3: acceptable use agreement (staff, governors, volunteers and visitors)

ACCEPTABLE USE OF THE SCHOOL'S ICT SYSTEMS AND INTERNET: AGREEMENT FOR STAFF, GOVERNORS, VOLUNTEERS AND VISITORS	
Name of staff member/governor/volunteer/visitor:	
When using the school's ICT systems and accessing the internet in school, or outside school on a work device (if applicable), I will not: • Access, or attempt to access inappropriate material, including but not limited to material of a violent, criminal or pornographic nature (or create, share, link to or send such material) • Use them in any way which could harm the school's reputation • Access social networking sites or chat rooms • Use any improper language when communicating online, including in emails or other messaging services • Install any unauthorised software, or connect unauthorised hardware or devices to the school's network • Share my password with others or log in to the school's network using someone else's details • Take photographs of pupils without checking with teachers first • Share confidential information about the school, its pupils or staff, or other members of the community • Access, modify or share data I'm not authorised to access, modify or share • Promote private businesses, unless that business is directly related to the school	
I will only use the school's ICT systems and access the internet in school, or outside school on a work device, for educational purposes or for the purpose of fulfilling the duties of my role. I agree that the school will monitor the websites I visit and my use of the school's ICT facilities and systems. I will take all reasonable steps to ensure that work devices are secure and password-protected when using them outside school, and keep all data securely stored in accordance with this policy and the school's data protection policy. I will let the designated safeguarding lead (DSL) and ICT manager know if a pupil informs me they have found any material which might upset, distress or harm them or others, and will also do so if I encounter any such material. I will always use the school's ICT systems and internet responsibly, and ensure that pupils in my care do so too.	
Signed (staff member/governor/volunteer/visitor):	**Date:**

Appendix 4: online safety training needs – self-audit for staff

ONLINE SAFETY TRAINING NEEDS AUDIT	
Name of staff member/volunteer:	**Date**:
Question	**Yes/No (add comments if necessary)**
What is the name of the person who has lead responsibility for online safety in school?	
What ways can pupils potentially abuse their peers online?	
What must you do if a pupil approaches you with a concern or issue?	
Where will you find the school's acceptable use agreement for staff, volunteers, governors and visitors?	
Have you signed the school's acceptable use agreement for staff?	
Are you familiar with the filtering and monitoring systems on the school's devices and networks?	
What is your role and responsibilities in relation to filtering and monitoring?	
Do you regularly change your password for accessing the school's ICT systems?	
What is the school's approach to tackling cyber-bullying?	
Are there any areas of online safety in which you would like training/further training?	

Appendix 5: online safety incident report log

ONLINE SAFETY INCIDENT LOG				
Date	**Where the incident took place**	**Description of the incident**	**Action taken**	**Name and signature of staff member recording the incident**



WE JUST MAKE I.T. WORK

Cloudsafe™ and CloudConnect™

Appropriate Filtering for Education Settings

Response to KCSIE 2023

TSI WORLD LTD
40/41 GREAT CASTLE STREET, LONDON, W1W 8LU

KEEPING CHILDREN SAFE IN EDUCATION 2023

The Department for Education (DfE) has published an updated version of the statutory safeguarding and child protection guidance for schools in England, Keeping children safe in education (KCSIE). This guidance will replace KCSIE 2022 when it comes into force on 1 September 2023. The guidance sets out what schools and colleges in England must do to safeguard and promote the welfare of children and young people under the age of 18. One of the updates in KCSIE 2023 relates to "clarification around the roles and responsibilities of education staff in relation to filtering and monitoring".

HOW CAN WE HELP?

At TSI World Ltd, we have ensured that all Customers who take the TSI World CloudConnect™ and / or CloudSafe™ solutions are using appropriate Web Filtering by embedding the Netsweeper® Web Filtering solution into the TSI World Service.

Please see the Appropriate Filtering for Education Settings Checklist responses for Netsweeper® to the UK Safer Internet Centre by following the attached link. This checklist has also been incorporated into this document under Appendix A.

https://d1xsi6mgo67kia.cloudfront.net/uploads/2016/09/Netsweeper-Appropriate-Filtering-Provider- Response-2023-Netsweeper-1.pdf

Please note that all checklist responses are GREEN showing that the TSI World CloudSafe™ filtering solution with embedded Netsweeper® Technology service meets each issue identified in the checklist.

CloudSafe™ Internet Filtering is able to allow or block access to specific websites at specific times of the day (or permanently) from all school users right through to individuals. With this capability, the system is able to prevent Overblocking, meaning that Teachers can access to deliver the Curriculum using appropriate web resources whilst, at the same time, safeguarding the school's students.

By default, the decryption of all websites is enabled thus allowing granular content and keyword blocking within a web page.

Filtering changes (i.e. allowing or blocking specific sites, times, year groups or individuals) are implemented by TSI World on the School's behalf. Such changes are requested through the TSI World HelpDesk and require agreement of the Head Teacher, Business Manager or the school's Designated Safeguarding Lead.

All internet access is monitored by the system and reports of denied pages, all page accesses etc. are available to schools upon request. Such reports can be scheduled for daily delivery to the Designated Safeguarding Lead or Head Teacher.

KCSIE 2023 recommends regular checks on your filtering provision. You can rapidly check your internet filtering for your school by going to https://testfiltering.com

APPENDIX A

Appropriate Filtering for Education settings; Self-Certification Checklist Responses by Netsweeper UK Ltd.

Appropriate Filtering for Education settings

May 2023

Filtering Provider Checklist Reponses

Schools (and registered childcare providers) in England and Wales are required "to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering". Furthermore, it expects that they "assess the risk of [their] children being drawn into terrorism, including support for extremist ideas that are part of

terrorist ideology". There are a number of self review systems (eg www.360safe.org.uk) that will

support a school in assessing their wider online safety policy and practice.

The Department for Education's statutory guidance 'Keeping Children Safe in Education' obliges schools and colleges in England to "*ensure appropriate filters and appropriate monitoring systems are in place and regularly review their effectiveness" and they "should be doing all that they reasonably can to limit children's exposure to [Content, Contact, Conduct, Contract] risks from the school's or college's IT system*" however, schools will need to "*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*."

By completing all fields and returning to UK Safer Internet Centre (enquiries@saferinternet.org.uk), the aim of this document is to help filtering providers to illustrate to education settings (including Early years, schools and FE) how their particular technology system(s) meets the national defined 'appropriate filtering standards. Fully completed forms will be hosted on the UK Safer Internet Centre website alongside the definitions

It is important to recognise that no filtering systems can be 100% effective and need to be supported with good teaching and learning practice and effective supervision.

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Filtering System	Netsweeper
Date of assessment	10/06/2023

System Rating response

Where a supplier is able to confirm that their service fully meets the issue identified in a specific checklist the appropriate self-certification colour for that question is GREEN.	

Where a supplier is not able to confirm that their service fully meets the issue identified in a specific checklist question the appropriate self-certification colour for that question is AMBER.	

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Illegal Online Content

Filtering providers should ensure that access to illegal content is blocked, specifically that the filtering providers:

Aspect	Rating	Explanation
Are IWF members		We are member of the IWF
and block access to illegal Child Abuse Images (by actively implementing the IWF URL list)		We implement the IWF and other lists to block child
Integrate the 'the police assessed list of unlawful terrorist content, produced on behalf of the Home Office'		We incorporate this list
Confirm that filters for illegal content cannot be disabled by the school		These are pushed down as immutable categories

Inappropriate Online Content

Recognising that no filter can guarantee to be 100% effective, providers should both confirm, and describe how, their system manages the following content

Content	Explanatory notes – Content that:	Rating	Explanation
Discrimination	Promotes the unjust or prejudicial treatment of people on the grounds of race, religion, age, or sex.		Netsweeper uses dynamic content analysis to categories , this and many other content types.
Drugs / Substance abuse	displays or promotes the illegal use of drugs or substances		Netsweeper uses dynamic content analysis to categories, this and many other content types.
Extremism	promotes terrorism and terrorist ideologies, violence or intolerance		Netsweeper uses dynamic content analysis to categories , this and many other content types.
Gambling	Enables gambling		Netsweeper uses dynamic content analysis to categories , this and many other content types.
Malware / Hacking	promotes the compromising of systems including anonymous browsing and other filter bypass tools as well as sites hosting malicious content		Netsweeper uses dynamic content analysis to categories , this and many other content types.
Pornography	displays sexual acts or explicit images		Netsweeper uses dynamic content analysis to categories , this and many other content types.

Piracy and copyright theft	includes illegal provision of copyrighted material		Netsweeper uses dynamic content analysis to categories , this and many other content types.
Self Harm	promotes or displays deliberate self harm (including suicide and eating disorders)		Netsweeper uses dynamic content analysis to categories , this and many other content types.
Violence	Displays or promotes the use of physical force intended to hurt or kill		Netsweeper uses dynamic content analysis to categories , this and many other content types.

This list should not be considered an exhaustive list. Please outline how the system manages this content and many other aspects

Netsweeper uses a tiered filtering methodology based around dynamic content analysis to ensure we can accurately categories these and many other categories. Netsweeper uses AI based technology to perform dynamic categorisation of over 90 categories in 47 languages. Netsweeper also has inhouse digital safety and categorisation teams working continuously at improve our categorisation algorithms and lists.

Regarding the duration and extent of logfile (Internet history) data retention, providers should outline their retention policy, specifically including the extent to the identification of individuals and the duration to which all data is retained.

Storage duration can be defined from our customer, theoretically any given storage requirement length could be catered for.

Providers should be clear how their system does not over block access so it does not lead to unreasonable restrictions

Market leading dynamic content analysis as well as easy to manage unblocking and recategorization tools ensure high levels of accuracy and ensure overblocking is not a problem

Filtering System Features

How does the filtering system meet the following principles:

Principle	Rating	Explanation

Be Your BEST
Believe – Excellence – Safe – Team

Context appropriate differentiated filtering, based on age, vulnerability and risk of harm – also includes the ability to vary filtering strength appropriate for staff		Netsweeper allows for differentiated filtering based on different user types. For example students may receive differentiated filtering based on age. Vulnerable users may have certain categories blocked that are not blocked for other uses.
Circumvention – the extent and ability to identify and manage technologies and techniques used to circumvent the system,		Netsweeper used advanced technology to detect and prevent
specifically VPN, proxy services and DNS over HTTPS.		attemps to circumvent the system.
Control – has the ability and ease of use that allows schools to control the filter themselves to permit or deny access to specific content. Any changes to the filter system are logged enabling an audit trail that ensure transparency and that individuals are not able to make unilateral changes		All changes made to the system are logged and auditable by the school. The schools are able to administer their own content filtering.
Contextual Content Filters – in addition to URL or IP based filtering, the extent to which (http and https) content is analysed as it is streamed to the user and blocked, this would include AI generated content. For example, being able to contextually analyse text on a page and dynamically filter.		Netsweper provides on the fly categorisation based on the content and context of text and links that appear on the page.
Filtering Policy – the filtering provider publishes a rationale that details their approach to filtering with classification and categorisation as well as over blocking		We have a stated filtering methodology
Group / Multi-site Management – the ability for deployment of central policy and central oversight or dashboard		Netsweeper has full multitenancy
Identification - the filtering system should have the ability to identify users		Users can be identified by various methodologies including but not limited to azure, AD , google

Mobile and App content – mobile and app content is often delivered in entirely different mechanisms from that delivered through a traditional web browser. To what extent does the filter system block inappropriate content via mobile and app technologies (beyond typical web browser delivered content). Providers should be clear about the capacity of their filtering system to manage content on mobile and web apps		Netsweeper is capable of filtering all device based content including content delivered via apps.
Multiple language support – the ability for the system to manage relevant languages		Netsweeper performs dynamic filtering in 47 languages
Network level - filtering should be applied at 'network level' ie, not reliant on any software on user devices whilst at school (recognising that device configuration/software may be required for filtering beyond the school infrastructure)		Filtering can be performed at the Network level
Remote devices – with many children and staff working remotely, the ability for school owned devices to receive the same or equivalent filtering to that provided in school		Netsweeper can deliver identical filtering to the schools devices onsite and offsite
Reporting mechanism – the ability to report inappropriate content for access or blocking		We offer bother reports and live alerts, with both premade templates and the ability to make custom reports
Reports – the system offers clear historical information on the websites users have accessed or attempted to access		We offer bother reports and live alerts, with both premade templates and the ability to make custom reports
Safe Search – the ability to enforce 'safe search' when using search engines		Safe search can be enforced

Filtering systems are only ever a tool in helping to safeguard children when online and schools have an obligation to "*consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum".*[1]

Please note below opportunities to support schools (and other settings) in this regard

Netsweeper offers a range of products in the monitoring space. As well as offering numerous training packages in the safeguarding space.

[1] https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

PROVIDER SELF-CERTIFICATION DECLARATION

In order that schools can be confident regarding the accuracy of the self-certification statements, the supplier confirms:

that their self-certification responses have been fully and accurately completed by a person or persons who are competent in the relevant fields

that they will update their self-certification responses promptly when changes to the service or its terms and conditions would result in their existing compliance statement no longer being accurate or complete

that they will provide any additional information or clarification sought as part of the self- certification process

that if at any time, the UK Safer Internet Centre is of the view that any element or elements of a provider's self-certification responses require independent verification, they will agree to that independent verification, supply all necessary clarification requested, meet the associated verification costs, or withdraw their self-certification submission.

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Position	Regional Director
Date	10/06/23
Signature	