Online Safety Policy

Reviewed: September 2025
Next review: September 2026

Bradford Diocesan Academies Trust

Immanuel College
Church of England Academy

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1. Trust Policy Statement

Bradford Diocesan Academies Trust (BDAT) regards knowing how to stay safe online as integral to the development and safeguarding of our pupils. We are committed to developing a culture where pupils are aware of the risks they face online and know how to keep themselves safe, but where they can also harness the opportunities within the digital world to enhance their education.

We aim to ensure our schools:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- 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 technology, smart technology and generative artificial intelligence tools
- Establish clear mechanisms to identify, intervene and escalate any online safety incidents including through the use of filtering and monitoring systems

As part of our focus on diversity and inclusion, BDAT pledges that our policies will seek to promote equality, fairness, and respect for all staff and pupils. Our policies reflect the BDAT values of inclusion, compassion, aspiration, resilience, and excellence. By working closely with a range of stakeholders, such as our school, union, and HR colleagues, we have ensured that BDAT's policies do not unlawfully discriminate against anybody.

This policy should be read in conjunction with our school specific Behaviour Policy, Safeguarding and Child Protection Policy and Anti-Bullying Policy, along with other Trust level policies held on the BDAT website. It will be reviewed annually in order to assess its implementation and effectiveness.

For the purpose of this policy, the term Trust refers to BDAT. The term school and the term academy are interchangeable. The term pupil and the term student are interchangeable.

2. Introduction and Policy Aims

Information and Communications Technology (ICT) in the 21st Century is seen as an essential resource to support teaching and learning, as well as playing an important role in the everyday lives of children, young people and adults. New technologies have become integral in today's society, both within schools and outside school.

The internet and other digital and information technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and increase awareness of context to promote effective learning. Children and young people should have an entitlement to safe internet access at all times and, consequently, schools need to build in the use of these technologies in order to arm our young people with the skills to access life-long learning and employment.

ICT covers a wide range of resources including web-based and mobile learning. It is also important to recognise the constant and fast paced evolution of ICT within our society as a whole, exemplified by the rapid development of generative artificial intelligence tools such as Chat GPT. Currently the internet technologies staff, children and young people are using both inside and outside of the classroom include:

- Websites
- E-mail, instant messaging and chat rooms
- Social Media (including Facebook, X, Snapchat, Instagram, TikTok, WhatsApp, Discord)
- Mobile phones with text, video and/or web functionality
- Making/receiving phone calls via their mobile phones
- Other mobile devices with web functionality such as Smartwatches
- Gaming, especially online
- Learning Platforms and Virtual Learning Environments
- Blogs and Wikis
- Podcasting
- Video Broadcasting and Live Streaming
- Music Downloading
- Generative Artificial Intelligence programmes

This policy recognises the commitment of Immanuel College to online safety and acknowledges its part in our overall safeguarding policies and procedures. It shows our commitment to meeting the requirement to keep pupils safe when using technology.

We know about the benefits of rationing time spent online, the risks of excessive time spent on electronic devices and the impact of positive and negative content online on their own and others' mental and physical wellbeing.

We pay due regard to DFE Guidance on Mobile Phones in Schools and it is our policy that mobile phones are not to be seen, heard or used during the school day.

We also believe the whole school community can benefit from the opportunities provided by the internet and other technologies used in everyday life. The online safety policy supports this by identifying the risks and the steps we are taking to avoid them. It shows our commitment to developing a set of safe and responsible behaviours that will enable us to reduce the risks whilst continuing to benefit from the opportunities.

Keeping Children Safe In Education 2025 references four areas of risk online within part two, these being:

Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams

As with all other risks, it is impossible to eliminate these risks completely. It is therefore essential, through strong educational provision that we build our pupils' resilience to the risks to which they

may be exposed, so that they have the confidence and skills to face and deal with these risks. This involves all stakeholders.

3. Key Staff

KCSIE makes clear that the Designated Safeguarding Lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL can delegate activities but not the responsibility for this area and whilst subject leads (e.g. for RSHE) will plan the curriculum for their area, it is important that this ties into a whole-school approach.

The below table details the staff and governors with specific responsibilities relating to online safety:

Role	**Name**
Designated Safeguarding Lead (Overall Responsibility for Filtering and Monitoring)	Mr J Patterson
Deputy Designated Safeguarding Lead	Rev. S Hacking
Nominated Governor for Safeguarding	Mrs E Pienaar
Curriculum Leads with Relevance to Online Safety	Mrs H Copson (Computing Lead) Mr R Tarr (PSHE Lead)

4. Online Safety Trends

In our school over the past year, we have particularly noticed the following in terms of types of online/device-based incidents which affect the wellbeing and safeguarding of our students:

- Children accessing age-inappropriate content
- Youth produced sexual imagery
- Cyber bullying via social media
- Use of discriminatory language

At Immanuel College, we are mindful that the online world is ever-developing and we recognise that we must be vigilant in being aware of and responding to new risks that may harm our pupils.

For example, the increasing prevalence of generative artificial intelligence (AI) remains an exponentially growing concern, with pupils potentially having access to tools that generate text, images and videos at home or in school.

Thousands of sites now offer AI-generated content, including disturbing levels of abusive, pornographic, and even illegal material like child sexual abuse content. Some platforms host AI “girlfriends,” unregulated therapy bots, and even chatbots that encourage self-harm or suicide—tools many students can access freely at home or school.

Chatbots can also blur reality, offering harmful advice or engaging in sexualised and bullying conversations. Their addictive design and unmoderated nature heighten the risk of overuse and exploitation.

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

Beyond text, generative AI makes it easier than ever to create sexualised images and deepfake videos. These can have a devastating emotional and physical impact on young people, including blackmail and abuse. The Internet Watch Foundation has warned of a sharp rise in AI-generated child sexual abuse imagery.

Alarming reports also show children using nudifying apps to create illegal content of peers. It's critical to stress that in the UK, any CSAM (child sexual abuse material)—AI-generated, photographic, or even cartoon—is illegal to create, possess, or share.

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

Given the 13yrs+ minimum age requirement on most social media platforms, it is notable that over half of 3-12-year olds (55%) were reported using at least one app. Despite age restrictions, four in ten admit to giving a fake age online, exposing them to content inappropriate for their age and increasing their risk of harm, with over a third of parents of all 3-17s saying they would allow their child to have a profile on sites or apps before they had reached the minimum age.

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

As a school we recognise that many of our children and young people are using social media apps and online games regardless of age limits, which are often misunderstood, ignored or bypassed, particularly as it can often be the case that children are more technologically literate than many adults. We will remind about best practice while remembering the reality for most of our students is quite different.

This is striking when you consider that over 95 percent of students have their own mobile phone by the end of Year 7, and the vast majority do not have safety controls or limitations to prevent harm of access to inappropriate material. This is particularly pertinent given that, according to the Internet Watch Foundation's annual report, 217,780 cases of self-generated child sexual abuse material were found of 11 to 13 year olds. These were predominantly (but importantly not only) girls; it is important also to recognise the increasing risk of financial sexual extortion, sometimes referred to as 'sextortion', where older teenage boys have been financially exploited after being tricked into sharing intimate pictures online. This resulted in the National Crime Agency releasing new guidance to all schools in Summer 2025.

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

The Revealing Reality: Anti-Social Media Report 2023 highlights that this content is interspersed with highly regular exposure to disturbing, graphic and illegal content such as fights, attacks, sexual acts and weapons.

At the same time, the Children's Commissioner Report 'A lot of it is actually just abuse' revealed the ever younger children are regularly consuming pornography and living out inappropriate behaviour and relationships due to 'learning from' pornography. This has coincided with the rise of misogynistic influencers such as Andrew Tate, which had a significant influence on many young boys across the world over the past year.

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

5. Role and Responsibilities

In the landscape of the challenges outlined above, it is vital that all stakeholders work together to ensure that our pupils remain safe in the online world. This section outlines the roles and responsibilities of the various stakeholders.

5.1 The Local Governing Body

The governing body has overall responsibility for monitoring this policy, holding the Headteacher to account for its implementation and reviewing its effectiveness.

The governing body will ensure that online safety is a focus of its safeguarding quality assurance activities. In particular, the nominated safeguarding governor, Mrs E Pienaar, will monitor the online safety arrangements through regular meetings with the Designated Safeguarding Lead (DSL).

All governors will:

- Ensure that they have read and understand this policy
- Ensure that online safety is a running and interrelated theme while monitoring the whole school approach to safeguarding (e.g. by asking questions such as those from the UK Council for Child Internet Safety (UKCIS) Online safety in schools and colleges: Questions from the Governing Board)
- Support the work of Immanuel College in promoting and ensuring safe and responsible use of technology in and out of school, including encouraging parents to become engaged in online safety awareness
- Have an overview of how the school IT infrastructure provides safe access to the internet through its filtering and monitoring systems and the steps Immanuel College takes to protect personal and sensitive data
- Ensure appropriate funding and resources are available for Immanuel College to implement their online safety strategy
- Ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum.

5.2 The Headteacher

The Headteacher is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout Immanuel College. They will:

- Liaise with the Governors to ensure they are provided with relevant online safety information
- Develop and promote an online safety culture within the school community and whole-school safeguarding approach
- Ensure that all staff and governors receive suitable CPD to enable them to carry out their roles in relation to online safety
- Ensure that all staff, pupils and other users agree to the ICT Acceptable Use Policy and that new staff have online safety included as part of their induction procedures
- Receive and regularly review online safety incident logs through their line management of the Designated Safeguarding Lead; ensuring that the correct procedures are followed should an online safety incident occur in school and review incidents to see if further action is required
- Ensure the school implements and makes effective use of appropriate ICT systems and services including filtering and monitoring, protected email systems and that all technology including remote systems are implemented according to child-safety first principles.
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information.

5.3 The Designated Safeguarding Lead (DSL)

The details of Immanuel College's DSL and deputies are set out in this policy as well as in the Safeguarding and Child Protection Policy and their relevant job descriptions. The DSL 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 IMMANUEL COLLEGE
- Working with the Headteacher, IT staff and other staff, as necessary, to address any online safety issues or incidents
- Managing all online safety issues and incidents in line with the IMMANUEL COLLEGE Safeguarding and Child Protection Policy, including making referrals to external agencies such as Children's Social Care, the Police and the Local Authority Designated Officer as necessary.
- Ensuring that any online safety incidents, including those related to filtering and monitoring, are logged on CPOMS and dealt with appropriately in line with this policy
- Receive regular updates about online safety issues and legislation, be aware of local and school trends
- Work with IT staff to ensure that filtering and monitoring systems are appropriately setup to prevent both under and over-blocking
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school Anti-Bullying Policy
- Updating and delivering staff training on online safety
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the Headteacher and Local Governing Body
- Promote an awareness of and commitment to online safety throughout the school community, with a strong focus on parents, including hard-to-reach parents

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5.4 IT Staff

The BDAT Head of Corporate Projects is responsible for managing and overseeing the Trust-wide ICT Managed Service Provision, whose responsibilities include the following:

- Collaborating regularly with the DSL and leadership team to help them make key strategic decisions around the safeguarding elements of technology.
- Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems, which are reviewed and updated on a regular basis to assess effectiveness and ensure pupils are kept safe from potentially harmful and inappropriate content and contact online whilst at school, including terrorist and extremist material
- Ensuring that IMMANUEL COLLEGE's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting security checks and monitoring IMMANUEL COLLEGE's ICT systems on an ongoing basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Supporting IMMANUEL COLLEGE in providing a safe technical infrastructure to support teaching and learning
- Ensuring appropriate technical steps are in place to safeguard the security of the school ICT system, sensitive data and information and reviewing these regularly to ensure they are up to date
- Ensuring that provision exists for misuse and malicious attack detection
- Ensuring that procedures are in place for new starters and leavers to be correctly added to and removed from all relevant electronic systems by administrative staff, including password management
- Ensure filtering and monitoring systems work on new devices and services before releasing them to students and staff.
- Ensuring that suitable access arrangements are in place for any external users of IMMANUEL COLLEGE's ICT equipment
- Ensuring appropriate backup procedures exist so that critical information and systems can be recovered in the event of a disaster.

5.5 All Staff and Volunteers

All staff and volunteers at IMMANUEL COLLEGE are responsible for:

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of IMMANUEL COLLEGE's ICT systems and the internet, and ensuring that pupils follow the school's terms on acceptable use
- Working with the DSL to ensure that any online safety incidents are logged on CPOMS and dealt with appropriately in line with this policy
- Reporting any unblocked websites that could be harmful to the DSL

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- Informing the DSL if they are teaching any topics that could lead to an influx of filtering and monitoring alerts
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the IMMANUEL COLLEGE Anti-bullying Policy
- Taking responsibility for ensuring the safety of sensitive school data and information
- Developing and maintaining an awareness of current online safety issues, legislation and guidance relevant to their work
- Maintaining a professional level of conduct in their personal use of technology at all times
- Ensuring that all digital communication with pupils is on a professional level and only through school based systems, NEVER through personal email, text, mobile phone social network or other online medium.
- Embedding online safety messages in learning activities where appropriate
- Supervising pupils carefully when engaged in learning activities involving technology
- Ensuring that pupils are told what to do should they encounter any material or receive a communication which makes them feel uncomfortable

5.6 Curriculum Leaders

Teaching pupils about online safety is a fundamental part of the whole-school approach in this area. All subject leaders should seek opportunities to embed online safety in their subject. The PSHE/RSHE Lead and the Computing Lead will play a particularly important role.

The PSHE/RSHE Lead will:

- Embed consent, mental wellbeing, healthy relationships and staying safe online as well as raising awareness of the risks and challenges from latest trends in self-generative artificial intelligence, financial extortion and sharing intimate pictures online into the curriculum. This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age-appropriate way that is relevant to their pupils' lives.
- Focus on the underpinning knowledge and behaviours outlined in Teaching Online Safety in Schools in an age appropriate way to help pupils to navigate the online world safely and confidently regardless of their device, platform or app.
- Work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE/RSHE, adapting the curriculum to respond to any patterns and trends in online safety safeguarding issues.

The Computing/ICT Lead will:

- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum.
- Work closely with the DSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing, adapting the curriculum to respond to any patterns and trends in online safety safeguarding issues.

5.7 Parents

IMMANUEL COLLEGE would ask that all of our parents and carers support the aims of this policy by:

- Ensuring their child (where age appropriate) has read, understood and agreed to the terms on acceptable use of IMMANUEL COLLEGE's ICT systems and internet
- Helping and supporting the school in promoting online safety with their children
- Discussing online safety concerns with their children, showing an interest in how they are using technology, and encouraging them to behave safely and responsibly when using technology
- Consulting with IMMANUEL COLLEGE if they have any concerns about their child's use of technology
- Supporting the IMMANUEL COLLEGE approach to online safety and not deliberately post comments or upload any images, sounds or text that could upset or offend any member of the school community or bring the school into disrepute

5.8 Pupils

All pupils at IMMANUEL COLLEGE are expected to:

- Take responsibility for their own and each other's' safe and responsible use of technology wherever it is being used, including judging the risks posed by the personal technology owned and used by them outside of school
- Ensure they respect the feelings, rights and values of other pupils in their use of technology at school and at home
- Understand what action should be taken if they feel worried, uncomfortable, vulnerable or at risk whilst using technology, or if they know of someone to whom this is happening
- Report all online safety incidents to appropriate members of staff in school
- Discuss online safety issues with family and friends in an open and honest way
- Know, understand and follow school policies on the use of technology to an age appropriate level
- Know, understand and follow school policies regarding bullying to an age appropriate level
- Support the IMMANUEL COLLEGE approach to online safety and not deliberately post comments or upload any images, sounds or text that could upset or offend any member of the school community or bring the school into disrepute.

5.9 Visitors and Members of the Community

Visitors and members of the community who use IMMANUEL COLLEGE'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.

If visitors are concerned about the welfare of a pupil for any reason, they should report it to the DSL without delay.

6. Educating Pupils about Online Safety

Despite the risks associated with being online, Immanuel College recognises the opportunities and benefits to children too. Technology is a fundamental part of adult life and so developing the competencies to understand and use it, are critical to children's later positive outcomes. The choice to use technology in school will always be driven by pedagogy and inclusion.

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It is important that schools establish a carefully sequenced curriculum for online safety that develops competencies (as well as knowledge about risks) and builds on what pupils have already learned and identifies subject content that is appropriate for their stage of development.

As well as teaching about the underpinning knowledge and behaviours that can help pupils navigate the online world safely and confidently regardless of the device, platform or app, Teaching Online Safety in Schools recommends embedding teaching about online safety and harms through a whole school approach and provides an understanding of these risks to help tailor teaching and support to the specific needs of pupils, including vulnerable pupils.

At IMMANUEL COLLEGE, pupils will be taught about online safety through:

- An age appropriate curriculum which has online safety related lessons embedded throughout, but with a planned online safety programme as part of the ICT/Computing and PSHE curriculum
- Celebration and promotion of online safety through collective worship and whole-school activities, such as Safer Internet Day each year

In Key Stage 3, pupils will be taught to:

- Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
- Recognise inappropriate content, contact and conduct, and know how to report concerns

In Key Stage 4, pupils will be taught:

- To understand how changes in technology affect safety, including new ways to protect their online privacy and identity
- How to report a range of concerns

By the end of secondary school, pupils will know:

- Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- How information and data is generated, collected, shared and used online
- How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours
- How people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)

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

7. Raising Awareness with Parents and Carers about Online Safety

IMMANUEL COLLEGE will raise parents' awareness of internet safety in letters or other communications home, and in information via our website. This policy will also be shared with parents. We will let parents know:

- What systems the school uses to filter and monitor online activity
- 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 have any queries or concerns in relation to online safety, these should be raised in the first instance with the DSL or a member of the safeguarding team.

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

UK Safer Internet Centre - What are the Issues?
Childnet International - Hot Topics
Childnet International - Parent Factsheet
Online Safety Basics - National Cybersecurity Alliance
Parent Zone - Working Towards a Safer Digital World
TALK Checklist by the Internet Watch Foundation
LGfL - Generative AI Information for Parents
Keeping children safe online | NSPCC
Topic: Digital Wellbeing | SWGfL
Parents and Carers - UK Safer Internet Centre
Parent Guides from ConnectSafely - ConnectSafely
LGfL - Parent Safe Resources

8. Key Online Safety Issues

8.1 Cyber Bullying

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 one person or group by another person or group.

Cyber bullying includes sending abusive or hurtful texts, emails, social media posts, images or videos, deliberately excluding others online, spreading nasty gossip or rumours online and imitating others online or using their log-in.

Cyber bullying can be overt or covert but uses digital technologies, including hardware such as computers and smartphones, and software such as social media, instant messaging, texts, websites and other online platforms. Cyber bullying can happen at any time, can be in public or in private online spaces and so is sometimes only known to the target and the person bullying.

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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.

IMMANUEL COLLEGE will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Staff are 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.

In relation to a specific incident of cyber-bullying, we will follow the processes set out in our Anti-Bullying 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 consider whether the incident should be reported to the Police if it involves illegal material, and will work with external services if it is deemed necessary to do so.

8.2 Sexual Violence and Harassment

Keeping Children Safe in Education is clear that sexual violence and harassment can take place online as well as physically in person. Any such incidents must be reported to the DSL who will lead on a safeguarding response.

All staff are responsible for fostering a zero-tolerance culture when it comes to sexual violence and harassment, never dismissing unacceptable behaviour as 'banter' and always maintaining an attitude that it could happen here.

Sexual violence includes causing someone to engage in sexual activity without consent, which could occur online. For example, someone being coerced on a video call to strip or touch themselves sexually.

Online sexual harassment could include the sending of unwanted sexualised comments or images, consensual and non-consensual sharing of nude or semi-nude images, sexualised jokes or sharing of explicit content.

Our curriculum teaches pupils about healthy relationships (including those online) at an age appropriate level. We ensure that all of our pupils know what to do and who to report it to in the event that they experience any kind of sexual violence or harassment, either online or offline.

8.3 Online Extremism and Radicalisation

The Counter-terrorism Local Profile and our Prevent Risk Assessment both indicate that the most likely way in which a pupil will be exposed to extremist material is online.

Misinformation, disinformation and conspiracy theories are all prevalent in the online world, with some platforms allowing any content to be posted without moderation. Algorithms on such platform mean that clicking one link (even unintentionally) can lead to a user being exposed to this type of content repeatedly.

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This poses additional risks as increasing numbers of cases dealt with by the Police link to people who have become 'self-initiated' extremists by being exposed to this type of content, alongside those who are targeted by extremist groups.

Our curriculum aims to teach pupils about disinformation and so-called fake news, whilst empowering them with the critical thinking skills to analyse and verify information they see online.

8.4 Social Media

Social media incidents involving pupils can often be safeguarding concerns and may link to the other concerns outlined within this section.

We recognise that social media is a significant part of modern life for children and young people, but strongly advocate that parents ensure their children are only accessing platforms in line with the recommended age limits.

We expect our pupils to use any social media platforms in line with the Behaviour Policy, Acceptable Use of ICT Agreement and our school values.

Where a social media post is inappropriate, offensive, upsetting or abusive we will request that the member of the school community who posted it removes it immediately, as well as following up via the relevant policy depending on who the poster is.

Where an offensive post is made about a member of staff, we will report it to the platform it is hosted on and may contact the Professionals' Online Safety Helpline for further support.

9. Searching and Screening Procedures

The Headteacher, and any member of staff authorised to do so by them (such as the DSL, senior leaders and the pastoral team), can carry out a search of a pupil in line with DFE Guidance on Searching and Screening 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 a criminal 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 or Designated Safeguarding Lead.
- 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 cooperation.

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 or erase data or files on an electronic device, staff must reasonably suspect that the data or file in question has been, or could be, used to:

- Cause harm, and/or;
- Disrupt teaching, and/or;
- Break any of the school rules.

If inappropriate material is found on the device, it is up to the staff member in conjunction with the Headteacher, Designated Safeguarding Lead or another 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 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 complaints about searching for or deleting inappropriate images or files on pupils' electronic devices will be dealt with through the school complaints procedure.

10. Acceptable Use of the Internet in School

All pupils, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of the IMMANUEL COLLEGE's ICT systems and the internet. Visitors will also be expected to read and agree to IMMANUEL COLLEGE's terms on acceptable use if relevant.

Use of IMMANUEL COLLEGE'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) through our filtering and monitoring systems to ensure they comply with the BDAT Acceptable Use of IT Policy.

Where pupils are provided with devices that they can use at home, their use is still covered by the IT Acceptable Use Policy and the device will still be subject to the filtering and monitoring systems.

11. Pupils Using Mobile Devices in School

Pupils may bring mobile devices into school, but are not permitted to use them whilst on school site unless given specific permission by a member of staff. They should be switched off and in school bags at all times within IMMANUEL COLLEGE

Any use of mobile devices in school by pupils must be in line with the ICT acceptable use agreement.

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.

12. Staff Using School Devices Outside Work

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

BDAT ensures that all laptops provided for use inside and outside school have:

- Anti-virus and anti-spyware software installed
- Up-to-date operating systems with the latest updates installed

Staff members must not use the device in any way which would violate the BDAT Acceptable Use of IT Policy. 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 a member of IT support.

13. Responding to Issues of Misuse

Where a pupil misuses IMMANUEL COLLEGE'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 IMMANUEL COLLEGE'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 and staff code of conduct. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

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IMMANUEL COLLEGE will consider whether incidents which involve illegal activity or content, or otherwise serious incidents, should be reported to the Police.

14. IT Systems and Access

In partnership with our trust-wide IT Managed Service Provision, IMMANUEL COLLEGE decides which users should and should not have internet access, the appropriate level of access and the level of supervision they should receive. There are robust systems in place for managing network accounts and passwords, including safeguarding administrator passwords. Suitable arrangements are in place for visitors to the school who may be granted a temporary log in.

All users are provided with a log in appropriate to their role in school and will be responsible for the security of their username and password. They must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security. Pupils are taught about safe practice in the use of their log in and passwords.

Staff are also given appropriate guidance on managing access to laptops which are used both at home and school and in creating secure passwords.

Access to personal, private or sensitive information and data is restricted to authorized users only, with proper procedures being followed for authorizing and protecting login and password information.

Our practice in relation to passwords is as follows:

- We ensure that a secure and robust username and password convention exists for all system access (email, network access, CPOMS, school management information system). This may require two-factor authentication.
- We provide all staff with a unique, individually-named user account and password for access to IT equipment, email and information systems available within school.
- All pupils have a unique, individually-named user account and password for access to IT equipment and information systems available within school.
- All staff and pupils have responsibility for the security of their usernames and passwords and are informed that they must not allow other users to access the systems using their log on details. They must immediately report any suspicion or evidence that there has been a breach of security.
- We maintain a log of all accesses by users and of their activities while using the system in order to track any online safety incidents. Class teachers closely monitor the use of the internet by pupils in school.
- Passwords must be difficult to guess and should be a mixture of upper case and lowercase, numbers and symbols.

15. Filtering and Monitoring

14.1 Filtering

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In order to ensure that appropriate online filtering is in place across our network, IMMANUEL COLLEGE use Smoothwall Filter, a cloud-based web filter which is designed specifically for schools. The Smoothwall Filter system filters all internet feeds, across all devices and operating systems.

Smoothwall Filter blocks internet access to harmful sites and inappropriate content, meeting all of the technical requirements set out by the Department for Education and specifically blocking access to illegal content including child sexual abuse material.

Smoothwall Filter identifies the device/IP address (and where possible the individual), time and date of attempted access and the search term or content being blocked. It is customisable to ensure the provision meets the ongoing needs of IMMANUEL COLLEGE, our pupils and our staff.

We have support via a managed IT service desk whose staff are trained on the Smoothwall Filter system and can make real-time changes should a site need to be blocked/un-blocked urgently.

As an additional check, the DSL checks that our internet filtering is effective in blocking certain harmful material by using http://testfiltering.com/

Smoothwall have been members of the Internet Watch Foundation since 1st June 2007.

14.2 Monitoring

As an additional safeguard IMMANUEL COLLEGE have keystroke monitoring in place through Smoothwall Monitor, who have been a member of the Internet Watch Foundation since 1st June 2007.

Smoothwall Monitor is a real-time, digital monitoring solution that flags safeguarding incidents as they happen when users view or type harmful content. This is able to capture activity that may indicate a risk, even outside of the regular web browser – such as in a Microsoft Word document etc.

All Smoothwall Monitor alerts are reported to the DSL via an email alert so that a safeguarding response can be implemented. Where there is an immediate risk of harm, Smoothwall Monitor will phone the school immediately. It is customisable to ensure the provision meets the ongoing needs of IMMANUEL COLLEGE, our pupils and our staff.

16. Using the Internet and Email

We provide the internet to:

- Support curriculum development in all subjects
- Support the professional work of staff as an essential professional tool
- Enhance IMMANUEL COLLEGE's management information, safeguarding and business administration systems
- Enable electronic communication and the exchange of curriculum and administration data with the examination boards and others

Email is regarded as an essential means of communication and IMMANUEL COLLEGE provides all members of the school community with an e-mail account for school based communication.

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Communication by email between staff, pupils and parents will only be made using the school email account and should be professional and related to school matters only. E-mail messages on school business should be regarded as having been sent on headed notepaper and reflect a suitable tone and content and should ensure that the good name of the school is maintained.

All email activity is recorded in line with data protection laws. The school is able to view these records in situations where this is called upon.

As part of the curriculum, pupils are taught about safe and appropriate use of email. Pupils are informed that misuse of email will result in a loss of privileges.

IMMANUEL COLLEGE will set clear guidelines about when pupil-staff communication via email is acceptable and staff will set clear boundaries for pupils. Under no circumstances will staff contact pupils, parents or conduct any school business using a personal email addresses.

17. Publishing Content Online

IMMANUEL COLLEGE maintains editorial responsibility for any school initiated website or publishing online to ensure that the content is accurate and the quality of presentation is maintained. We maintain the integrity of the school website by ensuring that responsibility for uploading material is always moderated and that passwords are protected.

The point of contact on the website is the school address, e-mail and telephone number.

Staff and pupils are encouraged to adopt similar safe and responsible behaviours in their personal use of blogs, wikis, social networking sites and other online publishing outside school as they are in school.

Material published by pupils, governors and staff in a social context which is considered to bring IMMANUEL COLLEGE into disrepute or considered harmful to, or harassment of another pupil or member of the school community will be considered a breach of school discipline and treated accordingly.

We recognize that many aspects of the curriculum can be enhanced by the use of multi-media and that there are now a wide and growing range of devices on which this can be accomplished.

Pupils are taught safe and responsible behaviour when creating, using and storing digital images, video and sound.

Digital images, video and sound recordings are only taken with the permission of participants and their parents; images and video are of appropriate activities and are only taken of pupils wearing appropriate dress. Identities of pupils are protected at all times and, in line with GDPR regulations, parents have the option to opt out so that photographs of individual pupils are not published on the website without permission. Group photographs do not have a name list attached.

For their own protection, staff or other visitors to school never use a personal device (mobile phone, digital camera or digital video recorder) to take photographs of pupils.

We are happy for parents to take photographs at school events, except in specific circumstances where rights holders refuse permission, but will always make them aware that they are for personal

use only and if they have taken photographs of children other than their own they should not be uploaded to social media sites and can be only used for their personal use.

18. 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 other children online through:
    - Abusive, harassing, and discriminatory 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 the risks up
- 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 safeguarding team 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.

19. Policy Monitoring Arrangements

This policy will be reviewed every year by the Headteacher and ratified by the Local Governing Body. Given the ever-changing nature of technology, we will ensure that this review is supported by ongoing risk assessment which reflects current online safety issues that children face. This is important because technology, and the risks and harms related to it, evolve and change rapidly.

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We will monitor the impact of the policy using:

- Logs of reported incidents in the Online Safety and Filtering and Monitoring categories on CPOMS
- Internal monitoring data for network activity gathered through filtering and monitoring software
- Pupil, staff and parent voice

The policy will be published on the school website, shared with all staff and will be reflected in our IT Acceptable Use Policies for all stakeholders. We will provide a version in other languages if required.

20. Links to Other Guidance and Policies

This policy reflects existing legislation, including but not limited to The Malicious Communications Act 1988, 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 takes into account the National Curriculum computing programmes of study and complies with our funding agreement and articles of association.

It should also be read in conjunction with the following guidance and other BDAT/Academy specific policies:

- Keeping Children Safe in Education
- DFE Guidance on Relationships Education, Relationships and Sex Education and Health Education
- DFE Guidance on Teaching Online Safety in Schools
- DFE Guidance on Preventing and tackling bullying and cyber-bullying: advice for headteachers and school staff
- DFE Guidance on Searching, screening and confiscation
- DFE Guidance on Sharing Nudes and Semi-Nudes Advice for Education Settings
- Guidance for Safer Working Practice in Education Settings - February 2022
- DFE Digital and Technology Standards
- DFE Guidance on Mobile Phones in Schools
- NPCC Guidance for Schools on When to Call the Police

- BDAT Equality Statement and Objectives
- BDAT GDPR Policy
- BDAT Acceptable Use of IT Policy
- BDAT Social Media Policy

- School level behaviour policy – see website
- School specific safeguarding and child protection policy - see website

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Appendix One: Summary of Policy Changes

The below table provides a summary of changes to this policy over time:

September 2024	
Page	**Summary of Change**
3	• Added in a greater range of examples of social media apps that are used by staff and pupils to more accurately reflect reality • Added in reference to Artificial Intelligence in recognition that there is a growing awareness and usage of this type of programme
4	Updated link to 2024 version of Ofcom report and the summary of its findings
5	• Updated statistics referenced to ensure they are accurate with the 2024 Ofcom report • Added in unpleasant behaviour/cyberbullying as one of the main issues schools are tackling on line to reflect current picture
9	Updated link to Safer Internet Video for Parents and Carers to the latest 2024 version
19	Updated all hyperlinks to the latest versions
September 2025	
Page	**Summary of Change**
2	Added reference to generative artificial intelligence into the summary of aims within the 'Trust Policy Statement' and the 'Introduction and Aims' section.
3	• Added in reference to DFE Guidance on Mobile Phones in schools and details of the approach taken in school to comply with this • Added in misinformation, disinformation (including fake news) and conspiracy theories into the 'Content' risks in line with the updated version of KCSIE.
4	Added in text from KCSIE that specifies the DSL as having overall lead responsibility for online safety including filtering and monitoring
4-5	Added in much greater detail about the safeguarding risks associated with generative AI
5-6	Changed the section about 'Ofcom's Children and parents media use and attitudes report' to reflect the 2025 findings rather than 2024. This includes updating the Primary only and Secondary only sections.
6	Added in Cybersecurity threats as a particular concern in education.
6-7	Added in link for governors to suggested questions around online safety
7	Added in that the Headteacher will have overall responsibility for the school's data management and information security
9-10	Added in section on the responsibilities of curriculum leaders (particularly in PSHE and Computing) in ensuring that proactive teaching of online safety underpins the whole-school approach
10	Moved signposting links for parents into the 'Raising Awareness with Parents About Online Safety' section.
11	Added more context as to the importance of the curriculum in educating pupils about online safety
12-13	Added in additional signposting links to reputable sources of supports for parents.
13-15	Inserted new section entitled 'Key Online Safety Issues' of which the existing cyberbullying section will now be a subsection. This will strengthen the policy as there are now further specific details about online sexual harassment, online extremism and social media incidents.
15-16	Made 'Searching and Screening' a standalone section to reflect that the procedures detailed may be applied in various situations, not just in cyberbullying cases where it was previously detailed.

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16	Added in that pupils using school devices at home are still expected to follow the IT Acceptable Use Policy and that filtering and monitoring systems will still be in effect.
18	Updated the 'Filtering' section to reflect that it is now provided by Smoothwall Filter rather than Securly.
21-22	Added in information about where stakeholders can find this policy in the 'Policy Monitoring Arrangements' section and that a translated version can be made available if required.
22	Checked all hyperlinks and updated to the latest version of guidance where necessary

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