

Denton and Harlaxton Church of England Schools



Learn
Encourage
Aspire
Respect &
Nurture



Policy : Online Safety	Date	Signatures of Chair of Finance / Personnel Committee & Head
Last Reviewed:	June 2026	Changes Made YES/NO
Board of Governors review complete:	15 th July 2026	
Head teacher review complete:	June 2026	
Admitted as school policy:		
Lifespan:	1 YEAR	
Date of next review:	Summer 2027	

This easy to remember statement sums up our vision for our children within our community.

With God, together we can...Learn Encourage Aspire Respect Nurture



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Introduction

SWGfL/UK Safer Internet Centre

The South West Grid for Learning Trust is an educational trust with an international reputation for supporting schools with online safety.

SWGfL, along with partners Childnet and IWF, launched the UK Safer Internet Centre (UKSIC) in January 2011 as part of the European Commission's Safer Internet Programme. The Safer Internet Centre is, for example, responsible for the organisation of Safer Internet Day each February. More information about UKSIC services and resources can be found on the website: www.saferinternet.org.uk. SWGfL is a founding member of UKCIS (UK Council for Internet Safety). It has contributed to conferences across the world and has worked with government and other agencies in many countries. More information about its wide-ranging online safety services for schools can be found on the SWGfL website – swgfl.org.uk

Development/Monitoring/Review of this Policy

This online safety policy has been developed by a working group made up of: *Designated Safeguarding Leads*

Schedule for Development/Monitoring/Review

The implementation of this online safety policy will be monitored by the:	<i>Senior Leadership Team</i>
Monitoring will take place at regular intervals:	<i>Minimum annually</i>
The Governing Body will receive a report on the implementation of the online safety policy generated by the monitoring group (which will include anonymous details of online safety incidents) at regular intervals:	<i>Minimum annually</i>
Should serious online safety incidents take place, the following external persons/agencies should be informed:	<i>Such as.: LA Safeguarding Officer, LADO, Police</i>

The school will monitor the impact of the policy using:

Surveys/questionnaires of

- students/pupils
- parents/carers
- staff

Scope of the Policy

This policy applies to all members of the school community (including staff, students/pupils, volunteers, parents/carers, visitors, community users) who have access to and are users of school digital technology systems, both in and out of the school.

The Education and Inspections Act 2006 empowers Headteachers/Principals to such extent as is reasonable, to regulate the behaviour of students/pupils when they are off the *school* site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of online-bullying or other online safety incidents covered by this policy, which may take place outside of the *school*, but is linked to membership of the school/academy. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data. In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

The school will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents/carers of incidents of inappropriate online safety behaviour that take place out of school.

Roles and Responsibilities

The following section outlines the online safety roles and responsibilities of individuals and groups within the school.

Governors

Governors are responsible for the approval of the online safety policy and for reviewing the effectiveness of the policy. This will be carried out by the Governors receiving regular information about online safety incidents and monitoring reports. A member of the Governing Body has taken on the role of Online Safety Governor/Safeguarding Governor role of the Online Safety/Safeguarding Governor will include:

- regular meetings with the Online Safety Co-ordinator/DSL
- receive minutes of Online Safety/ Safeguarding Group meetings
- reporting to relevant Governors meeting

Headteacher/Principal and Senior Leaders

- The Headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety will be delegated to the DSL

- The Headteacher and (at least) another member of the Senior Leadership Team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff. (see flow chart on dealing with online safety incidents – included in a later section – “Responding to incidents of misuse” and relevant Local Authority disciplinary procedures).
- The Senior Leadership Team will receive regular monitoring reports from DSLs and safeguarding leads.

Online Safety Lead/ Safeguarding DSL

- leads the Online Safety / safeguarding meetings
- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies/documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provides training and advice for staff
- liaises with the Local Authority
- liaises with school technical staff
- receives reports of online safety incidents and creates a log of incidents (using the school safeguarding incident form) to inform future online safety developments.
- meets regularly with Online Safety *Governor* to discuss current issues and review incidents
- attends relevant meetings of *Governors*
- reports regularly to Senior Leadership Team

Network Manager/Technical staff

The school's technical provider is ARK

Those with technical responsibilities are responsible contractually for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- that the school meets required online safety technical requirements and any Local Authority online safety guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection policy
- the filtering system is applied and updated on a regular basis

Teaching and Support Staff

Are responsible for ensuring that:

- they have an up-to-date awareness of online safety matters and of the current school online safety policy and practices
- they have read, understood and signed the staff acceptable use policy (AUP)
- they follow all relevant guidance and legislation including, for example, Keeping Children Safe in Education and UK GDPR regulations. Staff must never upload personal, private or protected data.
- where staff use AI (Artificial Intelligence), they should only use AI services for work purposes which have been evaluated to comply with organisational security and oversight requirements
- they report any suspected misuse or problem to the Headteacher/Senior Leader for investigation/action/sanction
- all digital communications with students/pupils/parents/carers should be on a professional level and only carried out using official school systems
- online safety issues are embedded in all aspects of the curriculum and other activities
- students/pupils understand and follow the Online Safety Policy and acceptable use policies
- students/pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor the use of digital technologies, mobile devices, cameras, etc. in lessons and other school activities (where allowed) and implement current policies with regard to these devices

- in lessons where internet use is pre-planned students/pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- they have a general understanding of how the learners in their care use digital technologies out of school, in order to be aware of online safety issues that may develop from the use of those technologies
- they are aware of the benefits and risks of the use of Artificial Intelligence (AI) services in school, being transparent in how they use these services, prioritising human oversight. AI should assist, not replace, human decision-making. Staff must ensure that final judgments, particularly those affecting people, are made by humans, fact-checked and critically evaluated.

Designated Safeguarding Lead

Should be trained in online safety issues and be aware of the potential for serious child protection/safeguarding issues to arise from:

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

Online Safety/ Safeguarding Group

The Online Safety Group provides a consultative group that has wide representation from the school community, with responsibility for issues regarding online safety and the monitoring of the Online Safety Policy including the impact of initiatives. This is also the Safeguarding group. The group will also be responsible for regular reporting to the Governing Body.

Members of the Online Safety/ Safeguarding Group will assist the Online Safety Lead/ DSL with:

- the production/review/monitoring of the school online safety policy/documents.
- Monitoring any e-safety incidents

The IT subject leader will take the lead with:

- mapping and reviewing the online safety/digital literacy curricular provision – ensuring relevance, breadth and progression
- consulting stakeholders – including parents/carers where possible and the students/pupils about the online safety provision

Professional Standards

There is an expectation that professional standards will be applied to online safety as in other aspects of school life i.e.

- there is a willingness to develop and apply new techniques to suit the purposes of intended learning in a structured and considered approach and to learn from the experience, while taking care to avoid risks that may be attached to the adoption of developing technologies e.g. Artificial Intelligence (AI) tools.

Students/Pupils:

- are responsible for using the school digital technology systems in accordance with the student/pupil acceptable use policy (AUP)
- have a good understanding of research skills and should avoid plagiarism and uphold copyright regulations, taking care when using Artificial Intelligence (AI) services to protect the intellectual property of themselves and others and checking the accuracy of content accessed through AI services.

- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking/use of images and on online-bullying.
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's online safety policy covers their actions out of school, if related to their membership of the school

Parents/carers

Parents/carers play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way. The school will take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website, social media and information about national/local online safety campaigns/literature. Parents and carers will be encouraged to support the school in promoting good online safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to parents' sections of the website and on-line student/pupil records
- their children's personal devices in the school/academy (personal devices are not permitted to be used in school during the school day but can be stored in the teacher's cupboard if, for example, a child is being collected by a different parent)

Community Users

Community Users who access school/academy systems or programmes as part of the wider school provision will be expected to sign a Community User AUP before being provided with access to school systems.

Policy Statements

Education – Students/Pupils

Whilst regulation and technical solutions are very important, their use must be balanced by educating *students/pupils* to take a responsible approach. The education of *students/pupils* in online safety/digital literacy is therefore an essential part of the school's online safety provision. Children and young people need the help and support of the school to recognise and avoid online safety risks and build their resilience.

Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:

- A planned online safety curriculum should be provided as part of Computing/PHSE/other lessons and should be regularly revisited
- Key online safety messages should be reinforced as part of a planned programme of assemblies and pastoral activities
- Students/pupils should be taught in all lessons to be critically aware of the materials/content they access on-line and be guided to validate the accuracy of information (including where the information is gained from Artificial Intelligence services)
- Students/pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet and particularly through the use of Artificial Intelligence services.
- Students/pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- Students/pupils should be helped to understand the need for the student/pupil acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school.
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices

- in lessons where internet use is pre-planned, it is best practice that students/pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where students/pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites / tools (including AI systems) the young people visit.

Education – Parents/carers and the wider community

Many parents and carers have only a limited understanding of online safety risks, issues and the use of Artificial intelligent (AI), yet they play an essential role in the education of their children and in the monitoring/regulation of the children's online behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

The school will therefore seek to provide information and awareness to parents and carers and the wider community through:

- Curriculum activities
- Letters, newsletters, web site,
- Parents/carers evenings/sessions
- High profile events/campaigns e.g. Safer Internet Day
- Reference to the relevant web sites/publications e.g. [swgfl.org.uk](http://www.swgfl.org.uk), www.saferinternet.org.uk/, <http://www.childnet.com/parents-and-carers> (see appendix for further links/resources)

Education & Training – Staff/Volunteers

It is essential that all staff receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- A planned programme of formal online safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly.
- All new staff should receive online safety training as part of their safeguarding induction programme, ensuring that they fully understand the school online safety policy and acceptable use policy.
- It is expected that some staff will identify online safety as a training need within the performance management process.
- The Online Safety Lead (or other nominated person) will receive regular updates through attendance at external training events (e.g. from SWGfL/LA/other relevant organisations) and by reviewing guidance documents released by relevant organisations.
- This online safety policy and its updates will be presented to and discussed by staff in staff/team meetings/training sessions.
- The Online Safety Lead (or other nominated person) will provide advice/guidance/training to individuals as required.

Training – Governors/Directors

Governors/Directors should take part in online safety training/awareness sessions, with particular importance for those who are members of any group involved in technology/online safety/health and safety /safeguarding. This may be offered in a number of ways:

- Attendance at training provided by the Local Authority / National Governors Association/or other relevant organisation (e.g. SWGfL).
- Participation in school training/information sessions for staff, parents or governors (this may include attendance at assemblies/lessons).
- Cyber-security awareness including understanding the filtering and monitoring provision

Technical – infrastructure/equipment, filtering and monitoring

The school will be responsible for ensuring that the school infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need

to ensure that the relevant people named in the above sections will be effective in carrying out their online safety responsibilities

School technical systems will be managed in ways that ensure that the school meets recommended technical requirements

- There will be regular reviews with the technical providers ARK of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school technical systems and devices.
- All users will be provided with a username and secure password by ARK. Users are responsible for the security of their username and password.
- Ark is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations.
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated, and internet use is logged and regularly monitored. There is a clear process in place to deal with requests for filtering changes
- Internet filtering/monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet.
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices, etc. from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual devices are protected by up-to-date virus software.
- An agreed username is in place for the provision of temporary access of "guests" (e.g. trainee teachers, supply teachers, visitors) onto the school systems.
- There are established and effective routes for users to report inappropriate content, recognising that no system can be 100% effective. These are acted upon in a timely manner, within clearly established procedures
- Staff must always recognise and safeguard sensitive data and not upload personal, private or protected data
- *Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.*

Mobile Technologies

Mobile technology devices may be school owned/provided or personally owned and might include: smartphone, tablet, notebook/laptop or other technology that usually has the capability of utilising the school's wireless network. The device then has access to the wider internet which may include the school's learning platform and other cloud based services such as email and data storage.

All users should understand that the primary purpose of the use of mobile/personal devices in a school context is educational. The mobile technologies policy should be consistent with and inter-related to other relevant school policies including but not limited to the safeguarding policy, behaviour policy, bullying policy, acceptable use policy, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school's online safety education programme.

- The school acceptable use policy for staff, pupils/students and parents/carers will give consideration to the use of mobile technologies
- The school allows:

	School Devices	Personal Devices
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	School owned for single user	School owned for multiple users	Authorised device ¹	Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	No or switched off for temporary storage	Yes	Yes
Full network access	Yes	Yes	Yes	No	No	No
Internet only				No	Yes	Yes
No network access				Yes		

School owned/provided devices:

- There is a device loan agreement for pupils who require a school device to be utilised for the purposes of remote learning
- For members of staff, school owned devices are able to be used at home using home internet systems for the use of educational purposes and school business. These devices may be used at home for personal use but only within the restrictions of school policies (including but not restricted to the AUP, GDPR, Code of Conduct, Staff Handbook)

Personal devices:

- Staff may use personal mobile devices in school for personal use and never in front of children. Devices are normally silent and stored securely at the owners' risk. Devices should only be used in staff free time and not in the vicinity or when working with children.

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and students/pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and students/pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for online-bullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- When using digital images, staff should inform and educate students/pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.
- Written permission from parents or carers will be obtained before photographs of students/pupils are published on the school website/social media/local press
- In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other students/pupils in the digital/video images.
- Staff and volunteers are allowed to take digital/video images to support educational aims but must follow school policies concerning the sharing, distribution and publication of those images. Those images should

¹ Authorised device – purchased by the pupil/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school.

only be taken on school/academy equipment; the personal equipment of staff should not be used for such purposes.

- Care should be taken when taking digital/video images that students/pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Students/pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include students/pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Students'/Pupils' full names will not be used anywhere on a website or public blog, particularly in association with photographs.
- Student's/Pupil's work can only be published with the permission of the student/pupil and parents or carers.
- Please refer to school photograph policy for more details

Cyber Security (new January 2025)

The school has reviewed the DfE Cyber security standards for schools and colleges and is working toward meeting these standards

- the school, (in partnership with ARK), has identified the most critical parts of the school's digital and technology services and sought assurance about their cyber security
- the school has an effective backup and restoration plan in place in the event of cyber attacks
- staff and Governors receive information on the common cyber security threats and incidents that schools experience
- the school's education programmes include cyber awareness for learners
- the school has a business continuity and incident management plan in place
- there are processes in place for the reporting of cyber incidents. All students and staff have a responsibility to report cyber risk or a potential incident or attack, understand how to do this feel safe and comfortable to do so.

Data Protection

Personal data will be recorded, processed, transferred and made available according to the current data protection legislation.

The school must ensure that:

- it has a Data Protection Policy.
- it implements the data protection principles and is able to demonstrate that it does so through use of policies, notices and records.
- it has paid the appropriate fee Information Commissioner's Office (ICO) and included details of the Data Protection Officer (DPO).
- it has appointed an appropriate Data Protection Officer (DPO) who has a high level of understanding of data protection law and is free from any conflict of interest.
- it has an 'information asset register' in place and knows exactly what personal data it holds, where this data is held, why and which member of staff has responsibility for managing it
- the information asset register records the lawful basis for processing personal data (including, where relevant, how consent was obtained and refreshed). Where special category data is processed, an additional lawful basis will have also been recorded
- it will hold only the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for. The school should develop and implement a 'retention policy' to ensure there are clear and understood policies and routines for the deletion and disposal of data to support this, personal data held must be accurate and up to date where this is necessary for the

purpose it is processed for. Have systems in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals

- it provides staff, parents, volunteers, teenagers and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice
- procedures must be in place to deal with the individual rights of the data subject, e.g. one of the 8 data subject rights applicable is that of Subject Access which enables an individual to see to have a copy of the personal data held about them (subject to certain exceptions which may apply).
- data Protection Impact Assessments (DPIA) are carried out where necessary. For example, to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier (this may also require ensuring that data processing clauses are included in the supply contract or as an addendum)
- it has undertaken appropriate due diligence and has required data processing clauses in contracts in place with any data processors where personal data is processed.
- it understands how to share data lawfully and safely with other relevant data controllers.
- it [reports any relevant breaches to the Information Commissioner](#) within 72hrs of becoming aware of the breach in accordance with UK data protection law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents.
- If a maintained school, it must have a Freedom of Information Policy which sets out how it will deal with FOI requests.
- all staff receive data protection training at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff.

When personal data is stored on any mobile device or removable media the:

- data must be password protected. Most data is stored on the cloud therefore is not stored on the device.
- Logins and passwords must not be shared.
- device must be password protected.
- device must be protected by up to date virus and malware checking software
- data must be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete.

Staff must ensure that they:

- at all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse
- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- can help data subjects understand their rights and know how to handle a request whether verbal or written. Know who to pass it to in the school
- where personal data is stored or transferred on mobile or other devices (including USBs) these must be encrypted and password protected.
- will not transfer any school personal data to personal devices except as in line with school policy
- access personal data sources and records only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data

Communications

- The official school email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and students/pupils should therefore use only the school email service to communicate with others when in school, or on school systems (e.g. by remote access).
- Users must immediately report to the nominated person – in accordance with the school policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and students/pupils or parents/carers (email, social media, chat, blogs, VLE etc) must be professional in tone and content. These communications may only take place on official (monitored) school systems. Personal email addresses, text messaging or social media must not be used for these communications.
- Students/pupils should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

All schools, academies, MATs and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Schools/academies, MATs and local authorities could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, engage in online bullying, discriminate on the grounds of sex, race or disability or who defame a third party may render the school/academy or local authority/MAT liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to pupils, staff and the school through:

- Ensuring that personal information is not published
- Training is provided including: acceptable use; social media risks; checking of settings; data protection; reporting issues.
- Clear reporting guidance, including responsibilities, procedures and sanctions

School staff should ensure that:

- No reference should be made in social media to students/pupils, parents/carers or school staff
- They do not engage in online discussion on personal matters relating to members of the school community
- Personal opinions should not be attributed to the school

When official school social media accounts are established there should be:

- A process for approval by administrators (senior leaders / PTA members)
- Clear processes for the administration and monitoring of these accounts – involving at least two members of staff/ PTA members
- A code of behaviour for users of the accounts, including :
 - Systems for reporting and dealing with abuse and misuse
 - Understanding of how incidents may be dealt with under school disciplinary procedures

Personal Use:

- Personal communications are those made via a personal social media accounts. In all cases, where a personal account is used there should be no association or reference with the school.
- Personal communications which do not refer to or impact upon the school are outside the scope of this policy
- Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken

Monitoring of Public Social Media:

- The school and PTA have a social media account. The school account is used and monitored by SLT, no other staff members access this account. The PTA account is monitored by the PTA. Any school related issues regarding professional identity are reported to SLT.

The use of Artificial Intelligence (AI) systems in School

As Generative Artificial Intelligence (gen AI) continues to advance and influence the world we live in, its role in education is also evolving. Ensuring all use is safe, ethical and responsible is essential.

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

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

Staff are encouraged to use AI based tools to support their work where appropriate, within the frameworks provided below and are required to be professionally responsible and accountable for this area of their work.

- We will comply with all relevant legislation and guidance, with reference to guidance contained in Keeping Children Safe in Education and UK GDPR
- We will provide relevant training for staff and governors in the advantages, use of and potential risks of AI. We will support staff in identifying training and development needs to enable relevant opportunities.
- We will seek to embed learning about AI as appropriate in our curriculum offer, including supporting learners to understand how gen AI works, its potential benefits, risks, and ethical and social impacts.
- As set out in the staff acceptable use policy, staff will be supported to use AI tools responsibly, ensuring the protection of both personal and sensitive data. Staff should only input anonymised data to avoid the exposure of personally identifiable or sensitive information.
- Staff will always ensure AI tools used comply with UK GDPR and other data protection regulations and not infringe copyright. They must never upload personal, private or protected data or input sensitive information.
- AI incidents must be reported promptly. Staff must report any incidents involving AI misuse, data breaches, or inappropriate outputs immediately to the relevant internal teams. Quick reporting helps mitigate risks and facilitates a prompt response.
- The school will regularly review the use of AI systems in school and assess their potential impact on staff, learners and the school's systems and procedures,
- We are aware of the potential risk for discrimination and bias in the outputs from AI tools and have in place interventions and protocols to deal with any issues that may arise. When procuring and implementing AI systems, we will follow due care and diligence to prioritise fairness and safety.
- We will prioritise human oversight. Staff must ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing. This is especially important for external communication to avoid spreading misinformation.

Recourse for improper use and disciplinary procedures.

Improper use of AI tools, including breaches of data protection standards, misuse of sensitive information, or failure to adhere to this agreement, will be subject to disciplinary action as defined in Staff Disciplinary Policy.

Dealing with unsuitable/inappropriate activities

Some internet activity e.g. accessing child abuse images or distributing racist material is illegal and would obviously be banned from school and all other technical systems. Other activities e.g. cyber-bullying would be banned and

could lead to criminal prosecution. There are however a range of activities which may, generally, be legal but would be inappropriate in a school context, either because of the age of the users or the nature of those activities.

The school believes that the activities referred to in the following section would be inappropriate in a school context and that users, as defined below, should not engage in these activities in/or outside the school when using school equipment or systems. The school policy restricts usage as follows:

User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978 N.B. Schools/academies should refer to guidance about dealing with self-generated images sexting – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	Criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	Pornography				X	
	Promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	Promotion of extremism or terrorism				X	X
	Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Activities that might be classed as cyber-crime under the Computer Misuse Act:						
- Gaining unauthorised access to school networks, data and files, through the use of computers/devices - Creating or propagating computer viruses or other harmful files						X

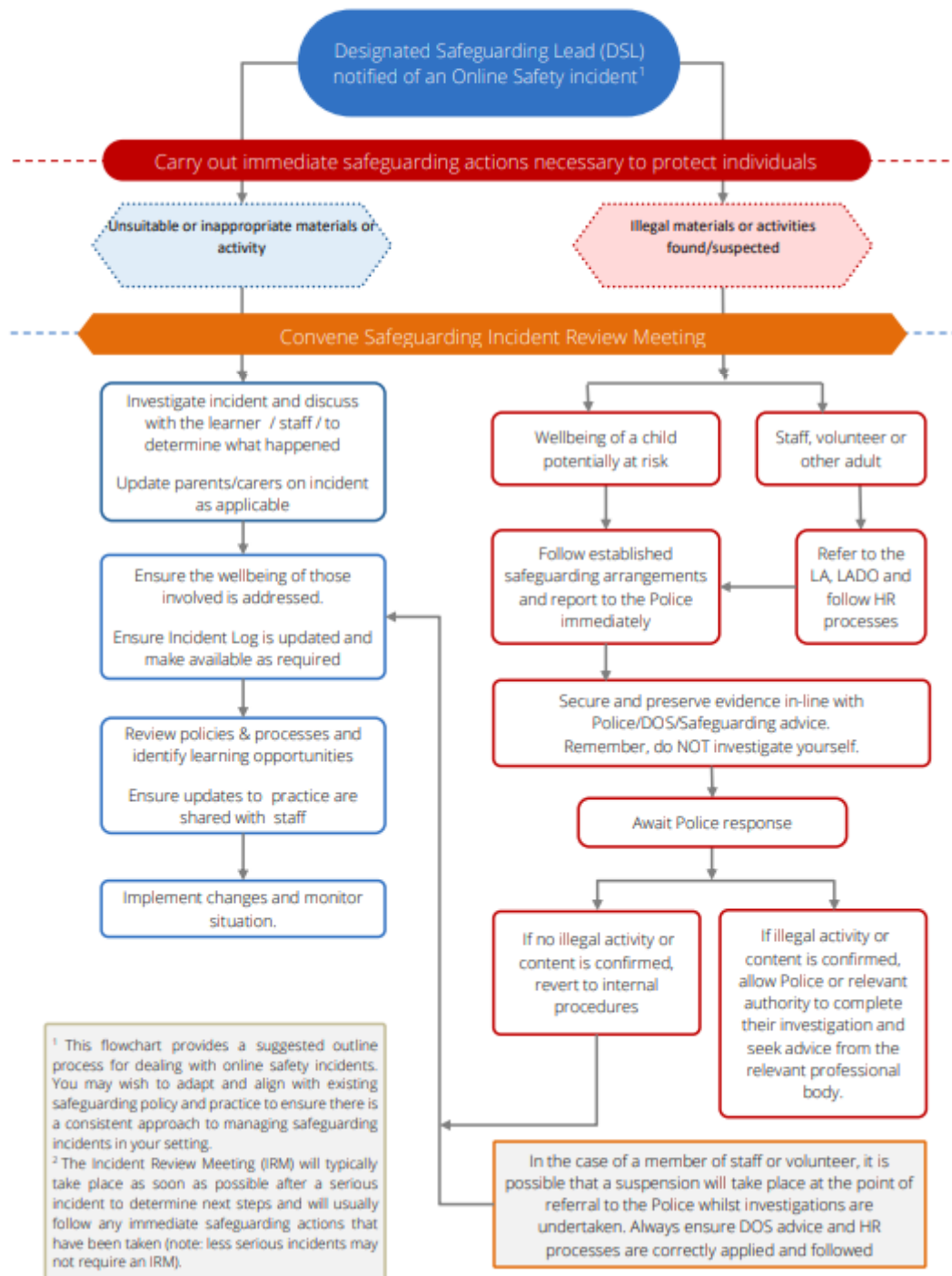
- Revealing or publicising confidential or proprietary information (e.g. financial / personal information, databases, computer / network access codes and passwords) - Disable/Impair/Disrupt network functionality through the use of computers/devices - Using penetration testing equipment (without relevant permission)					
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school/academy				X	
Infringing copyright and intellectual property (including through the use of AI services)				X	
Revealing or publicising confidential or proprietary information (e.g. financial/personal information, databases, computer/network access codes and passwords)				X	
Unfair usage (downloading/uploading large files that hinders others in their use of the internet)				X	
Using school systems to run a private business				X	
Infringing copyright				X	
On-line gaming as part of a scheme of work or intervention (educational and supervised)		X			
On-line gaming (non-educational)				X	
On-line gambling				X	
On-line shopping/commerce				X	
File sharing			X		
Use of social media during working hours (not including the school account)				X	
Use of messaging apps during working hours				X	
Use of video broadcasting e.g. Youtube as a teaching tool and supervised	X				
Use of AI services		X			

Responding to incidents of misuse

This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities (see “User Actions” above).

Illegal Incidents

If there is any suspicion that the web site(s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right hand side of the Flowchart (below and appendix) for responding to online safety incidents and report immediately to the police.



Other Incidents

It is hoped that all members of the school community will be responsible users of digital technologies, who understand and follow school policy. However, there may be times when infringements of the policy could take place, through careless or irresponsible or, very rarely, through deliberate misuse.

In the event of suspicion, all steps in this procedure should be followed:

- Have more than one senior member of staff involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below)
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:
 - Internal response or discipline procedures
 - Involvement by Local Authority/Academy Group or national/local organisation (as relevant).
 - Police involvement and/or action
- If content being reviewed includes images of child abuse, then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:
 - incidents of 'grooming' behaviour
 - the sending of obscene materials to a child
 - adult material which potentially breaches the Obscene Publications Act
 - criminally racist material
 - promotion of terrorism or extremism
 - offences under the Computer Misuse Act (see User Actions chart above)
 - other criminal conduct, activity or materials
- Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.

It is important that all of the above steps are taken as they will provide an evidence trail for the school and possibly the police and demonstrate that visits to these sites were carried out for safeguarding purposes. The completed form should be retained by the group for evidence and reference purposes.

School/academy actions & sanctions

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour/disciplinary procedures as in the relevant LA school-adopted policies.

Appendix

Copies of the more detailed template policies and agreements, contained in the appendix, can be downloaded from:

[SWGfL Online Safety Policy Templates](#)

Acknowledgements

SWGfL would like to acknowledge the contribution of a wide range of individuals and organisations whose policies, documents, advice and guidance have contributed to the development of the online safety policy templates and of the 360 degree safe online safety self-review tool.

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

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Legislation

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

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

Computer Misuse Act 1990

This Act makes it an offence to:

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

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

Data Protection Act 1998

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

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate.
- Not kept longer than necessary.
- Processed in accordance with the data subject’s rights.

- Secure.
- Not transferred to other countries without adequate protection.

The Data Protection Act 2018:

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

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

All data subjects have the right to:

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

Freedom of Information Act 2000

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

Communications Act 2003

Sending by means of the Internet a message or other matter that is grossly offensive or of an indecent, obscene or menacing character; or sending a false message by means of or persistently making use of the Internet for the purpose of causing annoyance, inconvenience or needless anxiety is guilty of an offence liable, on conviction, to imprisonment. This wording is important because an offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

Malicious Communications Act 1988

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

Regulation of Investigatory Powers Act 2000

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

- Establish the facts;
- Ascertain compliance with regulatory or self-regulatory practices or procedures;
- Demonstrate standards, which are or ought to be achieved by persons using the system;
- Investigate or detect unauthorised use of the communications system;
- Prevent or detect crime or in the interests of national security;

- Ensure the effective operation of the system.
- Monitoring but not recording is also permissible in order to:
- Ascertain whether the communication is business or personal;
- Protect or support help line staff.
- The school reserves the right to monitor its systems and communications in line with its rights under this act.

Trade Marks Act 1994

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

Copyright, Designs and Patents Act 1988

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

Telecommunications Act 1984

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

Criminal Justice & Public Order Act 1994

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

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

Racial and Religious Hatred Act 2006

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

Protection from Harassment Act 1997

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

Protection of Children Act 1978

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

Sexual Offences Act 2003

A grooming offence is committed if you are over 18 and have communicated with a child under 16 at least twice (including by phone or using the Internet) it is an offence to meet them or travel to meet them anywhere in the world with the intention of committing a sexual offence. Causing a child under 16 to watch a sexual act is illegal, including

looking at images such as videos, photos or webcams, for your own gratification. It is also an offence for a person in a position of trust to engage in sexual activity with any person under 18, with whom they are in a position of trust. (Typically, teachers, social workers, health professionals, connexions staff fall in this category of trust). Any sexual intercourse with a child under the age of 13 commits the offence of rape.

Public Order Act 1986

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

Obscene Publications Act 1959 and 1964

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

Human Rights Act 1998

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

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

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

The Education and Inspections Act 2006

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

The Education and Inspections Act 2011

Extended the powers included in the 2006 Act and gave permission for Headteachers (and nominated staff) to search for electronic devices. It also provides powers to search for data on those devices and to delete data.

(see template policy in these appendices and for DfE guidance -

<http://www.education.gov.uk/schools/pupilsupport/behaviour/behaviourpolicies/f0076897/screening-searching-and-confiscation>)

The Protection of Freedoms Act 2012

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

The School Information Regulations 2012

Requires schools to publish certain information on its website:

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

Serious Crime Act 2015

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

Criminal Justice and Courts Act 2015

Revenge porn – as it is now commonly known – involves the distribution of private and personal explicit images or video footage of an individual without their consent, with the intention of causing them embarrassment and distress. Often revenge porn is used maliciously to shame ex-partners. Revenge porn was made a specific offence in the Criminal Justice and Courts Act 2015. The Act specifies that if you are accused of revenge porn and found guilty of the criminal offence, you could be prosecuted and face a sentence of up to two years in prison.

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

Links to other organisations or documents

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

UK Safer Internet Centre

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

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

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

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

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

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

Report Harmful Content - <https://reporthearmfulcontent.com/>

[Harmful Sexual Support Service](#)

CEOP

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

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

Others

LGfL – [Online Safety Resources](#)

Kent – [Online Safety Resources page](#)

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

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

Tools for Schools / other organisations

Online Safety BOOST – <https://boost.swgfl.org.uk/>

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

360Data – online data protection self-review tool: www.360data.org.uk

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

UKCIS Digital Resilience Framework - <https://www.gov.uk/government/publications/digital-resilience-framework>

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

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

Bullying/Online-bullying/Sexting/Sexual Harassment

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

SELMA – Hacking Hate - <https://selma.swgfl.co.uk>

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

Scottish Government - Better relationships, better learning, better behaviour -

<http://www.scotland.gov.uk/Publications/2013/03/7388>

DfE - Cyberbullying guidance -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf

Childnet – Cyberbullying guidance and practical PSHE toolkit:

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

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

[UKSIC – Sexting Resources](#)

Anti-Bullying Network – <http://www.antibullying.net/cyberbullying1.htm>

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

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

Social Networking

Digizen – [Social Networking](#)

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

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

Curriculum

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

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

Department for Education: Teaching Online Safety in Schools

Teach Today – www.teachtoday.eu/

Insafe - [Education Resources](#)

Data Protection

[360data - free questionnaire and data protection self review tool](#)

[ICO Guides for Organisations](#)

[IRMS - Records Management Toolkit for Schools](#)

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

Professional Standards/Staff Training

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

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

[Childnet – School Pack for Online Safety Awareness](#)

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

Infrastructure/Technical Support/Cyber-security

[UKSIC – Appropriate Filtering and Monitoring](#)

[SWGfL Safety & Security Resources](#)

Somerset - [Questions for Technical Support](#)

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

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

NEN – [Advice and Guidance Notes](#)

Working with parents and carers

[SWGfL – Online Safety Guidance for Parents & Carers](#)

[Vodafone Digital Parents Magazine](#)

[Childnet Webpages for Parents & Carers](#)

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

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

[Internet Matters](#)

Prevent

[Prevent Duty Guidance](#)

[Prevent for schools – teaching resources](#)

Childnet – [Trust Me](#)

Research

[Ofcom –Media Literacy Research](#)

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

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

Glossary of Terms

AI	Artificial intelligence
AUP	Acceptable Use Policy
CEOP	Child Exploitation and Online Protection Centre (part of National Crime Agency, UK Police, dedicated to protecting children from sexual abuse, providers of the Think U Know programmes.
CPD	Continuous Professional Development
FOSI	Family Online Safety Institute
ICO	Information Commissioners Office
ICT	Information and Communications Technology
INSET	In Service Education and Training
IP address	The label that identifies each computer to other computers using the IP (internet protocol)
ISP	Internet Service Provider
ISPA	Internet Service Providers' Association
IWF	Internet Watch Foundation
LA	Local Authority
LAN	Local Area Network
MAT	Multi Academy Trust
MIS	Management Information System
NEN	National Education Network – works with the Regional Broadband Consortia (e.g. SWGfL) to provide the safe broadband provision to schools across Britain.
Ofcom	Office of Communications (Independent communications sector regulator)
SWGfL	South West Grid for Learning Trust – the Regional Broadband Consortium of SW Local Authorities – is the provider of broadband and other services for schools and other organisations in the SW
TUK	Think U Know – educational online safety programmes for schools, young people and parents.
UKSIC	UK Safer Internet Centre – EU funded centre. Main partners are SWGfL, Childnet and Internet Watch Foundation.
UKCIS	UK Council for Internet Safety
VLE	Virtual Learning Environment (a software system designed to support teaching and learning in an educational setting,
WAP	Wireless Application Protocol

A more comprehensive glossary can be found at the end of the UKCIS [Education for a Connected World Framework](#)

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