# Online Safety Policy

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Related Policies and Guidance Documents	Keeping Children Safe in Education (KCSE) 20243     Safeguarding Policy (506(E)	
Related Regulations	<ul> <li>Children's homes Regulations (England)</li> <li>Online Safety Act (OSA) (2023)</li> <li>Section 175 of the Education Act 2002</li> <li>Education (Independent School Standards) Regulations 2014</li> <li>Non-Maintained Special Schools (England) Regulations 2015.</li> </ul>	
Annexes and Supplementary Info		
Responsible Person	Mark Ryder/Neil Owen	
Responsible Person Signature		



# **Online Safety Policy**

# 1. Policy Statement

Senad works with children and families as part of its activities. These include educating, caring and supporting young people with special education needs and disabilities. We work with families and other agencies to keep children and young people safe. The purpose of this policy statement is to:

- ensure the safety and wellbeing of children and young people is paramount when adults, young people or children are using the internet, social media or mobile devices
- provide staff and volunteers with the overarching principles that guide our approach to online safety
- ensure that, as an organisation, we operate in line with our values and within the law in terms of how we use online devices.

# 2. Legal Framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. Summaries of the key legislation and guidance are available on:

- online abuse
- bullying
- · child protection

#### 3. We believe that:

- Children and young people should never experience abuse of any kind
- Children should be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe at all times.

# 4. We recognise that:

- The online world provides everyone with many opportunities; however, it can also present risks and challenges
- We have a duty to ensure that all children, young people and adults involved in our organisation are protected from potential harm online
- We have a responsibility to help keep children and young people safe online, whether or not they
  are using Senad's network and devices
- Working in partnership with children, young people, their parents, carers and other agencies is
  essential in promoting young people's welfare and in helping young people to be responsible in
  their approach to online safety
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse.

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# 5. We will seek to keep children and young people safe by:

- Appointing an online safety coordinator
- Providing clear and specific directions to staff and volunteers on how to behave online through our Code of Conduct for staff
- Supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
- Supporting and encouraging parents and carers to do what they can to keep their children safe online
- Developing an online Acceptable Use agreement for use with young people and their parents or carers
- Developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or a child or young person
- Reviewing and updating the security of our information systems regularly
- Ensuring that user names, logins, email accounts and passwords are used effectively
- Ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate
- Ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- Providing supervision, support and training for staff and volunteers about online Safety
- Examining and risk assessing any social media platforms and new technologies before they are used within the organisation.

# 6. If online abuse occurs, we will respond to it by:

- Having clear and robust safeguarding procedures in place for responding to abuse (including online abuse)
   Providing support and training for all staff and volunteers on dealing with all forms of abuse, including bullying or cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation
- Making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole into account
- Reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term.

## 7. Related policies and procedures

This policy statement should be read alongside our organisational policies and procedures, including:

- Child protection and Safeguarding Policy (506E)
- Procedures for responding to concerns about a child or young person's Wellbeing (506E)
- Dealing with allegations of abuse made against a child or young person (506E)
- Managing allegations against staff and volunteers (418)
- Code of conduct for staff and volunteers (614)
- Anti-bullying policy and procedures (502)
- Photography and image sharing guidance. (402 and 420 and 517)



# 8. Responsibilities

To ensure the online safeguarding of members of our residential school community it is important that all members of that community work together to develop safe and responsible online behaviours, learning from each other and from good practice elsewhere, reporting inappropriate online behaviours, concerns, and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals and groups within the residential school.

#### • Chief Executive Officer

Will ensure that the directors review and discuss online safety and associated policies and procedures for the group regularly and request additional resources as required.

#### Senior Management

Will provide oversight and governance on the policy's use and implementation across the group.

#### Group IT Manager

Will ensure the policy is fit for purpose and provide ongoing technical advice and guidance as needed.

#### Group training and education manager

Will ensure that training and development opportunities are available for staff and to review and resource additional training as required.

#### Heads of Service and Service Managers duties:

Will ensure the policy is implemented across their sites and that all staff have access and awareness of the policy.

# Employees Duties

Will ensure they understand and work within the policy framework, providing support, advice and guidance to young people and adults when required.



# **Appendix A:**

This section covers elements of online activity that could adversely affect a pupil's personal safety or the personal safety of others online.

Please also see the Online Safety Act explained

Potential	Description	Curriculum area this could be
harm		covered in
or risk		
Abuse (online)	Some online behaviours are abusive. They are negative in nature, potentiallyharmful and in some cases can be illegal.  Teaching could include  explaining about the types of online abuse including sexual, harassment, bullying, trolling and intimidation,  explanation of when online abuse can cross a line and become illegal, such as forms of hate crime and blackmail,  how to respond to online abuse including how to access help and support,  how to respond when the abuse is anonymous,  discussing the potential implications of online abuse, including implications for victims,  being clear what good online behaviours do and don't look like.	and how to report them."  Relationships Education core content (all stages) – online relationships. "about different types of bullying (including cyberbullying), the impact of bullying, responsibilities of bystanders (primarily reporting bullying to an adult) and how to get help."  Relationship's education, relationships and sex education and health education – the law "Pupils should be made aware of the relevant legal provisions when relevant topics are being taught"  Health education core content (all stages) – internet safety and harms. "that the internet can also be a negative place where online abuse, trolling, bullying and harassment can take place, which can have a negative impact on mental health"  Computing curriculum (all key stages) – "recognise acceptable/unacceptable behaviour; identify a range of ways to report concerns about content and contact."  Citizenship: Key Stage 4 – Pupils should be taught about diverse national, regional, religious and ethnic identities in the United
		Kingdom and the need for mutual respect and understanding
Challenges	is and that while some will be fun and harmless, others may be dangerous and or even illegal,  • how to assess if the challenge is safe or potentially harmful, including considering who has generated the challenge and why,	Relationship's education (all stages) and relationships and sex education (secondary) – "about online risks, including that any material someone provides to another has the potential to be shared online."  Health Education core content (all stages)



	explaining to pupils that it is ok to	- "how to consider the effect of their online
	say no and not take part,	actions on others and know how to
	<ul> <li>how and where to go for help if</li> </ul>	recognise and display respectful behaviour
	worried about a challenge,	online and the importance of keeping
	_	personal information private", "how to be a
	understanding the importance of	
	telling an adult about challenges	discerning consumer of information online"
	which include threat or secrecy	and "where and how to report concerns
	('chain letter' style challenges).	and get support with issues online."
Content which	Knowing that violence can be incited	Relationship's education (all stages),
incites	online and escalate very quickly into offline	relationships and sex education
	violence.	(secondary) and health education (all
		stages) – the law "Pupils should be made
	Teaching could include:	aware of the relevant legal provisions when
		relevant topics are being taught".
	<ul> <li>ensuring pupils know that online</li> </ul>	
	content (sometimes gang related)	
	can glamorise the possession of	
	weapons and drugs,	
	<ul> <li>explaining that to intentionally</li> </ul>	
	encourage or assist an offence is also a criminal offence,	
	ensuring pupils know how and where	
	to get help if worried about	
	involvement in violence.	
Fake profiles	Not everyone online is who they say they	Relationship's education core content (all
	are.	stages) – online relationships. "that people
		sometimes behave differently online,
	Teaching could include:	including by pretending to be someone
		they are not."
	<ul> <li>explaining that in some cases profiles</li> </ul>	
	may be people posing as someone	Computing curriculum (all stages) –
	they aren't (i.e. an adult posing as a	"identify a range of ways to report concerns
	child) or may be "bots" (which are	about content and contact."
	automated software programs designed	
	to create and control fake social media	
	accounts),	
	<ul> <li>how to look out for fake profiles.</li> </ul>	
	now to look out for take profiles.	
	This could include	
	profile pictures that don't like right, for	
	example of a celebrity or object,	
	accounts with no followers or thousands of follows; and	
	thousands of follows; and	
	Public figure who doesn't have a	
	verified account	
Grooming	Knowing about the different types of	Relationships Education (all stages) and
	grooming and motivations for it, for	Relationships and Sex Education
	example radicalisation, Child Sexual	(secondary) – "the characteristics of
	Abuse and Exploitation (CSAE) and gangs	positive and healthy friendships (in all
	(county lines).	contexts, including online)".
		Relationships and Sex Education
	Teaching could include:	(secondary) includes, for example, "the
	Ĭ	concepts of, and laws relating to, sexual
		January 10, John 10,



	boundaries in friendships with peers	consent, sexual exploitation, abuse,
	and also in families and with others,	grooming, coercion and how these can
	key indicators of grooming	affect current and future relationships" and
	behaviour,	"how people can actively communicate and
	explaining the importance of	recognise consent from others, including
	disengaging from contact with	sexual consent, and how and when
	suspected grooming and telling a	consent can be withdrawn (in all contexts,
	trusted adult; and	including online)."
	how and where to report it both in	including offine).
	school, for safeguarding and personal	
	support, and to the police. Where there	
	are concerns about sexual abuse and	
	exploitation these can also be reported	
	to Click CEOP.	
	See the NCA-CEOP Thinkuknow website	
	for further information on keeping children	
	safe from sexual abuse and exploitation.	
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	At all stages, it will be important to balance	
	teaching children about making sensible	
	decisions to stay safe whilst being clear it	
	is never the fault of a child who is abused	
	and why victim blaming is always wrong.	
Live streaming	Live streaming (showing a video of	Relationship's education core content (all
	yourself in real-time online either privately	stages) – online relationships. "the rules
	or to a public audience) can be popular	and principles for keeping safe online, how
	with children but it carries risk when	to recognise risks, harmful content and
	carrying it out and watching it.	contact, and how to report them"
	Teaching could include:	Health education (secondary)
	reacting could include.	Treattireducation (secondary)
	explaining the risks of carrying out	
	live streaming. These include the potential	core content – internet safety and harms.
		_
	for people to record live streams without	"the impact of viewing harmful content"
	the user knowing and content being	
	shared without the user's knowledge or	
	consent. As such pupils should think	
	carefully about who the audience might be	
	and if they would be comfortable with	
	whatever they are streaming being shared	
	widely,	
	online behaviours should mirror offline	
	behaviours and considering any live	
	1	
	stream in that context.	
	Pupils shouldn't feel pressured to do	
	1	
	something online that they wouldn't do	
	offline. Consider why in some cases	
	people will do and say things online that	
	they would never consider appropriate	
	offline,	
	explaining the risk of watching videos	
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that are being live streamed, for		
example there is no way of knowing		
what will come next and so this poses a		
risk that a user could see something		
that has not been deemed age		
appropriate in advance,		

 explaining the risk of grooming - see above for more on grooming.

### **Pornography**

Knowing that sexually explicit material presents a distorted picture of sexual behaviours.

Teaching could include:

- that pornography is not an accurate portrayal of adult sexual relationships,
- viewing pornography can lead to skewed beliefs about sex and in some circumstances can normalise violent sexual behaviour,
- that not all people featured in pornographic material are doing so willingly, i.e revenge porn or people trafficked into sex work. live streaming. These include the potential for people to record live streams without the user knowing and content being shared without the user's knowledge or consent. As such pupils should think carefully about who the audience might be and if they would be comfortable with whatever they are streaming being shared widely,
- online behaviours should mirror offline behaviours and considering any live stream in that context.

Pupils shouldn't feel pressured to do something online that they wouldn't do offline. Consider why in some cases people will do and say things online that they would never consider appropriate offline,

explaining the risk of watching videos
that are being live streamed, for
example there is no way of knowing
what will come next and so this poses a
risk that a user could see something
that has not been deemed age
appropriate in advance, explaining the
risk of grooming – see above for more
on grooming

RSE (secondary) core content – online and media. "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."

core content – internet safety and harms. "the impact of viewing harmful content"



# Unsafe communication

Knowing different strategies for staying safe when communicating with others, especially people they do not know/have never met.

Teaching could include:

- explaining that communicating safely online and protecting your privacy and data is important regardless of who you are communicating with,
- identifying indicators or risk and unsafe communications,
- identifying risks associated with giving out addresses, phone numbers or email addresses to people you do not know or arranging to meet someone you have not met before,
- explaining about consent online and supporting pupils to develop strategies to confidently say "no" to both friends and strangers online.

Relationship's education core content (all stages) – online relationships. "the rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them."

and "how to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met."

Relationships Education core content (all stages) – respectful relationships. "the importance of permission-seeking and giving in relationships with friends, peers and adults"

RSE (secondary) core content – "the characteristics of positive and healthy friendships (in all contexts, including online) including: trust, respect, honesty, kindness, generosity, boundaries, privacy, consent and the management of conflict, reconciliation and ending relationships. This includes different (non-sexual) types of relationship"

Computing curriculum (all key stages) – "identify a range of ways to report concerns about content and contact."

#### Cyberflashing

Cyberflashing involves offenders sending an unsolicited sexual image to people via social media or dating apps, but can also be over data sharing services such as Bluetooth and Airdrop.

Under the **Online Safety Act 2023**, cyber-flashing is a criminal offence. It's illegal for anyone to send or show a photo or film of any person's genitals to cause alarm, distress or humiliation, or for the purpose of their own sexual gratification. Offenders can face up to 2 years in prison.

Teaching could include:

- working with both young people and their parents and carers to ensure that restrictions and filters are in place on each device
- By turning off Bluetooth when not using will prevent this occurring

Relationship's education core content (all stages) – online relationships. "the rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them"

Health education (secondary)

RSE (secondary) core content – "the characteristics of positive and healthy friendships (in all contexts, including online) including: trust, respect, honesty, kindness, generosity, boundaries, privacy, consent and the management of conflict, reconciliation and ending relationships. This includes different (non-sexual) types of relationship"

Computing curriculum (all key stages) – "identify a range of ways to report concerns about content and contact."



	Inform young people that they should report all incidents of Cyberflashing to	
	staff/parents or the police	
	Help young people be aware they	
	have a right not to be 'cyber-flashed'	
	Make sure that young people know	
	what to do if this happens to them	
Epilepsy trolling	Epilepsy trolling is the act of using moving	RSE (secondary) core content – "the
	images such as GIFs and other media that	characteristics of positive and healthy
	provoke seizures in people with	friendships (in all contexts, including
	photosensitive epilepsy. This is often	online) including: trust, respect, honesty,
	performed to humiliate, cause harm, and	kindness, generosity, boundaries, privacy,
	demoralise individuals with the condition.	consent and the management of conflict, reconciliation and ending relationships.
		This includes different (non-sexual) types
	Teaching could include:	of relationship"
	Refer to 'Zach's Law' and how	Understanding photosensitive epilepsy; it's
	Epilepsy trolling become a criminal	causes and ways to reduce seizures.
	offence under the Online Safety Act	
	Help young people understand the	
	dangers of engaging in this activity	
	and the impact it can have on	
	someone's health	