



It's What You Say CIC

Online Safety Policy

Contents:

Statement of intent

1. Legal framework
2. Roles and responsibilities
3. The curriculum
4. Staff training
5. Educating parents
6. Classroom use
7. Internet access
8. Filtering and monitoring online activity
9. Network security
10. Emails
11. Social networking
12. The alternative provision website
13. Use of alternative provision-owned devices
14. Use of personal devices
15. Managing reports of online safety incidents
16. Responding to specific online safety concerns
17. Monitoring and review

Appendices

Appendix 1 – Online harms and risks – curriculum coverage

Statement of intent

It's What You Say CIC understands that using online services is an important aspect of raising educational standards, promoting pupil achievement and enhancing teaching and learning.

The use of online services is embedded throughout the alternative provision; therefore, there are a number of controls in place to ensure the safety of pupils and staff.

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

- **Content:** Being exposed to illegal, inappropriate or harmful material, e.g. pornography, fake news, and racist or radical and extremist views.
- **Contact:** Being subjected to harmful online interaction with other users, e.g. commercial advertising and adults posing as children or young adults.
- **Conduct:** Personal online behaviour that increases the likelihood of, or causes, harm, e.g. sending and receiving explicit messages, and cyberbullying.

The measures implemented to protect pupils and staff revolve around these areas of risk. Our alternative provision has created this policy with the aim of ensuring appropriate and safe use of the internet and other digital technology devices by all pupils and staff.

Signed by:

Charmaine Baines – Director

Date – September 2022

Joy Baines – Director

Date – September 2022

1. Legal framework

1.1. This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:

- Voyeurism (Offences) Act 2019
- The General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- DfE (2022) 'Keeping children safe in education'
- DfE (2019) 'Teaching online safety in alternative provision'
- DfE (2018) 'Searching, screening and confiscation'
- National Cyber Security Centre (2017) 'Cyber Security: Small Business Guide'
- UK Council for Child Internet Safety 'Education for a Connected World'
- [UK Council for Internet Safety - GOV.UK \(www.gov.uk\) 2020](https://www.gov.uk/government/publications/uk-council-for-internet-safety-education-for-a-connected-world)

1.2. This policy operates in conjunction with the following alternative provision policies:

- **Cyberbullying Policy**
- **Social Media Policy**
- **Allegations of Abuse Against Staff Policy**
- **Acceptable Use Agreement**
- **Data and E-Security Breach Prevention and Management Plan**
- **Child Protection and Safeguarding Policy**
- **Anti-Bullying Policy**
- **PSHE Policy**
- **RSE and Health Education Policy**
- **Staff Code of Conduct**
- **Behavioural Policy**
- **Disciplinary Policy and Procedures**
- **Data Protection Policy**
- **Confidentiality Policy**
- **Photography Policy**
- **Device User Agreement**
- **Staff ICT and Electronic Devices Policy**
- **Prevent Duty Policy**

2. Roles and responsibilities

2.1. The **I.W.Y.S. It's What You Say CIC Directors** are responsible for:

- Ensuring that this policy is effective and complies with relevant laws and statutory guidance.
- Ensuring the DSL's remit covers online safety.
- Reviewing this policy on an **annual** basis.
- Ensuring their own knowledge of online safety issues is up-to-date.
- Ensuring all staff undergo safeguarding and child protection training (including online safety) at induction.
- Ensuring that there are appropriate filtering and monitoring systems in place.

2.2. The **I.W.Y.S. It's What You Say CIC Directors** are responsible for:

- Supporting the DSL and any deputies by ensuring they have enough time and resources to carry out their responsibilities in relation to online safety.

- Ensuring staff receive regular, up-to-date and appropriate online safety training and information as part of their induction and safeguarding training.
- Ensuring online safety practices are audited and evaluated.
- Supporting staff to ensure that online safety is embedded throughout the curriculum so that all pupils can develop an appropriate understanding of online safety.
- Organising engagement with parents to keep them up-to-date with current online safety issues and how the alternative provision is keeping pupils safe.
- Working with the **DSL** to conduct **half-termly** light-touch reviews of this policy.
- Working with the **DSL** to update this policy on an **annual** basis.

2.3. The DSL is responsible for:

- Taking the lead responsibility for online safety in the alternative provision.
- Acting as the named point of contact within the alternative provision on all online safeguarding issues.
- Undertaking training so they understand the risks associated with online safety and can recognise additional risks that pupils with face online.
- Liaising with relevant members of staff on online safety matters
- Ensuring online safety is recognised as part of the alternative provision's safeguarding responsibilities and that a coordinated approach is implemented.
- Ensuring appropriate referrals are made to external agencies, as required.
- Staying up-to-date with current research, legislation and online trends.
- Coordinating the alternative provision's participation in local and national online safety events, e.g. Safer Internet Day.
- Establishing a procedure for reporting online safety incidents and inappropriate internet use, both by pupils and staff.
- Ensuring all members of the alternative provision community understand the reporting procedure.
- Maintaining records of reported online safety concerns as well as the actions taken in response to concerns.
- Monitoring online safety incidents to identify trends and any gaps in the alternative provision's provision and using this data to update the alternative provision's procedures.
- Reporting to the I.W.Y.S. It's What You Say CIC Directors about online safety on a termly basis.

- Working with the I.W.Y.S. It's What You Say CIC Directors to conduct half-termly light-touch reviews of this policy.
- Working with the I.W.Y.S. It's What You Say CIC Directors to update this policy on an annual basis.

2.4. I.W.Y.S. It's What You Say CIC Directors are responsible for:

- Providing technical support in the development and implementation of the alternative provision's online safety policies and procedures.
- Implementing appropriate security measures as directed by the I.W.Y.S. It's What You Say CIC Directors .
- Ensuring that the alternative provision's filtering and monitoring systems are updated as appropriate.

2.5. All staff members are responsible for:

- Taking responsibility for the security of ICT systems and electronic data they use or have access to.
- Modelling good online behaviours.
- Maintaining a professional level of conduct in their personal use of technology.
- Having an awareness of online safety issues.
- Reporting concerns in line with the alternative provision's reporting procedure.
- Where relevant to their role, ensuring online safety is embedded in their teaching of the curriculum.

2.6. Pupils are responsible for:

- Adhering to this policy, the Acceptable Use Agreement and other relevant policies.
- Seeking help from alternative provision staff if they are concerned about something they or a peer has experienced online.
- Reporting online safety incidents and concerns in line with the procedures within this policy.

3. The curriculum

- 3.1. Online safety is embedded throughout the curriculum; however, it is particularly addressed in the following subjects:
 - RSE
 - Health education
 - PSHE
 - Citizenship
 - Music and Radio Production and Media
 - Visual Art
- 3.2. The curriculum and the alternative provision's approach to online safety is developed in line with the UK Council for Child Internet Safety's 'Education for a Connected World' framework and the DfE's 'Teaching online safety in alternative provision' guidance.
- 3.3. Pupils are taught the underpinning knowledge and behaviours that can help them to navigate the online world safely and confidently regardless of the device, platform or app they are using.
- 3.4. Online safety teaching is always appropriate to pupils' ages and developmental stages.
- 3.5. The underpinning knowledge and behaviours pupils learn through the curriculum include the following:
 - How to evaluate what they see online
 - How to recognise techniques used for persuasion
 - Acceptable and unacceptable online behaviour
 - How to identify online risks
 - How and when to seek support
- 3.6. The online risks pupils may face online are always considered when developing the curriculum. The risks that are considered and how they are covered in the curriculum can be found in [Appendix 1](#) of this policy.
- 3.7. The DSL is involved with the development of the alternative provision's online safety curriculum.
- 3.8. The alternative provision recognises that, while any pupil can be vulnerable online, there are some pupils who may be more susceptible to online harm or have less support from family and friends in staying safe online, e.g. pupils with SEND and LAC. I.W.Y.S. DIRECTORS/SENCo will work together to ensure the curriculum is tailored so these pupils receive the information and support they need.

- 3.9. Class teachers review external resources prior to using them for the online safety curriculum, to ensure they are appropriate for the cohort of pupils. When reviewing these resources, the following questions are asked:
- Where does this organisation get their information from?
 - What is their evidence base?
 - Have they been externally quality assured?
 - What is their background?
 - Are they age appropriate for pupils?
 - Are they appropriate for pupils' developmental stage?
- 3.10. External visitors may be invited into alternative provision to help with the delivery of certain aspects of the online safety curriculum. The **I.W.Y.S. It's What You Say CIC Directors/DSL/SENCO** decide when it is appropriate to invite external groups into alternative provision and ensure the visitors selected are appropriate.
- 3.11. Before conducting a lesson or activity on online safety, the I.W.Y.S. DIRECTORS consider the topic that is being covered and the potential that pupils in the class have suffered or may be suffering from online abuse or harm in this way. The I.W.Y.S. DIRECTORS advises the staff member on how to best support any pupil who may be especially impacted by a lesson or activity.
- 3.12. Lessons and activities are planned carefully so they do not draw attention to a pupil who is being or has been abused or harmed online, to avoid publicising the abuse.
- 3.13. During an online safety lesson or activity, the class teacher ensures a safe environment is maintained in which pupils feel comfortable to say what they feel and are not worried about getting into trouble or being judged.
- 3.14. If a staff member is concerned about anything pupils raise during online safety lessons and activities, they will make a report in line with sections 15 and 16 of this policy.
- 3.15. If a pupil makes a disclosure to a member of staff regarding online abuse following a lesson or activity, the staff member will follow the reporting procedure outlined in sections **15 and 16** of this policy.

4. Staff training

- 4.1. All staff receive safeguarding and child protection training, which includes online safety training, during their induction.
- 4.2. Online safety training for staff is updated annually
- 4.3. In addition to this training, staff also receive regular online safety updates as required and at least annually.

- 4.4. The I.W.Y.S. DIRECTORS /DSL/SENCo undergo training to provide them with the knowledge and skills they need to carry out their role, this includes online safety training. This training is updated at least every two years.
- 4.5. In addition to this formal training, the I.W.Y.S. DIRECTORS /DSL and SENCo receive regular online safety updates to allow them to keep up with any developments relevant to their role. In relation to online safety, these updates allow the I.W.Y.S. DIRECTORS /DSL/SENCo to:
 - Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and capability required to keep pupils safe while they are online at alternative provision.
 - Recognise the additional risks that pupils with SEND face online and offer them support to stay safe online.
- 4.6. All staff receive a copy of this policy upon their induction and are informed of any changes to the policy.
- 4.7. Staff are required to adhere to the Staff Code of Conduct at all times, which includes provisions for the acceptable use of technologies and the use of social media.
- 4.8. All staff are informed about how to report online safety concerns, in line with sections 15 and 16 of this policy.
- 4.9. The DSL acts as the first point of contact for staff requiring advice about online safety.

5. Educating parents

- 5.1. The alternative provision works in partnership with parents to ensure pupils stay safe online at alternative provision and at home.
- 5.2. Parents are provided with information about the alternative provision's approach to online safety and their role in protecting their children. Parental awareness is raised in the following ways:
 - Letters home
 - Parent meetings
 - Links to useful information via the website/Social media sites
 - Newsletters
- 5.3. Parents are sent a copy of the Acceptable Use Agreement at the beginning of each academic year and are encouraged to go through this with their child to ensure their child understands the document and the implications of not following it.

6. Classroom use

- 6.1. A wide range of technology is used during lessons, including the following:

- Computers
 - Laptops
 - Tablets
 - Email
- 6.2. Prior to using any websites, tools, apps or other online platforms in the classroom, or recommending that pupils use these platforms at home, the class teacher always reviews and evaluates the resource.
- 6.3. I.W.Y.S. DIRECTORS ensure that any internet-derived materials are used in line with copyright law.
- 6.4. Pupils are supervised when using online materials during lesson time – this supervision is suitable to their age and ability.

7. Internet access

- 7.1. Pupils, staff and other members of the alternative provision community are only granted access to the alternative provision's internet network once they have read and signed the Acceptable Use Agreement.
- 7.2. A record is kept of users who have been granted internet access in the alternative provision office.
- 7.3. All members of the alternative provision community are encouraged to use the alternative provision's internet network, instead of 3G, 4G and 5G networks, as the network has appropriate filtering and monitoring to ensure individuals are using the internet appropriately.

8. Filtering and monitoring online activity

- 8.1. The I.W.Y.S. It's What You Say CIC Directors_ ensures the alternative provision's ICT network has appropriate filters and monitoring systems in place.
- 8.2. The I.W.Y.S. It's What You Say CIC Directors undertake a risk assessment to determine what filtering and monitoring systems are required.
- 8.3. The filtering and monitoring systems the alternative provision implements are appropriate to pupils' ages, the number of pupils using the network, how often pupils access the network, and the proportionality of costs compared to the risks.
- 8.4. The I.W.Y.S. It's What You Say CIC Directors ensures 'over blocking' does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding.
- 8.5. I.W.Y.S. DIRECTORS undertake monthly checks on the filtering and monitoring systems to ensure they are effective and appropriate.

- 8.6. Requests regarding making changes to the filtering system are directed to the I.W.Y.S. It's What You Say CIC Directors.
- 8.7. Prior to making any changes to the filtering system, I.W.Y.S. DIRECTORS /DSL conduct a risk assessment.
- 8.8. Any changes made to the system are recorded by I.W.Y.S. DIRECTORS.
- 8.9. Reports of inappropriate websites or materials are made I.W.Y.S. DIRECTORS immediately, who investigates the matter and makes any necessary changes.
- 8.10. Deliberate breaches of the filtering system are reported to I.W.Y.S. DIRECTORS who will escalate the matter appropriately.
- 8.11. If a pupil has deliberately breached the filtering system, they will be disciplined in line with the Behavioural Policy.
- 8.12. If a member of staff has deliberately breached the filtering system, they will be disciplined in line with the Disciplinary Policy and Procedure.
- 8.13. If material that is believed to be illegal is accessed, inadvertently or deliberately, this material will be reported to the appropriate agency immediately, e.g. the Internet Watch Foundation (IWF), CEOP Learning Pathways and/or the police.
- 8.14. The alternative provision's network and alternative provision-owned devices are appropriately monitored.
- 8.15. All users of the network and alternative provision-owned devices are informed about how and why they are monitored.
- 8.16. Concerns identified through monitoring are reported to the I.W.Y.S. DIRECTORS who manages the situation in line with sections 15 and 16 of this policy.

9. Network security

- 9.1. Technical security features, such as anti-virus software, are kept up-to-date and managed by I.W.Y.S. DIRECTORS
- 9.2. Firewalls are switched on at all times.
- 9.3. I.W.Y.S. DIRECTORS review the firewalls on a I.W.Y.S. DIRECTORS basis to ensure they are running correctly, and to carry out any required updates.
- 9.4. Staff and pupils are advised not to download unapproved software or open unfamiliar email attachments.
- 9.5. Staff members and pupils report all malware and virus attacks to I.W.Y.S. DIRECTORS All members of staff have their own unique usernames and private passwords to access the alternative provision's systems.

- 9.6. Staff members are responsible for keeping their passwords private.
- 9.7. Passwords have a minimum and maximum length and require a mixture of letters, numbers and symbols to ensure they are as secure as possible.
- 9.8. Staff are not permitted to share their login details with others and are not allowed to log in as another user at any time.
- 9.9. Staff are required to lock access to devices and systems when they are not in use.
- 9.10. If staff are found to be sharing their login details or otherwise mistreating the password system, the I.W.Y.S. It's What You Say CIC Directors are informed and decides the necessary action to take.
- 9.11. Full details of the alternative provision's network security measures can be found in the Data and E-Security Breach Prevention and Management Plan.

10. Emails

- 10.1. Access to and the use of emails is managed in line with the Data Protection Policy, Acceptable Use Agreement and Confidentiality Policy.
- 10.2. Staff are given approved alternative provision email accounts and are only able to use these accounts at alternative provision and when doing alternative provision-related work outside of alternative provision hours.
- 10.3. Prior to being authorised to use the email system, staff must agree to and sign the relevant acceptable use agreement.
- 10.4. Personal email accounts are not permitted to be used on the alternative provision site.
- 10.5. Any email that contains sensitive or personal information is only sent using secure and encrypted email.
- 10.6. Staff members are required to block spam and junk mail, and report the matter to I.W.Y.S. DIRECTORS
- 10.7. The alternative provision's monitoring system can detect inappropriate links, malware and profanity within emails – staff and pupils are made aware of this.
- 10.8. Chain letters, spam and all other emails from unknown sources are deleted without being opened.
- 10.9. I.W.Y.S. DIRECTORS organise an annual assembly where they explain what a phishing email and other malicious emails might look like – this assembly includes information on the following:
 - How to determine whether an email address is legitimate
 - The types of address a phishing email could use

- The importance of asking “does the email urge you to act immediately?”
 - The importance of checking the spelling and grammar of an email
- 10.10. Any cyberattacks initiated through emails are managed in line with the Data and E-Security Breach Prevention and Management Plan.

11. Social networking

Personal use

- 11.1. Access to social networking sites is filtered as appropriate.
- 11.2. Staff and pupils are not permitted to use social media for personal use during lesson time.
- 11.3. Staff and pupils can use personal social media during break and lunchtimes; however, inappropriate or excessive use of personal social media during alternative provision hours may result in the removal of internet access or further action.
- 11.4. Staff members are advised that their conduct on social media can have an impact on their role and reputation within the alternative provision.
- 11.5. Staff receive annual training on how to use social media safely and responsibly.
- 11.6. Staff are not permitted to communicate with pupils or parents over social networking sites and are reminded to alter their privacy settings to ensure pupils and parents are not able to contact them on social media.
- 11.7. Pupils are taught how to use social media safely and responsibly through the online safety curriculum.
- 11.8. Concerns regarding the online conduct of any member of the alternative provision community on social media are reported to the I.W.Y.S. DIRECTORS and managed in accordance with the relevant policy, e.g. Anti-Bullying Policy, Staff Code of Conduct and Behavioural Policy.

Use on behalf of the alternative provision

- 11.9. The use of social media on behalf of the alternative provision is conducted in line with the Social Media Policy.
- 11.10. The alternative provision’s official social media channels are only used for official educational or engagement purposes.
- 11.11. Staff members must be authorised by the I.W.Y.S. It’s What You Say CIC Directors to access to the alternative provision’s social media accounts.

- 11.12. All communication on official social media channels by staff on behalf of the alternative provision is clear, transparent and open to scrutiny.
- 11.13. The Staff Code of Conduct contains information on the acceptable use of social media – staff members are required to follow these expectations at all times.

12. The alternative provision website

- 12.1. The I.W.Y.S. It's What You Say CIC Directors is responsible for the overall content of the alternative provision website – they will ensure the content is appropriate, accurate, up-to-date and meets government requirements.
- 12.2. The website complies with guidelines for publications including accessibility, data protection, respect for intellectual property rights, privacy policies and copyright law.
- 12.3. Personal information relating to staff and pupils is not published on the website.
- 12.4. Images and videos are only posted on the website if the provisions in the Photography Policy are met.

13. Use of alternative provision-owned devices

- 13.1. Staff members are issued with the following devices to assist with their work:
 - Laptop
 - Phone
- 13.2. Pupils are provided with alternative provision-owned devices as necessary to assist in the delivery of the curriculum, e.g. tablets to use during lessons.
- 13.3. Alternative provision-owned devices are used in accordance with the Device User Agreement.
- 13.4. Staff and pupils are not permitted to connect alternative provision-owned devices to public Wi-Fi networks.
- 13.5. All alternative provision-owned devices are password protected.
- 13.6. All mobile alternative provision-owned devices are fitted with tracking software to ensure they can be retrieved if lost or stolen.
- 13.7. All alternative provision-owned devices are fitted with software to ensure they can be remotely accessed, in case data on the device needs to be protected, retrieved or erased.
- 13.8. I.W.Y.S. DIRECTORS review all alternative provision-owned devices on a monthly basis to carry out software updates and ensure there is no inappropriate material on the devices.

- 13.9. No software, apps or other programmes can be downloaded onto a device without authorisation from I.W.Y.S. DIRECTORS.
- 13.10. Staff members or pupils found to be misusing alternative provision-owned devices are disciplined in line with the Disciplinary Policy and Procedure and Behavioural Policy.

14. Use of personal devices

- 14.1. Personal devices are used in accordance with the Staff ICT and Electronic Devices Policy and the Pupils' Personal Electronic Devices Policy.
- 14.2. Any personal electronic device that is brought into alternative provision is the responsibility of the user.
- 14.3. Personal devices are not permitted to be used in the following locations:
- Toilets
 - Changing rooms
- 14.4. Staff members are not permitted to use their personal devices during lesson time, other than in an emergency.
- 14.5. Staff members are not permitted to use their personal devices to take photos or videos of pupils.
- 14.6. Staff members report concerns about their colleagues' use of personal devices on the alternative provision premises in line with the Allegations of Abuse Against Staff Policy.
- 14.7. If a member of staff is thought to have illegal content saved or stored on a personal device, or to have committed an offence using a personal device, the I.W.Y.S. It's What You Say CIC Directors_ will inform the police and action will be taken in line with the **Allegations of Abuse Against Staff Policy**.
- 14.8. Pupils are not permitted to use their personal devices during lesson time or when moving between lessons.
- 14.9. If a pupil needs to contact their parents during the alternative provision day, they are allowed to use the phone in the alternative provision office.
- 14.10. The I.W.Y.S. It's What You Say CIC Directors may authorise the use of mobile devices by a pupil for safety or precautionary use.
- 14.11. Pupils' devices can be searched, screened and confiscated in accordance with the Searching, Screening and Confiscation Policy.
- 14.12. If a staff member reasonably believes a pupil's personal device has been used to commit an offence or may provide evidence relating to an offence, the device will be handed to the police.

- 14.13. Appropriate signage is displayed to inform visitors to the alternative provision of the expected use of personal devices.
- 14.14. Any concerns about visitors' use of personal devices on the alternative provision premises are reported to the I.W.Y.S. DIRECTORS /DSL.

15. Managing reports of online safety incidents

- 15.1. Staff members and pupils are informed about what constitutes inappropriate online behaviour in the following ways:
- Staff training
 - The online safety curriculum
 - Student briefing
 - Staff briefing
- 15.2. Concerns regarding a staff member's online behaviour are reported to the I.W.Y.S. It's What You Say CIC Directors_ who decides on the best course of action in line with the relevant policies, e.g. Staff Code of Conduct, Allegations of Abuse Against Staff Policy and Disciplinary Policy and Procedures.
- 15.3. Concerns regarding a pupil's online behaviour are reported to the I.W.Y.S. DIRECTORS /DSL who investigates concerns with relevant staff members, e.g. the I.W.Y.S. It's What You Say CIC Directors
- 15.4. Concerns regarding a pupil's online behaviour are dealt with in accordance with relevant policies depending on their nature, e.g. Behavioural Policy and Child Protection and Safeguarding Policy.
- 15.5. Where there is a concern that illegal activity has taken place, the I.W.Y.S. It's What You Say CIC Directors contacts the police.
- 15.6. All online safety incidents and the alternative provision's response are recorded by the I.W.Y.S. DIRECTORS.
- 15.7. Section 16 of this policy outlines how the alternative provision responds to specific online safety concerns, such as cyberbullying and child-on-child abuse.

16. Responding to specific online safety concerns

Cyberbullying

- 16.1. Cyberbullying, against both pupils and staff, is not tolerated.
- 16.2. Any incidents of cyberbullying are dealt with quickly and effectively whenever they occur.
- 16.3. Information about the alternative provision's full response to incidents of cyberbullying can be found in the Cyberbullying Policy.

Online sexual violence and sexual harassment between children (child-on-child abuse)

- 16.4. The alternative provision recognises that child-on-child abuse can take place online. Examples include the following:
- Non-consensual sharing of sexual images and videos
 - Sexualised cyberbullying
 - Online coercion and threats
 - Unwanted sexual comments and messages on social media
 - Online sexual exploitation
- 16.5. The alternative provision responds to all concerns regarding online child-on-child abuse, whether or not the incident took place on the alternative provision premises or using alternative provision-owned equipment.
- 16.6. Concerns regarding online child-on-child abuse are reported to the I.W.Y.S. DIRECTORS who will investigate the matter in line with the Child Protection and Safeguarding Policy.

Information about the alternative provision's full response to incidents of online child-on-child abuse can be found in the I.W.Y.S. Safeguarding induction packs.

Upskirting

- 16.7. Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.
- 16.8. A "specified purpose" is namely:
- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).
 - To humiliate, distress or alarm the victim.
- 16.9. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion activated camera.
- 16.10. Upskirting is not tolerated by the alternative provision.
- 16.11. Incidents of upskirting are reported to the I.W.Y.S. DIRECTORS who will then decide on the next steps to take, which may include police involvement, in line with the Child Protection and Safeguarding Policy.

Youth produced sexual imagery (sexting)

- 16.12. Youth produced sexual imagery is the sending or posting of sexually suggestive images of under-18s via mobile phones or over the internet. Creating and sharing sexual photos and videos of individuals under 18 is illegal.
- 16.13. All concerns regarding sexting are reported to the I.W.Y.S. DIRECTORS
- 16.14. Following a report of sexting, the following process is followed:
- The I.W.Y.S. DIRECTORS /DSL holds an initial review meeting with appropriate alternative provision staff
 - Subsequent interviews are held with the pupils involved, if appropriate
 - Parents are informed at an early stage and involved in the process unless there is a good reason to believe that involving the parents would put the pupil at risk of harm
 - At any point in the process if there is a concern a pupil has been harmed or is at risk of harm, a referral will be made to children's social care services and/or the police immediately
 - The interviews with staff, pupils and their parents are used to inform the action to be taken and the support to be implemented
- 16.15. When investigating a report, staff members do not view the youth produced sexual imagery unless there is a good and clear reason to do so.
- 16.16. If a staff member believes there is a good reason to view youth produced sexual imagery as part of an investigation, they discuss this with the I.W.Y.S. It's What You Say CIC Directors first.
- 16.17. The decision to view imagery is based on the professional judgement of the DSL and always complies with the Child Protection and Safeguarding Policy.
- 16.18. Any accidental or intentional viewing of youth produced sexual imagery that is undertaken as part of an investigation is recorded.
- 16.19. If it is necessary to view the imagery, it will not be copied, printed or shared.
- 16.20. Viewing and deleting imagery is carried out in line with the Searching, Screening and Confiscation Policy.

Online abuse and exploitation

- 16.21. Through the online safety curriculum, pupils are taught about how to recognise online abuse and where they can go for support if they experience it.
- 16.22. The alternative provision responds to concerns regarding online abuse and exploitation, whether or not it took place on the alternative provision premises or using alternative provision-owned equipment.

16.23. All concerns relating to online abuse and exploitation, including child sexual abuse and exploitation and criminal exploitation, are reported to the I.W.Y.S. DIRECTORS /DSL and dealt with in line with the Child Protection and Safeguarding Policy.

Online hate

16.24. The alternative provision does not tolerate online hate content directed towards or posted by members of the alternative provision community.

16.25. Incidents of online hate are dealt with in line with the relevant alternative provision policy depending on the nature of the incident and those involved, e.g. Staff Code of Conduct, Anti-Bullying Policy and Adult Code of Conduct.

Online radicalisation and extremism

16.26. The alternative provision's filtering system protects pupils and staff from viewing extremist content.

16.27. Concerns regarding a staff member or pupil being radicalised online are dealt with in line with the Child Protection and Safeguarding Policy and Prevent Duty Policy.

17. Monitoring and review

17.1. The alternative provision recognises that the online world is constantly changing; therefore, the I.W.Y.S. It's What You Say CIC Directors conduct half-termly light-touch reviews of this policy to evaluate its effectiveness.

17.2. The I.W.Y.S. It's What You Say CIC Directors review this policy in full on an annual basis and following any online safety incidents.

17.3. The next scheduled review date for this policy is September 2023

17.4. Any changes made to this policy are communicated to all members of the alternative provision community.

Appendix 1: Online harms and risks – curriculum coverage

Subject area	Description and teaching content	Curriculum area the harm or risk is covered in
How to navigate the internet and manage information		
Age restrictions	<p>Some online activities have age restrictions because they include content which is not appropriate for children under a specific age.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • That age verification exists and why some online platforms ask users to verify their age • Why age restrictions exist • That content that requires age verification can be damaging to under-age consumers • What the age of digital consent is (13 for most platforms) and why it is important 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • Health education • Computing curriculum • PSHE
How content can be used and shared	<p>Knowing what happens to information, comments or images that are put online.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • What a digital footprint is, how it develops and how it can affect pupils' futures • How cookies work • How content can be shared, tagged, and traced • How difficult it is to remove something once it has been shared online • What is illegal online, e.g. youth-produced sexual imagery (sexting) 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE • Health education • RSE • Computing curriculum (Music technology and radio production) • Employability & Development • IT

<p>Disinformation, misinformation and hoaxes</p>	<p>Some information shared online is accidentally or intentionally wrong, misleading or exaggerated.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • Disinformation and why individuals or groups choose to share false information in order to deliberately deceive • Misinformation and being aware that false and misleading information can be shared inadvertently • Online hoaxes, which can be deliberately and inadvertently spread for a variety of reasons • That the widespread nature of this sort of content can often appear to be a stamp of authenticity, making it important to evaluate what is seen online • How to measure and check authenticity online • The potential consequences of sharing information that may not be true 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE • RSE • Computing curriculum (Music technology and radio production) • Visual Art • Drama
<p>Fake websites and scam emails</p>	<p>Fake websites and scam emails are used to extort data, money, images and other things that can either be used by the scammer to harm the person targeted or sold on for financial, or other, gain.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • How to recognise fake URLs and websites • What secure markings on websites are and how to assess the sources of emails • The risks of entering information to a website which is not secure • What pupils should do if they are harmed/targeted/groomed as a result of interacting with a fake website or scam email • Who pupils should go to for support 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE • RSE • IT • Employability & Development
<p>Online fraud</p>	<p>Fraud can take place online and can have serious consequences for individuals and organisations.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • What identity fraud, scams and phishing are • That children are sometimes targeted to access adults' data • What 'good' companies will and will not do when it comes to personal details 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE) • RSE • IT

		<ul style="list-style-type: none"> • Employability & Development
<p>Password phishing</p>	<p>Password phishing is the process by which people try to find out individuals' passwords so they can access protected content.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • Why passwords are important, how to keep them safe and that others might try to get people to reveal them • How to recognise phishing scams • The importance of online security to protect against viruses that are designed to gain access to password information • What to do when a password is compromised or thought to be compromised 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE • Employability & Development • IT
<p>Personal data</p>	<p>Online platforms and search engines gather personal data – this is often referred to as 'harvesting' or 'farming'.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • How cookies work • How data is farmed from sources which look neutral • How and why personal data is shared by online companies • How pupils can protect themselves and that acting quickly is essential when something happens • The rights children have with regards to their data • How to limit the data companies can gather 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE • IT • Employability & Development
<p>Persuasive design</p>	<p>Many devices, apps and games are designed to keep users online for longer than they might have planned or desired.</p> <p>Teaching includes the following:</p>	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • Health education • PSHE

	<ul style="list-style-type: none"> • That the majority of games and platforms are designed to make money – their primary driver is to encourage people to stay online for as long as possible • How notifications are used to pull users back online 	<ul style="list-style-type: none"> • Visual Art • IT
Privacy settings	<p>Almost all devices, websites, apps and other online services come with privacy settings that can be used to control what is shared.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • How to find information about privacy settings on various devices and platforms • That privacy settings have limitations 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • IT • PSHE
Targeting of online content	<p>Much of the information seen online is a result of some form of targeting.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • How adverts seen at the top of online searches and social media have often come from companies paying to be on there and different people will see different adverts • How the targeting is done • The concept of clickbait and how companies can use it to draw people to their sites and services 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE • Employability & Development
How to stay safe online		
Online abuse	<p>Some online behaviours are abusive. They are negative in nature, potentially harmful and, in some cases, can be illegal.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • The types of online abuse, including sexual harassment, bullying, trolling and intimidation • When online abuse can become illegal • How to respond to online abuse and how to access support • How to respond when the abuse is anonymous • The potential implications of online abuse • What acceptable and unacceptable online behaviours look like 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSE • PSHE • Health education • Computing curriculum (Music technology and radio production)

		<ul style="list-style-type: none"> • Employability & Development •
Challenges	<p>Online challenges acquire mass followings and encourage others to take part in what they suggest.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • What an online challenge is and that, while some will be fun and harmless, others may be dangerous and even illegal • How to assess if the challenge is safe or potentially harmful, including considering who has generated the challenge and why • That it is okay to say no and to not take part in a challenge • How and where to go for help • The importance of telling an adult about challenges which include threats or secrecy – ‘chain letter’ style challenges 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE • RSE • IT • Computing curriculum (Music technology and radio production) • Visual Art
Content which incites	<p>Knowing that violence can be incited online and escalate very quickly into offline violence.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • That online content (sometimes gang related) can glamorise the possession of weapons and drugs • That to intentionally encourage or assist in an offence is also a criminal offence • How and where to get help if they are worried about involvement in violence 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSE • PSHE • Employability & Development
Fake profiles	<p>Not everyone online is who they say they are.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • That, in some cases, profiles may be people posing as someone they are not or may be ‘bots’ • How to look out for fake profiles 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE • Employability & Development • IT

<p>Grooming</p>	<p>Knowing about the different types of grooming and motivations for it, e.g. radicalisation, child sexual abuse and exploitation (CSAE) and gangs (county lines).</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • Boundaries in friendships with peers, in families, and with others • Key indicators of grooming behaviour • The importance of disengaging from contact with suspected grooming and telling a trusted adult • How and where to report grooming both in alternative provision and to the police <p>At all stages, it is important to balance teaching pupils about making sensible decisions to stay safe whilst being clear it is never the fault of the child who is abused and why victim blaming is always wrong.</p>	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • Employability & Development • RSE • PSHE
<p>Live streaming</p>	<p>Live streaming (showing a video of yourself in real-time online either privately or to a public audience) can be popular with children, but it carries a risk when carrying out and watching it.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • What the risks of carrying out live streaming are, e.g. the potential for people to record livestreams and share the content • The importance of thinking carefully about who the audience might be and if pupils would be comfortable with whatever they are streaming being shared widely • That online behaviours should mirror offline behaviours and that this should be considered when making a livestream • That pupils should not feel pressured to do something online that they would not do offline • Why people sometimes do and say things online that they would never consider appropriate offline • The risk of watching videos that are being livestreamed, e.g. there is no way of knowing what will be shown next • The risks of grooming 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE • RSE • Employability & Development

<p>Pornography</p>	<p>Knowing that sexually explicit material presents a distorted picture of sexual behaviours.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • That pornography is not an accurate portrayal of adult sexual relationships • That 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 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSE • PSHE • Employability & Development
<p>Unsafe communication</p>	<p>Knowing different strategies for staying safe when communicating with others, especially people they do not know or have not met.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • That communicating safely online and protecting your privacy and data is important, regardless of who you are communicating with • How to identify indicators of risk and unsafe communications • The risks associated with giving out addresses, phone numbers or email addresses to people pupils do not know, or arranging to meet someone they have not met before • What online consent is and how to develop strategies to confidently say no to both friends and strangers online 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSE • PSHE
<p>Wellbeing</p>		
<p>Impact on confidence (including body confidence)</p>	<p>Knowing about the impact of comparisons to ‘unrealistic’ online images.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • The issue of using image filters and digital enhancement • The role of social media influencers, including that they are paid to influence the behaviour of their followers • The issue of photo manipulation, including why people do it and how to look out for it 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE • RSE • Art

<p>Impact on quality of life, physical and mental health and relationships</p>	<p>Knowing how to identify when online behaviours stop being fun and begin to create anxiety, including that there needs to be a balance between time spent online and offline.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • How to evaluate critically what pupils are doing online, why they are doing it and for how long (screen time) • How to consider quality vs. quantity of online activity • The need for pupils to consider if they are actually enjoying being online or just doing it out of habit due to peer pressure or the fear or missing out • That time spent online gives users less time to do other activities, which can lead some users to become physically inactive • The impact that excessive social media usage can have on levels of anxiety, depression and other mental health issues • That isolation and loneliness can affect pupils and that it is very important for them to discuss their feelings with an adult and seek support • Where to get help 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE • RSE • Employability & Development
<p>Online vs. offline behaviours</p>	<p>People can often behave differently online to how they would act face to face.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • How and why people can often portray an exaggerated picture of their lives (especially online) and how that can lead to pressures around having perfect/curated lives • How and why people are unkind or hurtful online when they would not necessarily be unkind to someone face to face 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • PSHE • RSE
<p>Reputational damage</p>	<p>What users post can affect future career opportunities and relationships – both positively and negatively.</p> <p>Teaching includes the following:</p> <ul style="list-style-type: none"> • Strategies for positive use • How to build a professional online profile 	<p>This risk or harm is covered in the following curriculum area(s):</p> <ul style="list-style-type: none"> • RSE • PSHE

		<ul style="list-style-type: none">• Employability & Development• Employability & Development
Suicide, self-harm and eating disorders	Pupils may raise topics including eating disorders, self-harm and suicide. I.W.Y.S. DIRECTORS/SENCO must be aware of the risks of encouraging or making these seem a more viable option for pupils and should take care to avoid giving instructions or methods and avoid using language, videos and images.	