



ROOTS 4 LEARNING CIC

Online Safety Policy

Last updated: 04/09/2026

Date policy last reviewed	04/09/2027
----------------------------------	------------

Signed by			
Liz Key	Co-Headteacher	Date:	08/09/2026
Alison Gardiner	Chair of Trustees	Date:	08/09/2026

Contents

Legal framework	3
Roles and responsibilities.....	4
Managing online safety	6
Cyberbullying	8
Child-on-child sexual abuse and harassment.....	8
Grooming and exploitation	9
Mental health	10
Online hoaxes and harmful online challenges.....	10
Cyber-crime	11
Online safety training for staff	12
Online safety and the curriculum	12
Use of technology in the classroom.....	14
Use of mobile devices	15
Educating parents.....	16
Internet access	16
Filtering and monitoring online activity.....	17
Network security	18
Emails	18
Artificial intelligence (AI).....	19
Social networking	19
The centre website	19
Use of devices	19
Remote learning	20
Monitoring and review	20

Legal framework

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

- Online Safety Act 2023
- Voyeurism (Offences) Act 2019
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Children's Wellbeing and Schools Act 2026
- DfE 'Filtering and monitoring standards for schools and colleges'
- DfE 'Harmful online challenges and online hoaxes'
- DfE 'Keeping children safe in education'
- DfE 'Teaching online safety in schools'
- DfE 'Searching, screening and confiscation'
- DfE 'Generative artificial intelligence in education'
- Department for Digital, Culture, Media and Sport and UK Council for Internet Safety 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- UK Council for Child Internet Safety 'Education for a Connected World'
- National Cyber Security Centre 'Small Business Guide: Cyber Security'

This policy operates in conjunction with the following centre policies:

- Social Media Policy
- Allegations of Abuse Against Staff Policy
- Technology Acceptable Use Agreement
- Cyber-security Policy
- Cyber Response and Recovery Plan
- Child Protection and Safeguarding Policy
- Child-on-child Abuse Policy
- Anti-Bullying Policy
- Mobile Devices Policy
- Pupils' Personal Electronic Devices Policy
- Staff Code of Conduct
- Relational Behaviour Policy
- Disciplinary Policy and Procedure
- Data Protection Policy

- Confidentiality Policy
- Photography and Images Policy
- Device User Agreement
- Staff ICT and Electronic Devices Policy
- Prevent Duty Policy
- Remote Education Policy
- Safe Use of AI Policy
- Making or Sharing of Nude or Semi-nude Images Policy

Roles and responsibilities

The Trust Board will be 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 and at regular intervals.
- Ensuring that there are appropriate filtering and monitoring systems in place.
- Ensuring that the effectiveness of filtering and monitoring systems is reviewed at least annually in liaison with ICT staff and service providers.
- Ensuring that the Co-Headteachers and other relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, and manage them effectively and know how to escalate concerns when identified.
- Ensuring that all relevant centre policies have an effective approach to planning for, and responding to, online challenges and hoaxes embedded within them.
- Ensuring compliance with the DfE's 'Meeting digital and technology standards in schools and colleges', with particular regard to the filtering and monitoring standards in relation to safeguarding.

The Co-Headteachers will be responsible for:

- Ensuring that online safety is a running and interrelated theme throughout the centre's policies and procedures, including in those related to the curriculum, teacher training and safeguarding.
- Supporting the DSL and the deputy DSL 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.
- Organising engagement with parents to keep them up to date with current online safety issues and how the centre is keeping pupils safe.
- Working with the DSL and ICT technicians to conduct half-termly light-touch reviews of this policy.
- Working with the DSL and Trust Board to update this policy on an annual basis.
- Identifying and assigning roles and responsibilities to manage the centre's filtering and monitoring systems.
- Appointing one of the Co-Headteachers as digital lead, in line with the Cyber-security Policy.

The DSL will be responsible for:

- Taking the lead responsibility for online safety at ROOTS.
- Undertaking training so they understand the risks associated with online safety and can recognise additional risks that pupils with SEND face online.
- Liaising with relevant members of staff on online safety matters, e.g. the SENCO and ICT technicians.
- Ensuring online safety is recognised as part of the centre's safeguarding responsibilities and that a coordinated approach is implemented.
- Ensuring safeguarding is considered in the centre's approach to remote learning.
- Establishing a procedure for reporting online safety incidents and inappropriate internet use, both by pupils and staff, and ensuring all members of the centre community understand this procedure.
- Understanding the filtering and monitoring processes in place at ROOTS and ensuring they continue to meet the centre's safeguarding needs.
- Ensuring that all safeguarding training given to staff includes an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring systems at the centre.
- 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 centre's provision, and using this data to update the centre's procedures.
- Reporting to the Trust Board about online safety on a termly basis.
- Working with the Co-headteachers and Trust Board to update this policy on an annual basis.

ICT technicians (Initially Co-Headteacher) will be responsible for:

- Providing technical support in the development and implementation of the centre's online safety policies and procedures.
- Implementing appropriate security measures.

- Ensuring that the centre's filtering and monitoring systems are updated as appropriate.
- Working with the DSL and Co-Headteacher to conduct half-termly light-touch reviews of this policy.

All staff members will be 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 current and emerging online safety issues.
- Ensuring they are familiar with, and understand, the indicators that pupils may be unsafe online.
- Reporting concerns in line with the centre's reporting procedure.
- Where relevant to their role, ensuring online safety is embedded in their teaching of the curriculum.

Pupils will be responsible for:

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

Managing online safety

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues affecting young people. Staff will understand that pupils are at risk of abuse and other safeguarding concerns online as well as face to face, and in many cases, abuse will take place concurrently online and offline.

The DSL has overall responsibility for the centre's approach to online safety, with support from deputies and the Co-headteachers where appropriate, and will ensure that there are strong processes in place to handle any concerns about pupils' safety online. The DSL should liaise with the police or children's social care services for support responding to harmful online sexual behaviour.

The importance of online safety is integrated across all centre operations in the following ways:

- Staff and trustees receive regular training
- Staff receive regular email updates regarding online safety information and any changes to online safety guidance or legislation
- Online safety is integrated into learning throughout the curriculum in PSHE

- Regular discussions will take place between students and staff around healthy online activity
- Assemblies are conducted termly on the topic of remaining safe online

Handling online safety concerns

Any disclosures made by pupils to staff members about online abuse, harassment or exploitation, whether they are the victim or disclosing on behalf of another child, will be handled in line with the Child Protection and Safeguarding Policy.

Staff will be aware that harmful online sexual behaviour can progress on a continuum, and appropriate and early intervention can prevent abusive behaviour in the future. Staff will also acknowledge that pupils displaying this type of behaviour are often victims of abuse themselves and should be suitably supported.

The victim of online harmful sexual behaviour may ask for no one to be told about the abuse. The DSL will consider whether sharing details of the abuse would put the victim in a more harmful position, or whether it is necessary in order to protect them from further harm. Ultimately the DSL will balance the victim's wishes against their duty to protect the victim and other young people. The DSL and other appropriate staff members will meet with the victim's parents to discuss the safeguarding measures that are being put in place to support their child and how the report will progress.

Confidentiality will not be promised, and information may be still shared lawfully, for example, if the DSL decides that there is a legal basis under UK GDPR such as the public task basis whereby it is in the public interest to share the information. If the decision is made to report abuse to children's social care or the police against the victim's wishes, this must be handled extremely carefully; the reasons for sharing the information should be explained to the victim and appropriate specialised support should be offered.

Concerns regarding a staff member's online behaviour are reported to the Co-headteachers, who decide on the best course of action in line with the relevant policies. If the concern is about the headteacher, it is reported to the Chair of Trustees.

Concerns regarding a pupil's online behaviour are reported to the DSL, who investigates concerns with relevant staff members, e.g. the Co-headteachers and ICT technicians, and manages concerns in accordance with relevant policies depending on their nature, e.g. the Relational Behaviour Policy and Child Protection and Safeguarding Policy.

Where there is a concern that illegal activity has taken place, the Co-headteacher contacts the police.

The centre avoids unnecessarily criminalising pupils, e.g. calling the police, where criminal behaviour is thought to be inadvertent and as a result of ignorance or normal developmental curiosity, e.g. where a pupil has shared nudes or semi-nudes of themselves. The DSL will decide in which cases this response is appropriate and will manage such cases in line with the Child Protection and Safeguarding Policy.

All online safety incidents and the centre's response are recorded by the DSL.

Cyberbullying

Cyberbullying can include, but is not limited to, the following:

- Threatening, intimidating or upsetting text messages
- Threatening or embarrassing pictures and video clips sent via mobile phone cameras
- Silent or abusive phone calls or using the victim's phone to harass others, to make them think the victim is responsible
- Threatening or bullying emails, possibly sent using a pseudonym or someone else's name
- Unpleasant messages sent via instant messaging
- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g. Facebook
- Abuse between young people in intimate relationships online i.e. teenage relationship abuse
- Discriminatory bullying online i.e. homophobia, racism, misogyny/misandry.

ROOTS will be aware that certain pupils can be more at risk of abuse and/or bullying online, such as LGBTQ+ pupils and pupils with SEND.

Cyberbullying against pupils or staff is not tolerated under any circumstances. Incidents of cyberbullying are dealt with quickly and effectively wherever they occur in line with the Anti-bullying Policy.

Child-on-child sexual abuse and harassment

Pupils may use the internet and technology to facilitate child-on-child sexual abuse and harassment. Staff will understand that this abuse can occur both in and outside of the centre, offline and online, and that online elements may facilitate or accompany abuse that also occurs face to face.

The following are examples of online harmful sexual behaviour of which staff will be expected to be aware:

- Threatening, facilitating or encouraging sexual violence
- Upskirting, i.e. taking a picture underneath a person's clothing without consent and with the intention of viewing their genitals, breasts or buttocks
- Sexualised online bullying, e.g. sexual jokes or taunts
- Unwanted and unsolicited sexual comments and messages
- Consensual or non-consensual making or sharing of nudes and semi-nudes, including those generated or altered using AI.
- Abuse between young people in intimate relationships online, i.e. teenage relationship abuse

All staff will be aware of and promote a zero-tolerance approach to sexually harassing or abusive behaviour, and any attempts to pass such behaviour off as

trivial or harmless. Staff will be aware that allowing such behaviour could lead to a culture that normalises abuse and leads to pupils becoming less likely to report such conduct.

Staff will be aware that creating, possessing, and distributing nudes or semi-nudes involving other children, including images generated or altered using AI, may constitute a criminal offence, even where the imagery is created, possessed, and distributed with the permission of the child depicted, or by the child themselves. Such incidents will be handled in accordance with the Making or Sharing of Nude or Semi-nude Images Policy.

The centre will be aware that interactions between the victim of online harmful sexual behaviour and the alleged perpetrator(s) are likely to occur over social media following the initial report, as well as interactions with other pupils taking "sides", often leading to repeat harassment. Roots will respond to these incidents in line with the Child-on-child Abuse Policy, Child Protection and Safeguarding Policy, and the Social Media Policy.

Roots will respond to all concerns regarding online child-on-child sexual abuse and harassment, regardless of whether the incident took place on the premises or using centre-owned equipment. Concerns regarding online child-on-child abuse will be reported to the DSL, who will investigate the matter in line with the Child-on-child Abuse Policy and the Child Protection and Safeguarding Policy.

Grooming and exploitation

Grooming is defined as the situation whereby an adult builds a relationship, trust and emotional connection with a child with the intention of manipulating, exploiting and/or abusing them.

Staff will be aware that grooming often takes place online and that pupils who are being groomed are commonly unlikely to report this behaviour for many reasons, e.g. the pupil may have been manipulated into feeling a strong bond with their groomer and may have feelings of loyalty, admiration, or love, as well as fear, distress and confusion.

Due to the fact pupils are less likely to report grooming than other online offences, it is particularly important that staff understand the indicators of this type of abuse. The DSL will ensure that online safety training covers online abuse, the importance of looking for signs of grooming, and what the signs of online grooming are, including:

- Being secretive about how they are spending their time online.
- Having an older boyfriend or girlfriend, usually one that does not attend the centre and whom their close friends have not met.
- Having money or new possessions, e.g. clothes and technological devices, that they cannot or will not explain.

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

Although CSE often involves physical sexual abuse or violence, online elements may be prevalent, e.g. sexual coercion and encouraging children to behave in sexually inappropriate ways online. In some cases, a pupil may be groomed online to become

involved in a wider network of exploitation, e.g. the production or distribution of child sexual abuse material (CSAM), or the sexual exploitation and trafficking of children.

CCE is a form of exploitation in which children are forced or manipulated into committing crimes for the benefit of their abuser, e.g. drug transporting (including county lines activity), shoplifting, serious violence and other forms of criminal exploitation. While these crimes often take place in person, it is increasingly common for children to be groomed and manipulated into participating online.

Where staff have any concerns about pupils with relation to CSE or CCE, they will bring these concerns to the DSL without delay, who will manage the situation in line with the Child Protection and Safeguarding Policy.

Radicalisation

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. This process can occur through direct recruitment, e.g. individuals in extremist groups identifying, targeting and contacting young people with the intention of involving them in terrorist activity, or by exposure to violent ideological propaganda. Children who are targets for radicalisation are likely to be groomed by extremists online to the extent that they believe the extremist has their best interests at heart, making them more likely to adopt the same radical ideology.

Staff members will be aware of the factors which can place certain pupils at increased vulnerability to radicalisation, as outlined in the Prevent Duty Policy. Staff will be expected to exercise vigilance towards any pupils displaying indicators that they have been, or are being, radicalised.

Where staff have a concern about a pupil relating to radicalisation, they will report this to the DSL without delay, who will handle the situation in line with the Child Protection and Safeguarding Policy and the Prevent Duty Policy.

Mental health

Staff will be aware that online activity both in and outside of the centre can have a substantial impact on a pupil's mental state, both positively and negatively. The DSL will ensure that training is available to help ensure that staff members understand apps, games and websites, online terminology, the ways in which social interactions online in general can impact mental health, and the indicators that a pupil is suffering from challenges in their mental health. Concerns about the mental health of a pupil will be dealt with in line with the Relational Behaviour Policy.

Online hoaxes and harmful online challenges

For the purposes of this policy, an **"online hoax"** is defined as a deliberate lie designed to seem truthful, normally one that is intended to scaremonger or to distress individuals who come across it, spread online, e.g. via social media, game chats, and messaging platforms.

For the purposes of this policy, **"harmful online challenges"** refers to challenges that are targeted at young people and generally involve users recording themselves

participating in an online challenge, distributing the video online, e.g. through social media channels, and daring others to do the same. Although many online challenges are harmless, an online challenge becomes harmful when it could potentially put the participant at risk of harm, either directly as a result of partaking in the challenge itself or indirectly as a result of the distribution of the video online; the latter will usually depend on the age of the pupil and the way in which they are depicted in the video.

Where staff become aware of, or suspect, a harmful online challenge or online hoax that may pose a risk to pupils, they will report this to the DSL immediately.

The DSL will conduct a case-by-case assessment for any harmful online content brought to their attention, establishing the scale and nature of the possible risk to pupils, and whether the risk is one that is localised to the centre or the local area, or whether it extends more widely across the country. Where the harmful content is prevalent mainly in the local area, the DSL will consult with the LA about whether quick local action can prevent the hoax or challenge from spreading more widely.

Prior to deciding how to respond to a harmful online challenge or hoax, the DSL and the Co-Headteachers will decide whether each proposed response is:

- In line with any advice received from a known, reliable source, e.g. the UK Safer Internet Centre, when fact-checking the risk of online challenges or hoaxes.
- Careful to avoid needlessly scaring or distressing pupils.
- Not inadvertently encouraging pupils to view the hoax or challenge where they would not have otherwise come across it, e.g. where content is explained to younger pupils but is almost exclusively being shared amongst older pupils.
- Proportional to the actual or perceived risk.
- Helpful to the pupils who are, or are perceived to be, at risk.
- Appropriate for the relevant pupils' age and developmental stage.
- Supportive.
- In line with the Child Protection and Safeguarding Policy.

Where the DSL's assessment finds an online challenge to be putting pupils at risk of harm, they will ensure that the challenge is directly addressed to the relevant pupils, e.g. those within a particular age range that is directly affected or individual pupils at risk where appropriate.

The DSL and Co-headteachers will only implement a centre-wide approach to highlighting potential harms of a hoax or challenge when the risk of needlessly increasing pupils' exposure to the risk is considered and mitigated as far as possible.

Cyber-crime

Cyber-crime is criminal activity committed using computers and/or the internet. There are two key categories of cyber-crime:

- **Cyber-enabled:** these crimes can be carried out offline; however, are made easier and can be conducted at higher scales and speeds online, e.g. fraud, purchasing and selling of illegal drugs, and sexual abuse and exploitation.
- **Cyber-dependent:** these crimes can only be carried out online or by using a computer, e.g. making, supplying or obtaining malware, illegal hacking, and 'booting', which means overwhelming a network, computer or website with internet traffic to render it unavailable.

Roots will factor into its approach to online safety the risk that pupils with a particular affinity or skill in technology may become involved, whether deliberately or inadvertently, in cyber-crime. Where there are any concerns about a pupil's use of technology and their intentions with regard to using their skill and affinity towards it, the DSL will consider a referral to the Cyber Choices programme, which aims to intervene where children are at risk of committing cyber-crime and divert them to a more positive use of their skills and interests.

The DSL and Co-headteachers will ensure that pupils are taught, throughout the curriculum, how to use technology safely, responsibly and lawfully.

Online safety training for staff

The DSL will ensure that all safeguarding training given to staff includes elements of online safety, including how the internet can facilitate abuse and exploitation, and understanding the expectations, roles and responsibilities relating to filtering and monitoring systems. All staff will be made aware that pupils are at risk of abuse, by their peers and by adults, online as well as in person, and that, often, abuse will take place concurrently via online channels and in daily life.

Staff training will include a specific focus on harmful online narratives such as misinformation, disinformation, and conspiracy theories, helping staff to recognise the signs of influence or vulnerability among pupils.

Training will equip staff with the knowledge and confidence to identify signs of online harm, respond appropriately to disclosures or concerns, and support pupils in developing critical thinking skills and safe online behaviours.

Staff will also be guided on how to embed online safety themes across the wider curriculum, promoting a consistent, whole-centre approach to digital safeguarding.

Online safety and the curriculum

Online safety is embedded throughout the curriculum; however, it is particularly addressed in the following subjects:

- RSHE
- PSHE
- Citizenship
- ICT

Online safety teaching is always appropriate to pupils' ages and developmental stages.

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. 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
- Knowledge and behaviours that are covered in the government's online media literacy strategy

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 the Appendix to this policy.

The centre's approach to teaching online safety in the curriculum will reflect the ever-evolving nature of online risks, ensuring pupils develop the knowledge and resilience to navigate digital spaces safely and responsibly. Online safety education will address four key categories of risk: content, contact, conduct, and commerce.

Content risks

Pupils will be taught how to critically evaluate online content and identify material that is illegal, inappropriate, or harmful. The curriculum will include discussions around harmful content such as AI-generated content, deepfakes, pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news), and conspiracy theories. Lessons will equip pupils with the skills to question sources, verify information, and understand the dangers of engaging with such content.

Contact risks

The centre will educate pupils about the potential dangers of interacting with others online or generative AI applications that simulate this. Pupils will explore topics such as peer pressure, commercial exploitation, and grooming tactics used by adults who pose as children or young adults. They will learn how to recognise unsafe interactions, use privacy settings effectively, and report any concerning behaviour or messages to trusted adults and platforms.

Conduct risks

Pupils will be guided on how their own online behaviour can impact both themselves and others. The curriculum will address the risks associated with making, sharing or receiving nudes and semi-nudes, including images that have been generated or altered using AI. Online bullying, including the use of online platforms, e.g. social media and messaging platforms, to harass or intimidate others, will also be a key focus. Pupils will be taught responsible digital conduct and the legal and emotional consequences of harmful behaviour.

Commerce risks

The curriculum will also include education on online commercial risks. Pupils will be informed about the dangers of online gambling, exposure to inappropriate advertising, and financial scams such as phishing. They will learn how to recognise fraudulent schemes, protect their personal and financial information, and seek help when confronted with suspicious online activity.

The DSL will be involved with the development of the centre's online safety curriculum. Pupils will be consulted on the online safety curriculum, where appropriate, due to their unique knowledge of the kinds of websites they and their peers frequent and the kinds of behaviours in which they engage online.

Relevant members of staff, e.g. the SENCO and designated teacher for LAC, will work together to ensure the curriculum is tailored so that pupils who may be more vulnerable to online harms, e.g. pupils with SEND and LAC, receive the information and support they need.

Roots will also endeavour to take a more personalised or contextualised approach to teaching about online safety for more susceptible children, and in response to instances of harmful online behaviour from pupils.

Class teachers will review external resources prior to using them for the online safety curriculum, to ensure they are appropriate for the cohort of pupils.

External visitors may be invited into the centre to help with the delivery of certain aspects of the online safety curriculum. The Co-headteacher and DSL will decide when it is appropriate to invite external groups in and ensure the visitors selected are appropriate.

Before conducting a lesson or activity on online safety, the class teacher and DSL will 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 DSL will advise the staff member on how to best support any pupil who may be especially impacted by a lesson or activity. Lessons and activities will be 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.

During an online safety lesson or activity, the class teacher will ensure a safe environment is maintained in which pupils feel comfortable to say what they feel and ask questions, and are not worried about getting into trouble or being judged.

If a staff member is concerned about anything pupils raise during online safety lessons and activities, they will make a report in line with the Child Protection and Safeguarding Policy.

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 the Child Protection and Safeguarding Policy.

Use of technology in the classroom

A wide range of technology will be used during lessons, including the following:

- Computers

- Laptops
- Tablets
- Intranet
- Email
- Cameras

Prior to using any websites, tools, apps, AI systems or other online platforms in the classroom, or recommending that pupils use these platforms at home, the class teacher will review and evaluate the resource to ensure it is appropriate, safe and suitable for the age and needs of the pupils. Class teachers will ensure that any internet-derived materials are used in line with copyright law.

Pupils will be supervised when using online materials during lesson time; this supervision is suitable to their age and ability.

Use of mobile devices

While Roots recognises that the use of mobile devices can have educational benefits, there are also a variety of associated risks which the centre will ensure it manages.

Pupils will not be permitted to use personal mobile devices at any point during the school day unless exceptions apply. The prohibited use of personal mobile devices will be managed in accordance with the centre's Mobile Devices Policy.

Staff will use all personal technology in line with the centre's Staff ICT and Electronic Devices Policy.

Roots recognises that pupils may have access to the internet through personal devices and mobile phone networks outside the school day, or where centre restrictions are circumvented. This can increase the risk of online behaviour that places pupils at risk of harm and breaches the centre's Mobile Devices Policy and Technology Acceptable Use Agreement for pupils.

Pupils will be educated on the acceptable and appropriate use of personal devices.

Where there is a significant problem with the misuse of smart technology among pupils, the centre will discipline those involved in line with the Relational Behaviour Policy.

Inappropriate use of smart technology may include:

- Using mobile and smart technology to sexually harass, bully, troll or intimidate peers.
- Making or sharing nudes and semi-nudes, including images generated or altered using AI, both consensually and non-consensually.
- Viewing and sharing pornography and other harmful content.

Roots will seek to ensure that it is kept up to date with the latest devices, platforms, apps, trends and related threats. We will consider the 4Cs (content, contact, conduct and commerce) when educating pupils about the risks involved with the

inappropriate use of smart technology and enforcing the appropriate disciplinary measures.

Educating parents

Roots will work in partnership with parents to ensure pupils stay safe online whilst at the centre and at home. Parents will be provided with information about our approach to online safety and their role in protecting their children. Parents will be 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.

Parents will be made aware of the various ways in which their children may be at risk online, including, but not limited to:

- Child sexual abuse, including grooming.
- Exposure to radicalising content.
- Making or sharing nudes and semi-nudes, including images generated or altered using AI.
- Cyberbullying.
- Exposure to age-inappropriate content, e.g. pornography.
- Exposure to harmful content, e.g. content that encourages self-destructive behaviour.

Parents will be informed of the ways in which they can prevent their child from accessing harmful content at home, e.g. by implementing parental controls to block age-inappropriate content.

Parental awareness regarding how they can support their children to be safe online will be raised in the following ways:

- Parents' evenings
- Flex Friday Catch ups
- Twilight training sessions
- Newsletters
- Online resources

Internet access

Pupils, staff and other members of the Roots community will only be granted access to the centre's internet network once they have read and signed the Acceptable Use Agreement. A record will be kept of users who have been granted internet access in the office.

All members of the Roots community will be encouraged to use the centre'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.

Filtering and monitoring online activity

The Trust Board will ensure the centre's ICT network has appropriate filters and monitoring systems in place and that it is meeting the DfE's 'Filtering and monitoring standards for schools and colleges'. The Trust Board will ensure 'over blocking' does not lead to unreasonable restrictions as to what pupils can be taught with regards to online teaching and safeguarding.

Roots will do all it reasonably can to limit pupils' exposure to online risks from the centre's ICT system. The centre will put in place appropriate filtering and monitoring systems and ensure that their effectiveness is reviewed at least annually and whenever there is a significant change to the centre's network, safeguarding risks or technology provision. Reviews will be carried out by the Co-Headteacher acting as digital lead, with support from the DSL and ICT technicians.

Reviews will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record will be kept of these checks.

The DSL will ensure that specific roles and responsibilities are identified and assigned to manage filtering and monitoring systems and to ensure they meet the centre's safeguarding needs.

The Co-headteacher will undertake a risk assessment to determine what filtering and monitoring systems are required. The filtering and monitoring systems the centre implements will be 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.

Requests regarding making changes to the filtering system will be directed to the Co-headteachers. Prior to making any changes to the filtering system, the DSL will conduct a risk assessment. Any changes made to the system will be recorded. Reports of inappropriate websites or materials will be made to the DSL immediately, who will investigate the matter and makes any necessary changes.

Deliberate breaches of the filtering system will be reported to the DSL and ICT technicians, who will escalate the matter appropriately. If a pupil has deliberately breached the filtering system, they will be disciplined in line with the Relational Behaviour Policy. If a member of staff has deliberately breached the filtering system, they will be disciplined in line with the Disciplinary Policy and Procedure.

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 and/or the police.

The centre's network and centre-owned devices will be appropriately monitored. All users of the network and centre-owned devices will be informed about how and why they are monitored. Concerns identified through monitoring will be reported to the DSL who will manage the situation in line with the Child Protection and Safeguarding Policy.

Network security

Technical security features, such as anti-virus software, will be kept up to date. Firewalls will be switched on at all times. These will be reviewed on a weekly basis to ensure they are running correctly, and to carry out any required updates.

Staff and pupils will be advised not to download unapproved software or open unfamiliar email attachments, and will be expected to report all malware and virus attacks to a member of the staff team.

All members of staff and pupils will have their own unique usernames and private passwords to access systems. Staff members and pupils will be responsible for keeping their passwords private. Passwords will have a minimum and maximum length and require a mixture of letters, numbers and symbols to ensure they are as secure as possible. Passwords will expire after 90 days, after which users will be required to change them.

Users will inform ICT technicians if they forget their login details, who will arrange for the user to access the systems under different login details. Users will not be permitted to share their login details with others and will not be allowed to log in as another user at any time. If a user is found to be sharing their login details or otherwise mistreating the password system, the Co-headteacher will be informed and will decide the necessary action to take.

Users will be required to lock access to devices and systems when they are not in use.

Emails

Access to and the use of emails will be managed in line with the Data Protection Policy, Acceptable Use Agreement, and the Confidentiality Policy.

Staff and pupils will be given approved centre email accounts and will only be able to use these accounts at the centre and when doing centre-related work outside of centre hours. Prior to being authorised to use the email system, staff and pupils must agree to and sign the Acceptable Use Agreement. Personal email accounts will not be permitted to be used on the centre site. Any email that contains sensitive or personal information will only be sent using secure and encrypted email.

Staff members and pupils will be required to block spam and junk mail, and report the email to ICT technicians. The centre's monitoring system can detect inappropriate links, malware and profanity within emails; staff and pupils will be made aware of this. Chain letters, spam and all other emails from unknown sources will be deleted without being opened. ICT technicians will organise annual cyber awareness training, including guidance on recognising phishing emails, AI-generated phishing attempts and other malicious communications. This training will include 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

Any cyber-attacks initiated through emails will be managed in line with the Cyber Response and Recovery Plan.

Artificial intelligence (AI)

Roots will take steps to prepare pupils for changing and emerging technologies, including generative AI, and teach them how to use AI safely, responsibly and appropriately, taking account of their age and developmental stage.

The centre will ensure its IT system includes appropriate filtering and monitoring systems to limit pupils' ability to access or create harmful or inappropriate content through generative AI.

The centre will ensure that pupils are not accessing or creating harmful or inappropriate content, including through generative AI.

The centre will take steps to ensure that personal, confidential or sensitive information is not entered into AI tools unless this is authorised, secure and compliant with data protection legislation.

Where staff use AI tools to support teaching, learning or administrative tasks, they will do so in accordance with the centre's Safe Use of AI Policy and DfE guidance on generative AI in education.

The centre will make use of any guidance and support that enables it to have a safe, secure and reliable foundation in place before using more powerful technology such as generative AI.

Social networking

The use of social media by staff and pupils will be managed in line with the centre's Social Media Policy.

The centre website

The Co-headteachers will be responsible for the overall content of the Roots website; they will ensure the content is appropriate, accurate, up-to-date and meets government requirements.

Use of devices

Staff members and pupils will be issued with centre-owned devices to assist with their work, where necessary. Requirements around the use of centre-owned devices can be found in the centre's Device User Agreement.

The use of personal devices on the centre premises and for the purposes of centre work will be managed in line with the Staff ICT and Electronic Devices Policy and Pupils' Personal Electronic Devices Policy.

Remote learning

All remote learning will be delivered in line with the ROOTS Remote Education Policy. This policy specifically sets out how online safety will be considered when delivering remote education.

Monitoring and review

Roots recognises that the online world is constantly changing; therefore, the DSL, ICT technicians and Co-headteachers conduct half-termly light-touch reviews of this policy to evaluate its effectiveness.

The Trust Board, Co-headteachers and DSL will review this policy in full on an annual basis and following any online safety incidents.

The next scheduled review date for this policy is 04/09/2027.

Any changes made to this policy are communicated to all members of the ROOTS community.

Appendix: Online harms and risks – curriculum coverage

The table below sets out the online harms and risks considered when developing the curriculum, and the subject areas in which they are covered. This table is carried over unchanged from Roots's existing curriculum planning.

How to navigate the internet and manage information

Age restrictions

Some online activities have age restrictions because they include content which is not appropriate for children under a specific age. Teaching will include the following:

- 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

Curriculum areas: Health education, Computing

How content can be used and shared

Knowing what happens to information, comments or images that are put online. Teaching will include the following:

- 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)

Curriculum areas: Relationships/RSHE, Computing

Disinformation, misinformation and hoaxes

Some information shared online is accidentally or intentionally wrong, misleading or exaggerated. Teaching will include the following:

- 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
- Misinformation and understanding that some genuine information can be published with the deliberate intent to harm, e.g. releasing private information or photographs
- 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

Curriculum areas: Relationships/health education and RSHE, Computing, Citizenship

Fake websites and scam emails

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. Teaching will include the following:

- 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, or groomed as a result of interacting with a fake website or scam email
- Who pupils should go to for support
- The risk of 'too good to be true' online offers, advertising and fake product sales designed to persuade people to part with money for products and services that do not exist

Curriculum areas: Relationships/RSHE, Computing

Online fraud

Fraud can take place online and can have serious consequences for individuals and organisations. Teaching will include the following:

- What identity fraud, scams and phishing are
- That online fraud can be highly sophisticated and that anyone can be a victim
- How to protect yourself and others against different types of online fraud

- How to identify 'money mule' schemes and recruiters
- The risk of online social engineering to facilitate authorised push payment fraud, where a victim is tricked into sending a payment to the criminal
- The risk of sharing personal information that could be used by fraudsters
- That children are sometimes targeted to access adults' data
- What 'good' companies will and will not do when it comes to personal details
- How to report fraud, phishing attempts, suspicious websites and adverts

Curriculum areas: Relationships/RSHE, Computing

Password phishing

Password phishing is the process by which people try to find out individuals' passwords so they can access protected content. Teaching will include the following:

- 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

Curriculum areas: Relationships/RSHE, Computing

Personal data

Online platforms and search engines gather personal data – this is often referred to as 'harvesting' or 'farming'. Teaching will include the following:

- 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

Curriculum areas: Relationships/RSHE, Computing

Persuasive design

Many devices, apps and games are designed to keep users online for longer than they might have planned or desired. Teaching will include the following:

- That the majority of games and platforms are designed to make money, and that their primary driver is to encourage people to stay online for as long as possible to encourage them to spend money or generate advertising revenue
- How notifications are used to pull users back online

Curriculum areas: Health education, Computing

Privacy settings

Almost all devices, websites, apps and other online services come with privacy settings that can be used to control what is shared. Teaching will include the following:

- How to find information about privacy settings on various sites, apps, devices and platforms
- That privacy settings have limitations

Curriculum areas: Relationships/RSHE, Computing

Targeting of online content

Much of the information seen online is a result of some form of targeting. Teaching will include the following:

- 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

Curriculum areas: Relationships/RSHE, Computing

How to stay safe online

Online abuse

Some online behaviours are abusive. They are negative in nature, potentially harmful and, in some cases, can be illegal. Teaching will include the following:

- 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

Curriculum areas: Relationships/RSHE, Computing, Citizenship

Radicalisation

Pupils are at risk of accessing inappropriate and harmful extremist content online, including terrorist material. Extremist and terrorist groups use social media to identify and target vulnerable individuals. Teaching will include the following:

- How to recognise extremist behaviour and content online
- Which actions could be identified as criminal activity
- Techniques used for persuasion

- How to access support from trusted individuals and organisations

Curriculum areas: all areas of the curriculum

Challenges

Online challenges acquire mass followings and encourage others to take part in what they suggest. Teaching will include the following:

- 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, such as 'chain letter' style challenges

Curriculum areas: Relationships/RSHE

Content which incites violence

Knowing that violence can be incited online and escalate very quickly into offline violence. Teaching will include the following:

- 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

Curriculum areas: Relationships/RSHE

Fake profiles

Not everyone online is who they say they are. Teaching will include the following:

- 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

Curriculum areas: Relationships/RSHE, Computing

Grooming

Knowing about the different types of grooming and motivations for it, e.g. radicalisation, child sexual abuse and exploitation, gangs and financial exploitation. Teaching will include the following:

- 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 school and to the police

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.

Curriculum areas: Relationships/RSHE

Livestreaming

Livestreaming (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. Teaching will include the following:

- What the risks of carrying out livestreaming are, e.g. the potential for people to record livestreams and share the content
- 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
- 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

Curriculum areas: RSHE

Pornography

Knowing that sexually explicit material presents a distorted picture of sexual behaviours. Teaching will include the following:

- 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, e.g. revenge porn or people trafficked into sex work

Curriculum areas: RSHE

Unsafe communication

Knowing different strategies for staying safe when communicating with others, especially people they do not know or have not met. Teaching will include the following:

- 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

Curriculum areas: Relationships/RSHE, Computing

Wellbeing

Impact on confidence (including body confidence)

Knowing about the impact of comparisons to 'unrealistic' online images. Teaching will include the following:

- 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
- That 'easy money' lifestyles and offers may be too good to be true
- The issue of photo manipulation, including why people do it and how to look out for it

Curriculum areas: RSHE

Impact on quality of life, physical and mental health and relationships

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. Teaching will include the following:

- 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 due to the fear of 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

Curriculum areas: Health education

Online vs. offline behaviours

People can often behave differently online to how they would act face to face. Teaching will include the following:

- How and why people can often portray an exaggerated picture of their lives (especially online) and how that can lead to pressure, and how and why people are unkind or hurtful online when they would not necessarily be unkind to someone face to face

Curriculum areas: Relationships/RSHE

Reputational damage

What users post can affect future career opportunities and relationships – both positively and negatively. Teaching will include the following:

- Strategies for positive use
- How to build a professional online profile

Curriculum areas: RSHE

Suicide, self-harm and eating disorders

Pupils may raise topics including eating disorders, self-harm and suicide. Teachers 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.

Curriculum areas: not specified in Roots's current table.