



Online and E - Safety Policy

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INTRODUCTION

- This online safety policy has been written by Pod81, involving staff, students and parents/carers
- It takes into account the DfES statutory guidance Keeping Children Safe in Education 2024.
- The policy focuses on the role of e-safety in the Pod81 setting, supported via technology supplied, monitored and maintained by the Pod81 SLT Team. Pod81 is responsible for e-safety, including the monitoring of staff.
- The purpose of this online safety policy is to:
 - Safeguard and protect all members of the Pod81 community online.
 - Identify approaches to educate and raise awareness of online safety throughout the community.
 - Require all staff to work safely and responsibly, to model positive behaviour online and to manage professional standards and practice when using technology.
 - Identify clear procedures to use when responding to online safety concerns.
- Pod81 broadly categorises online safety issue into four areas of risk:
 - **Content** - being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
 - **Contact** - being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
 - **Conduct** - personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
 - **Commerce**- risks such as online gambling, inappropriate advertising, phishing and/or financial scams

POLICY SCOPE

Pod81:

- Recognises online safety as an essential part of safeguarding and acknowledges its duty to protect all students and staff from potential harm online.
- Identifies the internet and associated devices (e.g., computers, tablets, mobile phones and games consoles) are an important part of everyday life.
- Believes students should be empowered to build resilience and develop strategies to manage and respond to risk online.

- This policy applies to all staff including, teachers, therapy team, support staff, external contractors, visitors, volunteers and other individuals who work for, or provide services on behalf of the Pod81 (hereafter collectively referred to as "staff") as well as students.
- This policy applies to all internet access and use of technology, including personal devices, or where students, staff or other individuals are provided with Pod81-issued devices for use off-site, such as a work laptops, tablets or mobile phones.

LINKS WITH OTHER POLICIES AND PRACTICES

This policy links with several other policies including:

- Anti-bullying Policy (2025-2026)
- Staff Code of Conduct
- Behaviour Policy
- Safeguarding and Child Protection Policy (2025-2026)
- Curriculum Policy

MONITORING AND REVIEW

- As technology evolves rapidly, this policy requires at least annual review.
- Additionally, the policy requires revision following any national or local policy requirements, any safeguarding concerns or any changes to the technical infrastructure.
- Pod81 monitors internet use via the use of Qustodio and evaluates online safety mechanisms to ensure this policy consistently applied.
- To ensure oversight of online safety, the Headteacher receives notifications from Qustodio
- Any issues identified via monitoring will be incorporated into Pod81 action planning.

ROLES AND RESPONSIBILITIES

- The Designated Safeguarding Lead ('DSL') has lead responsibility for online safety.
- The Pod81 recognises all members of the community have important roles and responsibilities with regard to online safety.

The Senior Leadership Team will:

- Ensure online safety is a safeguarding issue and practice is in line with national and local recommendations and requirements.
- Ensure there are appropriate and up-to-date policies regarding online safety - including a staff code of conduct/Wellbeing policy and/or acceptable use policy ('AUP') - covering acceptable use of technology.
- Ensure suitable and appropriate filtering and monitoring systems are in place and work with technical staff to monitor the safety and security of Pod81 systems and networks.
- Embed online safety within a progressive curriculum enabling all students to develop an age-appropriate understanding of online safety.

- Support the DSL by ensuring they have sufficient time and resources to fulfil their online safety responsibilities.
- Ensure there are robust reporting channels for the community to access regarding online safety concerns, including internal, local and national support.
- Undertake appropriate risk assessments regarding the safe use of technology.
- Audit and evaluate online safety practice to identify strengths and areas for improvement.

The Designated Safeguarding Lead (DSL) will:

- Act as the named point of contact on all online safeguarding issues and liaise with other members of staff or other agencies, as appropriate.
- Work alongside the Safeguarding Team to ensure online safety is recognised as part of Pod81's safeguarding responsibilities and implement a coordinated approach.
- Ensure all members of staff receive regular, up-to-date and appropriate online safety training.
- Access regular and appropriate training and support to ensure they understand the unique risks associated with online safety and have the relevant, up to date knowledge to keep pupils safe online.
- Access regular and appropriate training and support to ensure they recognise the additional risks pupils with Special Educational Needs and Disabilities (hereafter 'SEND') face online.
- Keep up-to-date with current research, legislation and trends regarding online safety and communicate this with the community, as appropriate.
- Work with staff to coordinate participation in local and national events to promote positive online behaviour, e.g., Safer Internet Day.
- Promote online safety to parents, guardians and the wider community through a variety of channels and approaches.
- Maintain records of online safety concerns, as well as actions taken, as part of the Pod81's safeguarding recording mechanisms.
- Monitor online safety incidents to identify gaps and trends, and use this data to update the education response, policies and procedures.
- Report online safety concerns, as appropriate, to the SLT.
- Work with the SLT to review and update online safety policies on a regular basis (at least annually) with stakeholder input.

It is the responsibility of all members of staff to:

- Contribute to the development of online safety policies.
- Read and adhere to the online safety policy and AUPs.
- Take responsibility for the security of Pod81 systems and the data they use or have access to.
- Model good practice when using technology and maintain a professional level of conduct in their personal use of technology, both on and off-site.
- Embed online safety education in curriculum delivery, wherever possible.
- Have an awareness of a range of online safety issues and how they may be experienced by the children in their care.
- Identify online safety concerns and take appropriate action by following the Pod81's safeguarding policies and procedures.

- Know when and how to escalate online safety issues, including signposting to appropriate support, internally and externally.
- Take personal responsibility for professional development in this area.

It is the responsibility of the Pod81 IT staff managing the technical environment to:

- Provide technical support and perspective to the DSL and SLT, especially in the development and implementation of appropriate online safety policies and procedures.
- Implement appropriate security measures such as use of passwords and encryption to ensure the Pod81's IT infrastructure is secure and not open to misuse or malicious attack, whilst allowing learning opportunities to be maximised.
- Reporting any safeguarding concerns, identified through monitoring or filtering breaches, to the DSL in accordance with the safeguarding procedures.

It is the responsibility of the student (at an appropriate level to their age and ability) to:

- Read, click to acknowledge and adhere to the AUPs
- Engage in age-appropriate online safety education opportunities
- Contribute to the development of online safety policies where appropriate
- Respect the feelings and rights of others both on and offline
- Take responsibility for keeping themselves and others safe online
- Seek help from a trusted adult, if there is a concern online, and support others who may be experiencing online safety issues

It is the responsibility of parents and guardians to:

- Support Pod81 online safety approaches by discussing online safety issues with their children and reinforcing appropriate and safe online behaviours at home
- Model safe and appropriate use of technology
- Identify changes in behaviour could indicate their child is at risk of harm online
- Seek help and support from the Pod81, or other appropriate agencies, if their child encounters risk or concerns online
- Use Pod81 systems, such as learning platforms and other network resources, safely and appropriately
- Take responsibility for their own awareness in relation to the risks and opportunities posed by new and emerging technologies

EDUCATION AND ENGAGEMENT APPROACHES

Education and engagement with students

- Pod81 will establish and embed a progressive online safety curriculum to raise awareness and promote safe and responsible internet use amongst students by:
 - Including online safety in the PSHE curriculum
 - Reinforcing online safety messages whenever technology or the internet is in use
 - Educating students in the effective use of the internet to research; including the skills of knowledge location, retrieval and evaluation
 - Teaching students to be critically aware of the materials they read and shown how to validate information before accepting its accuracy
- Pod81 will support students to read and understand the AUPs in a way which suits their age and ability by:
 - Displaying acceptable use posters in all rooms with internet access
 - Informing students that network and internet use is monitored for safety and security purposes and in accordance with legislation
 - Rewarding positive use of technology
 - Seeking student voice when developing online safety policies and practices, including curriculum development and implementation

VULNERABLE STUDENTS

- Pod81 recognises some students are more vulnerable online due to a range of factors. This may include, but is not limited to children in care, children with SEND or mental health needs, children with English as an Additional Language (EAL) and children experiencing trauma or loss. All students at Pod81 have SEN and as such, are potentially more vulnerable online.
- Pod81 provides differentiated and ability-appropriate online safety education, access and support to vulnerable pupils.
- When implementing an appropriate online safety policy and curriculum, the Pod81 will seek input from specialist staff as appropriate.

Training and engagement with staff

Pod81 will:

- Provide and discuss the online safety policy and procedures with all members of staff as part of induction
- Provide up-to-date and appropriate online safety training for all staff on a regular basis - with at least annual updates - as part of existing safeguarding and child protection training/updates
- This covers the potential risks posed to pupils (Content, Contact, Conduct and Commerce) as well as Pod81's professional practice expectations
- Recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns and provide opportunities for staff to contribute to and shape online safety policies and procedures
- Make staff aware that Pod81 monitors its IT systems and can trace activity to individual users; staff will be reminded to behave professionally and in accordance with Pod81 policies when accessing

Pod81 systems and devices

- Make sure staff are aware that all devices' internet activity is decrypted and subject to internet filtering
- Make staff aware their online conduct outside of Pod81, including personal use of social media, could have an impact on their professional role and reputation
- Highlight useful educational resources and tools staff should use, according to the age and ability of the students
- Ensure all members of staff are aware of the procedures to follow regarding online safety concerns affecting students, colleagues or other members of the community.

Awareness and engagement with parents and carers

- Pod81 recognises parents and carers have an essential role to play in enabling children and young people to become safe and responsible users of the internet and associated technologies
- Pod81 will build a partnership approach to online safety with parents and carers by:
 - Providing information and guidance on online safety in a variety of formats.
 - This includes offering specific online safety awareness training and highlighting online safety at other events, e.g., parent evenings and transition events. (Online National College)
 - Drawing attention to the online safety policy and expectations, e.g., via letters, etc

REDUCING ONLINE RISKS

- Pod81 recognises the internet is a constantly evolving environment and due to its global and connected nature, it is not possible to guarantee unsuitable material cannot be accessed via Pod81 computers or devices.
- To minimise exposure to unsuitable material, Pod81 will:
 - Regularly review the methods used to identify, assess and minimise online risks
 - Examine emerging technologies for educational benefit and undertake appropriate risk assessments before permitting use in Pod81
 - Ensure appropriate filtering and monitoring is in place and taking all reasonable precautions to ensure users can access only appropriate material (Pod81 uses Qustodio to support filtering and monitoring)
- All members of the community are made aware of Pod81's expectations regarding safe and appropriate behaviour online and the importance of not posting any content, comments, images or videos that could cause harm, distress or offence to members of the community. Pod81's AUPs outline these expectations which are further highlighted through a variety of education and training approaches

SAFER USE OF TECHNOLOGY

Classroom Use

- Pod81 uses a wide range of technology, including (but not limited to) access to
 - Computers, laptops and other digital devices
 - Internet (including search engines and educational websites)
 - Email
 - Digital cameras, web cams and video cameras
- All Pod81-owned devices will be used in accordance with the AUPs and with appropriate safety and security measures in place
- Members of staff evaluate websites, tools and apps fully before use in the classroom or recommending for use at home
- Pod81 will use age-appropriate search tools following an informed risk assessment, to identify which tool best suits the needs of the Pod81 community
- Pod81 will ensure the use of internet-derived materials, by staff and students, complies with copyright law and acknowledge the source of information
- Supervision of students will be appropriate to their age and ability

Managing Internet Access

- Pod81 will maintain a written record of users granted access to Pod81 devices and systems.
- All staff, students and visitors will read and sign an AUP before granted access to the Pod81 computer system, IT resources or internet.

FILTERING AND MONITORING

- The Centre Manager/Head of Centre will ensure Pod81'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 Centre Manager/Head of Centre will ensure 'over blocking' does not lead to unreasonable restrictions as to what students can be taught with regards to online teaching and safeguarding.
- 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 school's safeguarding needs.
- The Centre, in conjunction with the Head of Centre, will determine what filtering and monitoring systems are required. The filtering and monitoring systems the school implements will be appropriate to students' ages, the number of students using the network, how often students access the network, and the proportionality of costs compared to the risks.
- The Centre Manager will undertake weekly checks on the filtering and monitoring systems to ensure they are effective and appropriate, findings will be recorded and reported as appropriate to the DSL.
- Requests regarding making changes to the filtering system will be directed to the Head of Centre. Prior to making any changes to the filtering system, the head of Centre and the DSL will conduct a risk assessment. Any changes made to the system will be recorded by the Head of Centre.
- Reports of inappropriate websites or materials will be made to the Head of Centre immediately, who will investigate the matter and makes any necessary changes.
- Deliberate breaches of the filtering system will be reported to the DSL and the Head of Centre, who will escalate the matter appropriately. If a student has deliberately breached the filtering system, they will be disciplined in line with the Behaviour and Positive Relationships 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.
- Pod81's network and school-owned devices will be appropriately monitored. All users of the network and school-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.

Decision Making

- Pod81 ensures age and ability appropriate filtering and monitoring are in place to limit students' exposure to online risks
- Pod81 is aware of preventing "over blocking" which may unreasonably restrict what can be taught
- Decisions regarding filtering and monitoring are risk assessed considering Pod81's specific needs and circumstances
- Changes to filtering and monitoring are risk assessed by staff with educational and technical experience and with consent from the leadership team
- The SLT performs regular checks to ensure both filtering and monitoring are effective and appropriate
- All members of staff understand filtering and monitoring alone cannot fully safeguard pupils; effective classroom management and regular education about safe and responsible use is essential

Filtering

- Pod81 use Qustodio to alert access to and block prohibited sites categorised.
- The filtering system blocks all sites on the Internet Watch Foundation (IWF) list. If pupils discover unsuitable sites:
 - They are required to turn off monitor/screen and report the concern to a member of staff.
 - The member of staff will report the concern (including the URL of the site if possible) to the DSL and/or technical staff.
 - The breach is recorded and escalated.
- Any material believed to be illegal will be reported immediately to the appropriate agencies.

Monitoring

Pod81 monitors internet use on all Pod81-owned or provided internet-enabled devices. This is achieved by:

- Physical monitoring (supervision),
- Internet monitoring and filtering
- If monitoring identifies a concern, Pod81 will respond accordingly.
- All users will be informed that use of Pod81 system is monitored in line with data protection, human rights and privacy legislation.

Managing Personal Data Online

- Personal data will be recorded, processed, transferred and made available in accordance with General Data Protection Regulations and Data Protection legislation.

SECURITY AND MANAGEMENT OF INFORMATION SYSTEMS

- Pod81 take appropriate steps to ensure the security of Pod81 information systems, including:
 - Regular updates to virus protection.
 - Encryption for personal data sent over the Internet or taken off site (such as via portable media storage) or access via appropriate secure remote access systems.
 - Not using portable media without specific permission; portable media is checked by anti-virus /malware scan before use.
 - Not downloading unapproved software to work devices or opening unfamiliar email attachments.
 - Regularly checking files held on the Pod81 network,
 - The appropriate use of user logins and passwords to access the Pod81 network.
 - Specific user logins and passwords are enforced for all members of the Pod81 community.
 - All users must log off or lock their screens/devices if systems are unattended.

Password policy

- All members of staff will have their own unique username and private passwords to access Pod81 systems; members of staff are responsible for keeping their password private
- All students have their own unique username and private passwords to access Pod81 systems; students are responsible for keeping their password private
- Pod81 require all users to:
 - Use strong passwords to access the Pod81 system
 - Change their passwords when prompted
 - Always keep their password private; users must not share it with others or leave it where others can find it
 - Not to login as another user at any time

Managing the Safety of the Pod81 Website

- Pod81 ensures information posted on the website meets the requirements identified by the Department for Education (DfE)
- Pod81 will ensure the website complies with guidelines for publications including accessibility, data protection, and respect for intellectual property rights, privacy policies and copyright
- Staff or student's personal information is not published on the Pod81 website; the contact details on the website will be the Pod81 address, email and telephone number

- The administrator account for the Pod81 website will be secured with an appropriately strong password
- Pod81 will post appropriate information about safeguarding, including online safety, on the Pod81 website for members of the community.

Publishing Images and Videos Online

- Pod81 will ensure all images and videos shared online are used in accordance with the associated policies, including (but not limited to) the: cameras and image use, data security, acceptable use policies, codes of conduct/behaviour, social media and use of personal devices and mobile phones

Managing Email

- Access to Pod81 email systems will always take place in accordance with data protection legislation and in line with other policies, including confidentiality, AUPs and the code of conduct
 - The forwarding of any chain messages/emails is not permitted
 - Spam or junk mail will be blocked and reported to the email provider
 - Any electronic communication containing sensitive or personal information will only be sent using secure and encrypted email
 - Pod81 email addresses and other official contact details will not be used for setting up personal social media accounts
- Members of the community will immediately inform the Pod81 Centre Manager if they receive offensive communication, and this will be recorded in the Pod81 safeguarding files/records

Excessive social email use can interfere with teaching and learning and will be restricted

Staff Emails

- The use of personal email addresses by staff for any official Pod81 business is not permitted
- Only the SLT are provided with an email address to use for all official communication. Members of staff are encouraged to have an appropriate work life balance when responding to email, especially if communication is taking place between staff, students and parents.

Management of applications (Apps) used to record students' progress

- Pod81 uses POD81 Student report to track students' progress
- The Centre Manager/Head of Centre is ultimately responsible for the security of any data or images held of children. As such, they will ensure the use of tracking systems is appropriately risk assessed prior to use and used in accordance with data protection legislation, including the General Data Protection Regulations (GDPR) and Data Protection legislation.
- To safeguard students' data:
 - Personal staff mobile phones or devices will not be used to access or upload content to any apps that record and store student personal details, attainment or images - including Outlook
 - Two Factor Authentication will be used to access when offsite Office 365 applications e.g. Microsoft TEAMS/Outlook
 - All users will be advised regarding safety measures, such as using strong passwords and logging out of systems.
 - Parents and carers will be informed of the expectations regarding safe and appropriate use, prior to being given access; for example, not sharing passwords or images.

SOCIAL MEDIA

Expectations

- The expectations regarding safe and responsible use of social media applies to all members of the Pod81 community
- The term social media may include (but is not limited to) blogs, wikis, social networking sites, forums, bulletin boards, online gaming, apps, video/photo sharing sites, chatrooms and instant messenger
- All members of the Pod81 community must engage with social media in a positive, safe and responsible manner
- All members of the Pod81 community are advised to not publish specific and detailed private thoughts, concerns, pictures or messages on any social media services, especially content that may be considered threatening, hurtful or defamatory to others
- Pod81 will control student and staff access to social media whilst using Pod81- provided devices and systems on site
- The use of social media by staff for personal use during working hours is not permitted
- Inappropriate or excessive use of social media during Pod81 hours or whilst using Pod81 devices may result in disciplinary or legal action and/or removal of internet facilities
- Concerns regarding the online conduct of any member of the Pod81 community on social media should be reported to the DSL and managed in accordance with the appropriate policies

Staff Personal Use of Social Media

- The safe and responsible use of social networking, social media and personal publishing sites will be discussed with all members of staff as part of staff induction. This will be revisited and communicated via regular staff training opportunities
- Safe and professional behaviour will be outlined for all members of staff (including volunteers) as part of Pod81 code of conduct and as part of the AUPs
- All members of staff are advised their online conduct on social media can have an impact on their role and reputation within Pod81
- Civil, legal or disciplinary action may be taken if staff are found to bring the profession or institution into disrepute, or if something is felt to have undermined confidence in their professional abilities
- All members of staff are advised to safeguard themselves and their privacy when using social media sites. Advice will be provided to staff via staff training and by sharing appropriate guidance and resources on a regular basis. This will include (but is not limited to):
 - Setting the privacy levels of their personal sites
 - Being aware of location sharing services
 - Opting out of public listings on social networking sites
 - Logging out of accounts after use
 - Keeping passwords safe and confidential
 - Ensuring staff do not represent their personal views as Pod81's
- Members of staff are encouraged not to identify themselves as employees of Pod81 on their personal social networking accounts. This is to prevent information on these sites from being linked with Pod81, and to safeguard the privacy of staff members
- All members of staff are encouraged to consider the information, including text and images, they share and post online and to ensure their social media use is compatible with their professional role and is in accordance Pod81 policies and the wider professional and legal framework
- Information and content staff members have access to as part of their employment, including photos and personal information about students and their family members or colleagues, will not be shared or discussed on social media sites
- Members of staff will notify the SLT immediately if they consider any content shared on social media sites conflicts with their role

Communicating with students, parents and guardians

- Members of staff should not communicate with or add as 'friends' any current or past student or their family members via any personal social media sites, applications or profiles.
 - Any pre-existing relationships or exceptions that may compromise this should be discussed with the DSL
 - If contact with students is required once they have left Pod81, members of staff are expected to use existing official Pod81-provided communication tools

- Staff will not use personal social media accounts to contact students or parents, nor should any contact be accepted, except in circumstances whereby the Head of centre has given prior approval
- Any communication from students and parents received on personal social media accounts will be reported to the DSL

Students' Personal Use of Social Media

- Safe and appropriate use of social media is taught to students as part of an embedded and progressive education approach, via age-appropriate sites and resources
- Any concerns regarding students' use of social media are addressed in accordance with the safeguarding and child protection policy and anti-bullying policy
 - Concerns are shared with parents/carers as appropriate, particularly when concerning underage use of social media sites, games or tools
 - Students will be advised:
 - To consider the benefits and risks of sharing personal details on social media sites which could identify them and/or their location
 - To only approve and invite known friends on social media sites and to deny access to others by making profiles private
 - Not to meet any online friends without a parent/carer or other responsible adult's permission and only when a trusted adult is present
 - To use safe passwords
 - To use social media sites which are appropriate for their age and abilities
 - How to block and report unwanted communications
 - How to report concerns both within Pod81 and externally

Official Use of Social Media

- The Pod81 official social media channels are:
 - *Twitter, Facebook, LinkedIn and YouTube channel.*
 - The official use of social media sites only takes place with clear educational or community engagement objectives, with specific intended outcomes
 - The official use of social media as a communication tool has been approved by the Head of Centre
 - SLT have access to account information and login details for the Pod81 social media channels, in case of emergency, such as staff absence
 - Official social media channels have been set up as distinct and dedicated social media sites or accounts for educational or engagement purposes only
 - Staff will use Pod81 provided email addresses to register for and manage any official social media channels
 - Official social media sites protected and, where possible, linked to the Pod81 website
 - Public communications on behalf of Pod81 will, where appropriate and possible, be read and agreed by at least one other colleague
 - Official social media use is conducted in line with existing policies
 - All communication on official social media platforms will be clear,

- transparent and open to scrutiny
 - Only social media tools that have been risk assessed and approved as suitable for educational purposes will be used
 - Any official social media activity involving students will be moderated
- Parents and carers will be informed of any official social media use with students; written parental consent will be obtained, as required

Staff expectations

- Members of staff who follow and/or like the Pod81 official social media channels will be advised to use dedicated professional accounts, where possible, to avoid blurring professional boundaries
- If members of staff are participating in online social media activity as part of their capacity as an employee of Pod81, they will:
 - Always be professional and aware they are an ambassador for the Pod81
 - Disclose their official role and/or position but make it clear they do not necessarily speak on behalf of the Pod81
 - Always be responsible, credible, fair and honest, and consider how the information published could be perceived or shared
 - Always act within the legal frameworks they would adhere to within the workplace, including libel, defamation, confidentiality, copyright, data protection and equalities laws
 - Ensure they have appropriate consent before sharing images on the official social media channel
 - Not disclose information, make commitments or engage in activities on behalf of the Pod81, unless they are authorised to do so
 - Not engage with any direct or private messaging with current, or past, students, parents and carers
 - Inform their line manager, the DSL and/or the Headteacher of any concerns, such as criticism, inappropriate content or contact from pupils

USE OF PERSONAL DEVICES AND MOBILE PHONES

- Pod81 recognises personal communication through mobile technologies is an accepted part of everyday life for students, staff and parents/guardians, but technologies must be used safely and appropriately within the Pod81. Within Pod81, phones cannot be used during lesson time.
- For further information, refer to the Staff Mobile phone policy.

Expectations

- All use of personal devices (e.g., tablets, games consoles and 'smart' watches and mobile phones) will take place in accordance with the law and other appropriate policies
- Electronic devices of any kind brought onto site are the responsibility of the user

- All members of the Pod81 community must take steps to protect their personal devices

from loss, theft or damage; the Pod81 accepts no responsibility for the loss, theft or damage of such items on the Pod81 premises

- All members of the Pod81 community are advised to use passwords/PINs to ensure unauthorised calls or actions cannot be made on their phones or devices. Passwords and PINs should be kept confidential and mobile phones and personal devices should not be shared
- Mobile phones and personal devices are not permitted to be used in specific areas within the site such as changing rooms, toilets and classrooms
- Sending abusive or inappropriate messages or content via personal devices by any member of the community is forbidden.
- All members of the Pod81 community are advised to ensure their personal devices do not contain any content which may be offensive, derogatory or would otherwise contravene Pod81 behaviour or child protection policies

Staff Use of Personal Devices and Mobile Phones

- Members of staff will ensure use of personal devices takes place in accordance with the law, as well as relevant policies and procedures, such as confidentiality, child protection, data security and acceptable use.

Staff will be advised to:

- Keep personal devices in a safe and secure place during lesson time.
- Keep mobile phones and personal devices switched off or switched to 'silent' mode during lesson times.
- Ensure Bluetooth or other forms of communication (such as 'airdrop') are hidden or disabled during lesson times.
- Not use personal devices during teaching periods, unless the Centre Manager/Head of Centre has given written permission, such as in emergency circumstances.
- Ensure any content bought onto site via mobile phones and personal devices are compatible with their professional role and expectations.
- Ensure privacy by closing any open windows on personal devices before connecting - manually or automatically- the device to the Pod81 internet system.
- Members of staff may not use their own personal devices to contact students or parents and carers
 - Any pre-existing relationships that could undermine this will be discussed with the DSL.

Staff will not use personal devices:

- To take photos or videos of students and will only use Pod81-provided equipment for this purpose.
- Directly with students and will only use work-provided equipment during lessons or educational activities.
- If a member of staff breaches the Pod81 policy, action will be taken in line with the appropriate Pod81 policy.

- If a member of staff is thought to have illegal content saved or stored on a

personal device or have committed a criminal offence, the Police will be contacted.

Students' Use of Personal Devices and Mobile Phones

- Students will be educated regarding the safe and appropriate use of personal devices and made aware of boundaries and consequences
- Pod81 expects Students' personal devices to be used appropriately within Pod81 and not in lessons - see Mobile Phones and Other Internet Enabled Devices Policy
- If a student needs to contact their parents or guardians, they will be allowed to use a Pod81 phone or their personal device in the reception area
- Parents are advised to contact their child via the Pod81 office
- Personal devices will not be used by students during lessons or formal educational time unless as part of an approved and directed curriculum-based activity with consent from a member of staff
- Personal devices must not be taken into examinations
- Students found in possession of a mobile phone or personal device during an exam will be reported to the appropriate examining body. This may result in the withdrawal from that or all examinations
- If a student breaches the policy, the phone or device will be confiscated and held in a secure place.
- The Centre Manager or other member of SLT may confiscate a student's mobile phone or device if they believe it is being used to contravene the Pod81 Wellbeing (behaviour) or anti-bullying policy
- Mobile phones and devices that have been confiscated will be released to students at the end of the day
- If there is suspicion that material on a student's personal device or mobile phone may be illegal or may provide evidence relating to a criminal offence, the device will be handed over to the Police for further investigation

Visitors' Use of Personal Devices and Mobile Phones

- Parents/Carers and visitors (including volunteers and contractors) must use their personal devices in accordance with the Pod81's AUP and other associated policies
- Pod81 will ensure appropriate signage and information is displayed and provided to inform parents, guardians and visitors of expectations of use
- Members of staff are expected to challenge visitors if they have concerns and will always inform the DSL or SLT of any breaches of the Pod81 policy

Officially provided mobile phones and devices

- Members of staff will be issued with a work phone number and email address, where contact with students or parents/carers is required
- Pod81 mobile phones and devices will be protected via a passcode/password/PIN and must only be accessed or used by members of staff

- Pod81 mobile phones and devices will be used in accordance with the AUP and other relevant

policies

RESPONDING TO ONLINE SAFETY INCIDENTS AND CONCERNS

- All members of the community will be made aware of the reporting procedure for online safety concerns, including breaches of filtering, youth produced sexual imagery (sexting), cyberbullying and illegal content- in these instances, safeguarding reporting procedures must be followed.

Report safeguarding concerns to the DSL (or deputy) by:

- Completing a child protection incident report form. The staff member reporting the concern is only responsible for completing the front side of the form
- Forms must be completed then handed to a member of the safeguarding team as soon as possible
- Staff must not leave the Pod81 site without handing over the concern to the safeguarding team
- Child protection incident report forms need to contain clear, accurate, factual information
- Records must be dated and signed and written in blue or black ink
- The safeguarding team will input the information from the form into the Pod81 drive and follow their assessment procedure regarding the next steps

Concerns about Students' Welfare

- The DSL will be informed of any online safety incidents involving safeguarding or child protection concerns.
- The DSL will record these issues in line with the Pod81's safeguarding policy.
- The DSL will ensure online safety concerns are escalated and reported to relevant agencies
- The Pod81 will inform parents and guardians of online safety incidents or concerns

Staff Misuse

Any complaint about staff misuse should be made following the guidance outlined in the Low-level concern or Whistleblowing Policy

Appropriate action will be taken in accordance with the Pod81 Code of Conduct for Employee

PROCEDURES FOR RESPONDING TO SPECIFIC ONLINE INCIDENTS OR CONCERNS

Online Sexual Violence and Sexual Harassment between Children

- Pod81 has accessed and understood *Sexual violence and sexual harassment between children in Pod81s and colleges (2018)* guidance and Part 5 of Keeping Children Safe in Education 2024
- Pod81 recognises sexual violence and sexual harassment between children can take place online. Examples may include non-consensual sharing of sexual images and videos, sexualised online bullying, online coercion and threats, unwanted sexual comments and messages on social media, and online sexual exploitation
- Full details of how Pod81 will respond to concerns relating to sexual violence and sexual harassment between children is in Pod81's safeguarding and child protection policy and anti-bullying policy.
- Pod81 recognises the internet brings the potential for the impact of any sexual violence and sexual harassment concerns to extend further than the local community, and for a victim or alleged perpetrator to become marginalised and excluded by online communities
- Pod81 also recognises the potential for repeat victimisation in the future if abusive content continues to exist somewhere online
- Pod81 will ensure all members of the community are made aware of the potential social, psychological and criminal consequences of online sexual violence and sexual harassment between children by implementing a range of age and ability- appropriate educational methods as part of the PSHE and RSE curriculum
- Pod81 will ensure all members of the community are aware of sources of support regarding online sexual violence and sexual harassment between children
- Pod81 will respond to concerns regarding online sexual violence and sexual harassment between children, regardless of whether the incident took place on Pod81 premises or using Pod81 equipment
- **If made aware of online sexual violence and sexual harassment, the Pod81 will:**
 - Immediately notify the DSL in accordance with the Pod81 child protection and anti-bullying policies
 - If content is contained on pupils' electronic devices, they will be managed in accordance with the DfE 'searching screening and confiscation' advice
 - Provide the necessary safeguards and support for all pupils involved, such as offering specific advice on blocking, reporting and removing online content, as well as providing appropriate counselling/pastoral support
 - Implement appropriate sanctions in accordance with Pod81 policy
 - Inform parents and guardians, if appropriate, about the incident and how it is being managed

- If appropriate, make a referral to partner agencies, such as West Sussex Safeguarding Partnership
- If the concern involves children and young people at different Pod81s, the DSL will work in partnership with other DSLs to ensure appropriate safeguarding action is taken in the wider local community
- If a criminal offence has been committed, the DSL will discuss this with the Police first to ensure investigations are not compromised
- Review the handling of any incidents to ensure best practice was implemented, and policies/procedures are appropriate

Sharing nudes and semi-nudes

Sharing nudes and semi-nudes is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18; this is explained in the latest advice for Pod81s and colleges (UKCIS, 2020). This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. This advice does not apply to adults sharing nudes or semi-nudes of under 18-year-olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

Pod81 recognises the sharing of nudes or semi-nudes as a safeguarding issue; all concerns will be reported to the DSL or deputies.

- Pod81 staff must never view, copy, print, share, store or save the imagery, or ask a child to share or download it (this is illegal).
- If staff have already viewed the imagery by accident (e.g. if a young person has showed it to them before they could ask them not to), they must report this to the DSL or deputies as soon as possible.
- Staff must not delete the imagery or ask the young person to delete it.
- Staff must not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or deputies.
- Staff must not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Staff must not say or do anything to blame or shame any young people involved.
- Staff must explain to the child/young person(s) involved that they need to report it and reassure them that they will receive support and help from the DSL or deputies.
- If an indecent image has been taken or shared on the Pod81 network or devices,

Pod81 will act to block access to all users and isolate the image

- Pod81 will provide the necessary safeguards and support for student, such as offering counselling or pastoral support.
- The DSL/deputies will carry out a risk assessment that considers any vulnerability of students involved, including carrying out relevant checks with other agencies.
- The DSL/deputies will inform parents and carers, if appropriate, about the incident and how it is being managed.
- The DSL/deputies may make a referral to Bradford Safeguarding Partnership and/or the Police, as appropriate.
- Images will only be deleted once the DS deputies have confirmed other agencies do not need to be involved; and are sure to do so would not place a child at risk or compromise an investigation.
- The DSL will review the handling of any incidents to ensure best practice was implemented; the SLT will also review and update any management procedures, where necessary.

Online Child Sexual Abuse and Exploitation (including child criminal exploitation)

- Pod81 will ensure all members of the community are aware of online child sexual abuse, including exploitation and grooming, the consequences and possible approaches that may be employed by offenders to target children and how to respond to concerns.
- Pod81 recognises online child sexual abuse and exploitation (including criminal exploitation) as a safeguarding issue and, as such, all concerns will be reported to and dealt with by the DSL.
- Pod81 will implement preventative approaches for online child sexual abuse and exploitation (including criminal exploitation) via a range of age and ability appropriate education for pupils, staff and parents/guardians.
- Pod81 will ensure all members of the community are aware of the support available regarding online child sexual abuse and exploitation (including criminal exploitation), both locally and nationally.
- If made aware of incident involving online child sexual abuse and exploitation (including criminal exploitation), Pod81 will:
 - Act in accordance with the Pod81 safeguarding policy and the relevant Bradford Safeguarding Partnership procedures
 - If appropriate, store any devices involved securely
 - Make a referral to the Bradford Safeguarding Partnership (if required/ appropriate) and immediately inform the Police
 - Carry out a risk assessment which considers any vulnerabilities of students(s) involved (including carrying out relevant checks with other agencies)
 - Inform parents/carers about the incident if appropriate and how it is being managed
 - Provide the necessary safeguards and support for students, such as, offering counselling or pastoral support
 - Review the handling of any incidents to ensure best practice is

- implemented
 - The SLT will review and update any management procedures, where necessary
- Pod81 will respond to concerns regarding online child sexual abuse and exploitation (including criminal exploitation), regardless of whether the incident took place on Pod81 premises or using Pod81 provided or personal equipment
 - Where possible, students will be involved in decision making and if appropriate, will be empowered to report concerns
- report: www.ceop.police.uk/safety-centre
- If Pod81 are unclear whether a criminal offence has been committed, the DSL will immediately obtain advice through the Police
- If students at other schools are believed to have been targeted, the DSL will seek support from the Police and/or the Bradford Safeguarding Partnership first to ensure potential investigations are not compromised

Indecent Images of Children (IIOC)

- Pod81 will ensure all members of the community are aware of the possible consequences of accessing Indecent Images of Children (IIOC).
- Pod81 will respond to concerns regarding IIOC on Pod81 equipment and/or personal equipment, even if access took place off-site.
- Pod81 will seek to prevent accidental access to IIOC by using an internet Service provider (ISP) which subscribes to the Internet Watch Foundation block list and by implementing appropriate filtering, firewalls and anti-spam software.
- If Pod81 are unclear if a criminal offence has been committed, the DSL will obtain advice immediately through the Police and/or the West Sussex Safeguarding Partnership.
- If made aware of IIOC, Pod81 will:
 - Act in accordance with Pod81's safeguarding policy and the relevant Bradford Safeguarding Partnership's procedures.
 - Store any devices involved securely.
 - Immediately inform appropriate organisations, such as the Internet Watch Foundation (IWF), Bradford Police or the LADO (if involving staff).
- If made aware a member of staff or a student has been inadvertently exposed to indecent images of children, Pod81 will:
 - Ensure the DSL is informed.
 - Ensure the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via www.iwf.org.uk.
 - Ensure any copies that exist of the image, for example in emails, are deleted.
 - Report concerns, as appropriate to parents and carers.
- If made aware indecent images of children have been found on Pod81-provided devices, Pod81 will:
 - Ensure the DSL is informed

- Ensure the URLs (webpage addresses) which contain the suspect images are reported to the Internet Watch Foundation via www.iwf.org.uk
 - Ensure any copies that exist of the image, for example in emails, are deleted
 - Inform the Police via 101 (999 if there is an immediate risk of harm) and children's social services (as appropriate)
 - Only store copies of images (securely, where no one else has access to them and delete all other copies) if requested by the Police
 - Report concerns, as appropriate, to parents and carers
- If made aware a member of staff is in possession of indecent images of children on Pod81-provided devices, Pod81 will:
 - Ensure the Centre Manager is informed in line with Pod81 policy
 - Inform the Local Authority Designated Officer (LADO) and other relevant organisations in accordance with the Pod81 policy
 - Quarantine any devices until Police advice has been sought

Cyberbullying

Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of 1 person or group by another person or group, where the relationship involves an imbalance of power. (See also the Pod81 behaviour policy.)

- To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.
- Pod81 will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Form tutors will discuss cyber-bullying with their tutor groups.
- Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.
- All staff, governors and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training.
- Pod81 also sends information/leaflets on cyber-bullying to parents/carers so they are aware of the signs, how to report it and how they can support children who may be affected.
- In relation to a specific incident of cyber-bullying, the Pod81 will follow the processes set out in the Pod81 Wellbeing (behaviour) policy. Where illegal, inappropriate or harmful material has been spread among pupils, the Pod81 will use all reasonable endeavours to ensure the incident is contained.

- The DSL will report the incident and provide the relevant material to the police as soon as is reasonably practicable, if they have reasonable grounds to suspect that possessing that material is illegal. They will also work with external services if it is deemed necessary to do so.

Online Hate

- Online hate content, directed towards or posted by, specific members of the community will not be tolerated at Pod81 and will be responded to in line with existing policies, including anti-bullying and wellbeing policy
- All members of the community will be advised to report online hate in accordance with relevant policies and procedures
- The Police will be contacted if a criminal offence is suspected
- If Pod81 are unclear on how to respond, or whether a criminal offence has been committed, the DSL will obtain advice through the Bradford Safeguarding Partnership

ONLINE RADICALISATION AND EXTREMISM

- Pod81 will take all reasonable precautions to ensure students and staff are safe from terrorist and extremist material when accessing the internet on Pod81 site.
- If Pod81 are concerned a child or parent/carer may be at risk of radicalisation online, the DSL will be informed immediately, and action will be taken in line with Pod81's safeguarding policy.
- If Pod81 are concerned a member of staff may be at risk of radicalisation online, the Centre Manager will be informed immediately, and the safeguarding and child protection policy actioned.