

# Anstee Bridge

## Online Safety Policy



# Version control

Applies to	AfC wide
Review Board	Anstee Bridge
Signed off by	Sheldon Snashall, Associate Director for Pupil Support, Achieving for Children
Reviewing arrangements	This policy will be reviewed annually to judge its effectiveness, or updated sooner in accordance with changes in legislation
Date policy first created	August 2021
Current version date	December 2022
Next review date	December 2023
Equality analysis completed	N/A
Relating policies and procedures	Bullying and Behaviour Policy, Safeguarding and Child Protection Policy, Health AND Safety Policy
Version	Version 1 December 2022

Anstee Bridge Coordinator: Katherine Greening

Status and review cycle: Annual

Date written: August 2021

Date of next review: December 2023

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# Introduction

This policy applies to all staff, management, volunteers, artists, students and any visitors to Anstee Bridge.

## 1. Aims and objectives

This policy aims to:

- Set out expectations for all Anstee Bridge staff, volunteers and students online behaviour, attitudes and activities and use of digital technology (including when devices are offline)
- Help everyone involved to recognise that online or digital behaviour standards (including social media activity) must be upheld beyond the confines of Anstee Bridge and Anstee Bridge day, and regardless of device or platform
- Facilitate the safe, responsible and respectful use of technology to support teaching and learning, increase attainment and prepare students for the risks and opportunities of today's and tomorrow's digital world
- Help staff working with students to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
  - For the protection and benefit of the students in their care
  - for their own protection, minimising misplaced or malicious allegations
  - and to better understand their own standards and practice for the benefit of Anstee Bridge, supporting Anstee Bridge ethos, aims and objectives, and protecting the reputation of Anstee Bridge
- Establish clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other policies such as behaviour policy or anti-bullying policy)

## 2. Background and context

This policy applies to all members of Anstee Bridge Community - including staff, volunteers, artists, management, students, parents, carers, visitors and community users who have access to our digital technology, networks and systems, whether on-site or remotely, and at any time.

### **3. Implementing the policy**

#### **Roles and responsibilities**

Anstee Bridge is a community and all members have a duty to behave respectfully online and offline, to use technology for teaching and learning and to prepare for life after Anstee Bridge, and to immediately report any concerns or inappropriate behaviour, to protect staff, students, families and the reputation of Anstee Bridge. We learn together, make honest mistakes together and support each other in a world that is online and offline at the same time.

#### **Key responsibilities of Safeguarding Lead: Head of Centre**

- Foster a culture of safeguarding where online safety is fully integrated into Anstee Bridge.
- Ensure safeguarding responsibilities listed in the section below are being followed and fully supported.
- Ensure that policies and procedures are followed by all staff.
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and relevant Local Safeguarding Children Board (LSCB) guidance.
- Liaise with staff on all online-safety issues which might arise and receive regular updates on Anstee Bridge issues and broader policies.
- Take overall responsibility for data management and information security ensuring that Anstee Bridge follows best practice in information handling.
- Work with all members to ensure a data protection-compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information.
- Ensure Anstee Bridge implements and makes effective use of appropriate IT systems and services including filtering and monitoring, protected email systems and that all technology, including cloud systems are implemented according to child-safety first principles.
- Be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles.
- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident.
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of students, including risk of children being radicalised.
- Ensure that there is a system in place to monitor and support staff who carry out internal technical online-safety procedures.
- Ensure staff members are regularly updated on the nature and effectiveness of Anstee Bridges arrangements for online safety.
- Ensure that the Anstee Bridge website meets statutory Department for Education requirements.

- Ensure ‘an effective approach to online safety that empowers the staff to protect and educate the Anstee Bridge community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate’.
- Liaise with the local authority and work with other agencies in line with Working together to safeguard children.
- Take day-to-day responsibility for online safety issues and be aware of the potential for serious child protection concerns.
- Work in line with the DPO to ensure a GDPR compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information.
- Stay up to date with the latest trends in online safety – the new LGfL DigiSafe student survey of 40,000 students may be useful reading (new themes include ‘self-harm bullying’ and getting undressed on camera).
- Review and update this policy, other online safety documents (such as acceptable use policies) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others).
- Receive regular updates in online safety issues and legislation, be aware of local and Anstee Bridge trends.
- Ensure that online safety education is embedded across the curriculum and beyond, in wider life.
- Promote an awareness and commitment to online safety throughout Anstee Bridge community.
- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident.
- Ensure the 2018 Department for Education guidance on sexual violence and harassment is followed throughout Anstee Bridge and that staff and volunteers adopt a zero-tolerance approach to this, as well as to bullying.
- Facilitate training and advice for all staff:
  - All staff must read Keeping Children Safe in Education (September 2019) Part 1 and Annex A all staff to be aware of Annex C (online safety)
  - Cascade knowledge of risks and opportunities throughout the organisation. cpd.lgfl.net has helpful CPD materials including PowerPoints, videos and more.

## Key responsibilities (quotes are taken from Keeping Children Safe in Education 2019)

- Approve this policy and strategy and subsequently review its effectiveness, eg, by asking the questions in the helpful document from the UK Council for Child Internet Safety (UKCCIS).
- Support Anstee Bridge in encouraging parents and the wider community to become engaged in online safety activities.
- Have regular strategic reviews regarding online-safety.
- Incorporate online safety into standing discussions of safeguarding at meetings.
- Online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

There is further support for this at [cpd.lgfl.net](http://cpd.lgfl.net) to “Ensure appropriate filters and appropriate monitoring systems are in place [but...] be careful that ‘overblocking’ does not lead to unreasonable restrictions as to what students can be taught with regard to online teaching and safeguarding.

Ensure that students are taught about safeguarding, including online safety (...) as part of providing a broad and balanced curriculum (...). Consider a whole Anstee Bridge approach to online safety (with) a clear policy on the use of mobile technology.

Note: you may wish to investigate or adopt the UKCCIS cross-curricular framework ‘Education for a connected world’ to support a whole Anstee Bridge approach.

### All staff and volunteers key responsibilities

- Understand that online safety is a core part of safeguarding and as such it is part of everyone’s job – ever think that someone else will pick it up. Know who the designated safeguarding lead (DSL) and online safety lead (OSL) are: these are the Anstee Bridge co-ordinator and their assistant).
- Read Part 1, Annex A and Annex C of ‘Keeping Children Safe in Education’ (whilst Part 1 is statutory for all staff, Annex A for SLT and those working directly with children, it is good practice for all staff to read all three sections). Read and follow this policy in conjunction with Anstee Bridge’s main safeguarding policy. Record online-safety incidents in the same way as any safeguarding incident and report in accordance with Anstee Bridge procedures.
- Understand that safeguarding is often referred to as a jigsaw puzzle – you may have discovered the missing piece so do not keep anything to yourself.
- Sign and follow the staff acceptable use policy and code of conduct handbook.
- Notify the designated safeguarding lead or online safety lead if policy does not reflect practice and follow escalation procedures if concerns are not promptly acted upon.

- Identify opportunities to thread online safety through all activities, supporting and making the most of unexpected learning opportunities as they arise (which have a unique value for students).
- Whenever overseeing the use of technology (devices, the internet, new technology such as augmented reality, etc) at Anstee Bridge, encourage sensible use, monitor what students are doing and consider potential dangers and the age appropriateness of websites.
- Carefully supervise and guide students when engaged in learning activities involving online technology, supporting them with search skills, critical thinking (eg, fake news), age appropriate materials and signposting, and legal issues such as copyright and data law.
- Encourage staff and students to follow their acceptable use policy, remind them about it.
- Keep aware of new trends and issues before they become a problem.
- Take a zero-tolerance approach to bullying and low-level sexual harassment.
- Receive regular updates from the designated safeguarding lead or online safety lead and have a healthy curiosity for online safety issues – you may find it useful to read at least the headline statistics and conclusions from the LGfL DigiSafe student survey of 40,000 students (new themes include ‘self-harm bullying’ and getting undressed on camera).
- Model safe, responsible and professional behaviours in their own use of technology. This includes outside the Anstee Bridge hours and site, and on social media, in all aspects upholding the reputation of Anstee Bridge and of the professional reputation of all staff. More guidance on this point can be found in this online Reputation guidance for Anstee Bridge.

### **Volunteers and contractors key responsibilities**

- Read and understand Anstee Bridge’s online policy and report any concerns, no matter how small, to the Anstee Bridge co-ordinator or their assistant.

### **Students key responsibilities**

- Read, understand, sign and adhere to the eSafety policy.
- Report abuse, misuse or access to inappropriate materials.
- Know what action to take if they or someone they know feels worried or vulnerable when using online technology.
- Understand the importance of adopting safe and responsible behaviours and good online safety practice when using digital technologies outside of Anstee Bridge.



- Realise that Anstee Bridge’s acceptable use policies cover actions out of Anstee Bridge, including on social media.
- Understand the benefits, opportunities, risks and dangers of the online world and know who to talk to at Anstee Bridge, or outside Anstee Bridge, if there are problems.

### **Parents and carers key responsibilities**

- Consult with Anstee Bridge and school staff if they have any concerns about their children’s use of technology.
- Promote positive online safety and model safe, responsible and positive behaviours in their own use of technology, including on social media: not sharing other’s images or details without permission and refraining from posting negative, threatening or violent comments about others, including the staff, volunteers, management, contractors, students or other parents and carers.

### **Handling online-safety concerns and incidents**

It is vital that all staff and volunteers recognise that online-safety is a part of safeguarding (as well as being a curriculum strand of PSHE, Citizenship and the new statutory health education and relationships education (relationships and sex education)).

General concerns must be handled in the same way as any other safeguarding concern; safeguarding is often referred to as a jigsaw puzzle, so all staff should err on the side of talking to the online safety lead or designated safeguarding lead to contribute to the overall picture or highlight what might not yet be a problem.

Anstee Bridge commits to take all reasonable precautions to ensure online safety, but recognises that incidents can occur outside of Anstee Bridge (and can continue to impact students when they come into Anstee Bridge or leave Anstee Bridge).

All staff and volunteers are encouraged to report issues swiftly to allow us and Anstee Bridge to deal with them quickly and sensitively.

Any suspected online risk or infringement should be reported to the designated safeguarding lead on the same day. Any concern or allegation about staff or volunteers’ misuse is always referred directly to Katherine Greening, unless the concern is about her, in which case the complaint is referred to the Associate Director for Pupil Support, Sheldon Snashall ([sheldon.snashall@achievingforchildren.org.uk](mailto:sheldon.snashall@achievingforchildren.org.uk)).

Or

**The LADO Team:**

Email: [LADO@achievingforchildren.org.uk](mailto:LADO@achievingforchildren.org.uk)

Phone: 020 8891 7370

Kingston and Richmond SPA: 020 8547 5008  
(Outside of office hours, please ring 020 8770 5000)

Staff may also use the NSPCC Whistleblowing Helpline.

Anstee Bridge will actively seek support from other agencies as needed (the local authority, LGfL, UK Safer Internet Centre's Professionals' Online Safety Helpline, NCA CEOP, Prevent Officer, police, IWF). We will inform parents and carers of online-safety incidents involving their children, and the police where staff or students engage in or are subject to behaviour which we consider is particularly disturbing or breaks the law (particular procedures are in place for sexting; see section below).

### **Sexting**

- Staff should refer to the UK Council for Child Internet Safety (UKCCIS) guidance on sexting (also referred to as 'youth produced sexual imagery') in Anstee Bridge.  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/759009/Overview\\_of\\_Sexting\\_Guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759009/Overview_of_Sexting_Guidance.pdf)
- It is important that everyone understands that whilst sexting is illegal, students can come and talk to members of staff if they have made a mistake or had a problem in this area.

Online resources:

<https://www.lgfl.net/online-safety/resource-centre?s=1>

### **Bullying**

- Online bullying should be treated like any other form of bullying and the bullying policy should be followed for online bullying, which may also be referred to as cyberbullying.

### **Sexual harassment or violence**

- Any incident of sexual harassment or violence (online or offline) should be reported to the designated safeguarding lead who will follow the full guidance.
- Staff should work to foster a zero-tolerance culture.
- The guidance stresses that we must take all forms of sexual violence and harassment seriously, explaining how it exists on a continuum and that behaviours incorrectly viewed as 'low level' are treated seriously and not allowed to perpetuate.

- The document makes specific reference to behaviours such as bra strap flicking and the careless use of language.

### **Misuse of technology (devices, systems, networks or platforms)**

- Clear and well communicated rules and procedures are essential to govern student and adult use of networks, connections, internet connectivity and devices, cloud platforms and social media (both when on site and outside of Anstee Bridge).
- These are defined in the relevant acceptable use policy as well as in this document, for example in the sections relating to the professional and personal use of Anstee Bridge platforms, networks, clouds, devices and other technology, as well as to 'Bring your own device' (BYOD) policy. Where students contravene these rules, Anstee Bridge behaviour policy will be applied. Where staff contravene these rules, action will be taken as outlined in the staff code of conduct and handbook.
- Further to these steps, Anstee Bridge reserves the right to withdraw (temporarily or permanently) any or all access to such technology.

### **Social media incidents**

- Breaches will be dealt with in line with the Anstee Bridge behaviour policy (for students) or code of conduct and handbook (for staff).
- Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of Anstee Bridge community, we will request that the post be deleted and will expect this to be actioned promptly.
- Where an offending post has been made by a third party, we may report it to the platform it is hosted on, and may contact the Professionals' Online Safety Helpline (run by the UK Safer Internet Centre) for support or help to accelerate this process.

<https://www.saferinternet.org.uk/helpline/professionals-online-safety-helpline#:~:text=Co%2Dfunded%20by%20the%20European,in%20their%20care%2C%20may%20face.>

### **Data protection and data security**

General Data Protection Regulations (GDPRs) do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Legal and secure information sharing between Anstee Bridge, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. Information can be shared without consent if to gain consent would place a child at risk.

Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards should still be in place. Remember, the law does not prevent information about children being shared with specific authorities if it is for the purposes of safeguarding.

All students, staff, volunteers, contractors and parents are bound by the data protection policy and agreements. Please see more information [here](#).

### **Appropriate filtering and monitoring**

There are three types of appropriate monitoring identified by the Safer Internet Centre. These are:

- Physical monitoring (adult supervision in the classroom, at all times)
- Internet and web access
- Active and proactive technology monitoring services

At Anstee Bridge we have decided that options 1 and 2 are appropriate because of the nature of Anstee Bridge being small with a high student, staff to volunteer ratio within it.

### **Email**

Staff at Anstee Bridge use AfC emails. This is for the mutual protection and privacy of all staff, students and parents, as well as to support data protection.

General principles for email use are as follows.

- Email and text message (T2P) are the only means of electronic communication to be used between staff and students or parents (in both directions). Use of a different platform must be approved in advance by the data-protection officer and head of centre in advance.
- Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the head of centre (if by a student or a staff member).
- Email may only be sent using the email systems above.
- There should be no circumstances where a private email is used. If this happens by mistake, the head of centre or DPO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately.
- Internally, staff should use the AfC network, including when working from home when remote access is available.
- Any sensitive information being sent must always have (official sensitive) at the beginning of the subject line of the message and only sent to AfC, Kingston, GOV.UK or SCH.UK.

- Appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring Anstee Bridge into disrepute or compromise the professionalism of staff.
- Students and staff are allowed to use the email system for reasonable (not during lessons) personal use, but should be aware that all use is monitored, their emails may be read and the same rules of appropriate behaviour apply at all times.
- Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination.

### **Anstee Bridge website**

The Anstee Bridge website is a key public-facing information portal for the Anstee Bridge community with a key reputational value. Anstee Bridge has the same duty as any person or organisation to respect and uphold copyright law.

- Sources must always be credited and material only used with permission.
- Where students work, images or videos are published on the website, their identities are protected and full names are not published (remember also not to save images with a filename that includes a student's full name).

### **Digital images and video**

- When a student joins Anstee Bridge, parents and carers are asked if they give consent for their child's image to be captured in photographs or videos and for what purpose.
- Any students shown in public facing materials are never identified.
- All staff are governed by their contract of employment and the Anstee Bridge's acceptable use policy, which covers the use of mobile phones and personal equipment for taking pictures of students, and where these are stored.
- At Anstee Bridge, members of staff may use their work phones to take photographs and volunteers may use Anstee Bridge iPads: these will be appropriate and linked to Anstee Bridge activities, taken without secrecy and not in a one-to-one situation.
- Staff, volunteers, and parents are reminded annually about the importance of not sharing without permission, due to reasons of child protection (such as looked after children often have restrictions for their own protection), data protection, religious or cultural reasons, or simply for reasons of personal privacy.

- We encourage students to think about their online reputation and digital footprint, so we should be good adult role models by not oversharing (or providing embarrassment in later life – and it is not for us to judge what is embarrassing or not).
- Students are taught about how images can be manipulated in their online safety education programme and also taught to consider how to publish for a wide range of audiences which might include parents or younger children.
- Students are advised to be very careful about placing any personal photos on social media. They are taught to understand the need to maintain privacy settings so as not to make public, personal information.
- Students are taught that they should not post images or videos of others without their permission.
- We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location.  
We teach them about the need to keep their data secure and what to do if they are subject to bullying or abuse.

### **Staff, students' and parents' social media presence**

Social media (including all apps, sites and games that allow sharing and interaction between users) is a fact of modern life and we accept that many parents, staff and students will use it.

However, as stated in the acceptable use policies, which all members of the Anstee Bridge community sign, we expect everybody to behave in a positive manner, engaging respectfully with each other on social media, in the same way as they would face to face.

This positive behaviour can be summarised as not making any posts which are or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which might bring Anstee Bridge or (particularly for staff or volunteers) into disrepute. This applies both to public pages and to private posts (parent chats, pages or groups).

If parents have a concern about Anstee Bridge, we would urge them to contact us directly and in private to resolve the matter.

If an issue cannot be resolved in this way, Anstee Bridge's complaints procedure should be followed.

Sharing complaints on social media is unlikely to help resolve the matter, but can cause upset to staff, students and parents, also undermining staff morale and the reputation of Anstee Bridge (which is important for the students we serve).

We ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use.

It is worth noting that following on from the government's Safer Internet Strategy, enforcement and age checking is likely to become more stringent over the coming years.

However, Anstee Bridge has to strike a difficult balance of not encouraging underage use at the same time as needing to acknowledge reality in order to best help our students to avoid or cope with issues if they arise.

Online safety lessons will look at social media and other online behaviour, how to be a good friend online and how to report bullying, misuse, intimidation or abuse.

However, children will often learn most from the models of behaviour they see and experience, which will often be from adults. Parents can best support this by talking to their children about the apps, sites and games they use (you don't need to know them – ask your child to explain it to you), with whom, for how long, and when (late at night and in bedrooms is not helpful for a good night's sleep and productive for learning the next day).

Email or text is the only communication channel between parents and Anstee Bridge, and between staff and students.

Students are not allowed\* to be 'friends' with or make a friend request to any staff, volunteers and contractors or otherwise communicate via social media.

Students are discouraged from 'following' staff, volunteer or contractor public accounts (such as following a staff member with a public Instagram account).

However, we accept that this can be hard to control, but this highlights the need for staff to remain professional in their private lives.

In the reverse situation, however, staff must not follow such public student accounts.

\*Exceptions may be made, e.g., for pre-existing family links, but these must be approved by the head of centre, and should be declared upon entry of the student or staff member to Anstee Bridge.

Staff and volunteers are reminded that they are obliged not to bring Anstee Bridge or profession into disrepute and the easiest way to avoid this is to have the strictest privacy settings and avoid inappropriate sharing and oversharing online.

They should never discuss Anstee Bridge on social media and be careful that their personal opinions might not be attributed to Anstee Bridge or AfC, bringing Anstee Bridge into disrepute.

## **Device usage**

Please read the following in conjunction with acceptable use policies and the following sections of this document which all impact upon device usage: copyright, data protection, social media, misuse of technology, and digital images and video.

## **Personal devices and bring your own device (BYOD) policy**

Students may use mobile phones during lunch break, but not when moving around the building.

During sessions phones must remain on silent and in bags or pockets at all times, unless staff, volunteers or the artist has given express permission as part of the lesson.

Any attempt to use a phone in workshops without permission or to take inappropriate photographs will result in being asked to leave the workshop and talk one on one in another room. In line with our behaviour policy.

Important messages and phone calls to or from parents can be made if permission is asked outside the room or in one of the smaller side rooms.

All staff who work directly with children should leave their mobile phones on silent and only use them in private staff areas during Anstee Bridge hours.

Child or staff data should never be downloaded onto a private phone.

If a staff member is expecting an important personal call they should leave the room to answer the call.

Volunteers, contractors, should leave their phones in their pockets and turned on silent.

Under no circumstances should they be used in the presence of children or to take photographs or videos. If this is required (for example for contractors to take photos of equipment or buildings), permission from the head of centre should be sought and this should be done in the presence of a member of staff.

## **Trips and events away from Anstee Bridge**

For Anstee Bridge trips and events away from Anstee Bridge, staff will have their Anstee Bridge phones and this number will be used for any authorised or emergency communications with students or students and parents.

Any deviation from this policy (by mistake or because the Anstee Bridge phone will not work) will be notified immediately to the head of centre. Staff using their personal phone in an emergency will ensure that the number is hidden to avoid a parent or student accessing staff or volunteers' private phone numbers.

## **4. Monitoring and reviewing**

This policy will be reviewed annually to judge its effectiveness, or updated sooner in accordance with changes in legislation.



## 5. Relating policies and procedures

Anstee Bridge procedures for dealing with online-safety will be mostly detailed in the following policies, contained on the [Anstee Bridge](#) page:

- Safeguarding and Child Protection Policy
- Bullying and Behaviour Policy
- Code of Conduct / Staff Behaviour Policy
- Data Protection Policy
- Agreements and other documentation (e.g., [privacy statement](#) and consent forms for data sharing, image use)