



Online Safety Policy

Turning Heads directors are responsible for ensuring that those benefiting from us or working with us are not harmed in any way. The directors of Turning Heads have a legal duty to act prudently, and this means that they must take all reasonable steps within their power to ensure that no one is harmed. It is particularly important where beneficiaries are vulnerable persons or children in the community.

This policy applies to all those involved in Turning Heads, including, but not exclusively, administrators, volunteer drivers, parents, young people, and third party suppliers.

Scope of the Policy

This policy applies to all members of the Turning Heads community (including staff, students/pupils, volunteers, parents/carers, visitors, community users) who have access to and are users of Turning Heads digital technology systems.

Turning Heads will deal with incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents/carers of incidents of inappropriate online safety behaviour that take place out of school.

Role of the Board of Directors

Directors are responsible for the approval of the online safety policy and for reviewing the effectiveness of the policy. This will be carried out by the *Directors* receiving regular information about online safety incidents and monitoring reports.

A member of the *Board* has taken on the role of *Online Safety Director*. The role of the *Online Safety Governor/Director* will include:

- regular monitoring of online safety incident logs
- regular monitoring of filtering/change control logs

Support Staff

Are responsible for ensuring that:

- they have an up-to-date awareness of online safety matters
- they have read, understood, and signed the staff acceptable use policy/agreement (AUP/AUA)
- they report any suspected misuse or problem to the *Online Safety Lead* for investigation/action/sanction
- all digital communications with students/pupils/parents/carers should be on a professional level *and only carried out using official school systems*
- online safety issues are embedded in all aspects of the curriculum and other activities
- students/pupils understand and follow the Online Safety Policy and acceptable use policies
- students/pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor the use of digital technologies, mobile devices, cameras, etc. in lessons and other school activities (where allowed) and implement current policies with regard to these devices

Designated Safeguarding Person

They should be trained in online safety issues and be aware of the potential for serious child protection/safeguarding issues to arise from:

- sharing of personal data
- access to illegal/inappropriate materials
- inappropriate on-line contact with adults/strangers
- potential or actual incidents of grooming
- online-bullying

Students:

- are responsible for using Turning Heads digital technology systems in accordance with the student/pupil acceptable use agreement
- have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking/use of images and on online-bullying.

Parents/carers

Parents/carers play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way. Turning Heads will take every opportunity to help parents understand these issues through *letters, website,*

social media and information about national/local online safety campaigns/literature.

Parents and carers will be encouraged to support Turning Heads in promoting good online safety practice and to follow guidelines on the appropriate use of digital and video images.

Community Users

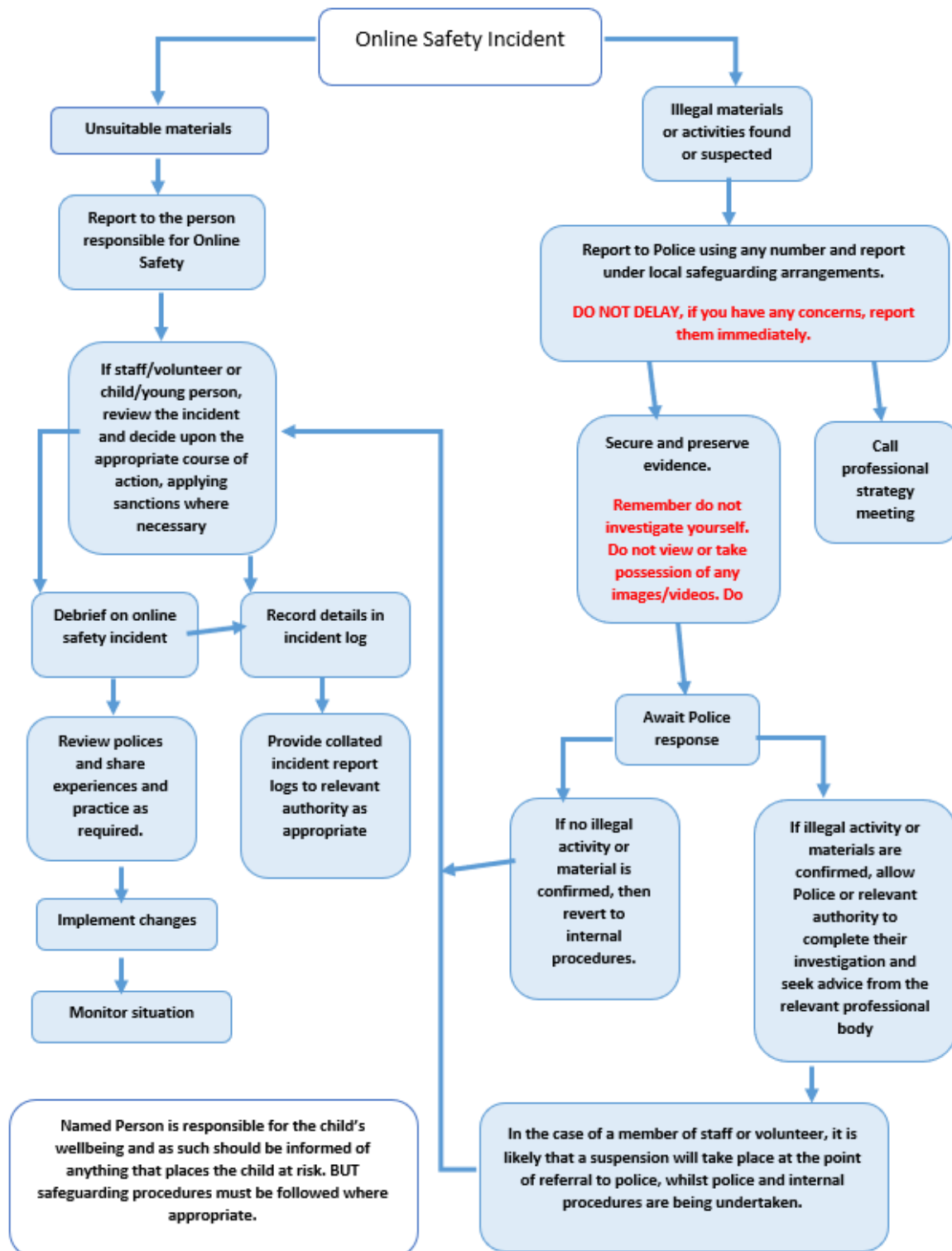
Community Users who access Turning Heads programmes as part of the wider provision will be expected to sign a Community User AUA before being provided with access to Turning Heads.

Responding to incidents of misuse

This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities (see “User Actions” above). Online Safety BOOST includes a comprehensive and interactive ‘Incident Management Tool’ that steps staff through how to respond, forms to complete and action to take when managing reported incidents (<https://boost.swgfl.org.uk/>)

Illegal Incidents

If there is any suspicion that the web site(s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right hand side of the Flowchart (below and appendix) for responding to online safety incidents and report immediately to the police.



Other Incidents

All members of Turning Heads will be responsible users of digital technologies, who understand and follow policy. However, there may be times when infringements of the policy could take place, through careless or irresponsible or, very rarely, through deliberate misuse.

In the event of suspicion, all steps in this procedure should be followed:

- Have more than one senior member of staff involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below)
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:
 - Internal response or discipline procedures
 - Involvement by Local Authority/Academy Group or national/local organisation (as relevant).
 - Police involvement and/or action
- **If content being reviewed includes images of child abuse, then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:**
 - incidents of ‘grooming’ behaviour
 - the sending of obscene materials to a child
 - adult material which potentially breaches the Obscene Publications Act
 - criminally racist material
 - promotion of terrorism or extremism
 - offences under the Computer Misuse Act (see User Actions chart above)
 - other criminal conduct, activity or materials
- **Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.**

It is important that all of the above steps are taken as they will provide an evidence trail for Turning Heads and possibly the police and demonstrate that visits to these

sites were carried out for safeguarding purposes. The completed form should be retained by the group for evidence and reference purposes.

Appointed Person

An appointed person should be made known to members, volunteers and parents alike; as the designated person to whom concerns should be addressed. If the concern is about this designated person, please report to **Ben Twitney, Turning Heads**.

The appointed person for Online Safety at Turning Heads is:

Name: Ben Twitney Contact number: 07817777739

Reviewed: 1 February 2022

Next Review: 1 February 2024