

GRIFFITHSTOWN PRIMARY SCHOOL

INSPIRE, CHALLENGE, ACHIEVE

Title	E-Safety Policy
Date	Autumn 2026
Author	I Pembrey

UNCRC Article 28 – The right to an education

UNCRC Article 29 – The right to an education which develops my personality, respect for others' rights and the environment.



Rationale

New technologies have become integral to the lives of children and young people in today's society, both within schools and in their lives outside school.

The Internet and other digital and information technologies are powerful tools, which open up new opportunities for everyone. Electronic communication helps teachers and pupils learn from each other. These technologies can stimulate discussion, promote creativity and increase awareness of context to promote effective learning. Children and young people should have an entitlement to safe Internet access at all times.

The requirement to ensure that children and young people are able to use the internet and related communications technologies appropriately and safely is addressed as part of the wider duty of care to which all who work in schools are bound. An Online-Safety Policy should help to ensure safe and appropriate use.

The use of these exciting and innovative tools in school and at home has been shown to raise educational standards and promote pupil achievement. However, the use of these new technologies can put young people at risk within and outside the school. Some of the dangers they may face include:

- Access to illegal, harmful or inappropriate images or other content
- Unauthorised access to/loss of/sharing of personal information
- The risk of being subject to grooming by those with whom they make contact on the internet
- The sharing/distribution of personal images without an individual's consent or knowledge
- Inappropriate communication/contact with others, including strangers
- Cyber-bullying
- Access to unsuitable video/internet games
- An inability to evaluate the quality, accuracy and relevance of information on the internet
- Plagiarism and copyright infringement
- Illegal downloading of music or video files
- The potential for excessive use which may impact on the social and emotional development and learning of the young person

Many of these risks reflect situations in the off-line world and it is essential that this E-Safety Policy is used in conjunction with other school policies (e.g., Behaviour, Anti-Bullying and Safeguarding policies).

As with all other risks, it is impossible to eliminate those risks completely. It is therefore essential, through good educational provision to build pupils' resilience to the risks to which they may be exposed, so that they have the confidence and skills to face and deal with these risks.

The school must demonstrate that it has provided the necessary safeguards to help ensure that they have done everything that could reasonably be expected of them to manage and reduce these risks. The E-Safety Policy that follows explains how we intend to do this, while also addressing wider educational issues in order to help young people (and their parents/carers) to be responsible users and stay safe while using the Internet and other communications technologies for educational, personal and recreational use.

Development, Monitoring & Review of this Policy

This E-Safety Policy has been developed by:

- I Pembrey, ICT Leader

In consultation with:

- Pupils
- Teachers
- Support Staff
- Governors

- Parents and Carers
- E-Safety Team
- Pupil Council

Scope of the Online Safety Policy

This Online Safety Policy outlines the commitment of Griffithstown Primary School to safeguard members of our school community online in accordance with principles of open government and with the law. Schools should be aware of the legislative framework under which this Online Safety Policy template and guidance has been produced as outlined in the attached 'Legislation' Appendix.

This Online Safety Policy applies to all members of the school community (including staff, learners, volunteers, parents and carers, visitors, community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal devices on the school site (where allowed).

Griffithstown Primary School will deal with such 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.

Policy development, monitoring and review

This Online Safety Policy has been developed by:

- *headteacher/senior leaders*
- *online safety lead*
- *staff – including teachers/education practitioners/support staff/technical staff*
- *governors*
- *parents and carers*
- *community users*

Consultation with the whole school community has taken place through a range of formal and informal meetings.

Schedule for development, monitoring and review

This E-Safety Policy was approved by the Governing Body on:	21.09.26
The implementation of this E-Safety Policy will be monitored by:	I Pembrey
Monitoring will take place at regular intervals:	Termly
The Governing Body will receive a report on the implementation of this E-Safety Policy:	Annually
The E-Safety Policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to e-safety or incidents that have taken place. The next anticipated review date will be:	Autumn 2027
Should serious e-safety incidents take place, the following external agencies will be informed:	LA Safeguarding Officer Gwent Police Child Protection Team

Process for monitoring the impact of the Online Safety Policy

We monitor the impact of the policy using:

- *logs of reported incidents*
- *monitoring logs of internet activity (including sites visited)*
- *internal monitoring data for network activity*
- *surveys/questionnaires of:*

- *learners*
- *parents and carers*
- *staff.*

Policy and leadership

Responsibilities

In order to ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviours, learning from each other and from good practice elsewhere, reporting inappropriate online behaviours, concerns and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals¹ and groups within the school.

Headteacher and senior leaders

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding, though the day-to-day responsibility for online safety may be delegated to an appropriate member of the senior leadership team.
- The headteacher and (at least) another member of the senior leadership team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff².
- The headteacher/senior leaders are responsible for ensuring that all staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.
- The headteacher/senior leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role.
- The headteacher/senior leaders will receive regular monitoring reports from the Online Safety Lead.

Governors

Keeping Learners Safe states:

2.38. "All governors, including the chair of governors, should be given access to safeguarding and child protection training to ensure a basic and consistent level of awareness. This training includes, but is not limited to, the Keeping learners safe modules. Governing bodies are responsible for ensuring the education setting policies and procedures for safeguarding meet statutory requirements, and all governors should know what to do if they have concerns about a child."

3.61. "The DSP should liaise with the designated governor for safeguarding so that the designated governor can report on safeguarding issues, irrespective of whether the issue is online or offline, to the governing body. Reports to the governing body should not be about specific child protection cases, but should review the safeguarding policies and procedures. It is good practice for the nominated governor and the DSP to present the report together"

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy e.g. by asking the questions posed in the Welsh Government and UKCIS document Five key questions for governing bodies to help challenge their school to effectively safeguard their learners. This will be carried out by Paul Richardson and Amy Phillips who will receive regular information about online safety incidents and monitoring reports. A member of the governing body will take on the role of Online Safety Governor to include:

- regular meetings with the Online Safety Lead

¹ In a small school some of the roles described may be combined, though it is important to ensure that there is sufficient 'separation of responsibility' should this be the case.

² See flow chart on dealing with online safety incidents in 'Responding to incidents of misuse' and relevant local authority HR/other relevant body disciplinary procedures.

- regularly receiving (collated and anonymised) reports of online safety incidents
- checking that provision outlined in the Online Safety Policy (e.g. online safety education provision and staff training is taking place as intended)
- reporting to relevant *governors group/meeting*
- *membership of the school Online Safety Group*
- *occasional review of the filtering change control logs and the monitoring of filtering logs (where possible)*

The governing body will also support the school in encouraging parents/carers and the wider community to become engaged in online safety activities.

Online Safety Lead

The ICT Leader is the Online Safety Leader and communicates concerns to the Designated Safeguarding Person (DSP) role.

The online safety lead will:

- work closely on a day-to-day basis with the Designated Safeguarding Person (DSP), where these roles are not combined
- take day-to-day responsibility for online safety issues, being aware of the potential for serious child protection concerns
- have a leading role in establishing and reviewing the school online safety policies/documents
- promote an awareness of and commitment to online safety education across the school and beyond
- liaise with curriculum leaders to ensure that the online safety curriculum is planned and embedded
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents
- receive reports of online safety incidents³ and create a log of incidents to inform future online safety developments
- provide (or identify sources of) training and advice for staff/ governors/ parents/ carers/ learners
- liaise with (school/local authority) technical staff, pastoral staff and support staff (as relevant)
- meet regularly with the online safety governor to discuss current issues, review (anonymised) incidents and if possible, filtering and monitoring logs
- attend relevant governing body meetings/groups
- report regularly to headteacher/senior leadership team.
- liaises with the local authority/relevant body.

Designated Safeguarding Person (DSP)

Keeping Learners Safe states:

2.14. "The headteacher/principal must appoint the appropriate number of DSPs and deputy DSPs for their education setting and should ensure the DSP:

- is given sufficient time and resources to carry out the role effectively, which should be explicitly defined in the postholder's job description
- has access to the required levels of training and support to undertake the role, including online safety training
- has time to attend and provide reports and advice to case conferences and other inter-agency meetings as required
- has the appropriate IT equipment to carry out the role effectively."

³ The school will need to decide how these incidents will be dealt with and whether the investigation/action will be the responsibility of the online safety lead or another member of staff, e.g. headteacher/senior leader/Designated Safeguarding Person/class teacher/head of year, etc.

The Designated Safeguarding Person should be trained in online safety issues and be aware of the potential for serious safeguarding issues to arise from:

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

Curriculum Leads

The Keeping Learners Safe safeguarding audit tool suggests:

“The curriculum should support existing policy within the education setting on important issues and provide sufficient information on managing risk, e.g. in: sex and relationships; drug, alcohol and tobacco education; accident prevention; anti-bullying; online safety; extremism and radicalisation.”

Curriculum Leads will work with the online safety lead to develop a planned and coordinated online safety education programme. This will be provided through:

- a discrete programme
- the Digital Competence Framework
- relationships and sexuality education
- Health and Wellbeing area of learning and experience
- assemblies and pastoral programmes
- through relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week.

Teaching and support staff

School staff are responsible for ensuring that:

- they have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices
- they understand that online safety is a core part of safeguarding
- they have read, understood and signed the staff acceptable use agreement (AUA), and that this is reviewed regularly
- they follow all relevant guidance and legislation including, for example, Keeping Learners Safe and UK GDPR regulations
- they immediately report any suspected misuse or problem to (*I Pembrey (Online-Safety Lead, DSP- Mr Blackburn/Mrs Pugh)*) for investigation/action, in line with the school safeguarding procedures
- all digital communications with learners, parents and carers and others should be on a professional level *and only carried out using official school systems and devices (where staff use Generative AI, they should only use school-approved Generative AI services for work purposes which have been evaluated to comply with organisational security and oversight requirements)*
- online safety issues are embedded in all aspects of the curriculum and other activities
- ensure learners understand and follow the Online Safety Policy and acceptable use agreements, have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they supervise and 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
- in lessons where internet use is pre-planned learners should be guided to sites that are checked as suitable for their use *and that processes are in place for dealing with any unsuitable material that is found in internet searches*
- where lessons take place using live-streaming or video-conferencing, staff must have full regard to Live-streaming and video-conferencing: safeguarding principles and practice guidance, which outlines key considerations to ensure safe practice when live-streaming.

- Keeping Learners Safe (Paragraph 7.6) states: “Safeguarding is an integral principal of digital learning and the safety and welfare of learners must take precedence over all other considerations. Safeguarding must be integral to the delivery of live-streamed lessons to ensure learners are appropriately protected.”
- they adhere to the school’s technical security policy, with regard to the use of devices, systems and passwords and understand basic cybersecurity
- they have a general understanding of how the learners in their care use digital technologies out of school, in order to be aware of online safety issues that may develop from the use of those technologies
- they are aware of the benefits and risks of the use of Generative Artificial Intelligence (GenAI) services in school, being transparent in how they use these services, prioritising human oversight. Gen AI should assist, not replace, human decision-making. Staff must ensure that final judgments, particularly those affecting people, are made by humans, fact-checked and critically evaluated.
- they have a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc
- they model safe, responsible and professional online behaviours in their own use of technology, including out of school and in their use of social media.

Network manager/technical staff

The network manager/technical staff (SRS) is responsible for ensuring that:

- they are aware of and follow the school Online Safety Policy and Technical Security Policy in order to carry out their work effectively in line with school policy
- the school technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets (as a minimum) the required online safety technical requirements as identified by the local authority, Welsh government via the Education Digital Standards or other relevant body
- users may only access the networks and devices through a properly enforced password protection policy
- they keep up-to-date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- the use of the technical and communications systems is regularly monitored in order that any misuse/attempted misuse can be reported to (I Pembrey-Online -Safety Lead/ DSP- Mr Blackburn) for investigation and action
- *(if present) monitoring software/systems are implemented and updated as agreed in school or education technology support partner policies*

Learners

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement and this is reviewed annually.
- should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology
- should avoid plagiarism and uphold copyright regulations, taking care when using Generative Artificial Intelligence (GenAI) services to protect the intellectual property of themselves and others and checking the accuracy of content accessed through gen AI services.
- will be expected to know and follow school Online Safety Policy
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school’s Online Safety Policy covers their actions out of school, if related to their membership of the school.

Parents and carers

Parents and carers play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way.

Enhancing digital resilience in education: An action plan to protect children and young people online (November 2022) states:

“We are committed to nurturing and promoting the safe and positive use of technology to children and young people by building a strong architecture around the child where professionals are skilled and families are aware of how to support children in their online lives. We seek to foster a protective environment for our children and young people by supporting families, practitioners, governors and other professionals creating a culture where keeping children safe online is everyone’s business.”

The school will take every opportunity to help parents and carers understand these issues through:

- providing them with a copy of the learners’ acceptable use agreement
- publish information about appropriate use of social media relating to posts concerning the school
- seeking their permissions concerning digital images, cloud services etc (see parent/carer AUA in the appendix)
- *providing opportunities for parents and carers to improve their understanding of online safety through parents’/carers’ evenings, newsletters, letters, website, ClassDojo, Hwb, learning platform and information about national/local online safety campaigns and literature*

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not access online content (including apps, games, sites) to make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Any illegal activity for example: • Child sexual abuse imagery* • Child sexual abuse/exploitation/grooming • Terrorism • Encouraging or assisting suicide • Offences relating to sexual images i.e., revenge and extreme pornography • Incitement to and threats of violence • Hate crime • Public order offences - harassment and stalking • Drug-related offences • Weapons / firearms offences • Fraud and financial crime including money laundering N.B. Schools should refer to guidance about dealing with self-generated nude and semi-nude images (sometimes referred to as 'sexting') - <u>Sharing nudes and semi-nudes: Responding to incidents and safeguarding children and young people.</u>					X

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not undertake activities that might be classed as cyber-crime under the Computer Misuse Act (1990)	- Using another individual's username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised) - Gaining unauthorised access to school networks, data and files, through the use of computers/devices - Creating or propagating computer viruses or other harmful files - Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords) - Disable/Impair/Disrupt network functionality through the use of computers/devices - Using penetration testing equipment (without relevant permission) N.B. Schools will need to decide whether these should be dealt with internally or by the police. Serious or repeat offences should be reported to the police. Under the Cyber-Prevent agenda the National Crime Agency has a remit to prevent learners becoming involved in cyber-crime and harness their activity in positive ways – read more about this: NCA Cyber Choices Programme					X
Users shall not undertake activities that are not illegal but are classed as unacceptable in school policies:	Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs)			X	X	
	Promotion of any kind of discrimination				X	
	Using school systems to run a private business				X	
	Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school				X	
	Infringing copyright and intellectual property (including through the use of Generative AI services)				X	
	Unfair usage (downloading/uploading large files that hinders others in their use of the internet)			X	X	
	Any other information which may be offensive to others or breaches the integrity				X	

User actions	Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
of the ethos of the school or brings the school into disrepute					

	Staff & Other Adults				Pupils			
Communication Technologies	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Mobile phones may be brought to school	✓						✓	
Use of mobile phones in lessons	✓			✓				✓
Use of mobile phones in social time	✓							✓
Taking photos on mobile phones or other personal camera devices				✓				✓
Use of hand held devices e.g., PDAs, PSPs	✓				✓			
Use of personal email addresses in school, or on school network		✓						✓
Use of school email for personal emails		✓						✓
Use of chat rooms / facilities				✓				✓
Use of instant messaging apps		✓						✓
Use of social networking sites	✓	✓						✓
Use of blogs	✓						✓	

Entertainment streaming e.g. Netflix, Disney+	✓							✓
Use of gen AI services that have not been approved by the school	✓							✓

When using communication technologies the school considers the following as good practice:

- when communicating in a professional capacity, staff should ensure that the communication tools they use are officially sanctioned by the school
- any digital communication between staff and learners or parents/carers (email, social media, learning platform, etc.) must be professional in tone and content. *Personal email addresses, text messaging or social media must not be used for these communications.*
- staff should be expected to follow good practice when using personal social media regarding their own professional reputation and that of the school and its community
- users should immediately report to a nominated person – in accordance with the school policy – the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication
- *relevant policies and permissions should be followed when posting information online e.g., school website and social media. Only school email addresses should be used to identify members of staff and learners.*

Reporting and responding

The school has in place procedures for identifying and reporting cases, or suspected cases, of online safeguarding issues/incidents and understands that because of our day-to-day contact with children our staff are well placed to observe the outward signs of these issues.

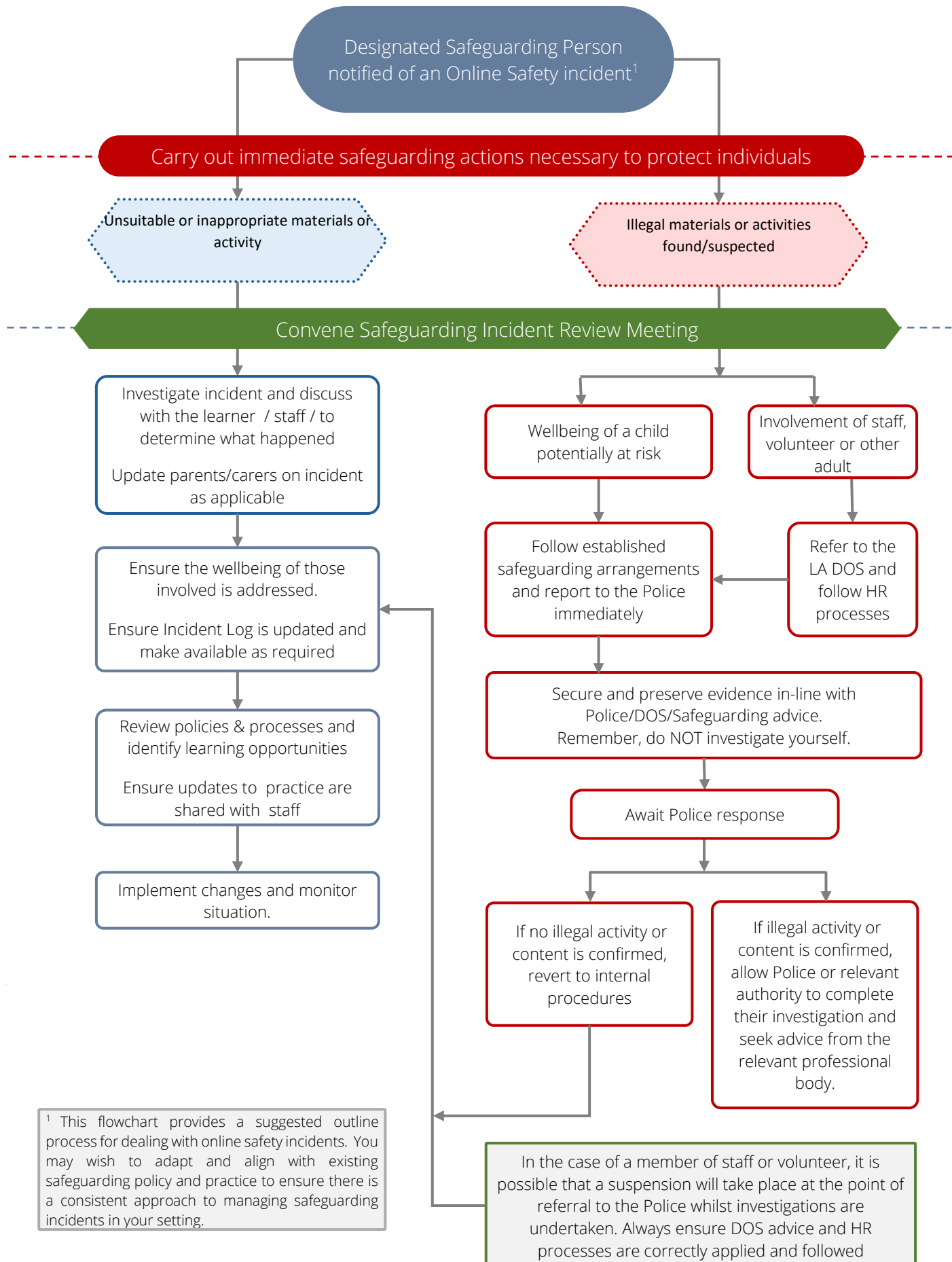
We ensure that every member of staff and every governor knows that they have an individual responsibility for reporting and that they are aware of the need to be alert to signs of abuse and neglect, and know how to respond to a learner who may disclose such issues.

We also understand that reporting systems do not always respond to the needs of learners and that we need to identify issues and intervene early to better protect learners.

The school will take all reasonable precautions to ensure online safety for all school users, but recognises that incidents may occur inside and outside of the school (with impact on the school) which will need intervention. The school will ensure:

- there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the school safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies.
- all members of the school community will be made aware of the need to immediately report online safety issues/incidents
- reports will be dealt with as soon as is practically possible once they are received
- the Designated Safeguarding Person, Online Safety Lead and other responsible staff have appropriate skills and training to deal with the various risks related to online safety
- if there is any suspicion that the incident involves child abuse images, any other illegal activity or the potential for serious harm (see [flowchart](#) and user actions chart below), the incident must be escalated through the normal school safeguarding procedures and the police informed. In these circumstances any device involved should be isolated to support a potential police investigation. In addition to child abuse images such incidents 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
- other criminal conduct, activity or materials



Making Safeguarding Referral

where concern relates to a

eSAFETY

CAUSE FOR CONCERN must be reported on [MyConcern](#)

[MyConcern - Apps - MyConcern Portal](#)

- A Concern Category must be allocated. Select from:
 - ⇒ Accessing Age Inappropriate Material
 - ⇒ Bullying - Online / Mobile Device
 - ⇒ Computer Misuse
 - ⇒ Inappropriate Access to Pornography
 - ⇒ Inappropriate Communication—Social Media
 - ⇒ Online Abuse
 - ⇒ Online Safety
 - ⇒ Sexting
- A record of the device must be made in the report
- A record of the website, if appropriate, must be made in the report.

School actions

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour/disciplinary procedures as follows:

Responding to Learner Actions

Incidents	Refer to class teacher/tutor	Refer to Head of Department / Principal Teacher / Deputy Head	Refer to Headteacher	Refer to Police/Social Work	Refer to local authority technical support for advice/action	Inform parents/carers	Remove device/ network/internet access rights	Issue a warning	Further sanction, in line with behaviour policy
Deliberately accessing or trying to access material that could be considered illegal (see list in <u>earlier section on User Actions</u> on unsuitable/inappropriate activities).		X	X	X	X	X		X	X
Attempting to access or accessing the school network, using another user's account (staff or learner) or allowing others to access school network by sharing username and passwords	X								X
Corrupting or destroying the data of other users.		X	X			X		X	X
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature		X	X			X		X	X
Unauthorised downloading or uploading of files or use of file sharing.	X								
Using proxy sites or other means to subvert the school's filtering system.	X				X			X	X
Accidentally accessing offensive or pornographic material and failing to report the incident.		X	X		X	X			

Deliberately accessing or trying to access offensive or pornographic material.		X	X		X	X		X	X
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act.	X								X
Unauthorised use of digital devices (including taking images)	X	X	X			X			X
Unauthorised use of online services	X	X	X			X			X
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.	X	X	X			X		X	X
Continued infringements of the above, following previous warnings or sanctions.	X	X	X		X	X			X

Responding to Staff Actions

Incidents	Refer to line manager	Refer to Headteacher/ Principal	Refer to local authority/MAT/HR	Refer to Police	Refer to LA / Technical Support Staff for action re filtering, etc.	Issue a warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities)		X	X	X	X		X	X
Actions which breach data protection or network / cyber-security rules.		X	X		X	X		
Deliberately accessing or trying to access offensive or pornographic material.		X	X	X	X		X	X
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software.		X	X		X	X	X	X

Using proxy sites or other means to subvert the school's filtering system.		X	X		X	X		
Unauthorised downloading or uploading of files or file sharing.		X	X					
Breaching copyright / intellectual property or licensing regulations (including through the use of Generative AI services)		X	X			X		
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account.		X	X					
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature.		X	X			X	X	X
Using personal email/social networking/messaging to carry out digital communications with learners and parents/carers								
Inappropriate personal use of the digital technologies e.g. social media / personal email.		X	X					
Careless use of personal / sensitive data, e.g. displaying, holding or transferring data in an insecure manner.		X	X			X		
Actions which could compromise the staff member's professional standing.		X	X			X	X	X
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.		X	X			X	X	X
Failing to report incidents whether caused by deliberate or accidental actions.		X	X					
Continued infringements of the above, following previous warnings or sanctions.							X	X

The use of Generative Artificial Intelligence (GenAI) systems in School

Artificial Intelligence (AI) technology is already widely used in commercial environments and is gaining greater use in education. We recognise that integrating gen AI tools into education presents many opportunities, including the potential to enhance educational experiences and support staff with some administrative tasks. However, their use must prioritise safety, responsibility, ethics, trust, data protection and inclusivity.

We also realise that there are risks involved in the use of gen AI systems, but that these can be mitigated through our existing policies and procedures, amending these as necessary to address risks.

We will educate staff and learners about safe and ethical use of gen AI, preparing them for a future in which AI technologies are likely to play an increasing role.

The safeguarding of staff and learners will, as always, be at the forefront of our policy and practice.

Policy Statements

- The school acknowledges the potential benefits of the use of gen AI in an educational context - including enhancing learning and teaching, improving administrative processes, managing workload and preparing staff and learners for a future in which AI technology

will be an integral part. Staff are encouraged to use gen AI based tools to support their work where appropriate, within the frameworks provided below and are required to be professionally responsible and accountable for this area of their work.

- We will comply with all relevant legislation and guidance, with reference to guidance contained in Keeping Learners Safe
- We will provide relevant training for staff *and governors* in the potential advantages, use of and potential risks of gen AI. We will support staff in identifying training and development needs to enable relevant opportunities.
- We will seek to embed learning about gen AI as appropriate in our curriculum offer, including supporting learners to understand how gen AI works, its potential benefits, risks, and ethical and social impacts. The school recognises the importance of equipping learners with the knowledge, skills and strategies to engage responsibly with gen AI tools.
- As set out in the staff acceptable use agreement, staff will be supported to engage with gen AI tools responsibly, ensuring the protection of both personal and sensitive data.
- Staff will always ensure gen AI tools used comply with UK GDPR and other data protection regulations, verifying with the Data Protection Officer (DPO) that tools comply with standards set by the Information Commissioner's Office (ICO) before using them for work related to the school.
- DPAI Completed and shared with stakeholders. Link to DPAI: [DPAI- Griffithstown Primary](#)
- All staff will be required to carefully consider the use of any gen AI tool and involve senior leadership in decision-making around its use.
- Staff should always use school-provided accounts for work purposes. These accounts are configured to comply with organisational security and oversight requirements, reducing the risk of data breaches.
- We will protect sensitive information. Schools and practitioners will not input any personal data, learner data or other sensitive or confidential information into gen AI tools.
- The school will ensure that when gen AI is used, it will not infringe copyright or intellectual property conventions. Care will be taken to avoid intellectual property, including that of the learners, being used to train gen AI models without appropriate consent.
- Where AI has been used to support learning, learners should be able to explain how it was used and demonstrate their own understanding of the work submitted.
- Staff must report any incidents involving gen AI misuse, data breaches or inappropriate outputs immediately to the relevant internal teams.
- The school will keep a record of all tools in use, their purpose and potential risks.
- Griffithstown Primary School currently approves the use of:
 - Microsoft Copilot via Hwb/Microsoft 365 (where available)
 - Google Gemini via HWB
 - Canva Education AI tools
 - Adobe Express AI features
- We are aware of the potential risk for discrimination and bias in the outputs from AI tools and have in place interventions and protocols to deal with any issues that may arise. When acquiring and implementing gen AI systems, we will follow due care and diligence to prioritise fairness and safety.
- *The school will support parents and carers in their understanding of the use of gen AI in the school*
- *Where staff use gen AI tools to support their learning and teaching practice, this will be purposeful, considered, with a clear focus on ensuring impact and understanding and mitigating risk.*
- Learners may only access and use Generative AI tools under the direct supervision of school staff and for educational purposes approved by the school.
- Learners and staff must not use AI tools to create, alter or share images, audio or video of another person without appropriate consent.

- The creation, possession or sharing of AI-generated harmful, deceptive or inappropriate imagery will be treated as a safeguarding concern and managed in line with school safeguarding procedures.
- *Staff will ensure that documents, emails, presentations, and other outputs influenced by AI include clear labels or notes indicating AI assistance.*
- *Staff will ensure that all AI-generated content is fact-checked and reviewed for accuracy before sharing or publishing.*
- Improper use of gen AI tools, including breaches of data protection standards, misuse of sensitive information, or failure to adhere to this agreement, will be subject to disciplinary action as defined in Staff Disciplinary Policy.

Education

Online Safety Education Programme

While regulation and technical solutions are very important, their use must be balanced by educating learners to take a responsible approach. The education of learners in online safety is therefore an essential part of the school's safeguarding provision. Learners need the help and support of the school to recognise and avoid online safety risks and develop their resilience.

Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways

- a planned online safety curriculum across all year groups and a range of subjects, (e.g. DCF/PSE/RSE/Health and Well-being) and topic areas and should be regularly revisited
- key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial/pastoral activities
- it incorporates/makes use of relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week
- the programme will be accessible to learners at different ages and abilities such as those with additional learning needs or those with English as an additional language. Learners considered to be at increased risk online (e.g. children in care, ALN learners, learners experiencing loss or trauma or mental health issues) are provided with targeted or differentiated online safety education
- learners should be taught in all lessons to be critically aware of the materials/content they access online and be guided to validate the accuracy of information (including where the information is gained from Gen AI services)
- learners should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- *learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school*
- *staff should act as good role models in their use of digital technologies the internet and mobile devices*
- *in lessons where internet use is pre-planned, it is best practice that learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches*
- where learners are allowed to freely search the internet, staff should be vigilant in supervising the learners and monitoring the content of the websites/ tools (including Gen AI systems) the learners visit
- the online safety education programme will be regularly audited and evaluated to ensure the quality of learning and outcomes.

Contribution of Learners

Keeping Learners Safe states:

"How safe do learners feel? The United Nations Convention on the Rights of the Child (UNCRC) sets out that children have a right to be safe and protected from harm, and have the right to express their opinions and participate in decision-making. In accordance with the UNCRC, the best way to understand how safe an education setting feels to learners is to ask them and observe how they and staff interact."

The school acknowledges, learns from and uses the skills and knowledge of learners in the use of digital technologies. We recognise the potential for this to shape the online safety strategy for the school community and how this contributes positively to the personal development of young people. Their contribution is recognised through:

- *mechanisms to canvass learner feedback and opinion.*
- *appointment of digital leaders/anti-bullying ambassadors/peer mentors*

- *learners contribute to the online safety education programme e.g. peer education, digital leaders leading lessons for younger learners, online safety campaigns*
- *learners designing/updating acceptable use agreements*
- *contributing to online safety events with the wider school community e.g. parents' evenings, family learning programmes etc.*

Staff/volunteers

It is essential that all staff receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- a planned programme of formal online safety, cyber security and data protection training will be made available to all staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly. *It is expected that some staff will identify online safety as a training need within the performance management process*
- the training will be an integral part of the school's annual safeguarding / data protection and cyber-security training for all staff
- all new staff will receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements. It includes explicit reference to classroom management, professional conduct, online reputation and the need to model positive online behaviours
- *the Online Safety Lead and Designated Safeguarding Person (or other nominated person) will receive regular updates through attendance at external training events, (e.g. Hwb Keeping safe online training events, from the Regional Consortium/SWGfL/LA/other relevant organisations) and by reviewing guidance documents released by relevant organisations*
- *this Online Safety Policy and its updates will be presented to and discussed by staff in staff/team meetings/INSET days*
- *the Online Safety Lead (or other nominated person) will provide advice/guidance/training to individuals as required.*

Governors

Governors should take part in online safety training/awareness sessions, with particular importance for those who are members of any sub-committee/group involved in technology/online safety/health and safety/safeguarding. This may be offered in a number of ways such as:

- Hwb training – Online safety for governors
- attendance at training provided by the local authority or other relevant organisation (e.g. SWGfL)
- participation in school training/information sessions for staff or parents
- A higher level of training will be made available to (at least) the Online Safety Governor and should include training on filtering and monitoring systems used by the school, data protection, cyber-security and new developments in digital technologies.

Families

Enhancing digital resilience in education: An action plan to protect children and young people online states:

“Building digital resilience in our children and young people also depends on the resilience of our families and communities. We are committed to nurturing and promoting the safe and positive use of technology to children and young people by building a strong architecture around the child where professionals are skilled and families are aware of how to support children in their online lives. We seek to foster a protective environment for our children and young people by supporting families, practitioners, governors and other professionals creating a culture where keeping children safe online is everyone's business.”

The school will seek to provide information and awareness to parents and carers through:

- *regular communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes*

- *regular opportunities for engagement with parents/carers on online safety issues through awareness workshops/parent/carer evenings etc*
- *the learners – who are encouraged to pass on to parents the online safety messages they have learned in lessons and by learners leading sessions at parent/carer evenings.*
- *letters, newsletters, website, learning platform, Hwb*
- *high profile events/campaigns e.g. Safer Internet Day*
- *reference to the relevant web sites/publications, e.g. Hwb Keeping safe online, The UK Safer Internet Centre, Childnet International (see Appendix for further links/resources).*
- *Sharing good practice with other schools in clusters and or the local authority*

Adults and Agencies

The Enhancing digital resilience in education: An action plan to protect children and young people online draws upon the self-review information schools in Wales record in the 360 safe Cymru tool. This data highlights that schools showing the strongest performance, amongst other indicators,

‘ensure that parents and carers receive these important online safety messages, often through the learners themselves sharing the messages learned in school. The school will also share their good practice with the wider community and other schools and will make use of the valuable community resources available to them from agencies such as the police’.

Drawing on this intelligence, the school will provide opportunities for local community groups and members of the wider community to gain from the school's online safety knowledge and experience. This may be offered through the following:

- providing family learning courses in use of new digital technologies and online safety
- online safety messages targeted towards families and relatives.
- the school will provide online safety information via their learning platform, website, and social media for the wider community

The school recognises the support and advice that may be provided by external groups and agencies and values their contribution to school programmes and events.

The school is committed to sharing its good practice with other schools and education settings.

Technology

The school is responsible for ensuring that the school infrastructure and network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. The school should ensure that all staff are made aware of policies and procedures that are in place on a regular basis and explain that everyone is responsible for online safety and data protection.

Filtering

Keeping Learners Safe states:

7.7. “It is critical that web-filtering standards are fit for purpose for twenty-first century learning and teaching, allowing the access schools require while still safeguarding children and young people. Governing bodies should ensure appropriate filters and appropriate monitoring systems are in place and refer to web filtering standards as part of the Education Digital Standards for schools in Wales. The standards seek to support schools to provide a safe, responsible and supportive environment to learn in, and prevent access to inappropriate or harmful content.

- the school filtering policies are agreed by senior leaders and technical staff and systems are regularly reviewed and updated in response to changes in technology and patterns of online safety incidents and behaviours
- the school manages access to content across its systems for all users.
- illegal content
- there are established and effective routes for users to report inappropriate content and this is acted upon in a timely manner by the Designated Safeguarding Person whilst adhering to the Wales Safeguarding Procedures
- there is a clear process in place to deal with requests for filtering changes
- younger learners will use child friendly/age appropriate search engines

- there is an appropriate and balanced approach to providing access to online content according to role and/or need

If necessary, the school will seek advice from, and report issues to, the [Report Harmful Content](#) site.

Users are made aware, through the acceptable use agreements, that monitoring takes place.

Technical Security

The school has a clear technical security systems managed in ways that ensure- that the school meets recommended technical requirements

- servers, wireless systems and cabling are securely located and physical access restricted
- there are rigorous and verified back-up routines, including the keeping of copies off-site or in the cloud and these are resilient by design
- the master account passwords for the school systems are kept in a secure place
- systems are in place for the recovery and resetting of passwords
- See the [Family guide to cybersecurity](#) for more information.
- Only if necessary, records of learner usernames and passwords for Nursery – Y2 learners may be kept in an electronic or paper-based form, but they must be securely stored when not required by the user.
- password requirements for learners at Y3 – Y6 and above should increase as learners progress through school
- I Pembrey is responsible for ensuring that software licence logs are accurate and up-to-date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- an appropriate system is in place for users to report any actual/potential technical incident/security breach to the relevant person, as agreed)
- appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices, etc., from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.
- systems and programme software are regularly updated with security patches
- an agreed policy is in place for the provision of temporary access of 'guests', (e.g. trainee teachers, supply teachers, visitors) onto the school systems
- an agreed policy is in place regarding the extent of personal use that users (staff/learners/community users) and their family members are allowed on school devices that may be used out of school
- an agreed device management policy is in place that allows staff to/forbids staff from downloading executable files and installing programmes on school devices
- an agreed policy is in place regarding the use of removable media (e.g. memory sticks/CDs/DVDs) by users on school devices.
- systems are in place that prevent the unauthorised sharing of personal / sensitive data unless safely encrypted or otherwise secured. (See school personal data policy template in the appendix for further detail). Care should be taken when using Gen AI services to avoid the input of sensitive information, such as personal data, internal documents or strategic plans, into third-party Gen AI systems unless explicitly vetted for that purpose. Staff must always recognise and safeguard sensitive data.
- encryption is used for the transfer of sensitive or vulnerable data and on school managed devices
- dual-factor authentication is used for sensitive data or access outside of a trusted network
- where Gen AI systems are used for technical security, their effectiveness is regularly reviewed, updated and monitored for vulnerabilities.
- where Gen AI systems are used, the school will work with suppliers to understand how these services are trained and will regularly review flagged incidents to ensure equality for all users e.g. avoiding bias

Devices

Mobile technology devices may be school owned/provided or personally owned and might include smartphone, tablet, wearable devices, notebook/laptop or other technology that usually has the capability of utilising the school's wireless network. The device then has access to the wider internet which may include the school learning platform and other cloud-based services such as email and data storage.

Pupils must leave personal devices in the front office for collection at the end of the day.

Adults must keep devices in a safe space and only access during non-directed time.

Social media

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to learners through:

- ensuring that personal information is not published
- providing education/training on social media use including; acceptable use, age restrictions, social media risks, digital and video images policy, checking of settings, data protection and reporting issues
- having in place clear reporting guidance, including responsibilities, procedures and sanctions
- risk assessment, including legal risk
- provision of guidance for learners, parents/carers

School staff ensure that:

- no reference is made in social media to learners, parents/carers or school staff
- they do not engage in online discussion on personal matters relating to members of the school community
- personal opinions are not attributed to the school or local authority
- security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information
- they act as positive role models in their use of social media

Personal use

- personal communications are those made via personal social media accounts. In all cases, where a personal account is used which associates itself with, or impacts on, the school it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy
- personal communications which do not refer to or impact upon the school are outside the scope of this policy
- where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken
- *the school permits reasonable and appropriate access to private social media sites*

Monitoring of public social media

- As part of active social media engagement, the school will pro-actively monitor the Internet for public postings about the school
- the school will effectively respond to social media comments made by others according to a defined policy or process
- when parents/carers express concerns about the school on social media we will urge them to make direct contact with the school, in private, to resolve the matter. Where this cannot be resolved, parents/carers should be informed of the school complaints procedure.

Digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and learners instant use of images that they have recorded themselves or downloaded from the internet.

The school will inform and educate users about these risks.

- in accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect

everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other learners in the digital/video images

- *staff and volunteers are allowed to take digital/video images to support educational aims, but must follow school policies concerning the sharing, storage, distribution and publication of those images. Staff/volunteers must be aware of those learners whose images must not be taken/published. Those images should only be taken on school equipment. The personal equipment of staff should not be used for such purposes*
- *care should be taken when taking digital/video images that learners are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute*
- *learners must not take, use, share, publish or distribute images of others without their permission*
- *photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with good practice guidance on the use of such images*
- *learners' full names will not be used anywhere on a website or blog, particularly in association with photographs*
- *written permission from parents or carers will be obtained before photographs of learners are taken for use in school or published on the school website/social media.*

Online safety messaging

The school communicates with parents/carers and the wider community and promotes the school through:

- Public-facing website
- Social media
- Online newsletters
- Other

The school website is managed/hosted by Webflow. The school ensures that good practice has been observed in the use of online publishing e.g. use of digital and video images, copyright, identification of young people, publication of school calendars and personal information – ensuring that there is no risk to members of the school community, through such publications. Where learner work, images or videos are published, their identities are protected and full names are not published.

Data Security

Personal data will be recorded, processed, transferred and made available according to the current data protection legislation.

The school follows the Torfaen Data Protection Policy.

Cyber Security

The school follows the Torfaen Cyber Security Policy.

Outcomes

The impact of the Online Safety Policy and practice is regularly evaluated through the review/audit of online safety incident logs; behaviour/bullying reports; surveys of staff, learners; parents/carers and is reported to relevant groups:

- there is balanced professional debate about the evidence taken from the reviews/audits and the impact of preventative work e.g. online safety education, awareness and training
- there are well-established routes to regularly report patterns of online safety incidents and outcomes to school leadership and Governors
- parents/carers are informed of patterns of online safety incidents as part of the school's online safety awareness raising
- online safety (and related) policies and procedures are regularly updated in response to the evidence gathered from these reviews/audits/professional debate

- the evidence of impact is shared with other schools, agencies and LAs to help ensure the development of a consistent and effective local online safety strategy.

Appendix

Copies of the more detailed template policies and agreements, contained in the appendix, can be downloaded from Hwb.

The Welsh Government and SWGfL would like to acknowledge a range of individuals and organisations whose policies, documents, advice and guidance have contributed to the development of this school Online Safety Policy template and of the 360 safe Cymru online safety self-review tool:

Acknowledgements:

- Members of the SWGfL Online Safety Group
- Representatives of Welsh local authorities
- Representatives from a range of Welsh schools involved in consultation and pilot groups

All appendix are accessed via SWGfL