ONLINE SAFETY POLICY

Policy implemented:	September 2023
Last reviewed:	August 2026
Next review due:	August 2027

EQUALITY AND DIVERSITY STATEMENT

Salutem Care & Education is committed to the fair and equitable treatment of all individuals in accordance with the Equality Act 2010. An Equality Impact Assessment has been completed for this policy to ensure it can be applied consistently and without discrimination. Salutem Care & Education is committed to safe, high-quality, person-centred services that uphold people's rights and dignity.

All colleagues (including volunteers, agency workers and contractors) must follow this policy, guided by our values. Policies are reviewed every two years; if a review is delayed, the current version remains in force until approved by the Policy Sponsor.

Training will support understanding, and people we support will be involved in reviews. Local procedures may support this policy, but corporate policies must not be changed locally without formal approval.

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1. Summary

This Online Safety Policy outlines the commitment of Chiron OEP to safeguard members of our school community online in accordance with statutory guidance and best practice. This policy is created in accordance with the relevant legislation. Chiron OEP 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.

Safeguarding and protecting the people we support effectively is central to all of Ambito Education's work and supports Ambito Education's strategy to maximise the life opportunities and the health and wellbeing of disabled people. All staff and volunteers recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for our customers or not. This commitment is equally as strong in virtual environments as it is when working with young people face-to-face. This policy is aligned with the statutory guidance "Keeping Children Safe in Education 2025". Chiron OEP recognises that online safety is a core safeguarding responsibility and that online risks—including abuse, exploitation, radicalisation, and online child-on-child abuse—are as significant as offline risks.

The school Online Safety Policy:

- sets expectations for the safe and responsible use of digital technologies for learning, administration, and communication
- allocates responsibilities for the delivery of the policy
- is regularly reviewed in a collaborative manner, taking account of online safety incidents and changes/trends in technology and related behaviours
- establishes guidance for staff in how they should use digital technologies responsibly, protecting themselves and the school and how they should use this understanding to help safeguard students in the digital world
- describes how the school will help prepare students to be safe and responsible users of online technologies

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- establishes clear procedures to identify, report, respond to and record the misuse of digital technologies and online safety incidents, including external support mechanisms
- is supplemented by a series of related acceptable use agreements
- is made available to staff at induction and on our internal comms system (Blink)
- is published on the school website.

2. Document Control

Policy Sponsor (Name & Role):	Aaron Churchyard, Education Quality Assurance Manager
Policy Reviewer (Name & Role):	Ayesha Allen, Principal
Approved by (Name/Role):	James Winchester, Regional Director
Date Implemented:	September 2023
Last Reviewed:	August 2026
Next Review Due:	August 2027
Version Number:	V2.0
Controlled Copy Location:	☒ BLINK ☒ Education Policy Hub
Policy category (tick):	☒Safeguarding ☐ Health & Safety ☐ Care practice ☐ HR/People ☒ Education ☒ Information Governance ☐ Other: [ ]
Policy Applies to:	**People we Support** ☒ Families/Carers ☒ Children/young people ☒ Adults

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	☒ Students **Workforce** ☒ Permanent ☒ Bank ☒ Agency ☐ Other: [ ] ☒ Volunteers ☒ Contractors

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4. Definitions

Safeguarding

Protecting children and young people from harm and promoting their welfare.

Online Safety

The safe, responsible and informed use of digital technologies and online services.

Acceptable Use Agreement

A document outlining the expectations for safe and appropriate use of technology.

Filtering

Technical controls used to restrict access to harmful or inappropriate online content.

Monitoring

Processes and systems that identify concerning online activity on school devices, networks and platforms.

Personal Data

Any information which can identify an individual directly or indirectly.

Data Breach

An incident in which personal data is accessed, disclosed, lost or altered without authorisation.

Cyberbullying

Bullying which takes place through digital technologies or online platforms.

Online Sexual Harassment

Unwanted sexual comments, communication, requests or imagery communicated online.

Sextortion

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A form of online blackmail involving threats to share sexual content unless demands are met.

Youth Produced Sexual Imagery

Nude or semi-nude images created or shared by children or young people.

Grooming

The process of building a relationship with a child for the purpose of exploitation, abuse or manipulation.

Child Sexual Exploitation

A form of abuse involving the manipulation or coercion of a child into sexual activity.

Criminal Exploitation

The exploitation of a child for criminal purposes.

Harmful Online Content

Content that may negatively impact a student's health, wellbeing, safety or development.

Contact Risk

Risks arising through communication with other users online.

Conduct Risk

Risks arising from an individual's own online behaviour.

Misinformation

False information shared without intent to deceive.

Disinformation

False information deliberately created or shared to mislead others.

Deepfakes and AI Generated Content

Artificially generated or manipulated content designed to appear authentic.

Digital Footprint

The record of an individual's online activity.

Privacy Settings

Controls that determine who can view information and interact with online accounts.

Remote Learning

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Education delivered through online platforms and digital systems.

Password Security

Processes that protect access to systems and accounts.

Multi-Factor Authentication

A security process requiring multiple methods of identity verification.

Phishing

Fraudulent attempts to obtain personal information through deception.

Malware

Malicious software designed to damage systems or gain unauthorised access.

Prevent Duty

The statutory duty to have due regard to preventing people from being drawn into terrorism.

Reporting Procedures

Processes used to report online safety concerns or incidents.

Business Continuity Plan

Organisation arrangements for maintaining safe operations during disruption.

5. Principles

Chiron OEP adopts a whole-school approach to online safety that is safeguarding-led, proportionate and responsive to emerging risks. As an online education provider, safeguarding considerations underpin all decisions relating to technology, digital learning platforms and online communication.

5.1 Safeguarding First

Online safety is recognised as a core safeguarding responsibility.

All decisions involving technology, online platforms, digital services and communication systems will prioritise the safety, wellbeing and protection of students. Online risks are treated with the same importance as offline safeguarding risks.

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Staff must remain vigilant to a range of online risks including:

- Child-on-child abuse
- Grooming and sexual exploitation
- Criminal exploitation
- Radicalisation and extremist content
- Online bullying and harassment
- Sextortion
- Sharing of nude or semi-nude images
- Harmful online content
- Cybercrime and online fraud
- Artificial intelligence and deepfake related risks

5.2 Reporting Culture

Chiron OEP is committed to maintaining a culture where students, staff and parents/carers feel confident in reporting concerns and understand that concerns will be taken seriously.

The school will ensure:

- Clear reporting routes exist and are understood by all members of the school community.
- Students can report concerns to any trusted adult or through the school's online reporting mechanisms.
- Staff understand their responsibility to report concerns immediately.
- Concerns are recorded using CPOMS in accordance with safeguarding procedures.
- Those reporting concerns are supported appropriately.
- Students are reassured that reports will be taken seriously and acted upon.

Staff must never promise confidentiality to a student making a disclosure regarding online abuse or harm.

5.3 Filtering and Monitoring

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

Chiron OEP will maintain robust filtering and monitoring arrangements appropriate to the age, needs and vulnerabilities of students.

Filtering systems will be used to restrict access to harmful, inappropriate or illegal content.

Monitoring systems will be used to identify potential safeguarding concerns, including:

- Grooming
- Exploitation
- Online bullying
- Radicalisation
- Access to harmful content
- Self-harm related content
- Sexual abuse and exploitation
- Criminal exploitation

Filtering and monitoring arrangements will be reviewed regularly to ensure they remain effective and proportionate.

Staff will receive training to understand:

- The purpose of filtering and monitoring systems
- Their role in safeguarding students online
- How concerns generated through monitoring systems are escalated and managed

Filtering and monitoring systems are an important safeguarding control but do not replace professional curiosity, supervision or effective online safety education.

5.4 Digital Resilience and Education

Online safety education is embedded throughout the curriculum and wider school culture.

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Students will be supported to develop the knowledge, skills and understanding required to navigate the online world safely and responsibly.

Online safety education will include:

- Safe online behaviour
- Digital footprints
- Privacy settings
- Password security
- Online relationships
- Consent and boundaries
- Cyberbullying
- Misinformation and disinformation
- Artificial intelligence and deepfakes
- Online exploitation
- Reporting concerns and seeking help

Opportunities to reinforce online safety messages will be integrated across the curriculum.

5.5 Professional Boundaries and Communication

All communication between staff and students must take place through approved school systems.

Staff must:

- Maintain professional boundaries at all times.
- Use only approved school email systems and educational platforms.
- Never communicate with students through personal social media accounts, personal email accounts or personal messaging services.
- Follow the Staff Code of Conduct and Acceptable Use Agreement.
- Act professionally in all digital communications.

Staff are expected to model safe and responsible online behaviour at all times.

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5.6 Safe Remote Learning

As an online education provider, Chiron OEP recognises the importance of maintaining robust safeguards within virtual learning environments.

The school will ensure that:

- Only approved educational platforms are used.
- Live lessons are delivered through authorised school systems.
- Lessons are recorded in accordance with school procedures.
- Appropriate controls are used within virtual classrooms, including waiting rooms, moderated chat functions and participant controls where appropriate.
- Staff maintain professional standards at all times during online teaching.
- Any safeguarding concerns arising during online learning are reported immediately.

Private one-to-one communication between staff and students outside approved school systems is prohibited.

5.7 Information Governance and Data Protection

Personal information must be processed securely, lawfully and fairly.

Chiron OEP is committed to protecting the confidentiality, integrity and availability of information.

Staff must:

- Follow data protection procedures.
- Use approved systems for storing and sharing information.
- Report suspected data breaches immediately.
- Protect student information from unauthorised access, disclosure or loss.

Data protection obligations apply equally to online and offline environments.

5.8 Artificial Intelligence and Emerging Technologies

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Chiron OEP recognises the increasing use of artificial intelligence and emerging online technologies.

Students will be educated regarding:

- The safe use of AI tools.
- Risks associated with manipulated content.
- Deepfakes and misinformation.
- Responsible use of technology.

The misuse of artificial intelligence systems to create, access or distribute harmful, abusive or inappropriate content will be managed through safeguarding and behavioural procedures.

AI-generated sexual imagery involving children will be treated as a safeguarding concern and responded to in accordance with safeguarding procedures and national guidance.

5.9 Responding to Incidents

The school will take all reasonable steps to prevent online safety incidents but recognises that concerns may arise both within and outside the school environment.

The school will ensure:

- Online safety concerns are responded to promptly.
- Appropriate safeguarding procedures are followed.
- Serious concerns are escalated immediately to the DSL.
- Relevant agencies are involved where required.
- Records are maintained in accordance with safeguarding procedures.
- Learning is identified from incidents and used to improve practice.

Where concerns involve suspected illegal activity, staff will follow safeguarding procedures and seek advice from appropriate agencies as required.

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5.10 Continuous Improvement

Chiron OEP is committed to continuously improving online safety arrangements.

The school will:

- Review online safety practices regularly.
- Monitor incident trends and emerging risks.
- Review filtering and monitoring effectiveness.
- Update training and curriculum content as required.
- Learn from incidents, audits and safeguarding reviews.
- Respond proactively to technological developments and emerging online risks.

5.11 Partnership Working

Chiron OEP recognises that effective online safety requires collaboration between students, staff, parents/carers and safeguarding partners.

The school will:

- Provide guidance and support to parents/carers.
- Signpost families to trusted online safety resources.
- Work collaboratively with local authorities and safeguarding partners.
- Engage with external professionals where appropriate.
- Promote consistent online safety messages across all aspects of school life.

6. Monitoring, Audit and Compliance

6.1 Policy Review

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This policy will be reviewed annually and following any significant safeguarding incident, organisational learning, legislative update or technological change.

6.2 Filtering and Monitoring Reviews

The effectiveness of filtering and monitoring systems will be reviewed at least termly.

Reviews will consider:

- safeguarding alerts
- blocked content
- attempted access to inappropriate material
- monitoring reports
- emerging risks
- identified gaps in protection

6.3 Incident Analysis

The DSL and Online Safety Lead will undertake termly analysis of online safety incidents to identify patterns, themes and emerging risks.

Findings will inform:

- curriculum development
- staff training
- technical controls
- student support

6.4 Governance Reporting

The Online Safety Lead will provide termly online safety reports to Senior Leaders covering:

- safeguarding incidents
- training compliance

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- filtering and monitoring effectiveness
- emerging online risks
- required actions

6.5 Evidence Retention

Online safety incidents will be recorded using CPOMS and retained in accordance with safeguarding and records management requirements.

7. Areas of Responsibility

Senior Leadership Team:

The Senior Leadership Team will monitor the effectiveness of this policy by:

- regular meetings with the Principal
- 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)

The Principal

- The Principal has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding.
- The Principal should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff.
- The Principal is responsible for ensuring that, technical staff, and other relevant 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 Principal 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.

Online Safety Lead

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The Online Safety Lead will:

- coordinate online safety activities
- oversee implementation of this policy
- support the DSL
- monitor emerging online risks
- coordinate awareness campaigns
- monitor incidents and trends
- provide assurance reports to senior leaders

The DSL

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

- sharing of personal data 3
- access to illegal/inappropriate materials
- inappropriate online contact with adults/strangers
- potential or actual incidents of grooming
- online bullying.
- 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 / awareness raising across the school and beyond
- liaise with curriculum leaders to ensure that the online safety curriculum is planned, mapped, embedded and evaluated
- 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 incidents4 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/students
- liaise with Salutem technical staff, pastoral staff and support staff (as relevant)
- meet regularly with the online safety governing advisor to discuss current issues, review (anonymised) incidents and if possible, filtering and monitoring logs

School Staff

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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
- Staff must be alert to a full range of online risks, including:
- Child-on-child abuse (online bullying, harassment, sexual violence and harassment)
- Grooming and sexual exploitation
- Criminal exploitation (e.g., county lines)
- Radicalisation and extremist content
- Sharing or receiving indecent images ("sexting")
- Exposure to harmful or inappropriate content
- Cybercrime and online fraud
- they have the relevant training to ensure that they are in control of the virtual space (e.g. turning off peer chat facilities and creating a lobby for the classroom)
- they understand that online safety is a core part of safeguarding
- they have read, understood, and signed the staff acceptable use agreement (AUA)
- they immediately report any suspected misuse or problem to the DSL (Via Nourish) for investigation/action, in line with the school safeguarding procedures
- all digital communications with students and 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
- ensure students 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 spaces in accordance with the Code of Conduct
- students 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
- All lessons are recorded and stored using approved school platforms in accordance with organisational procedures and data protection requirements.
- 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.

The Network Manager

The network manager (via Salutem Care and Jigsaw24) is responsible for ensuring that:

- they are aware of and follow the school Online Safety Policy and Technical Security Policy 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 will ensure robust filtering and monitoring systems are in place to protect children from harmful and inappropriate online content.
- the effectiveness of these systems will be reviewed regularly.

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- staff will be trained to understand how filtering and monitoring works and how to report concerns if these systems are not working effectively.
- the school meets (as a minimum) the required online safety technical requirements as identified by the local authority/MAT or other relevant body
- there is clear, safe, and managed control of user access to networks and devices
- 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 technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported to the Principal for investigation and action
- the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person.
- monitoring software/systems are implemented and regularly updated as agreed in school policies

Data Protection Officer

The DPO will:

- provide guidance regarding data protection obligations
- support investigations involving data breaches
- advise on lawful processing of personal information
- support compliance with UK GDPR and the Data Protection Act 2018

Students

- are responsible for using the school digital technology systems in accordance with the student acceptable use agreement and Online Safety Policy
- 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 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.
- this policy applies to children's use of technology both within and outside of school, where there is a clear link to school membership or the school community.

Parents/Carers

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

- publishing the school Online Safety Policy on the school website
- publish information about appropriate use of social media relating to posts concerning the school

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- Parents and carers will be encouraged to support the school in:
- reinforcing the online safety messages provided to students in school
- the use of their children's personal devices in the school (where this is allowed)

8. Learning and Development

Salutem is committed to ensuring that all staff are aware of what is expected of them so that everyone is appropriately supported. Staff should speak to their line manager in relation to their learning needs using supervision and through the appraisal process.

The school will ensure that the Designated Safeguarding Lead, and other responsible staff have appropriate skills and training to deal with online safety risks.

All staff, including volunteers and temporary staff, will receive safeguarding and online safety training at induction and at least annually, in line with KCSIE 2026. Training will cover:

- identifying and reporting online abuse, exploitation, and radicalisation
- understanding the school's filtering and monitoring systems
- recognising the overlap between online and offline safeguarding risks
- a planned programme of formal online safety 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.
- the training will be an integral part of the school's annual safeguarding and data protection 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 Designated Safeguarding Lead will receive regular updates through attendance at external training events, 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 DSL will provide advice/guidance/training to individuals as required.

9. Associated Documents

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Anti-Bullying Policy
- Staff Code of Conduct

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- Whistleblowing Policy
- Information Governance Policy
- Student Acceptable Use Agreement

10. Legal, Regulatory & Standards Framework

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children
- Education Act 2002
- Independent School Standards Regulations
- Prevent Duty Guidance
- UK GDPR
- Data Protection Act 2018
- Equality Act 2010
- DfE Filtering and Monitoring Standards
- UK Council for Internet Safety (UKCIS) Guidance
- Searching, Screening and Confiscation Guidance

11. Version Control

This is a controlled document. As a controlled document, any printed copies of this document, or saved onto local or network drives should be actively monitored to ensure the latest version is always available.

Version Number	Date	Author	Summary of Changes	Approved By
V1.0	June 2023	New	New policy	V1.0
V1.2	September 2025	Updated	Updating in line with new guidance in Keeping Children Safe in Education 2025	V1.2
V2.0	August 2026	Aaron Churchyard	New template applied, reviewed and written in line with KCSIE 2026	James Winchester

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12. Appendices

Appendix A: Acceptable Use Agreement

Appendix B: (e.g., checklist) Incident flow-chart for staff

Appendix C: (e.g., flowchart) Incident flow-chart for DSL actions

APPENDIX A: Acceptable Use Agreement

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Acceptable Use Agreement

		Acceptable	Not Acceptable	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not undertake activities that are not illegal but are classed as unacceptable in school	Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs)				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				X	
	Unfair usage (downloading/uploading large files that hinders others in their use of the internet)				X	
	Any other information which may be offensive to others or breaches the integrity of the ethos of the school or brings the school into disrepute				X	

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Acceptable Use Agreement

	Acceptable	Not Acceptable	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 • Public order offences - harassment and stalking • Drug-related offences • Weapons / firearms offences • Fraud and financial crime including money laundering • Incitement to and threats of violence • Hate crime N.B. When dealing with self-generated images/sexting we will refer to – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges					X
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. Serious or repeat offenders will be referred to the Police.					X

Acceptable Use Agreement

		Staff and adult users				Students			
		Not Allowed	Allowed	Allowed at certain times	Allowed for selected staff	Not Allowed	Allowed	Allowed at certain times	Allowed with staff supervision
Consideration should be given for the following activities when undertaken for non-educational purposes:	Online gaming			X					X
	Online shopping/commerce	X				X			
	File Sharing		X					X	
	Social Media			X					X
	Messaging/chat (Peer to peer)		X			X			
	Messaging/chat (Student to teacher)		X					X	
	Entertainment streaming e.g. Netflix			X					X
	Use of broadcasting e.g. Youtube/Twitch/TikTok			X		X			
	Use of personal email to contact teachers or peers			X		X			
	Use of school email for personal emails	X				X			

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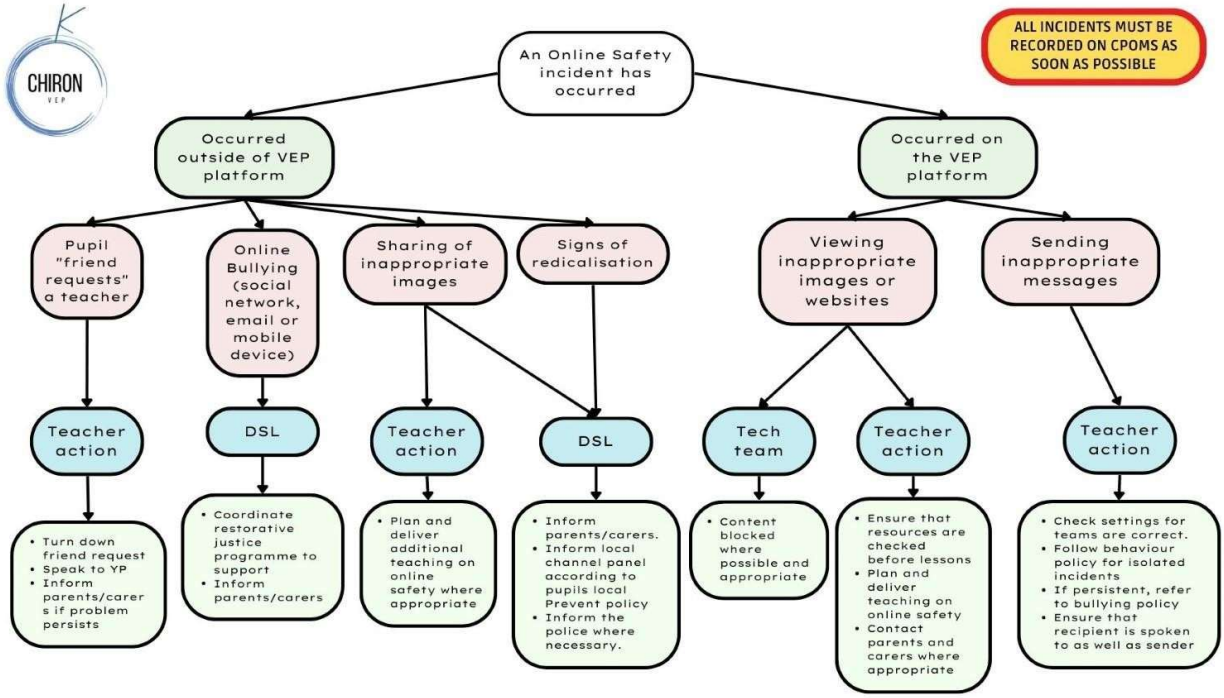
APPENDIX B: Incident Flow-chart for staff



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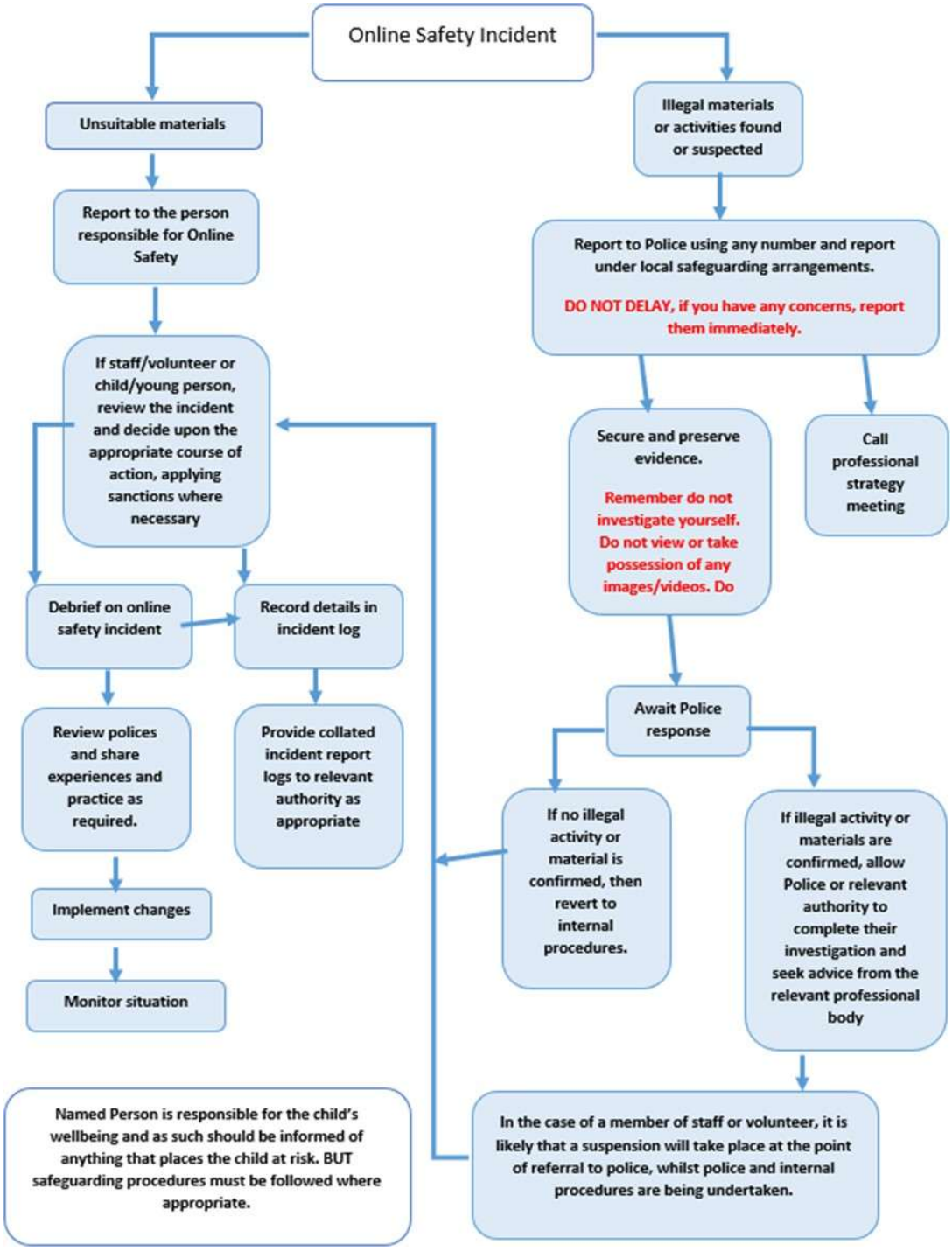
APPENDIX C: Incident flow-chart for DSL actions



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