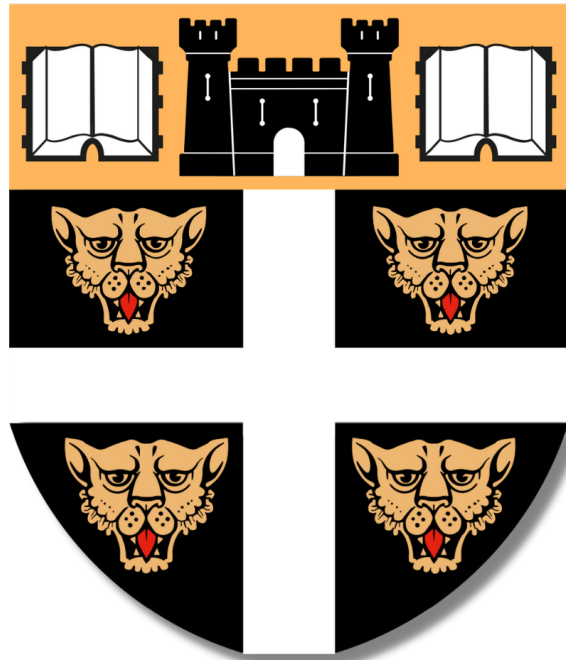


Online Safety Policy

Dover College



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1. Aims

Our school aims to:

Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors.

Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology, including mobile and smart technology (which we refer to as 'mobile phones').

Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate.

The 4 key categories of risk

Our approach to online safety is based on the four categories of risk set out in section 6 of the Safeguarding and Child Protection Policy: content, contact, conduct and commerce.

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism, misinformation, disinformation and conspiracy.
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying, harmful interaction with generative AI chatbots and companion applications under Contact, and AI-generated explicit images.
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

2. Legislation and guidance

This policy is based on the Department for Education's (DfE's) statutory safeguarding guidance, Keeping Children Safe in Education, and its advice for schools on:

- Teaching online safety in schools
- Preventing and tackling bullying and cyber-bullying: advice for headteachers and school staff
- Relationships and sex education
- Searching, screening and confiscation

It also refers to the DfE's guidance on protecting children from radicalisation.

It reflects existing legislation, including but not limited to the Education Act 1996 (as amended), and the Equality Act 2010. In addition, it reflects the Education Act 2011, which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on pupils' electronic devices where they believe there is a 'good reason' to do so. The full statutory and regulatory framework within which this policy operates, including the Education (Independent School Standards) Regulations 2014 and the National Minimum Standards for Boarding Schools, is set out in section 1.2 of the Safeguarding and Child Protection Policy.

3. Roles and responsibilities

3.1 Governors

Governors have overall responsibility for monitoring this policy and holding the headmaster to account for its implementation.

Governors will make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.

Governors will also make sure all staff receive regular online safety updates (via email, e-bulletins and staff meetings), as required and at least annually, to ensure they are continually provided with the relevant skills and knowledge to effectively safeguard children.

Governors will receive regular reports on online safety, including training and the operation of filtering and monitoring, from the Designated Safeguarding Lead. Reports to governors will not include details of individual pupil situations or identifying features of families.

Governors should ensure children are taught how to keep themselves and others safe, including keeping safe online.

- Governors have overall strategic responsibility for the school's filtering and monitoring approaches. The named roles, the arrangements for meeting the DfE filtering and monitoring standards, the annual review, and the logging and recording of system checks are set out in section 6.3 of the Safeguarding and Child Protection Policy. Governors will receive assurance that those arrangements have been carried out.

The governor who oversees online safety is **Paul Tapsell**.

All governors will:

- Ensure they have read and understand this policy.
- Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet (AUP policy).
- Ensure that online safety is a running and interrelated theme while devising and implementing their whole-school or college approach to safeguarding and related policies and/or procedures.
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable

3.2 The Headmaster

The Headmaster is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school.

3.3 The Designated Safeguarding Lead

Details of the school's Designated Safeguarding Lead (DSL), deputies and wider Safeguarding Team are set out in our Child Protection and Safeguarding Policy and on posters displayed throughout the school.

The DSL takes lead responsibility for online safety in school, in particular:

- Supporting the Headmaster in ensuring that staff understand this policy and that it is being implemented consistently throughout the school

- Working with the Headmaster and governors to review this policy annually and ensure the procedures and implementation are updated and reviewed regularly
- Taking the lead on understanding the filtering and monitoring systems and processes in place on school devices and school networks
- Working with the Network Manager to make sure the appropriate systems and processes are in place
- Working with the Headmaster, Network Manager and other staff, as necessary, to address any online safety issues or incidents
- Managing all online safety issues and incidents in line with the school's Child Protection and Safeguarding Policy
- Ensuring that any online safety incidents are logged on My Concern and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the Headmaster and/or governors
- Providing regular safeguarding and child protection updates, including online safety, to all staff, at least annually, in order to continue to provide them with relevant skills and knowledge to safeguard effectively

This list is not intended to be exhaustive.

3.4 The Network Manager

The Network Manager is responsible for:

- Maintaining the filtering and monitoring systems and providing filtering and monitoring reports, in line with the arrangements and responsibilities set out in section 6.3 of the Safeguarding and Child Protection Policy.
- Ensuring that the school's IT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring the school's ICT systems
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are logged on My Concern and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

This list is not intended to be exhaustive.

3.5 All Staff and Volunteers

All staff, including contractors and agency staff, and volunteers are responsible for:

- Maintaining an understanding of this policy
- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the school's IT systems and the internet (see AUP) , and ensuring that pupils follow the school's terms on acceptable use (see AUP)
- Working with the DSL to ensure that any online safety incidents are logged on My Concern and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy
- Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline and maintaining an attitude of 'it could happen here'

This list is not intended to be exhaustive.

3.6 Parents

Parents are expected to:

- Notify a member of staff or the headteacher of any concerns or queries regarding this policy
- Ensure their child has read, understood and agreed to the terms on acceptable use of the school's IT systems and internet

Parents can seek further guidance on keeping children safe online from the following organisations and websites:

- What are the issues? – [UK Safer Internet Centre](#)
- Hot topics – [Childnet International](#)
- Parent resource sheet – [Childnet International](#)

3.7 Visitors and members of the community

Visitors and members of the community who use the school's IT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use (see AUP).

4. Educating pupils about online safety

Pupils will be taught about online safety as part of the curriculum:

In the **Early Years Foundation Stage**, pupils will be taught to:

- Use technology safely and respectfully, keeping personal information private
- Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies
- Include strong parent communication and provide resources and links within class and to support at home (see below point 5 Educating Parents about Online Safety)

In **Key Stage 1**, pupils will be taught to:

- Use technology safely and respectfully, keeping personal information private
- Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies

Pupils in **Key Stage 2** will be taught to:

- Use technology safely, respectfully and responsibly
- Recognise acceptable and unacceptable behaviour
- Identify a range of ways to report concerns about content and contact

By the **end of their time at the Prep School**, pupils will know:

- That people sometimes behave differently online, including by pretending to be someone they are not
- That the same principles apply to online relationships as to face-to-face relationships, including the importance of respect for others online including when we are anonymous
- The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them
- How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met
- How information and data is shared and used online

- What sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know

Senior School:

In **Key Stage 3**, pupils will be taught to:

- Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
- Recognise inappropriate content, contact and conduct, and know how to report concerns

Pupils in **Key Stage 4** will be taught:

- To understand how changes in technology affect safety, including new ways to protect their online privacy and identity
- How to report a range of concerns

By the **end of their time at the Senior School**, pupils will know:

- Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- How information and data is generated, collected, shared and used online
- How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours
- How people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)

The safe use of social media and the internet will also be covered in other subjects where relevant.

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.

5. Educating Parents about Online Safety

The school will raise parents' awareness of internet safety in letters and regular Online Safety updates in the weekly newsletter, *A View of The Close*. Online Safety videos designed for parents and put together by Alan Mackenzie are sent out every few weeks.

The school lets parents know about the systems the school uses to filter and monitor online use.

If parents have any queries or concerns in relation to online safety, these should be raised in the first instance with the Headmaster and/or the DSL.

Concerns or queries about this policy can be raised with any member of staff or the Headmaster.

The following national organisations provide information to help support parents:

- [Childnet](#)
- [Internet Matters](#)
- [NCA-CEOP](#)
- [Parent Zone](#)

6. Cyber-bullying

6.1 Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power. Please see the schools Anti-Bullying Policy and Behaviour Policies (Prep and Senior School).

6.2 Preventing and addressing cyber-bullying

To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The school will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.

All staff, governors and volunteers (where appropriate) receive training on cyber-bullying, its impact and ways to support pupils, as part of safeguarding training (see section 11 for more detail).

In relation to a specific incident of cyber-bullying, the school will follow the processes set out in the Behaviour Policy. Where illegal, inappropriate or harmful material has been spread among pupils, the school will use all reasonable endeavours to ensure the incident is contained.

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

6.3 Examining Electronic Devices

The Headmaster, and any member of staff authorised to do so by the Headmaster, can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or pupils, and/or
- Is identified in the school rules as a banned item for which a search can be carried out, and/or
- Is evidence in relation to an offence

The conduct of the search itself, including consent, the presence of a second member of staff, recording and informing parents, is governed by section 8 of the Behaviour Policy.:

Make an assessment of how urgent the search is, and consider the risk to other pupils and staff. If the search is not urgent, they will:

- Seek advice from the DSL or a DDSL
- Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it

- Seek the pupil's co-operation

Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so.

When deciding whether there is a 'good reason' to examine data or files on an electronic device, the staff member should reasonably suspect that the device has, or could be used to:

- Cause harm, and/or
- Undermine the safe environment of the school or disrupt teaching, and/or
- Commit an offence

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL or DDSL to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response.

When deciding if there is a good reason to erase data or files from a device, staff members will consider if the material may constitute evidence relating to a suspected offence. In these instances, they will not delete the material, and the device will be handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if:

- They reasonably suspect that its continued existence is likely to cause harm to any person, and/or
- The pupil and/or the parent/carer refuses to delete the material themselves

If a staff member suspects a device may contain an indecent image of a child (also known as a nude or semi-nude image), they will:

- Not view the image
- Confiscate the device and report the incident to the DSL (or equivalent) immediately, who will decide what to do next. The DSL will make the decision in line with the DfE's latest guidance on [screening, searching and confiscation](#) and the UK Council for Internet Safety (UKCIS) guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

Any searching of pupils will be carried out in line with the DfE's latest guidance on [searching, screening and confiscation](#).

Any complaints about searching for or deleting inappropriate images or files on pupils' electronic devices will be dealt with through the school complaints procedure.

7. Acceptable Use of the Internet in School

All pupils, parents, staff, volunteers and governors are expected to sign an agreement (younger pupils in the Prep School do not sign themselves, and instead there is more of a discussion) regarding the acceptable use of the school's IT systems and the internet.

Use of the school's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role.

Use of the school's devices and networks is monitored to detect safeguarding risks, in line with section 6.3 of the Safeguarding and Child Protection Policy. All users are informed that use of school devices and networks can and will be monitored, and all monitoring is carried out in line with data protection, human rights and privacy legislation.

More information is set out in the acceptable use agreements.

8. Pupils Using Mobile Devices in School

Pupils may bring mobile devices into school, but are not permitted to use them during:

- Lessons
- Tutor group time
- Clubs before or after school, or any other activities organised by the school

Prep School pupils are asked not to bring mobile phones to school. In exceptional circumstances where there is a reason for them to do so, they must hand in the device to the school office on arrival and collect it before leaving at the end of the day.

In the Senior School, pupils in Shell to Fifth Form must hand in any devices to their Houseparent at morning registration (or Priory Lodge if they arrive at school late). Phones may be collected at 4.20 pm (the end of the school day).

Sixth Form pupils may keep mobile devices with them, but are only permitted to use them in the Sixth Form Centre or top floor of the LRC.

Any use of mobile devices in school by pupils must be in line with the Acceptable Use Policy for Pupils.

Any breach of the Acceptable Use Policy by a pupil may trigger disciplinary action in line with the school Behaviour Policy, which may result in the confiscation of their device.

Boarding houses

Boarders may use mobile and smart devices in their boarding house outside the school day, subject to the arrangements set out by the Head of Boarding, which specify the times at which devices may be used, arrangements for overnight storage, and expectations for contact with home. Houseparents are responsible for the day to day application of those arrangements. Any concern arising from a boarder's device use is reported in line with the Safeguarding and Child Protection Policy.

9. Staff using Work Devices Outside School

All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- Keeping the device password-protected – strong passwords are at least 8 characters, with a combination of upper and lower-case letters, numbers and special characters (e.g. asterisk or currency symbol)
- Ensuring their hard drive is encrypted – this means if the device is lost or stolen, no one can access the files stored on the hard drive by attaching it to a new device
- Making sure the device locks if left inactive for a period of time
- Not sharing the device among family or friends
- Keeping operating systems up to date by always installing the latest updates
- Keeping the device password-protected, in line with the password requirements in the Staff (and Volunteer) IT Acceptable Use Policy & Agreement.
- Work devices must be used solely for work activities.

If staff have any concerns over the security of their device, they must seek advice from the Network Manager.

Early Years Foundation Stage:

- Personal phones and cameras are not permitted in the Early Years department.
- Only school devices may be used for photographs and observations.

10. How the school will respond to issues of misuse

Where a pupil misuses the school's ICT systems or internet, we will follow the procedures set out in our Behaviour Policy and Acceptable Use Policy. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the school's ICT systems or the internet, or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with the staff code of conduct. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The school will consider whether incidents which involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

11. Training

All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation.

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

By way of this training, all staff will be made aware that:

- Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse
- Children can abuse their peers online through:
 - Abusive, harassing, and misogynistic messages
 - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
 - Sharing of abusive images and pornography, to those who don't want to receive such content
- Physical abuse, sexual violence and initiation/hazing type violence can all contain an online element

Training will also help staff:

- develop better awareness to assist in spotting the signs and symptoms of online abuse
- develop the ability to ensure pupils can recognise dangers and risks in online activity and can weigh up the risks
- develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term

The DSL and deputies will undertake child protection and safeguarding training, which will include online safety, at least every two years. They will also update their knowledge and skills on the subject of online safety at regular intervals, and at least annually.

Governors will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

More information about safeguarding training is set out in our Child Protection and Safeguarding Policy.

12. Monitoring arrangements

All staff log behaviour and safeguarding issues related to online safety on My Concern.

This policy will be reviewed every year by the Designated Safeguarding Lead. At every review, the policy will be shared with the governing board. The review will be supported by an annual risk assessment that considers and reflects the risks pupils face online. This is important because technology, and the risks and harms related to it, evolve and change rapidly.

13. Links with other policies

This online safety policy is linked to our:

- Child Protection and Safeguarding Policy
- Behaviour Policy
- Staff Code of Conduct
- GDPR Policy and Privacy Notices
- Complaints Procedure
- Acceptable Use Policy (Pupils and Staff)
- RSE Policy
- Social Media Policy
- AI Policy
- Use of Mobile Phones and Digital Photography Policy in EYFS (Appendix 3 of the Safeguarding and Child Protection Policy)