Malmesbury Primary
Online Safety Policy 2026-2027

Introduction

Key people / dates

Malmesbury Primary School	Designated Safeguarding Lead (DSL), with lead responsibility for filtering and monitoring	Mr S Donegan
	Deputy Designated Safeguarding Leads / DSL Team Members	Miss L Rivaldi
	Link governors for safeguarding	Ms Shreya Desai Mrs Regina Akinbolaji
	Curriculum leads with relevance to online safeguarding and their role	Miss K Norman – Computing Lead
	Network manager / other technical support	MMICT
	Date this policy was reviewed and by whom	July 2026 – Miss K Norman
	Date of next review and by whom	July 2027 – Miss K Norman

What is this policy?

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. Accordingly, this policy is written in line with 'Keeping Children Safe in Education' 2023 (KCSIE), 'Teaching Online Safety in Schools', statutory RSHE guidance and other statutory documents. It is cross-curricular (with relevance beyond Relationships, Health and Sex Education, Citizenship and Computing) and designed to sit alongside or be integrated into your school's statutory Child Protection & Safeguarding Policy. Any issues and concerns with online safety must always follow the school's safeguarding and child protection procedures.

Who is it for; when is it reviewed?

This policy is a living document, subject to full annual review but also amended where necessary during the year in response to developments in the school and local area. Although many aspects will be informed by legislation and regulations, we will involve staff, governors, pupils and parents in writing and reviewing the policy and make sure the policy makes sense and is possible to follow in all respects. This will help all stakeholders to understand the rules that are in place and why, and that the policy affects day-to-day practice.

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Who is in charge of online safety?

KCSIE makes clear that "the designated safeguarding lead should take **lead** responsibility for safeguarding and child protection (including online safety)." The DSL can delegate activities but not the responsibility for this area and whilst subject leads, e.g. for RSHE will plan the curriculum for their area, it is important that this ties into a **whole-school approach**.

What were the main online safety risks in 2026/2027?

Current Online Safeguarding Trends

In our school over the past year, we have particularly noticed the following in terms of device use and abuse and types of online/device-based incidents which affect the wellbeing and safeguarding of our students:

- The use of social media outside of school effecting relationships while in school.

Nationally, some of the latest trends of the past twelve months are outlined below. These are reflected in this policy and the acceptable use agreements we use and seen in the context of the 5 Cs (see KCSIE for more details), a whole-school contextual safeguarding approach that incorporates policy and practice for curriculum, safeguarding and technical teams.

Self-generative artificial intelligence has become rapidly more accessible, with many students often having unfettered access to tools that generate text and images at home or in school. These tools not only represent a challenge in terms of accuracy when young people are genuinely looking for information (gen AI can be responsible for incorrect and sometime harmful information), but also in terms of plagiarism for teachers and above all safety - none of the mainstream tools have end-user safety settings, most have an age limit of 13 or even 18 and in spite of basic rude words not delivering results, will easily produce inappropriate material. Schools not only need to tackle this in terms of what comes into school but also educating young people and their parents on use of these tools in the home. Self-generative AI has also made it easier than ever to create sexualised images and deepfake videos. Whilst they may not be real, they have a devastating effect on a young person's emotional wellbeing and physical safety, and can also be used to blackmail, humiliate and abuse. The Internet Watch Foundation has reported AI-generated imagery of child sexual abuse progressing at such a worrying rate.

Ofcom's 'Children and parents: media use and attitudes report 2024' has shown that YouTube remains the most used site or app among all under 18s and the reach of WhatsApp, TikTok and Snapchat increased yet further (especially with the minimum age for use of WhatsApp now 13). With children aged 3 - 17 spending an average 3 hours 5 minutes per day online, four in ten parents report finding it hard to control their child's screentime. Notably, 45% of 8-11s feel that their parents' screentime is too high, underlining the importance of modelling good behaviour.

Given the 13+ minimum age requirement on most social media platforms, it is notable that half (51%) of children under 13 use them. Despite age restrictions, four in ten admit to giving a fake age online, exposing them to content inappropriate for their age and increasing their risk of harm, with over a third (36%) of parents of all 3-17s saying they would allow their child to have a profile on sites or apps before they had reached the minimum age.

As a school we recognise that many of our children and young people are on these apps regardless of age limits, which are often misunderstood or ignored. We therefore will remind about best practice while remembering the reality for most of our students is quite different.

This is striking when you consider that 25% of 3-4 year olds have access to their OWN mobile phone (let alone shared devices), rising to over 90 percent by the end of Primary School, and the vast majority have no safety controls or limitations to prevent harm or access to inappropriate material. At the same time, even 3- to 6-year-olds are being tricked into 'self-generated' sexual content (Internet Watch Foundation Annual Report) while considered to be safely using devices in the home and the 7–10-year-old age group remains the fastest growing for this form of child sexual abuse material.

Growing numbers of children and young people are using social media and apps such as Snapchat as their source of news and information, with little attention paid to the facts or veracity of influencers sharing news. The alarming speed and scale at which misinformation about the attack in Southport (August 2024) was shared, resulting in Islamophobic and racist violence, rioting and looting across England is particularly concerning, with much of it was fuelled by false online accusations about the assailant. Despite attempts by Police and national news to correct the misleading information, it racked up millions of views on social media sites like X and was actively promoted by several high-profile users with large followings.

There have also been significant safeguarding concerns where parents have filmed interactions with staff outside the school gates and posted this on social media, putting children and the wider school community at risk of harm. See nofilming.lgfl.net to find out more.

Cyber Security is an essential component in safeguarding children and now features within KCSIE. Sadly, the education sector remains a clear target for cyber-attacks, with the Cyber Security Breaches Survey 2024 highlighting an increase in school attacks nationally, with 71% of secondary schools reporting a breach or attack in the past year, and 52% of primary schools.

How will this policy be communicated?

This policy can only impact upon practice if it is a (regularly updated) living document. It must be accessible to and understood by all stakeholders. It will be communicated in the following ways:

- Posted on the school website
- Part of school induction pack for all new staff (including temporary, supply and non-classroom-based staff and those starting mid-year)

- Integral to safeguarding updates and training for all staff
- Clearly reflected in the Acceptable Use Policies (AUPs) for staff, volunteers, contractors, governors, pupils and parents/carers (which must be in accessible language appropriate to these groups), which will be issued to whole school community, on entry to the school, annually and whenever changed, plus displayed in school
- Discussed in parent webinars/workshops

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Overview

Aims

This policy aims to promote a whole school approach to online safety by:

- Setting out expectations for all Malmesbury Primary School's community members' online behaviour, attitudes and activities and use of digital technology (including when devices are offline)
- Helping safeguarding and senior leadership teams to have a better understanding and awareness of all elements of online safeguarding through effective collaboration and communication with technical colleagues (e.g. for filtering and monitoring), curriculum leads (e.g. RSHE) and beyond.
- Helping all stakeholders to recognise that online/digital behaviour standards (including social media activity) must be upheld beyond the confines of the school gates and school day, regardless of device or platform, and that the same standards of behaviour apply online and offline.
- Facilitating the safe, responsible, respectful and positive use of technology to support teaching & learning, increase attainment and prepare children and young people for the risks and opportunities of today's and tomorrow's digital world, to survive and thrive online.
- Helping school staff working with children to understand their roles and responsibilities to work safely and responsibly with technology and the online world:
    - for the protection and benefit of the children and young people in their care, and
    - for their own protection, minimising misplaced or malicious allegations and to better understand their own standards and practice.
    - for the benefit of the school, supporting the school ethos, aims and objectives, and protecting the reputation of the school and profession.
- Establishing clear structures by which online misdemeanours will be treated, and procedures to follow where there are doubts or concerns (with reference to other school policies such as Behaviour Policy or Anti-Bullying Policy)

Scope

This policy applies to all members of the Malmesbury Primary School community (including teaching, supply and support staff, governors, volunteers, contractors, students/pupils, parents/carers, visitors and community users) who have access to our digital technology, networks and systems, whether on-site or remotely, and at any time, or who use technology in their school role.

Roles and responsibilities

This school is a community, and all members have a duty to behave respectfully online and offline, to use technology for teaching and learning and to prepare for life after school, and to immediately report any concerns or inappropriate behaviour, to protect staff, pupils, families and the reputation of the

school. We learn together, make honest mistakes together and support each other in a world that is online and offline at the same time.

Depending on their role, all members of the school community should **read the relevant section in Annex A of this document** that describes individual roles and responsibilities. Please note there is one for All Staff which must be read even by those who have a named role in another section. There are also pupil, governor, etc role descriptions in the annex. All staff have a key role to play in feeding back on potential issues.

Education and curriculum

Despite the risks associated with being online, Malmesbury Primary School recognises the opportunities and benefits of children being online. Technology is a fundamental part of our adult lives and so developing the competencies to understand and use it, are critical to children's later positive outcomes. The choice to use technology in school will always be driven by pedagogy and inclusion.

It is important that schools establish a carefully sequenced curriculum for online safety that develops competencies (as well as knowledge about risks) and builds on what pupils have already learned and identifies subject content that is appropriate for their stage of development.

As well as teaching about the underpinning knowledge and behaviours that can help pupils navigate the online world safely and confidently regardless of the device, platform or app, Teaching Online Safety in Schools recommends embedding teaching about online safety and harms through a whole school approach and provides an understanding of these risks to help tailor teaching and support to the specific needs of pupils, including vulnerable pupils.

The teaching of online safety, features in these particular areas of curriculum delivery:

- Relationships education, relationships and sex education (RSE) and health
- Computing
- PSHE

However, as stated previously, it is the role of **ALL** staff to identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise.

Whenever overseeing the use of technology (devices, the internet, generative AI tools, etc.) in school or setting as homework tasks, all staff should remind/encourage sensible use, monitor what pupils/students are doing and consider potential risks and the age appropriateness of tasks. This includes supporting them with search skills, reporting and accessing help, critical thinking (e.g. disinformation, misinformation and fake news), access to age-appropriate materials and signposting, and legal issues such as copyright and data law.

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At Malmesbury Primary School, we recognise that online safety and broader digital resilience must be thread throughout the curriculum and that is why we adopt the cross-curricular framework 'Education for a Connected World – 2020 edition' from UKCIS (the UK Council for Internet Safety) through the use of Project Evolve.

Annual reviews of curriculum plans / schemes of work (including for SEND pupils) take place and are used as an opportunity to follow this framework more closely in its key areas. This is done within the context of an annual online safety audit.

We communicate with parents and carers about how we support pupils with their online safety learning, including what their children are being asked to do online and the sites they will be asked to use through the website, home-school diaries and AUPs.

Handling safeguarding concerns and incidents

It is vital that all staff recognise that online safety is a part of safeguarding and so concerns must be handled in the same way as any other safeguarding concern. Safeguarding is often referred to as a jigsaw puzzle, so all stakeholders should speak to the safeguarding lead with any concerns (no matter how small these seem) to contribute to the overall picture or highlight what might not yet be a problem.

Support staff will often have a unique insight and opportunity to find out about issues first in the playground, corridors, toilets and other communal areas outside the classroom.

School procedures for dealing with online safety will be mostly detailed in the following policies (primarily in the first key document):

- Safeguarding and Child Protection Policy
- Sexual Harassment / Child-on-Child Abuse Policy
- Anti-Bullying Policy
- Behaviour Policy (including school sanctions)
- Acceptable Use Policies
- Prevent Risk Assessment
- Data Protection Policy, agreements and other documentation (e.g. privacy statement and consent forms for data sharing, image use etc)

This school commits to take all reasonable precautions to safeguard pupils online but recognises that incidents will occur both inside school and outside school (and that those from outside school will continue to impact pupils when they come into school or during extended periods away from school). All members of the school are encouraged to report issues swiftly to allow us to deal with them quickly and sensitively through the school's escalation processes.

Any suspected online risk or infringement should be reported to the designated safeguarding lead as soon as possible on the same day. The reporting member of staff will ensure that a record is made of the

concern on MyConcern this includes any concerns raised by the filtering and monitoring systems (see section further on in this policy for more information).

Any concern/allegation about staff misuse is always (similar to any safeguarding concern) referred directly to the Headteacher, unless the concern is about the Headteacher in which case the complaint is referred to the Chair of Governors and the LADO (Local Authority's Designated Officer). Staff may also use the NSPCC Whistleblowing Helpline.

The school will actively seek support from other agencies as needed (i.e. the local authority, LGfL, UK Safer Internet Centre's Professionals' Online Safety Helpline (POSH), NCA CEOP, Prevent Officer, Police, IWF and Harmful Sexual Behaviour Support Service). The DfE guidance Behaviour in Schools, advice for headteachers and school staff September 2024 provides advice and related legal duties including support for pupils and powers of staff when responding to incidents – see pages 31-33 for guidance on child on child sexual violence and harassment, behaviour incidents online and mobile phones.

We will inform parents/carers of online safety incidents involving their children, and the Police where staff or pupils engage in or are subject to behaviour which we consider is particularly concerning or breaks the law.

The school should ensure all online safety reporting procedures are sustainable for any unforeseen periods of closure.

For more information on reporting channels for online safety concerns, please visit reporting.lgfl.net.

The following sub-sections provide detail on managing particular types of concern.

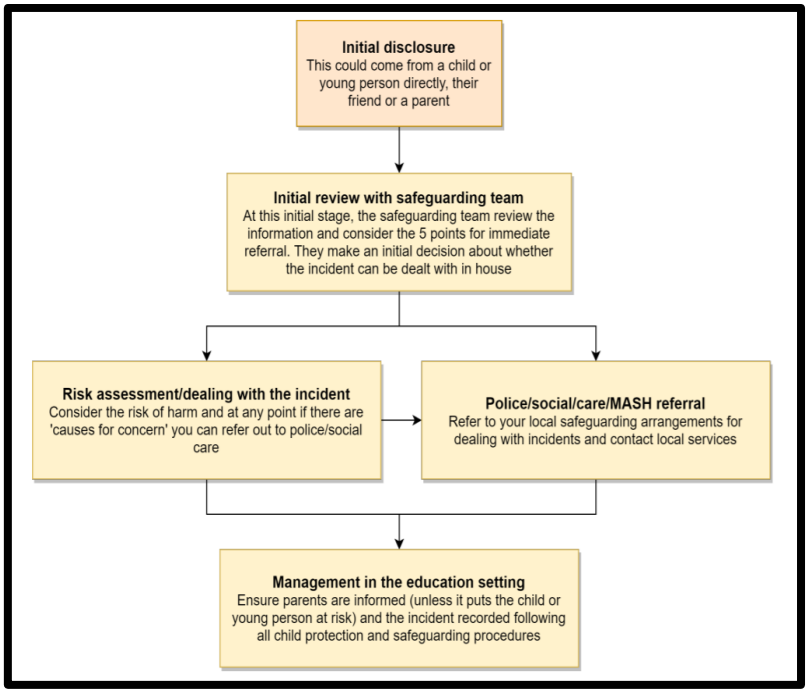
Nudes – sharing nudes and semi-nudes

All schools (regardless of phase) should refer to the UK Council for Internet Safety (UKCIS) guidance on sexting - now referred to as Sharing nudes and semi-nudes: advice for education settings.

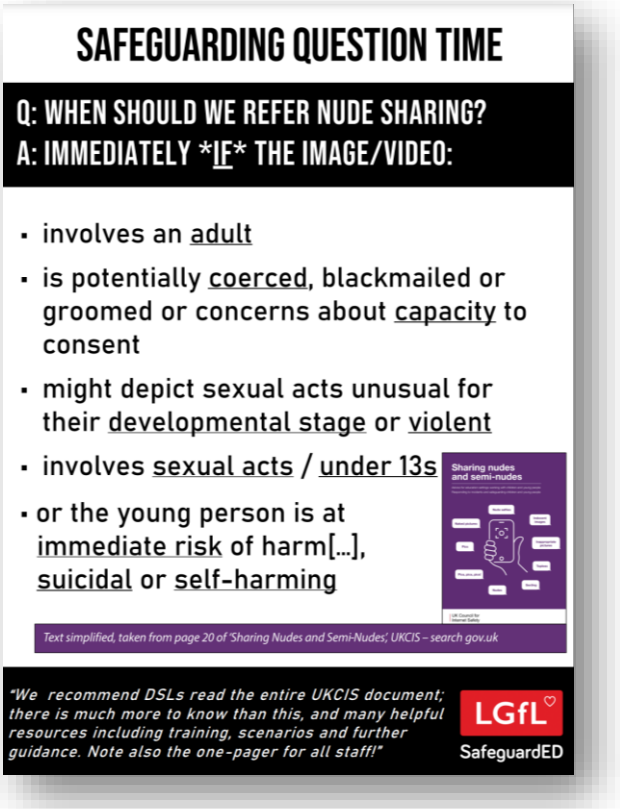
There is a one-page overview called Sharing nudes and semi-nudes: how to respond to an incident for all staff (not just classroom-based staff) to read, in recognition of the fact that it is mostly someone other than the designated safeguarding lead (DSL) or online safety lead to first become aware of an incident, and it is vital that the correct steps are taken. **Staff other than the DSL must not attempt to view, share or delete the image or ask anyone else to do so, but to go straight to the DSL**.

It is important that everyone understands that whilst the sharing of nudes involving children is illegal, students should be encouraged and supported to talk to members of staff if they have made a mistake or had a problem in this area. The UKCIS guidance seeks to avoid unnecessary criminalisation of children.

The school DSL will use the full guidance document, Sharing nudes and semi-nudes – advice for educational settings to decide next steps and whether other agencies need to be involved (see flow chart below from the UKCIS guidance) and next steps regarding liaising with parents and supporting pupils.



The following LGfL document (available at nudes.lgfl.net) may also be helpful for DSLs in making their decision about whether to refer a concern about sharing of nudes:



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Priority Areas

Bullying - Mr S Donegan

Online bullying (which may also be referred to as cyberbullying), including incidents that take place outside of school should be treated like any other form of bullying and the school bullying policy should be followed. This includes issues arising from 'banter'.

It is important to be aware that sometimes fights are being filmed, live streamed or shared online and fake profiles are used to bully children in the name of others. When considering bullying, staff will be reminded of these issues.

Child-on-child sexual violence and sexual harassment - Mr S Donegan

Any incident of sexual harassment or violence (online or offline) should be reported to the DSL who will follow the guidance in KCSIE. Staff should work to foster a zero-tolerance culture and maintain an attitude of 'it could happen here'. The guidance stresses that schools must take all forms of sexual violence and harassment seriously, explaining how it exists on a continuum and that behaviours incorrectly viewed as 'low level' are treated seriously and not allowed to perpetuate. The document makes specific reference to behaviours such as bra-strap flicking and the careless use of language. This will be discussed in staff training.

Misuse of school technology (devices, systems, networks or platforms)

Clear and well communicated rules and procedures are essential to govern pupil and adult use of school networks, connections, internet connectivity and devices, cloud platforms and social media (both when on school site and outside of school).

These are defined in the relevant Acceptable Use Policy as well as in this document, for example in the sections relating to the professional and personal use of school platforms/networks/clouds, devices and other technology, as well as to BYOD (bring your own device) policy.

Where pupils contravene these rules, the school behaviour policy will be applied; where staff contravene these rules, action will be taken as outlined in the staff code of conduct/handbook.

It will be necessary to reinforce these as usual at the beginning of any school year but also to remind pupils that **the same applies for any home learning** that may take place.

Further to these steps, the school reserves the right to withdraw – temporarily or permanently – any or all access to such technology, or the right to bring devices onto school property.

Social media incidents

Social media incidents involving pupils are often safeguarding concerns and should be treated as such and staff should follow the safeguarding policy. Other policies that govern these types of incidents are the school's Acceptable Use Policies and Social Media Policy.

Breaches will be dealt with in line with the school behaviour policy (for pupils) or code of conduct/handbook (for staff). See the social media section later in this document for rules and expectations of behaviour for children and adults in the Malmesbury Primary School community.

Further to this, where an incident relates to an inappropriate, upsetting, violent or abusive social media post by a member of the school community (e.g. parent or visitor), Malmesbury Primary School will request that the post be deleted and will expect this to be actioned promptly.

Where an offending post has been made by a third party, the school may report it to the platform it is hosted on, and may contact the Professionals' Online Safety Helpline, POSH, (run by the UK Safer Internet Centre) for support or help to accelerate this process.

CCTV

We currently have 12 CCTV cameras covering multiple areas of the school premises. These cameras help to ensure the health and safety of all stakeholders. The cameras only cover communal areas (corridors/playground/entrances etc.) and are not used to monitor toilets, classrooms or changing rooms. All footage is stored for 28 days and is accessible by the head teacher and site manager. All staff and children have been made aware of the CCTV coverage and there are signs around the school informing all visitors that CCTV is in operation.

Extremism

The school has obligations relating to radicalisation and all forms of extremism under the Prevent Duty. Staff will not support or promote extremist organisations, messages or individuals, give them a voice or opportunity to visit the school, nor browse, download or send material that is considered offensive or of an extremist nature. We ask for parents' support in this also, especially relating to social media, where extremism and hate speech can be widespread on certain platforms.

Data protection and cyber security

All pupils, staff, governors, volunteers, contractors and parents are bound by the school's data protection policy which can be found here. It is important to remember that there is a close relationship between both data protection and cyber security and a school's ability to effectively safeguard children. Schools are reminded of this in KCSIE which also refers to the DfE Standards of Cyber Security for Schools and Colleges.

Schools should remember that data protection does not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in *Data protection in schools*, 2023, "It's not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child." And in KCSIE 2024, "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children."

Appropriate filtering and monitoring

The designated safeguarding lead (DSL) Mr S Donegan has lead responsibility for filtering and monitoring and works closely with MMICT and the LA to implement the DfE filtering and monitoring standards, which require schools to:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs.

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We look to provide 'appropriate filtering and monitoring (as outlined in Keeping Children Safe in Education) at all times.

We ensure ALL STAFF are aware of filtering and monitoring systems and play their part in feeding back about areas of concern, potential for students to bypass systems and any potential overblocking. They can submit concerns at any point via My Concern and will be asked for feedback at the time of the regular checks which will now take place.
Technical and safeguarding colleagues work together closely to carry out annual reviews and check and also to ensure that the school responds to issues and integrates with the curriculum.

We carry out checks to ensure all systems are in operation, functioning as expected, etc and an annual review as part of an online safety audit. Safe Search is enforced on any accessible search engines on all devices.
We recommend the use of Swiggle and Kiddle alongside recommended safe websites for children to use.

Our YouTube mode is **moderate.**

Staff will be reminded of the systems in place and their responsibilities at induction and start of year safeguarding as well as via AUPs and regular training reminders in the light of the annual review and regular checks that will be carried out.

The DSL checks filtering reports and notifications weekly and takes any necessary action as a result. Emails are also sent instantly with notifications marked 'urgent'.

According to the DfE standards, "a variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users
- live supervision by staff on a console with device management software
- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services

At Malmesbury Primary school, we use

- web filtering is provided by MMICT/LGFL on school site and for school devices used in the home
- changes can be made by S Donegan, the LA and MMICT.
- overall responsibility is held by the DSL
- technical support and advice, setup and configuration are from MMICT
- regular checks are made half termly by Mr S Donegan to ensure filtering is still active and functioning everywhere.
- an annual review is carried out by Mr S Donegan

Messaging/commenting systems (incl. email, learning platforms & more)

Authorised systems

- Pupils at this school communicate with each other and with staff using Google Classroom. This is heavily monitored by staff membered. Children can only communicate with each other on a public stream and not in private.
- Staff at this school use the email system provided by LGfL for all school emails. They never use a personal/private email account (or other messaging platform) to communicate with children or parents, or to colleagues when relating to school/child data, using a non-school-administered system. Staff are permitted to use this email system to communicate with other staff members and outside agencies and/or companies related to learning. Parents are encouraged to contact the school office to communicate to class teachers or other members of staff.
- Staff at this school use Instagram to communicate school news and learning but staff are encouraged not to private message and comments on photos are always turned off.

Any systems above are centrally managed and administered by the school or authorised IT partner (i.e. they can be monitored/audited/viewed centrally; are not private or linked to private accounts). This is for the mutual protection and privacy of all staff, pupils and parents, supporting safeguarding best-practice, protecting children against abuse, staff against potential allegations and in line with UK data protection legislation.

Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member).

Where devices have multiple accounts for the same app, mistakes can happen, such as an email being sent from, or data being uploaded to the wrong account. If this a private account is used for communication or to store data by mistake, the DSL/Headteacher/DPO (the particular circumstances of the incident will determine whose remit this is) should be informed immediately.

Behaviour / usage principles of messaging/commenting systems

- More detail for all the points below are given in the Social media section of this policy as well as the school's Acceptable Use Agreements, Behaviour Policy and Staff Code of Conduct.
- Appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff.
- Data protection principles will be followed at all times when it comes to all school communications, in line with the school Data Protection Policy and only using the authorised systems mentioned above.

- Pupils and staff are allowed to use the email system for reasonable (not excessive, not during lessons) personal use but should be aware that all use is monitored, their emails may be read and the same rules of appropriate behaviour apply at all times. Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination (and will be dealt with according to the appropriate policy and procedure).

Use of generative AI

At Malmesbury Primary School, we acknowledge that generative AI platforms (e.g. ChatGPT or Bard for text creation or the use of Co-Pilot or Adobe Firefly to create images and videos) are becoming widespread. We are aware of and follow the DfE's guidance on this. In particular:

- We will talk about the use of these tools with pupils, staff and parents – their practical use as well as their ethical pros and cons
- We are aware that there will be use of these apps and exposure to AI creations on devices at home for some students – these experiences may be both positive/creative and also negative (inappropriate data use, misinformation, bullying, deepfakes, undressing apps).
- The use of any generative AI in Exams, or to plagiarise and cheat is prohibited, and the Behaviour Policy will be used for any pupil found doing so.
- In school, we allow teachers to use AI tools to support teaching and learning. Children may use some AI tools under teacher instruction to ensure appropriate use.
- Teachers have had a staff meeting about the benefits of AI to support planning and resourcing and its appropriate use within the classroom.
- Staff and parent/carer newsletters are uploaded to the school website which inform on the latest online safety trends including the use of AI.

Online storage or learning platforms

All the principles outlined above also apply to any system to which you log in online to conduct school business, whether it is to simply store files or data (an online 'drive') or collaborate, learn, teach, etc. Malmesbury Primary School this includes Google Classroom, Google Drive and OneDrive.

For all these, it is important to consider data protection and cyber security before adopting such a platform or service and at all times when using it. Any new platforms will be approved by Mr S Donegan.

School website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. The Headteacher and Governors have delegated the day-to-day responsibility of updating the content of the website and ensuring compliance with DfE stipulations to Mr J Mitchell.

The website is managed by / hosted by PrimarySite.

Where staff submit information for the website, they are asked to remember that schools have the same duty as any person or organisation to respect and uphold copyright law – schools have been fined thousands of pounds for copyright breaches. Sources must always be credited, and material only used with permission. There are many open-access libraries of public-domain images/sounds etc that can be used. Finding something on Google or YouTube does not mean that copyright has been respected. If in doubt, check with Miss K Norman.

Digital images and video

When a pupil/student joins the school, parents/carers are asked if they give consent for their child's image to be captured in photographs or videos, for what purpose (beyond internal assessment, which does not require express consent) and for how long. Parents answer as follows:

- For displays around the school
- For the newsletter
- For the school website
- For social media
- For a specific high-profile image for display or publication
- For sporting competitions

Whenever a photo or video is taken/made, the member of staff taking it will check the latest database before using it for any purpose.

Any pupils shown in public facing materials are never identified with more than first name (and photo file names/tags do not include full names to avoid accidentally sharing them). Photos on social media (such as Instagram) do not show any faces.

All staff are governed by their contract of employment and the school's Acceptable Use Policy, which covers the use of mobile phones/personal equipment for taking pictures of pupils, and where these are stored. At Malmesbury Primary School, members of staff may occasionally use personal phones to capture photos or videos of pupils, but these will be appropriate, linked to school activities, taken without secrecy and not in a one-to-one situation, and always moved to school storage as soon as possible, after which they are deleted from personal devices or cloud services (NB – many phones automatically back up photos).

Photos are stored on Staffshare in line with the retention schedule of the school Data Protection Policy.

Class teachers are responsible for checking images/video on school devices. Any concerns about the nature of these images will be reported to the DSL.

Staff and parents are reminded about the importance of not sharing images on social media or otherwise without permission, due to reasons of child protection (e.g. children who are looked after by the local

authority may have restrictions in place for their own protection), data protection, religious or cultural reasons, or simply for reasons of personal privacy.

We encourage young people to think about their online reputation and digital footprint, so we should be good adult role models by not oversharing (or providing embarrassment in later life – and it is not for us to judge what is embarrassing or not).

Pupils are taught about how images can be manipulated in their online safety education programme and also taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children.

Pupils are advised to be very careful about placing any personal photos on social media. They are taught to understand the need to maintain privacy settings so as not to make public, personal information.

Pupils are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location. We teach them about the need to keep their data secure and what to do if they / or a friend are subject to bullying or abuse.

Social media

Our SM presence

Malmesbury Primary School works on the principle that if we don't manage our social media reputation, someone else will.

Online Reputation Management (ORM) is about understanding and managing our digital footprint (everything that can be seen or read about the school online). Few parents will apply for a school place without first Googling the school, and the Ofsted pre-inspection check includes monitoring what is being said online.

Negative coverage almost always causes some level of disruption. Up to half of all cases dealt with by the Professionals Online Safety Helpline (POSH: helpline@saferinternet.org.uk) involve schools' (and staff members') online reputation.

Accordingly, we manage and monitor our social media footprint carefully to know what is being said about the school and to respond to criticism and praise in a fair, responsible manner.

Miss A Clarke is responsible for managing our Instagram account.

Staff, pupils' and parents' SM presence

Social media (including all apps, sites and games that allow sharing and interaction between users) is a fact of modern life, and as a school, we accept that many parents, staff and pupils will use it. However, as stated in the acceptable use policies which all members of the school community sign, we expect everybody to behave in a positive manner, engaging respectfully with the school and each other on social media, in the same way as they would face to face.

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

If parents have a concern about the school, we would urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, the school complaints procedure should be followed. Sharing complaints on social media is unlikely to help resolve the matter, but can cause upset to staff, pupils and parents, also undermining staff morale and the reputation of the school (which is important for the pupils we serve).

Many social media platforms have a minimum age of 13 (note that WhatsApp is 16+), but the school regularly deals with issues arising on social media involving pupils/students under the age of 13. We ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use. It is worth noting that Online Harms regulation is likely to require more stringent age verification measures over the coming years.

However, the school has to strike a difficult balance of not encouraging underage use at the same time as needing to acknowledge reality in order to best help our pupils/students to avoid or cope with issues if they arise. Online safety lessons will look at social media and other online behaviour, how to be a good friend online and how to report bullying, misuse, intimidation or abuse. However, children will often learn most from the models of behaviour they see and experience, which will often be from adults.

Parents can best support this by talking to their children about the apps, sites and games they use (you don't need to know them – ask your child to explain it to you), with whom, for how long, and when (late at night / in bedrooms is not helpful for a good night's sleep and productive teaching and learning at school the next day). You may wish to refer to the Digital Family Agreement to help establish shared expectations and the Top Tips for Parents poster along with relevant items and support available from parentsafe.lgfl.net and introduce the Children's Commission Digital 5 A Day.

Although the school has an official Instagram account we will not respond to general enquiries about the school, and it asks parents/carers not to use these channels, especially not to communicate about their children.

Email is the official electronic communication channel between parents and the school.

As outlined in the Acceptable Use Policies, pupils/students are not allowed* to be 'friends' with or make a friend request** to any staff, governors, volunteers and contractors or otherwise communicate via social media.

Pupils/students are discouraged from 'following' staff, governor, volunteer or contractor public accounts (e.g. following a staff member with a public Instagram account) as laid out in the AUPs. However, we accept that this can be hard to control (but this highlights the need for staff to remain professional in their private lives). In the reverse situation, however, staff must not follow such public student accounts.

* Exceptions may be made, e.g. for pre-existing family links, but these must be approved by the Headteacher/Principal and should be declared upon entry of the pupil or staff member to the school).

** Any attempt to do so may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Headteacher (if by a staff member).

Staff are reminded that they are obliged not to bring the school or profession into disrepute and the easiest way to avoid this is to have the strictest privacy settings and avoid inappropriate sharing and oversharing online. They should never discuss the school or its stakeholders on social media and be careful that their personal opinions might not be attributed to the school, trust or local authority, bringing the school into disrepute.

The serious consequences of inappropriate behaviour on social media are underlined by the fact that there has been a considerable number of Prohibition Orders issued by the Teacher Regulation Agency to teaching staff that involved misuse of social media/technology.

All members of the school community are reminded that particularly in the context of social media, it is important to comply with the school policy on Digital images and video and permission is sought before uploading photographs, videos or any other information about other people. Parents must **not** covertly film or make recordings of any interactions with pupils or adults in schools or near the school gates, nor share images of other people's children on social media as there may be cultural or legal reasons why this would be inappropriate or even dangerous (see nofilming.lgfl.net for more information). The school sometimes uses images/video of children for internal purposes such as recording attainment, but it will only do so publicly if parents have given consent on the relevant form.

Device usage

AUPs remind those with access to school devices about rules on the misuse of school technology – devices used at home should be used just like if they were in full view of a teacher or colleague. Please read the following in conjunction with those AUPs and the sections of this document which impact upon device usage, e.g. copyright, data protection, social media, misuse of technology, and digital images and video.

Personal devices including wearable technology and bring your own device (BYOD)

- Pupils/students in UKS2 are allowed to bring mobile phones in for emergency use only. During the school day, phones must remain in the school office. Any attempt to use a phone during the school day without permission or to take illicit photographs will be sent to the DSL who will follow the Behaviour Policy and the child will have the withdrawal of mobile privileges. Important messages and phone calls to or from parents can be made at the school office, which will also pass on messages from parents to pupils in emergencies.
- All staff who work directly with children should leave their mobile phones on silent and only use them in private staff areas during school hours. Child/staff data should never be downloaded onto a private phone. If a staff member is expecting an important personal call when teaching or otherwise on duty, they may inform another member of staff who can cover the class so that the call can be taken privately or ask for the message to be left with the school office.
- Volunteers, contractors, governors should leave their phones in their pockets and turned off. Under no circumstances should they be used in the presence of children or to take photographs or videos. If this is required (e.g. for contractors to take photos of equipment or buildings), permission of the headteacher should be sought (the headteacher may choose to delegate this) and this should be done in the presence of a member staff.
- Parents primary schools – where parents are regularly in the playground for drop-off or collection, are asked to leave their phones in their pockets and to try to limit use around other children. They should ask permission before taking any photos, e.g. of displays in corridors or classrooms, and avoid capturing other children. When at school events, if given permission, parents are asked not to share any photos or videos of other children on social media. Parents are asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office.

Use of school devices

Staff and pupils are expected to follow the terms of the school acceptable use policies for appropriate use and behaviour when on school devices, whether on site or at home.
School devices are not to be used in any way which contravenes AUPs, behaviour policy / staff code of conduct.
Wifi is accessible to staff for school-related internet use. All such use is monitored.
School devices for staff or students are restricted to the apps/software installed by the school, whether for use at home or school, and may be used for learning and reasonable as well as appropriate personal use. All and any usage of devices and/or systems and platforms may be tracked.

Trips / events away from school

For school trips/events away from school, teachers may use their personal phone in an emergency and will ensure that the number is hidden to avoid a parent or student accessing a teacher's private phone

number. For all other communication, the teacher or member of staff will call the school office to speak to the relevant person or to pass on messages to parents.

Searching and confiscation

In line with the DfE guidance '[Searching, screening and confiscation: advice for schools]', the Headteacher and Senior Leadership Team have a statutory power to search pupils/property on school premises. This includes the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material, including but not exclusive to sexual images, pornography, violence or bullying.

Full details of the school's search procedures are available in the school [Behaviour Policy].

Appendix – Roles

Please read the relevant roles & responsibilities section from the following pages.

All school staff must read the "All Staff" section as well as any other relevant to specialist roles.

Roles:

- All Staff
- Headteacher/Principal
- Designated Safeguarding Lead
- Governing Body, led by Online Safety / Safeguarding Link Governor
- PSHE / RSHE Lead/s
- Computing Lead
- Subject / aspect leaders
- Network Manager/technician
- Data Protection Officer (DPO)
- Volunteers and contractors (including tutor)
- Pupils
- Parents/carers
- External groups including parent associations

All staff

All staff should sign and follow the staff acceptable use policy in conjunction with this policy, the school's main safeguarding policy, the code of conduct/handbook and relevant parts of Keeping Children Safe in Education to support a whole-school safeguarding approach.

They must report any concerns, no matter how small, to the designated safety lead as named in the AUP, maintaining an awareness of current online safety issues (see the start of this document for issues in 2024) and guidance (such as KCSIE), modelling safe, responsible and professional behaviours in their own use of technology at school and beyond and avoiding scaring, victim-blaming language.

Staff should also be aware of the DfE standards for filtering and monitoring and play their part in feeding back to the DSL about overblocking, gaps in provision or pupils bypassing protections. All staff are also responsible for the physical monitoring of pupils' online devices during any session/class they are working within.

Malmesbury Primary
Online Safety Policy 2026-2027

Headteacher/Principal – Mr S Donegan

Key responsibilities:

- Foster a culture of safeguarding where online safety is fully integrated into whole-school safeguarding.
- Oversee and support the activities of the designated safeguarding lead team and ensure they work technical colleagues to complete an online safety audit in line with KCSIE (including technology in use in the school)
- Undertake training in offline and online safeguarding, in accordance with statutory guidance and Local Safeguarding Children Partnership support and guidance.
- Ensure ALL staff undergo safeguarding training (including online safety) at induction and with regular updates and that they agree and adhere to policies and procedures.
- Ensure ALL governors and trustees undergo safeguarding and child protection training and updates (including online safety) to provide strategic challenge and oversight into policy and practice and that governors are regularly updated on the nature and effectiveness of the school's arrangements
- Ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including remote systems are implemented according to child-safety first principles.
- Better understand, review and drive the rationale behind decisions in filtering and monitoring as per the DfE standards—through regular liaison with technical colleagues and the DSL– in particular understand what is blocked or allowed for whom, when, and how as per KCSIE.
- Liaise with the designated safeguarding lead on all online safety issues which might arise and receive regular updates on school issues and broader policy and practice information.
- Support safeguarding leads and technical staff as they review protections for pupils in the home and remote-learning procedures, rules and safeguards
- Take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and governors to ensure a compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information.
- Understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident.
- Ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised.
- Ensure the school website meets statutory requirements

Malmesbury Primary
Online Safety Policy 2026-2027

Designated Safeguarding Lead – Mr S Donegan

Key responsibilities (remember the DSL can delegate certain online safety duties but not the overall responsibility; this assertion and all quotes below are from Keeping Children Safe in Education):

- The DSL should "take **lead responsibility** for safeguarding and child protection (**including online safety and understanding the filtering and monitoring** systems and processes in place).
- Ensure "An effective whole school approach to online safety as per KCSIE.
- Ensure the school is complying with the DfE's standards on Filtering and Monitoring.
- As part of this, DSLs will work with technical teams to carry out reviews and checks on filtering and monitoring, to compile the relevant documentation and ensure that safeguarding and technology work together. This will include a decision on relevant YouTube mode and preferred search engine/s etc.
- Where online safety duties are delegated and in areas of the curriculum where the DSL is not directly responsible, but which cover areas of online safety (e.g. RSHE), ensure there is regular review and open communication and that the DSL's clear overarching responsibility for online safety is not compromised or messaging to pupils confused.
- Ensure ALL staff and supply staff undergo safeguarding and child protection training (including online safety) at induction and that this is regularly updated.
    - This must include filtering and monitoring and help them to understand their roles.
    - All staff must read KCSIE Part 1 and all those working with children also Annex B – translations are available in 13 community languages at kcsietranslate.lgfl.net (the condensed Annex A can be provided instead to staff who do not directly work with children if this is better)
    - Cascade knowledge of risks and opportunities throughout the organisation.
- Ensure that ALL governors and trustees undergo safeguarding and child protection training (including online safety) at induction to enable them to provide strategic challenge and oversight into policy and practice and that this is regularly updated
- Take day-to-day responsibility for safeguarding issues and be aware of the potential for serious child protection concerns.
- Be mindful of using appropriate language and terminology around children when managing concerns, including avoiding victim-blaming language
- Remind staff of safeguarding considerations as part of a review of remote learning procedures and technology, including that the same principles of online safety and behaviour apply.
- Work closely with SLT, staff and technical colleagues to complete an online safety audit (including technology in use in the school)
- Work with the headteacher, DPO and governors to ensure a compliant framework for storing data but helping to ensure that child protection is always put first, and data-protection processes support careful and legal sharing of information.
- Stay up to date with the latest trends in online safeguarding and "undertake Prevent awareness training."

- Review and update this policy, other online safety documents (e.g. Acceptable Use Policies) and the strategy on which they are based (in harmony with policies for behaviour, safeguarding, Prevent and others) and submit for review to the governors.
- Receive regular updates about online safety issues and legislation, be aware of local and school trends
- Ensure that online safety education is embedded across the curriculum in line with the statutory RSHE guidance (e.g. by use of the updated UKCIS framework 'Education for a Connected World – 2020 edition') and beyond, in wider school life.
- Promote an awareness of and commitment to online safety throughout the school community, with a strong focus on parents, including hard-to-reach parents
- Communicate regularly with SLT and the safeguarding governor/committee to discuss current issues (anonymised), review incident logs and filtering/change control logs and discuss how filtering and monitoring work and have been functioning/helping.
- Ensure all staff are aware of the procedures that need to be followed in the event of an online safety incident, and that these are logged in the same way as any other safeguarding incident.
- Ensure adequate provision for staff to flag issues when not in school and for pupils to disclose issues when off site, especially when in isolation/quarantine, e.g. a survey to facilitate disclosures and an online form on the school home page about 'something that worrying me' that gets mailed securely to the DSL inbox.
- Ensure staff adopt a zero-tolerance, whole school approach to all forms of child-on-child abuse, and don't dismiss it as banter (including bullying).

Governing Body, led by Online Safety / Safeguarding Link Governor – Mr F Omowaye

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

- Approve this policy and strategy and subsequently review its effectiveness, e.g. by asking the questions in the helpful document from the UK Council for Child Internet Safety (UKCIS) Online safety in schools and colleges: Questions from the Governing Board .
- Undergo (and signpost all other governors to attend) safeguarding and child protection training (including online safety) at induction to provide strategic challenge and into policy and practice, ensuring this is regularly updated
- Ensure that all staff also receive appropriate safeguarding and child protection (including online) training at induction and that this is updated.
- Appoint a filtering and monitoring governor to work closely with the DSL on the new filtering and monitoring standards
- Support the school in encouraging parents and the wider community to become engaged in online safety activities.
- Have regular strategic reviews with the online safety coordinator / DSL and incorporate online safety into standing discussions of safeguarding at governor meetings.

- Work with the DPO, DSL and headteacher to ensure a compliant framework for storing data but helping to ensure that child protection is always put first, and data-protection processes support careful and legal sharing of information.
- Check all school staff have read Part 1 of KCSIE; SLT and all working directly with children have read Annex B.
- Ensure that all staff undergo safeguarding and child protection training (including online safety and now also reminders about filtering and monitoring.
- "Ensure that children are taught about safeguarding, including online safety […] as part of providing a broad and balanced curriculum […] Consider a whole school approach to online safety [with] a clear policy on the use of mobile technology."

PSHE / RSHE Lead/s – Mrs A Davis

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Embed consent, mental wellbeing, healthy relationships and staying safe online as well as raising awareness of the risks and challenges from latest trends in self-generative artificial intelligence, financial extortion and sharing intimate pictures online into the PSHE / Relationships education, relationships and sex education (RSE) and health education curriculum. "This will include being taught what positive, healthy and respectful online relationships look like, the effects of their online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age-appropriate way that is relevant to their pupils' lives."
- Focus on the underpinning knowledge and behaviours outlined in Teaching Online Safety in Schools in an age appropriate way to help pupils to navigate the online world safely and confidently regardless of their device, platform or app.
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within PSHE / RSHE.
- Note that an RSHE policy should be included on the school website.
- Work closely with the Computing subject leader to avoid overlap but ensure a complementary whole-school approach, and with all other lead staff to embed the same whole-school approach.

Computing Lead – Miss K Norman

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Oversee the delivery of the online safety element of the Computing curriculum in accordance with the national curriculum.

- Work closely with the RSHE lead to avoid overlap but ensure a complementary whole-school approach.
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing.
- Collaborate with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with acceptable-use agreements.

Subject / aspect leaders (Music/MFL/PE)

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Look for opportunities to embed online safety in your subject or aspect, especially as part of the RSHE curriculum, and model positive attitudes and approaches to staff and pupils alike.
- Consider how the UKCIS framework Education for a Connected World and Teaching Online Safety in Schools can be applied in your context.
- Work closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messaging within Computing.
- Ensure subject specific action plans also have an online safety element.

Network Manager/other technical support roles – MMICT

Key responsibilities:

- As listed in the 'all staff' section, plus:
- Collaborate regularly with the DSL and leadership team to help them make key strategic decisions around the safeguarding elements of technology.
- Support safeguarding teams to understand and manage filtering and monitoring systems and carry out regular reviews and annual checks
- Support DSLs and SLT to carry out an annual online safety audit as recommended in KCSIE. This should also include a review of technology, including filtering and monitoring systems (what is allowed, blocked and why and how 'over blocking' is avoided as per KCSIE) to support their role as per the DfE standards, protections for pupils in the home and remote-learning
- Keep up to date with the school's online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant.
- Work closely with the designated safeguarding lead / online safety lead / data protection officer / LGfL nominated contact / RSHE lead to ensure that school systems and networks reflect school policy and there are no conflicts between educational messages and practice.

- Ensure the above stakeholders understand the consequences of existing services and of any changes to these systems (especially in terms of access to personal and sensitive records / data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms etc.
- Ensure filtering and monitoring systems work on new devices and services before releasing them to students and staff.
- Maintain up-to-date documentation of the school's online security and technical procedures.
- To report online safety related issues that come to their attention in line with school policy.
- Manage the school's systems, networks and devices, according to a strict password policy, with systems in place for detection of misuse and malicious attack, with adequate protection, encryption and backup for data, including disaster recovery plans, and auditable access controls.
- Work with the Headteacher to ensure the school website meets statutory DfE requirements

Data Protection Officer (DPO) – Derek Crabtree (LB Merton)

Key responsibilities:

- Alongside those of other staff, provide data protection expertise and training and support the DP and cyber security policy and compliance with those and legislation and ensure that the policies conform with each other and with this policy.
- Not prevent, or limit, the sharing of information for the purposes of keeping children safe. As outlined in *Data protection in schools*, 2023, "It's not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child." And in KCSIE, "The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children."
- Note that retention schedules for safeguarding records may be required to be set as 'Very long-term need (until pupil is aged 25 or older)'. However, some local authorities require record retention until 25 for all pupil records. You should check the requirements in your area.
- Ensure that all access to safeguarding data is limited as appropriate, and also monitored and audited.

Volunteers and contractors (including tutors)

Key responsibilities:

- Read, understand, sign and adhere to an Acceptable Use Policy (AUP)
- Report any concerns, no matter how small, to the designated safety lead.
- Maintain an awareness of current online safety issues and guidance.
- Model safe, responsible and professional behaviours in their own use of technology at school and as part of remote teaching or any online communications.

- Note that as per AUP agreement a contractor will never attempt to arrange any meeting, **including tutoring session,** without the full prior knowledge and approval of the school, and will never do so directly with a pupil. The same applies to any private/direct communication with a pupil.

Pupils

Key responsibilities:

Read, understand, sign and adhere to the pupil acceptable use policy.

Parents/carers

Key responsibilities:

- Read, sign and adhere to the school's parental acceptable use policy (AUP), read the pupil AUP and encourage their children to follow it.

External groups (e.g. those hiring the premises) including parent associations – MSCA

Key responsibilities:

- Any external individual/organisation will sign an acceptable use policy prior to using technology or the internet within school.
- Support the school in promoting online safety and data protection.
- Model safe, responsible, respectful and positive behaviours in their own use of technology, including on social media: not sharing other's images or details without permission and refraining from posting negative, threatening or violent comments about others, including the school staff, volunteers, governors, contractors, pupils or other parents/carers.