

# Online Safety Policy

<b>Approved/reviewed by</b>	
SLT body	
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This policy is reviewed annually to ensure compliance with current regulations

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# 1. Aims

Work Skills Learning (WSL) aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Identify and support groups of pupils that are potentially at greater risk of harm online than others
- Deliver an effective approach to online safety, which empowers us to protect and educate the whole WSL 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 addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **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; and
- **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), the [Education and Inspections Act 2006](#) 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.

# 3. Roles and responsibilities

## 3.1 The governing board

The governing board has overall responsibility for monitoring this policy and holding the Head of Centre to account for its implementation.

The governing board 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.

The governing board 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.

The governing board will co-ordinate regular meetings with appropriate staff to discuss online safety, requirements for training, and monitor online safety logs as provided by the designated safeguarding lead (DSL).

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

The governing board must ensure WSL has appropriate filtering and monitoring systems in place on WSL devices and WSL networks, and will regularly review their effectiveness. The board will review the DfE filtering and monitoring standards, and discuss with IT staff and service providers what needs to be done to support WSL in meeting those standards, which include:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems;
- Reviewing filtering and monitoring provisions at least annually;
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning;
- Having effective monitoring strategies in place that meet their safeguarding needs.

The governor who oversees online safety is Helen Jackson who is also Director of Education at WSL.

All governors will:

- Ensure they have read and understand this policy
- Agree and adhere to the terms on acceptable use of WSL's ICT systems and the internet (appendix 3)
- 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 Head of Centre**

The Head of Centre is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout WSL.

### **3.3 The designated safeguarding lead**

Details of WSL's designated safeguarding lead (DSL) and deputy designated safeguarding lead (DDSL) are set out in our child protection and safeguarding policy, as well as relevant job descriptions. The DSL is the Head of Centre at WSL.

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

- › Ensuring that staff understand this policy and that it is being implemented consistently throughout WSL
- › Working with the Director of Education, Proprietor and governing board 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 WSL devices and WSL networks
- › Working with the ICT specialist adviser to make sure the appropriate systems and processes are in place
- › Working with the Senior Leadership Team, ICT adviser and other staff, as necessary, to address any online safety issues or incidents
- › Managing all online safety issues and incidents in line with WSL's child protection policy
- › Ensuring that any online safety incidents are logged (see appendix 5) 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 WSL behaviour policy
- › Updating and delivering staff training on online safety (appendix 4 contains a self-audit for staff on online safety training needs)
- › Liaising with other agencies and/or external services if necessary
- › Providing regular reports on online safety in WSL to the governing board
- › Undertaking annual risk assessments that consider and reflect the risks children face
- › 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 ICT Adviser/Consultant**

The ICT Adviser/Consultant is responsible for:

- › Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems on WSL devices and WSL networks, which are reviewed and updated at least annually to assess effectiveness and ensure pupils are kept safe from potentially harmful and inappropriate content and contact online while at WSL, including terrorist and extremist material
- › Ensuring that WSL's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- › Conducting a full security check and monitoring WSL's ICT systems on a half termly basis initially and conduct training for the Online Safety Officer lead to conduct full security check on a monthly basis.
- › Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- › Ensuring that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this 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 WSL's ICT systems and the internet (appendix 3), and ensuring that pupils follow WSL's terms on acceptable use (appendices 1 and 2)
- Knowing that the DSL is responsible for the filtering and monitoring systems and processes, and being aware of how to report any incidents of those systems or processes failing by alerting the DSL and/or Online Safety lead with a follow up ABC report.
- Following the correct procedures if they need to bypass the filtering and monitoring systems for educational purposes
- Working with the DSL to ensure that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with WSL 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/carers

Parents/carers are expected to:

- Notify a member of staff or the Head of Centre of any concerns or queries regarding this policy
- Ensure their child has read, understood and agreed to the terms on acceptable use of WSL's ICT systems and internet (appendices 1 and 2)

Parents/carers 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 WSL's ICT 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 (appendix 3).

## 4. Educating pupils about online safety

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

All schools have to teach:

- [Relationships education and health education](#) in primary schools
- [Relationships and sex education and health education](#) in secondary schools

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 secondary 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 that 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.

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

## **5. Educating parents/carers about online safety**

WSL will raise parents/carers' awareness of internet safety in letters or other communications home, and in information via our website. This policy will also be shared with parents/carers.

Online safety will also be covered during parents' evenings.

WSL will let parents/carers know:

- › What systems WSL uses to filter and monitor online use
- › What their children are being asked to do online, including the sites they will be asked to access and who from WSL (if anyone) their child will be interacting with online

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

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

## **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 1 person or group by another person or group, where the relationship involves an imbalance of power. (See also WSL behaviour policy.)

### **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.

WSL will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Key Staff/Mentors will discuss cyber-bullying with the young people at WSL.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. 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).

WSL also sends information/leaflets on cyber-bullying to parents/carers so they are aware of the signs, how to report it and how they can support children who may be affected.

In relation to a specific incident of cyber-bullying, WSL will follow the processes set out in the WSL behaviour policy. Where illegal, inappropriate or harmful material has been spread among pupils, WSL 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 Head of Centre, and any member of staff authorised to do so by the Head of Centre, 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 WSL rules as a banned item for which a search can be carried out, and/or
- Is evidence in relation to an offence

Before a search, if the authorised staff member is satisfied that they have reasonable grounds for suspecting any of the above, they will also:

- 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 Head of Centre/DSL
- 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 WSL or disrupt teaching, and/or
- Commit an offence

If inappropriate material is found on the device, it is up to the Head of Centre/DSL, with the support of the Director of Education/Proprietor where necessary, 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](#)
- UKCIS guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- Our behaviour policy

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

## 7. Acceptable use of the internet in WSL

All pupils, parents/carers, staff, volunteers and governors are expected to sign an agreement regarding the acceptable use of WSL's ICT systems and the internet (appendices 1 to 3). Visitors will be expected to read and agree to WSL's terms on acceptable use if relevant.

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

We will monitor the websites visited by pupils, staff, volunteers, governors and visitors (where relevant) to ensure they comply with the above and restrict access through filtering systems where appropriate.

More information is set out in the acceptable use agreements in appendices 1 to 3.

## **8. Pupils using mobile devices in WSL**

Pupils may bring mobile devices into WSL, but are only permitted to use them with staff consent during:

- Lessons
- Personal time

Any use of mobile devices in WSL by pupils must be in line with the acceptable use agreement (see appendices 1 and 2).

Any breach of the acceptable use agreement by a pupil may trigger disciplinary action in line with WSL's behaviour policy, which may result in the confiscation of their device.

## **9. Staff using work devices outside WSL**

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
- Installing anti-virus and anti-spyware software
- Keeping operating systems up to date by always installing the latest updates

Staff members must not use the device in any way that would violate WSL's terms of acceptable use, as set out in appendix 3.

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 Online Safety Lead.

## **10. How WSL will respond to issues of misuse**

Where a pupil misuses WSL's ICT systems or internet, we will follow the procedures set out in our policies on behaviour and ICT and internet acceptable use. 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 WSL'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/staff disciplinary procedures. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

WSL will consider whether incidents that 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 DDSL will undertake child protection and safeguarding training, which will include online safety, at least every 2 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**

The DSL logs behaviour and safeguarding issues related to online safety. An incident report log can be found in appendix 5.

This policy will be reviewed every year by the Head of Centre. 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 disciplinary procedures
- Data protection policy and privacy notices
- Complaints procedure
- ICT and internet acceptable use policy

## Appendix 2: KS3/4 and KS5 acceptable use agreement (pupils and parents/carers)

### ACCEPTABLE USE OF WSL'S ICT SYSTEMS AND INTERNET: AGREEMENT FOR PUPILS AND PARENTS/CARERS

Name of pupil:

**I will read and follow the rules in the acceptable use agreement policy.**

**When I use WSL's ICT systems (like computers) and get onto the internet in WSL I will:**

- Always use WSL's ICT systems and the internet responsibly and for educational purposes only
- Only use them when a teacher is present, or with a teacher's permission
- Keep my usernames and passwords safe and not share these with others
- Keep my private information safe at all times and not give my name, address or telephone number to anyone without the permission of my teacher or parent/carer
- Tell a teacher (or sensible adult) immediately if I find any material which might upset, distress or harm me or others
- Always log off or shut down a computer when I've finished working on it

**I will not:**

- Access any inappropriate websites including: social networking sites, chat rooms and gaming sites unless my teacher has expressly allowed this as part of a learning activity
- Open any attachments in emails, or follow any links in emails, without first checking with a teacher
- Use any inappropriate language when communicating online, including in emails
- Create, link to or post any material that is pornographic, offensive, obscene or otherwise inappropriate
- Log in to WSL's network using someone else's details
- Arrange to meet anyone offline without first consulting my parent/carer, or without adult supervision

**If I bring a personal mobile phone or other personal electronic device into WSL:**

- I will not use it during lessons, personal time, trips or other activities organised by WSL, without a teacher's permission
- I will use it responsibly, and will not access any inappropriate websites or other inappropriate material or use inappropriate language when communicating online

**I agree that WSL will monitor the websites I visit and that there will be consequences if I don't follow the rules.**

**Signed (pupil):**

**Date:**

**Parent/carer's agreement:** I agree that my child can use WSL's ICT systems and internet when appropriately supervised by a member of WSL staff. I agree to the conditions set out above for pupils using WSL's ICT systems and internet, and for using personal electronic devices in WSL, and will make sure my child understands these.

**Signed (parent/carer):**

**Date:**

## Appendix 3: acceptable use agreement (staff, governors, volunteers and visitors)

### ACCEPTABLE USE OF WSL'S ICT SYSTEMS AND INTERNET: AGREEMENT FOR STAFF, GOVERNORS, VOLUNTEERS AND VISITORS

**Name of staff member/governor/volunteer/visitor:**

**When using WSL's ICT systems and accessing the internet in WSL, or outside WSL on a work device (if applicable), I will not:**

- Access, or attempt to access inappropriate material, including but not limited to material of a violent, criminal or pornographic nature (or create, share, link to or send such material)
- Use them in any way which could harm WSL's reputation
- Access social networking sites or chat rooms
- Use any improper language when communicating online, including in emails or other messaging services
- Install any unauthorised software, or connect unauthorised hardware or devices to WSL's network
- Share my password with others or log in to WSL's network using someone else's details
- Take photographs of pupils without checking with teachers first
- Share confidential information about WSL, its pupils or staff, or other members of the community
- Access, modify or share data I'm not authorised to access, modify or share
- Promote private businesses, unless that business is directly related to WSL

I will only use WSL's ICT systems and access the internet in WSL, or outside WSL on a work device, for educational purposes or for the purpose of fulfilling the duties of my role.

I agree that WSL will monitor the websites I visit and my use of WSL's ICT facilities and systems.

I will take all reasonable steps to ensure that work devices are secure and password-protected when using them outside WSL, and keep all data securely stored in accordance with this policy and WSL's data protection policy.

I will let the designated safeguarding lead (DSL) an/or Online Safety Lead/ ICT Consultant know if a pupil informs me they have found any material which might upset, distress or harm them or others, and will also do so if I encounter any such material.

I will always use WSL's ICT systems and internet responsibly, and ensure that pupils in my care do so too.

**Signed (staff member/governor/volunteer/visitor):**

**Date:**

## Appendix 4: online safety training needs – self-audit for staff

ONLINE SAFETY TRAINING NEEDS AUDIT	
<b>Name of staff member/volunteer:</b>	<b>Date:</b>
<b>Question</b>	<b>Yes/No (add comments if necessary)</b>
Do you know the name of the person who has lead responsibility for online safety in WSL?	
Are you aware of the ways pupils can abuse their peers online?	
Do you know what you must do if a pupil approaches you with a concern or issue?	
Are you familiar with WSL's acceptable use agreement for staff, volunteers, governors and visitors?	
Are you familiar with WSL's acceptable use agreement for pupils and parents/carers?	
Are you familiar with the filtering and monitoring systems on WSL's devices and networks?	
Do you understand your role and responsibilities in relation to filtering and monitoring?	
Do you regularly change your password for accessing WSL's ICT systems?	
Are you familiar with WSL's approach to tackling cyber-bullying?	
Are there any areas of online safety in which you would like training/further training?	

## Appendix 5: online safety incident report log

ONLINE SAFETY INCIDENT LOG				
Date	Where the incident took place	Description of the incident	Action taken	Name and signature of staff member recording the incident