

Path Hill Outdoors

Online Safety (including safe use of mobile phones) Policy

Status:	Updated Policy Date:	Scheduled Review:
Non-Statutory	September 2025	September 2026

Aims

This policy takes into account the DfE statutory guidance 'Keeping Children Safe in Education 2025', 'Working Together to Safeguard Children 2025' and the local Safeguarding Children Multi-agency Partnership procedures.

Path Hill Outdoors works with young people in the outdoors. The use of computers and other devices is kept to a minimum. However, we recognise that online safety is an essential part of safeguarding and acknowledge our duty to ensure that all students and staff are protected from potential harmful and inappropriate online material and/or behaviour. This policy sets out our approach to online safety which will empower, protect and educate our students and staff in their use of technology and establishes the mechanisms in place to identify, intervene, and escalate any concerns where appropriate.

The Department for Education has published filtering and monitoring standards which set out that educational settings should:

- 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. SMT should review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.
- Understand and adhere to The Prevent duty departmental advice for schools and childcare providers and Home Office Statutory guidance.

Path Hill Outdoors understands that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users; for example: 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; for example, making, sending and receiving explicit images, for example, consensual and non-

consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.

- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Path Hill Outdoors recognises that students are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online.

Path Hill Outdoors identifies that the internet and technology, including computers, tablets, mobile phones, smart watches, games consoles and social media, is an important part of everyday life, and presents positive and exciting opportunities, as well as challenges and risks. This policy applies to all access to and use of technology, both on and offsite. This policy applies to students, parents and carers and all staff, including the Director, SMT, instructors, office staff, site staff, external contractors, visitors, volunteers and other individuals who work for, or provide services on behalf of the centre.

Path Hill Outdoors recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected online, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any online safety concerns about a student.

Responding to Emerging Risks

Path Hill Outdoors recognises that the internet is a constantly changing environment with new apps, devices, websites and material emerging at a rapid pace. We will:

- Carry out an annual review of our online safety approaches which will be supported by an annual risk assessment which considers and reflects the specific risks our students face.
- Regularly review the methods used to identify, assess and minimise online risks.
- Examine emerging technologies for educational benefit and undertake appropriate risk assessments before their use is permitted.
- Ensure that appropriate filtering and monitoring is in place and take all reasonable precautions to ensure that internet access is appropriate.
- Recognise that due to the global and connected nature of the internet, it is not possible to guarantee that unsuitable material cannot be accessed via our systems, and as such identify clear procedures to follow if breaches or concerns arise.

Roles and Responsibilities

The Designated Safeguarding Leads (DSLs) are recognised as holding overall lead responsibility for online safety, however Path Hill Outdoors identifies that all members of the community have important roles and responsibilities to play with regards to online safety. Whilst activities of the DSL may be delegated to an appropriately trained deputy, the lead responsibility for safeguarding and child protection, including online safety remains with them.

Leaders and DSLs access guidance about establishing 'appropriate levels' of filtering and monitoring to help inform their decision making: [Homepage - UK Safer Internet Centre](#)

The Director of Path Hill Outdoors alongside SMT will use '[Meeting digital and technology standards in schools and colleges](#) : Filtering and monitoring standards for schools and colleges' which set out that schools to ensure regulations are met and the Safeguarding Policy and Online Safety policy are reflected in practise. When reviewing online safety provision, the Director will make reference to [UKCIS external visitors guidance](#) to develop an approach towards online safety.

Filtering and monitoring

The Department for Education has published filtering and monitoring standards. Path Hill Outdoors demonstrates how it complies to those standards in the following ways:

- Path Hill Outdoors will review this policy at least annually. The policy will also be revised following any national or local policy updates, any local concerns and/or any changes to our technical infrastructure.
- Path Hill Outdoors will regularly monitor internet use taking place via our provided devices and systems and evaluate online safety mechanisms to ensure that this policy is consistently applied.
- The Director and SMT will report on online safety practice and incidents, including outcomes, on a regular basis to our IT team.
- Any issues identified will be incorporated into an action plan.

SMT will:

- Create a culture that incorporates online safety throughout.
- Ensure that online safety is viewed as a safeguarding issue and that practice is in line with national and local recommendations and requirements.
- Implement appropriate and up-to-date policies which address the acceptable use of technology, child on child abuse, use of social media and mobile technology.
- Work with technical staff and IT support to ensure that suitable and appropriate filtering and monitoring systems are in place.
- Ensure robust reporting channels are in place regarding online safety concerns via CPOMS.
- Undertake appropriate risk assessments regarding the safe use of technology on site.
- Audit and evaluate online safety practice to identify strengths and areas for improvement.
- Ensure that staff, students and parents/carers are proactively engaged in activities which promote online safety.
- Support staff to ensure that online safety is embedded within programmes which enables students to develop an appropriate understanding of online safety.

Designated Safeguarding Leads (DSLs) will:

- Act as named points of contact on all online safeguarding issues.
- Liaise with other members of staff, such as IT technicians, network managers and the staff team on matters of online safety as appropriate.
- Ensure referrals are made to relevant external partner agencies, as appropriate.
- Ensure online safety is recognised as part of the PHO safeguarding responsibilities, and that a coordinated approach is implemented.
- Access regular and appropriate training and support to ensure they understand the unique risks associated with online safety and have the relevant and up-to-date knowledge required to keep

students safe online, including the additional risks that students with Special Educational Needs and Disabilities (SEND) face online.

- Ensure all members of staff receive up-to-date and appropriate online safety training and information as part of their induction and child protection training.
- Keep up to date with current research, legislation and trends regarding online safety and communicate this with the community, as appropriate.
- Ensure that online safety is promoted to parents and carers and the wider community through a variety of channels and approaches.
- Maintain records of online safety concerns as well as actions taken on CPOMS, as part of the schools safeguarding recording mechanisms.
- Monitor online safety incidents to identify gaps and trends and use this data to update the education response and PHO policies and procedures.

It is the responsibility of all members of staff to:

- Contribute to the development of our online safety policies.
- Read and adhere to our online safety policy and acceptable use of technology policies.
- Take responsibility for the security of IT systems and the electronic data they use or have access to.
- Model good practice when using technology with students.
- Maintain a professional level of conduct in their personal use of technology, both on and off site.
- Embed online safety education in delivery wherever possible.
- Have an awareness of a range of online safety issues and how they may be experienced by the students in their care.
- Identify online safety concerns and take appropriate action by following our safeguarding policies and procedures.
- Know when and how to escalate online safety issues, including reporting to a DSL and signposting students and parents and carers to appropriate support, internally and externally.
- Take personal responsibility for professional development in this area.
- It is the responsibility of staff managing the technical environment to:

It is the responsibility of students (at a level that is appropriate to their individual age and ability) to:

- Adhere to the 'no student phones' rule. If they bring their mobile phone in at the beginning of the day, they must hand their phone into the office on arrival.
- Engage in age/ability appropriate online safety education.
- Contribute to the development of online safety policies.
- Respect the feelings and rights of others, on and offline.
- Take an appropriate level of responsibility for keeping themselves and others safe online.
- Seek help from a trusted adult, if they are concerned about anything, they or others experience online.

It is the responsibility of parents and carers to:

- Support our online safety approaches by discussing online safety issues with their children and reinforcing appropriate and safe online behaviours at home.
- Role model safe and appropriate use of technology and social media

- Seek help and support from the centre or other appropriate agencies if they or their child encounter online issues.
- Take responsibility for their own awareness in relation to the risks and opportunities posed by the new and emerging technologies that their children access and use at home.

Education and Engagement Approaches

Path Hill Outdoors will establish and embed a culture and will empower our students to acquire the knowledge needed to use technology in a safe, considered and respectful way, and develop their resilience so they can manage and respond to online risks. We will raise awareness and promote safe and responsible internet use amongst students by:

- Ensuring our curriculum and approach is developed in line with the [UK Council for Internet Safety \(UKCIS\) 'Education for a Connected World Framework'](#) namely using this tool to develop one of our termly PSHE focuses, 'Online Safety'
- Creating a safe environment in which all students feel comfortable to say what they feel, without fear of getting into trouble and/or being judged for talking about something which happened to them online.
- DSLs are involved in planning for online safety activities or staff training, so they can advise on any known safeguarding cases, and ensure support is in place for any students who may be impacted by the content.
- Making informed decisions to ensure that any educational resources used are appropriate for our students.

Vulnerable students

Path Hill Outdoors recognises that any students can be vulnerable online, and vulnerability can fluctuate depending on age, developmental stage and personal circumstances. However, there are some students, for example, looked after children, child who are care leavers, children who are adopted, children who are, or who are perceived to be, lesbian, gay, bi, or transgender (LGBT), and those with special educational needs or disabilities (SEND), who may be more susceptible or may have less support in staying safe online. Our 1 to 1 programme enables us to employ differentiated and bespoke online safety education depending on student need. Staff at Path Hill Outdoors will seek input from DSLs or SENDCO as appropriate, to ensure that the policy and curriculum is appropriate to our community's needs.

Training and engagement with staff

- To provide all staff with relevant skills and knowledge to safeguard children effectively, we will:
- Provide and discuss the online safety policy and procedures with all members of staff as part of induction.
- Provide up-to-date and appropriate training for all staff which is integrated, aligned and considered as part of our overarching safeguarding approach.
- Ensure that online safety training provided to all staff is regularly updated.
- Ensure our training covers the potential risks posed to students (content, contact, conduct and commerce) as well as our professional practice expectations.

- Build on existing expertise, by providing opportunities for staff to contribute to and shape our online safety approaches.
- Ensure staff are aware that our IT systems are monitored, and that activity can be traced to individual users. Staff will be reminded to behave professionally and in accordance with our policies when accessing our systems and devices.
- Ensure staff are aware that their online conduct, including personal use of social media, can have an impact on their professional role and reputation (See Staff Behaviour Policy)
- Highlight useful educational resources and tools which staff could use with students.
- Ensure all members of staff are aware of the procedures to follow regarding online safety concerns involving students, colleagues or other members of the community.

Awareness and engagement with parents and carers

Path Hill Outdoors recognises that parents and carers have an essential role to play in enabling our students to become safe and responsible users of the internet and associated technologies. We will build a partnership approach and reinforce the importance of online safety through regular contact and communication with parents and carers. We will do this by providing information and guidance on online safety in a variety of formats. We will also drawing their attention to our online safety policy and expectations in external communication (such as letters and social media channels) as well as on our website. We will contact parents if there are any queries or concerns we have about their child's safety online, and signpost them to information to services that could be helpful.

Safer Use of Technology

Use of student laptops

We adopt a 'More green, less screen' philosophy and use of computers and other devices as part of our educational provision is kept to a minimum. Sometimes the internet is used via student laptops to complement their outdoor programme, such as looking up a recipe or costing out a woodwork project. The following steps are taken to ensure safe use:

- Filters are reviewed and updated annually on laptops, as described above
- Students will have 1 to 1 supervision when using the laptop
- Members of staff will always evaluate websites, tools and apps fully before use at Path Hill Outdoors, or recommending for use at home.
- Any videos viewed via a video sharing platform, such as youtube.com should be previewed by the instructor before sharing with a student.
- We will ensure that the use of internet-derived materials by staff and students complies with copyright law and acknowledge the source of information.

Filtering breaches

If students or staff discover unsuitable sites or material, they are required to:

- Turn off monitor/screen, report the concern immediately to a DSL and report the URL of the site to technical staff/services.
- DSL will record and escalate incident as appropriate in line with existing policies, including Safeguarding and Prosocial Behaviour Policies.

- Parents/carers will be informed of filtering breaches involving students.
- Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the IWF, the police and/or NCA-Child Exploitation and Online Protection Command (NCA-CEOP).

Managing the safety of our website

- We will ensure that information posted on our website meets the requirements as identified by the DfE, including Non-School Alternative Provision: Voluntary National Standards
- We will ensure that we comply with guidelines for publications, including accessibility, data protection, respect for intellectual property rights, privacy policies and copyright.
- Staff or students' personal information will not be published on our website; the contact details on the website will be our centre address, email and telephone number.
- The administrator account for our website will be secured with an appropriately strong password.
- We will post appropriate information about safeguarding, including online safety, on our website for members of the community.

Publishing images and videos online

We will ensure that all images and videos shared online are given consent to do so.

Managing email

- Access to our email systems will always take place in accordance with data protection legislation and in line with other policies, including Data Protections and Confidentiality, and Staff Behaviour Policy.
- The forwarding of any chain messages/emails is not permitted.
- Spam or junk mail will be blocked and reported to the email provider.
- Any electronic communication which contains sensitive or personal information will only be sent using secure and encrypted email.
- Centre email addresses and other official contact details will not be used to set up personal social media accounts.
- Members of the community will immediately report offensive communication to a DSL.
- Excessive social email use can interfere with teaching and learning and will be restricted; access to external personal email accounts may be blocked on site.

Staff email

Only a small number of office-based staff have a staff email address. Instructors do not have work email addresses; our inhouse communication is largely done through face-to-face daily briefings or via a staff WhatsApp group.

Social Media Expectations

Path Hill Outdoors official use of social media

- Path Hill Outdoors official social media channels are Facebook, Instagram and Youtube.
- The official use of social media sites by PHO only takes place with clear educational or community engagement objectives and with specific intended outcomes.

- Official social media sites are suitably protected and, where possible, run and linked to our website.
- Official social media channels have been set up as distinct and dedicated accounts for official educational or engagement purposes only.
- Staff use Path Hill Outdoors email addresses to register for and manage official social media channels.
- SMT have access to account information and login details for our social media channels, in case of emergency, such as staff absence.
- Official social media use will be conducted in line with existing policies, including but not limited to Anti-Bullying, Data Protection & Confidentiality and Safeguarding.
- All communication on official social media platforms by staff on behalf of the setting will be clear, transparent and open to scrutiny. Public communications on behalf of the setting will, where appropriate and possible, be read and agreed by at least one other colleague.
- Written parental consent will be obtained before publishing any content involving identifiable students
- Students' names or other personal details are never shared on social media. Students will be referred to by their first initial only.
- We will ensure that any official social media use does not exclude members of the community who are unable or unwilling to use social media channels.
- If members of staff are managing and/or participating in online social media activity as part of their capacity as an employee of the setting, they will:
 - Be aware they are an ambassador for Path Hill Outdoors
 - Be professional, responsible, credible, fair and honest, and consider how the information being published could be perceived or shared.
 - Always act within the legal frameworks they would adhere to within the workplace, including libel, defamation, confidentiality, copyright, data protection and equalities laws.
 - Follow our image use procedure at all times, for example ensuring that appropriate consent has been given before sharing images.
 - Not disclose information, make commitments or engage in activities on behalf of the setting, unless they are authorised to do so.
 - Not engage with any private or direct messaging with current or past students or their family members.
 - Inform their line manager, a DSL and/or the Director of any concerns, such as criticism, inappropriate content or contact from students.

Staff use of social media

See Staff Behaviour Policy.

Students use of social media

The use of student phones, and therefore social media, during PHO hours is not permitted for students.

Many online behaviour incidents amongst children and young people occur on social media outside the PHO day and off the centre premises. Parents and carers are responsible for this behaviour; however, some online incidents may affect our culture and/or pose a risk to children and young people's health and

well-being. Where online behaviour poses a threat or causes harm to another student, could have repercussions for the orderly running of the centre when the student is identifiable as a member of PHO, or if the behaviour could adversely affect the reputation of the centre, action will be taken in line with our Prosocial Behaviour and Safeguarding Policies.

Path Hill Outdoors will empower our students to acquire the knowledge needed to use social media in a safe, considered, and respectful way, and develop their resilience so they can manage and respond to online risks. Safe and appropriate use of social media will be taught to students as part of a wider PSHE education approach using age-appropriate resources.

Students will be advised:

- to consider the benefits and risks of sharing personal details or information on social media sites which could identify them and/or their location
- to only approve and invite known friends on social media sites and to deny access to others, for example by making profiles private
- not to meet any online friends without a parent/carer or other appropriate adults' permission, and to only do so when a trusted adult is present
- to use safe passwords
- to use social media sites which are appropriate for their age and abilities
- how to block and report unwanted communications
- how to report concerns on social media, both within the setting and externally
- any concerns regarding students use of social media will be dealt with in accordance with appropriate existing policies, including Anti-Bullying, Safeguarding and Prosocial Behaviour Policies

The DSLs will respond to social media concerns involving safeguarding risks in line with our Safeguarding Policy. Consequences and/or pastoral/welfare support will be implemented and offered to students as appropriate, in line with our Safeguarding and Prosocial Behaviour Policies. Civil or legal action may be taken if necessary. Concerns regarding students use of social media will be shared with parents/carers.

Safe use of mobile and smart technology

Safe use of mobile and smart technology expectations

Path Hill Outdoors recognises that use of mobile and smart technologies is part of everyday life for many students, staff and parents/carers. Electronic devices of any kind that are brought onto site are the responsibility of the user.

All members of the Path Hill Outdoors community are advised to:

- take steps to protect their mobile phones or personal devices from loss, theft or damage; we accept no responsibility for the loss, theft or damage of such items on our premises.
- use passwords/PIN numbers to ensure that unauthorised access, calls or actions cannot be made on their phones or devices.
- Mobile phones and personal devices are not permitted to be used by children in any area on the PHO site.

- The sending of abusive or inappropriate messages or content, including via personal smart devices and mobile phones is forbidden by any member of the community; any breaches will be dealt with in line with our Anti-Bullying, Prosocial Behaviour and Safeguarding Policies.
- All members of the Path Hill community are advised to ensure that their mobile phones and personal devices do not contain any content which may be offensive, derogatory or illegal, or which would otherwise contravene our Anti-Bullying, Prosocial Behaviour and Safeguarding Policies.

PHO provided mobile phones and devices

SMT will be issued with a work phone number in addition to their work email address, where contact with parents/ carers is required. Centre mobile phones and devices will be suitably protected via a passcode/password/PIN and must only be accessed or used by the member of staff it has been issued to. Centre mobile phones and devices will always be used in accordance with our Staff Behaviour Policy and other relevant policies/procedures.

Staff use of mobile and smart technology

Members of staff will ensure that use of any mobile and smart technology, including personal phones and mobile devices, will take place in accordance with the law, as well as relevant PHO policy and procedures.

Staff are permitted to use their personal mobile devices for following purposes;

- 1) In case of an emergency. Instructors usually work 1 to 1 with a student in isolation, and mobile phones are a crucial component of our First Aid, Safeguarding, Lone Working with Students and ProSocial Behaviour Policies.
- 2) To access the staff WhatsApp 'group chat'. This is an important platform to share information with the staff group quickly, in case of emergencies. It is also a way to communicate daily information such as lunch arrangements.
- 3) To photograph student's work and, with permission from parents/carers. The photograph can be used as evidence of their educational progress e.g. completion of an AQA unit award, and/or for our social media platforms. Staff must delete any student photos once they are shared with a 1 to 1 Manager, including deleting photos from any cloud storage. Staff are reminded at the end of every day after debrief to do this. See also Staff Behaviour Policy.
- 4) The occasional use of the internet or apps for educational purposes when 'out in the field', such as geocaching maps, birdsong identifiers, or researching a recipe. More thorough research tasks, such as looking at local colleges, would be done on laptops in office area (see above).

If a member of staff is not able to/ wanting to use a personal mobile device, they are to collect a spare Path Hill mobile phone from the office.

Students are not permitted to use staff personal mobile phones, or Path Hill mobile phones.

Staff are advised to:

- Keep mobile phones and personal devices in a secure place, out of sight (for example, the inside pocket of a rucksack or jacket)
- Keep personal mobile phones set to loud mode so they are able to hear any group message alerts or phone calls.
- Not to use personal devices during student contact times, other than the reasons listed above.

- Ensure that any content bought onto site via personal mobile phones and devices is compatible with their professional role and our behaviour expectations.
- Members of staff are not permitted to use their own personal phones or devices for contacting students or parents and carers without prior arrangement with the Director. Any pre-existing relationships or circumstance, which could compromise staff's ability to comply with this, will be discussed with the Director.

If a member of staff is thought to have illegal content saved or stored on a mobile phone or personal device or have committed a criminal offence using a personal device or mobile phone, the police will be contacted, and the LADO (Local Authority Designated Officer) will be informed in line with our Safeguarding Policy.

Students use of mobile and smart technology

Students will be educated regarding the safe and appropriate use of mobile and smart technology, including mobile phones and personal devices, and will be made aware of behaviour expectations and consequences for policy breaches. Safe and appropriate use of mobile and smart technology will be taught to students as part of their PSHE education using age-appropriate sites and resources.

Mobile phones and/or personal devices will not be used on site by students, and students are required to hand them into the office on arrival.

Path Hill Outdoors expects students' personal devices and mobile phones to be kept safe and secure when on site. This means:

- Phones will be switched off and handed in to the Office Manager.
- If a student needs to contact their parents/carers whilst on site, they will be allowed to use a PHO phone.
- Parents are advised to contact their child via the PHO office; exceptions may be permitted on a case-by-case basis, as approved by the SMT
- If a student requires access to a personal device in exceptional circumstances, for example medical assistance and monitoring, this will be discussed with the Director prior to use being permitted.
- Any arrangements regarding access to personal devices in exceptional circumstances will be documented and recorded.

Screening, searching and confiscation of electronic devices

Electronic devices, including mobile phones, can contain files or data which relate to an offence, or which may cause harm to another person. This includes, but is not limited to, indecent images of children, pornography, abusive messages, images or videos, or evidence relating to suspected criminal behaviour. Where there are any concerns regarding student's use of mobile technology or policy breaches, they will be dealt with in accordance with our existing policies, including Anti-Bullying, Safeguarding, Online Safety and Prosocial Behaviour.

Staff may confiscate a student's mobile phone or device if they believe it is being used to contravene our Safeguarding or Prosocial Behaviour Policy and with the support of parents/carers. Mobile phones and devices that have been confiscated will be held in a secure place and released to parents/carers at the end of the PHO day.

Where a concern involves a potentially indecent image or video of a child, staff will respond in line with our Safeguarding Policy and will confiscate devices, avoid looking at any content, and refer the incident to

a Designated Safeguarding Lead urgently as they will be most appropriate person to respond. If there is suspicion that data or files on a student's personal device or mobile phone may be illegal, or may provide evidence relating to a criminal offence, the device will be handed over to the police for further investigation.

If deemed to be necessary and appropriate, searches of mobile phones or personal devices may be carried out in accordance with our Safeguarding Policy and [DfE 'Searching, Screening and Confiscation'](#) guidance. The Designated Safeguarding Leads will always be informed of any searching incidents where authorised members of staff have reasonable grounds to suspect a student was in possession of prohibited items, as identified in our Prosocial Behaviour Policy. The Designated Safeguarding Leads will be involved without delay if staff believe a search of a student device has revealed a safeguarding risk.

In exceptional circumstances and in accordance with our behaviour policy and the [DfE 'Searching, Screening and Confiscation'](#) guidance, the Director or SMT may examine or erase data or files if there is a good reason to do so. If the Director or SMT finds any data or files that they suspect might constitute a specified offence, they will be delivered to the police as soon as is reasonably practicable.

Visitors' use of mobile and smart technology

Parents/ carers and visitors, including volunteers and contractors, are expected not use a mobile phone onsite. If mobile phone use is required for a specific reason, such as to photograph the environment to support a new student's transition, or to carry out contractor sitework, DSL permission should be sought. A member of staff, preferably a DSL, must be present when the permitted photos are taken. Parents/ carers and visitors are never permitted to photograph students unless it is their own child and with permission.

Responding to Online Risks and/or Policy Breaches

All members of the community:

- Are made aware of our expectations regarding safe and appropriate behaviour online and the importance of not posting any content, comments, images or videos which could cause harm, distress or offence.
- Are informed of the need to report policy breaches or concerns in line with existing centre policies and procedures.
- Will respect confidentiality and the need to follow the official procedures for reporting concerns.
- Will be informed of our complaints procedure and staff will be made aware of the whistleblowing procedure.
- If appropriate, after any investigations are completed, the DSLs will debrief, identify lessons learnt and implement any policy or curriculum changes, as required
- If we are unsure how to proceed with an incident or concern, the DSLs including Director will seek advice from the local authority, Education Safeguarding Service, or other agency in accordance with our Safeguarding Policy.
- Where there is a concern that illegal activity has taken place, we will contact the police using 101, or 999 if there is immediate danger or risk of harm.
- If information relating to a specific incident or a concern needs to be shared beyond our community, for example if other local provision are involved or the wider public may be at risk,

the DSLs and/or Director will speak with the police and/or the Local Authority first, to ensure that potential criminal or child protection investigations are not compromised.

Concerns about students' online behaviour and/or welfare

Path Hill Outdoors recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, gender and/or sexual orientation. All concerns about students will be responded to and recorded in line with our Safeguarding Policy:

- The DSL will be informed of all online safety concerns involving safeguarding or child protection risks in line with our Safeguarding Policy.
- The DSL will ensure that online safety concerns are escalated and reported to relevant partner agencies in line with local policies and procedures.

Abuse that occurs online and/or offsite will not be dismissed or downplayed; concerns will be treated equally seriously and in line with relevant policies/procedures, for example Anti-Bullying, Prosocial Behaviour and/or Safeguarding.

Path Hill Outdoors recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to students that avoids alarming or distressing them.

Appropriate consequences and/or pastoral/welfare support will be implemented and/or offered to students as appropriate. Civil or legal action will be taken if necessary. We will inform parents and carers of online safety incidents or concerns involving their child, as and when required.

Concerns about staff online behaviour and/or welfare

Any complaint about staff misuse will be managed in accordance with our Staff Behaviour Policy. Any allegations regarding a member of staff's online conduct will be discussed with the LADO (Local Authority Designated Officer). Where appropriate, welfare support will be offered, and where necessary, disciplinary, civil and/or legal action will be taken in accordance with our staff code of conduct.

Concerns about parent/carer online behaviour and/or welfare

Concerns regarding parents and carers behaviour and/or welfare online will be reported to a DSL and dealt with in line with existing policies, such as Safeguarding. Where appropriate, welfare support will be offered, and where necessary, civil and/or legal action may be taken.

Online child-on-child abuse

Path Hill Outdoors recognises that whilst risks can be posed by unknown individuals or adults online, students can also abuse their peers; all online child-on-child abuse concerns will be responded to in line with our Safeguarding and Prosocial Behaviour Policies. We recognise that online child-on-child abuse can take many forms, including but not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Abuse in intimate personal relationships between peers

- Physical abuse, this may include an online element which facilitates, threatens and/or encourages physical abuse
- Sexual violence and sexual harassment, which may include an online element which facilitates, threatens and/or encourages sexual violence
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as 'sexting' or 'youth produced sexual imagery')
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Up skirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals

Path Hill Outdoors adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh", "part of growing up" or "boys being boys"; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.

Path Hill Outdoors believes that all staff have a role to play in challenging inappropriate online behaviours between children. Staff recognise that some online child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. Path Hill Outdoors recognises that even if there are no reported cases of online child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to a DSL about any concerns regarding online child-on-child abuse.

Concerns about child-on-child abuse taking place online offsite will be responded to as part of a partnership approach with students' and parents/carers; concerns will be recorded and responded to in line with existing appropriate policies, such as Safeguarding.

Path Hill Outdoors want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of online child-on-child abuse will be reported to a DSL and will be recorded, investigated, and dealt with in line with associated policies, including Safeguarding, Anti-Bullying and Prosocial Behaviour. Students who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Child on child online sexual violence and sexual harassment

When responding to concerns relating to online child on child sexual violence or harassment, Path Hill Outdoors will follow the guidance outlined in Part Five of Keeping Children Safe in Education 2025.

Online sexual violence and sexual harassment exists on a continuum and may overlap with offline behaviours; it is never acceptable. Abuse that occurs online will not be downplayed and will be treated equally seriously. All victims of online sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting online sexual violence or sexual harassment or be made to feel ashamed for making a report. Path Hill Outdoors recognises that sexual violence and sexual harassment between children can take place online. Examples may include:

- Consensual and non-consensual sharing of nude and semi-nude images and videos

- Sharing of unwanted explicit content
- ‘Upskirting’ (which is a criminal offence and typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm)
- Sexualised online bullying or unwanted sexual comments and messages, including, on social media.
- Sexual exploitation, coercion, and threats.

Path Hill Outdoors recognises that sexual violence and sexual harassment occurring online (either in isolation or in connection to face to face incidents) can introduce a number of complex factors. These include the potential for the incident to take place across a number of social media platforms and services, and for things to move from platform to platform online. Path Hill Outdoors will respond to concerns regarding online sexual violence and sexual harassment between children, regardless of whether the incident took place on our premises or using our equipment. Path Hill Outdoors will ensure that all members of the community are made aware of the potential social, psychological and criminal consequences of online sexual violence and sexual harassment and the support available, by implementing a range of age and ability appropriate educational methods as part of our curriculum.

When there has been a report of online sexual violence or harassment, a DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted. The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them. Reports will initially be managed internally by a DSL, and where necessary will be referred to Children’s Social Care and/or the Police. The decision making and required action taken will vary on a case-by-case basis but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, or staff, and any other related issues or wider context.

If content is contained on students’ personal devices, they will be managed in accordance with the [DfE ‘Searching, Screening and Confiscation’](#) advice. Following an immediate risk assessment, PHO will:

- provide the necessary safeguards and support for all students involved, such as implementing safety plans, offering advice on blocking, reporting and removing online content, and providing appropriate counselling/pastoral support.
- inform parents/carers for all children involved about the incident and how it is being managed and provide support and signposting, as appropriate, unless to do so would place a child at risk of significant harm.
- if the concern involves children and young people at a different educational provision, the DSL will work in partnership with other DSLs to ensure appropriate safeguarding action is taken in the wider local community.
- If a criminal offence has been committed, the DSL will discuss this with the Police first to ensure that investigations are not compromised.
- Review the handling of any incidents to ensure that best practice was implemented, and policies/procedures are appropriate. Path Hill Outdoors recognises that internet brings the

potential for the impact of any concerns to extend further than the local community, and for a victim or alleged perpetrator to become marginalised and excluded by online communities. Path Hill Outdoors also recognises the potential for repeat victimisation in the future if abusive content continues to exist somewhere online.

Nude or semi-nude image sharing

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex. The [UKCIS 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'](#) guidance outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing, and should be read and understood by DSLs working with all age groups, not just older students.

Path Hill Outdoors recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") is a safeguarding issue; all concerns will be reported to and dealt with by a DSL. This policy defines sharing nude or semi-nude image sharing as when a person under the age of 18:

- creates and/or shares nude and/or semi-nude imagery (photos or videos) of themselves with a peer(s) under the age of 18.
- shares nude and/or semi-nude imagery created by another person under the age of 18 with a peer(s) under the age of 18.
- possesses nude and/or semi-nude imagery created by another person under the age of 18. When made aware of concerns regarding nude and/or semi-nude imagery,

Path Hill Outdoors will follow the advice as set out in the non-statutory [UKCIS guidance: 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'](#) Path Hill Outdoors will ensure that all members of the community are made aware of the potential social, psychological and criminal consequences of creating or sharing nude or semi-nude images and sources of support, by implementing preventative approaches, via a range of age and ability appropriate educational methods.

We will respond to concerns regarding nude or semi-nude image sharing, regardless of whether the incident took place on site or using centre provided or personal equipment. When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:

- Report any concerns to a DSL immediately.
- Never view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
- Not delete the imagery or ask the child to delete it.
- Not say or do anything to blame or shame any children involved.
- Explain to child(ren) involved that they will report the issue to a DSL and reassure them that they will receive appropriate support and help.

- Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.

If made aware of an incident involving nude or semi-nude imagery, DSLs will:

- act in accordance with our Safeguarding Policies and the relevant local procedures and in line with the UKCIS guidance.
- carry out a risk assessment in line with the UKCIS guidance which considers the age and vulnerability of students involved, including the possibility of carrying out relevant checks with other agencies.
- a referral will be made to Children's Social Care and/or the police immediately if:
 - the incident involves an adult (over 18).
 - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
 - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nude.

The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date. If DSLs are unsure how to proceed, advice will be sought from the local authority.

Store any devices securely:

- If content is contained on students' personal devices, they will be managed in accordance with the DfE 'searching screening and confiscation' advice.
- If a potentially indecent image has been taken or shared on our network or devices, we will act to block access to all users and isolate the image.
- inform parents and carers about the incident and how it is being managed and provide support and signposting, as appropriate, unless to do so would place a child at risk of significant harm.
- provide the necessary safeguards and support for students, such as offering counselling or pastoral support.
- Implement consequences where necessary and appropriate in accordance with our Prosocial Behaviour Policy but taking care not to further traumatise victims where possible.
- Consider the deletion of images in accordance with the UKCIS guidance.
- Images will only be deleted once the DSL has confirmed that other agencies do not need to be involved and are sure that to do so would not place a child at risk or compromise an investigation.
- Students will be supported in accessing the [Childline 'Report Remove' tool](#) where necessary.
- Review the handling of any incidents to ensure that best practice was implemented; the SMT will also review and update any management procedures, where necessary.

We will not:

- view any imagery, unless there is no other option, or there is a clear safeguarding need or reason to do so. Note, DSLs should follow 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' If it is deemed necessary, the imagery will only be viewed where possible by the DSL in line with the national UKCIS guidance, and any decision making will be clearly documented.

- Send, share, save or make copies of content suspected to be an indecent image/video of a child and will not allow or request students to do so.

Cyberbullying

Path Hill Outdoors is directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and students and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Cyberbullying, along with all other forms of bullying, will not be tolerated. Full details of how we will respond to cyberbullying are set out in our Anti-Bullying Policy

Online child abuse and exploitation

Path Hill Outdoors recognises online abuse and exploitation, including sexual abuse and sexual or criminal exploitation, as a safeguarding issue and all concerns will be reported to and dealt with by the DSL, in line with our Safeguarding Policy. Path Hill Outdoors will ensure that all members of the community are aware of online child abuse and sexual or criminal exploitation, including the possible grooming approaches which may be employed by offenders to target students, and understand how to respond to concerns. Path Hill Outdoors will implement preventative approaches for online child abuse and exploitation via a range of age and ability appropriate education for students, staff and parents and carers. Path Hill Outdoors will ensure that all members of the community are aware of the support available regarding online child abuse and exploitation, both locally and nationally. If made aware of an incident involving online child abuse and/or exploitation, we will:

- act in accordance with our Safeguarding Policy and the relevant local safeguarding children partnership procedures.
- store any devices containing evidence securely:
 - If content is contained on students' personal devices, they will be managed in accordance with the DfE 'searching screening and confiscation' advice.
 - If any evidence is stored on our network or devices, we will act to block access to other users and isolate the content.
 - if appropriate, make a referral to Children's Social Work Service and inform the police via 101, or 999 if a student is at immediate risk
 - carry out a risk assessment which considers any vulnerabilities of students involved, including carrying out relevant checks with other agencies.
 - inform parents and carers about the incident and how it is being managed and provide support and signposting, as appropriate.
 - provide the necessary safeguards and support for students, such as, offering counselling or pastoral support.
 - review the handling of any incidents to ensure that best practice is implemented; leadership team will review and update any management procedures, where necessary.
 - We will respond to concerns regarding online abuse and exploitation, regardless of whether the incident took place on our premises or using or personal equipment.
 - Where possible and appropriate, students will be involved in decision making. If appropriate, they will be empowered to report concerns themselves with support, for example if the concern relates to online sexual abuse via the [National Crime Agency CEOP Command \(NCA-CEOP\)](#)

- If we are unclear whether a criminal offence has been committed, the DSL will obtain advice immediately through the Local Authority and/or Police.
- We will ensure that the NCA-CEOP reporting tools are visible and available to students and other members of our community via the centre website.
- If made aware of intelligence or information which may relate to child sexual exploitation (on or offline), it will be passed through to the police by a DSL.
- If members of the public or students at other schools or settings are believed to have been targeted, a DSL, will seek advice from the Police and/or the Local Authority before sharing specific information to ensure that potential investigations are not compromised.

Indecent Images of Children (IIOC)

Path Hill Outdoors will ensure that all members of the community are made aware of the possible consequences of accessing Indecent Images of Children (IIOC) as appropriate. We will respond to concerns regarding IIOC on our equipment and/or personal equipment, even if access took place off site. We will seek to prevent accidental access to IIOC by using an Internet Service Provider (ISP) which subscribes to the Internet Watch Foundation (IWF) block list and by implementing appropriate filtering, firewalls and anti-spam software.

If we are unclear if a criminal offence has been committed, the DSL will obtain advice immediately through the police and/or the Local Authority. If made aware of IIOC, we will:

- act in accordance with our Safeguarding Policy and the relevant local safeguarding children partnership procedures.
- store any devices involved securely, until advice has been sought. If content is contained on students personal devices, they will be managed in accordance with the DfE 'searching screening and confiscation' advice.
- immediately inform appropriate organisations, such as the IWF and police.

If made aware that a member of staff or a student has been exposed to indecent images of children, we will:

- ensure that the DSL is informed to ensure that the URLs (webpage addresses), which contain the suspect images, are reported to the IWF via www.iwf.org.uk and/or police.
- inform the police as appropriate, for example if images have been deliberately sent to or shared by students.
- report concerns as appropriate to parents and carers.

If made aware that indecent images of children have been found on PHO provided devices, we will:

- ensure that the DSL is informed.
- ensure that the URLs (webpage addresses), which contain the suspect images, are reported to the [IWF](http://www.iwf.org.uk)
- inform the police via 101 or 999 if there is an immediate risk of harm, and any other agencies, as appropriate.
- only store copies of images (securely, where no one else has access to them and delete all other copies) following a written request from the Police.

- report concerns, as appropriate to parents and carers.

If made aware that a member of staff is in possession of indecent images of children, we will:

- ensure that the Director is informed in line with our safeguarding policies.
- Inform the LADO and other relevant organisations, such as the police in accordance with our Safeguarding Policy.
- Quarantine any involved centre provided devices until police advice has been sought.

Online hate

Online hate content, directed towards or posted by specific members of the community will not be tolerated at Path Hill Outdoors and will be responded to in line with existing policies, including Safeguarding, Anti-Bullying and Prosocial Behaviour. All members of the community will be advised to report online hate in accordance with relevant policies and procedures.

The police will be contacted if a criminal offence is suspected. If we are unclear on how to respond, or whether a criminal offence has been committed, the DSL will obtain advice through the Local Authority and/or the Police.

Online radicalisation and extremism

We will take all reasonable precautions to ensure that students and staff are safe from terrorist and extremist material when accessing the internet on site.

If we are concerned that a child or adult may be at risk of radicalisation online, the DSL will be informed immediately, and action will be taken in line with our Safeguarding Policy

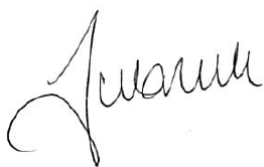
If the concerns relate to a member of staff, the Director will be informed immediately, and action will be taken in line with the safeguarding policies. The LADO will be informed, and guidance will be followed.

Cybercrime

Path Hill Outdoors recognises that children with particular skills and interests in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Reviewed by

A handwritten signature in black ink, appearing to read "A. Smith", is written over a faint, circular watermark or stamp.

Julia Warwick- Director September 2025