

Online Safeguarding Policy

School, College or Other Provider:	<i>Hodgson Academy</i>	
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Approved by SLT		
Date of Approval:	<i>September 2021</i>	
Monitoring and Revision due:	<i>The online safety policy will be reviewed annually. It will also be reviewed to align with national, regional and local legislative or statutory changes.</i> <i>The next anticipated review date will be: September 2022</i>	

Policy Overview:

The purpose of this policy is to safeguard and protect all members of the Hodgson Academy online community by providing a framework to promote and maintain a safe, effective and responsive online safety culture. The policy is applicable to all members of the academy. This includes staff, students and pupils, volunteers, parents/carers, visitors and community users who have access to and are users of the academy's digital technology systems, both internally and externally.

References:

Department for Education (DfE) (2020a) Keeping Children Safe in Education: statutory guidance for schools and colleges. London: DfE.

Department for Education (DfE) (2019b) Teaching online safety in school: guidance supporting schools to teach their pupils how to stay safe online, within new and existing school subjects. London: DfE.

Department for Education (DfE) (2018) Working together to safeguard children. London: DfE

Department for Education (2014) Cyberbullying: Advice for headteachers and school staff. London: DfE.

Children Act 1989

Children Act 2004

Communications Act 2003

Computer Misuse Act 1990

Criminal Justice and Courts Act 2015

Data Protection Act 1998

Data Protection Act 2018

Education Act 2011

Education and Inspections Act 2006

Freedom of Information Act 2000

Malicious Communications Act 1988

Obscene Publications Act

Serious Crime Act 2015

Voyeurism (Offences) Act 2019

This policy links with other policies and practices

- *Anti-bullying*
- *Behaviour policy*
- *Child Protection and Safeguarding policy*
- *Complaints policy*
- *Data protection policy*
- *ICT network and internet access*
- *Staff code of professional practice*
- *Whistleblowing*
- *Electronic communications*
- *Remote learning*

Disclaimer

Every effort has been made to ensure that the information contained within this policy is up to date and accurate and reflective of the latest legislative and statutory guidance. If errors are brought to our attention, we will correct them as soon as is practicable.

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1. Introduction

Online safety in schools is of paramount importance. As the online world evolves, so do both the online harms and risks facing our children and the relevant legislation, both statutory and non-statutory, which directs and guides how schools should meet their online safety requirements.

School staff and governors play a vital role in setting an example for the whole school and are central to implementing policy and process. It is imperative that a whole school community approach to online safety is adopted and that all stakeholders are aware of their responsibilities and duties in relation to keeping children safe online. This will support a robust online safety ethos and ensure that schools are providing the best online safety provision they possibly can.

This policy is applicable to all members of Hodgson Academy. This includes: staff, students and pupils, volunteers, parents/carers, visitors and community users who have access to and are users of the academy's digital technology systems, both internally and externally within the home and community setting.

2. Online Safety Academy Statement

Hodgson Academy asserts that online safety is an essential element of safeguarding and duly acknowledges its statutory obligation to ensure that all learners and staff are protected from potential online harm.

The academy believes that the internet and associated devices are an integral part of everyday life and affirms that all learners should be empowered to build resilience and to develop strategies to recognise and respond to online risks.

3. Policy Scope

Online safety is an omnipresent topic which requires recurrent regulatory review and places a stringent duty of care on us all. This policy supports schools in meeting statutory requirements as per the DfE guidance under KCSiE (2020), Working together to safeguard children (2018) and non-statutory guidance, Teaching online safety in schools (2019). Effective, timely and robust online safety is fundamental to protecting children and young people in education and it is a significant part of the safeguarding agenda.

High quality online safety provision requires constant vigilance and a readiness to act where abuse, exploitation or neglect is suspected. The landscape of safeguarding is constantly evolving, and educational establishments must endeavour to embrace and shape their key priorities in support of this. Education has a vital role to fulfil in protecting children and young people from forms of online abuse whilst demonstrating a concerted obligation to respond with haste and flexibility to concerns as they arise. Above all, all staff must foster dedication to ensuring that they listen to the voices of the vulnerable and act upon what is heard. Safeguarding is everyone's responsibility.

Defining online abuse: *"Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones"* (NSPCC, 2019).

Hidden harms – types of online abuse may include:

- Cyberbullying
- Emotional abuse

- Grooming
- Sexting
- Sexual abuse
- Sexual exploitation

The types, patterns and different circumstances of significant harm and abuse should be considered within the categories identified for children in the Children Act 1989 / 2004. These are:

- Neglect
- Sexual
- Physical
- Emotional

Technology can facilitate a world of learning and development in addition to help yield a range of opportunities. However, the stark reality is that it can also present a window to potential and actual harm and abuse. It can elicit and support an array of illegal abusive behaviours including, but not limited to:

- harassment
- stalking
- threatening behaviour
- creating or sharing child sexual abuse material
- inciting a child to sexual activity
- sexual exploitation
- grooming
- sexual communication with a child
- causing a child to view images or watch videos of a sexual act.

This policy should be read alongside the relevant policies relating to safeguarding of children and in addition to the associated statutory legislation and guidance as stipulated on page 1-2 of this policy.

4. Roles and Responsibilities

The following section outlines the online safety roles and responsibilities of all stakeholders across the online community within Hodgson Academy.

4.1 Teachers and Staff

All members of academy staff (teaching and non-teaching) have a responsibility to protect children online. This includes every member of staff who works at the academy; Headteacher, teachers, substitute teachers, work-experience staff, office staff, nurses, caretakers, cleaners, etc. All teachers and staff must always act in accordance with their own professional boundaries, upholding professional behaviour and conduct at all times.

All academy staff need to:

- Be aware of and adhere to all policies in school which support online safety and safeguarding.
- Contribute to policy development and review.
- Support in the ownership and responsibility for the security of systems and the data accessed.

- Model good practice when using technology.
- Know the process for making referrals and reporting concerns.
- Know how to recognise, respond and report signs of online abuse and harm.
- Receive appropriate child protection training.
- Always act in the best interests of the child.
- Be responsible for their own continuing professional development in online safety.

4.2 Governors and Senior Leadership Team

A governor's role for online safety in the academy should include, but is not limited to:

- Upholding online safety as a safeguarding issue which is embedded across the whole school culture.
- Ensuring that children are provided with a safe environment in which to learn and develop.
- Ensuring that the academy has appropriate filters and monitoring systems in place.
- Ensuring the academy has effective policies and training in place.
- Carrying out risk assessments on effectiveness of filtering systems.
- Auditing and evaluating online safety practice.
- Ensuring there are robust reporting channels.

4.3 Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (Deputy DSL)

With respect to online safety, it is the responsibility of the DSL to:

- Ensure children and young people are being appropriately taught about and know how to use the internet responsibly.
- Ensure teachers and parents are aware of measures to keep children safe online through relevant training provision.
- Take responsibility for all safeguarding matters, including online safety.
- Collaborate with the senior leadership team, the online safety lead and network manager.
- Facilitate effective record keeping and the reporting and monitoring of all online safety concerns.
- Promote online safety and the adoption of a whole school approach.
- Maintain own training and learning needs, ensuring they are up to date with all matters relating to online safety.

4.4 Children and Young People

With respect to online safety in the academy, children need to:

- Know who the DSL is.
- Engage in age appropriate online safety education opportunities.
- Read and adhere to online safety policies.
- Respect the feelings of others, both off and online.
- Take responsibility for keeping themselves and others safe online.
- Where and how to find help with any online incidents or concerns.
- How, when and where to report concerns and when to seek help from a trusted adult.

The UKCCIS 'Education for a Connected World' framework aims to equip children and young people for digital life. It covers:

- Self-image and identity
- Online relationships
- Online reputation
- Online bullying
- Managing online information
- Health, wellbeing and lifestyle
- Privacy and security
- Copyright and ownership

4.5 Parents and Carers

Parents and carers need to understand the risks that children face online to protect them from online dangers. Parents and carers need to:

- Read and adhere to all relevant policies.
- Be responsible when taking photos/using technology at academy events.
- Know who the school DSL is.
- Know how to report online issues.
- Support online safety approaches and education provision.
- Be a role model for safe and appropriate behaviour.
- Identify changes in children's behaviour that could indicate they are at risk of online harm or abuse.

5. Education and Training

Safeguarding activity across the United Kingdom (UK) continues to intensify in volume and intricacy with national influences relating to political uncertainty, a rise in poverty, an increase in the ageing population, sustained funding pressures and increased demand for child and adult services.

Furthermore, a commitment to ensuring the provision of an integrated and highly robust safeguarding service for all ages is essential. Effective online safety provision and promotion of the welfare of children and young people relies upon constructive relationships that are conducive to robust multi-agency partnership working. This can only be effective when all staff are knowledgeable, confident and equipped with the skills to deal with processes and procedures when concerns arise relating to online abuse or harm.

Online safety has a high emphasis on a competent well-established workforce, up to date policies and procedures, robust governance arrangements and collaborative practices. Types of online risk usually fall under one of three categories:

Contact: Contact from someone online who may wish to bully or abuse the child. This could also include online grooming, online harassment or activities of a commercial nature, including tracking and harvesting person information.

Content: Inappropriate material available to children online including: adverts, spam, sponsorship, personal info, violent or hateful content, pornographic or unwelcome sexual content, biased materials, racist materials, and misleading information or advice.

Conduct: The child may be the perpetrator of activities including: illegal downloading, hacking, gambling, financial scams, bullying or harassing another child. They might create and upload inappropriate material or provide misleading information or advice.

5.1 Learners

Hodgson Academy will promote safe and responsible internet use:

- Education regarding safe and responsible use and access of the internet.
- Include online safety in Personal, Social, Health and Economic (PSHE) education, Relationships and Sex Education (RSE) and the curriculum where appropriate.
- Reinforce online safety messages as a continuum.

Hodgson Academy will support learner's understanding based on age and ability:

- Acceptable use posters across the academy.
- Informing all learners of monitoring and filtering in place.
- Implement peer education strategies.
- Provide continuous training and education as part of their transition across key stages.
- Use alternative, complementary support where needed.
- Seeking learner voice.

5.2 Vulnerable Learners

Vulnerable children who need our help the most are not only missing out on opportunities to flourish online but are often experiencing the very worst that the online world can be. Over 2 million children in England are living in families with complex needs. Many children are living in families with domestic abuse, parental substance abuse and mental health problems.

Hodgson Academy recognises that some learners are more vulnerable due to a range of factors. Those children may be:

- Receiving statutory care or support.
- Known to have experienced specific personal harm.
- With a disability, ill-health or developmental difficulties.
- In households or families with characteristics or locations that indicate higher potential likelihood of current and future harm.
- Vulnerable or of concern by virtue of their identity or nationality.
- At risk in relation to activity or institutions outside the home.
- Caring for others.

Hodgson Academy will ensure the effective and safe provision of tailored online safety education and will obtain input and advice from specialist staff as deemed necessary.

5.3 Staff

Hodgson Academy will:

- Ensure provision of robust policies and practices as part of induction and ongoing training provision.
- Provide up to date online safety training at least annually or more in line with legislative and statutory changes and/or online safety incidents arising.
- Ensure training will include recognition of risks and responding to concerns.
- Inform of monitoring and filtering processes.

- Make staff aware that their online conduct outside of work can impact upon their professional role and responsibilities.
- Advise of appropriate resources.
- Ensure that all staff are aware of procedures to follow in recognising, responding and reporting online safety concerns.

5.4 Parents and carers

Hodgson Academy will:

- Recognise and cultivate the essential role parents and carers have in fostering safer online safety practices in children and young people.
- Ensure provision of resources, support and advice.
- Ensure provision and adherence to online safety policies and other policies of relevance.
- Advise of how and when to raise concerns.
- Provide details of all relevant contacts (for example, the DSL).

6. Communications

A wide range of rapidly developing communications technologies has the potential to enhance learning. The following table shows how the school currently considers the benefit of using these technologies for education outweighs their risks / disadvantages:

Communication Technologies	Staff & other adults			Students				
	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Mobile phones may be brought to school	✓				✓			
Use of mobile phones in lessons		✓					✓	
Use of mobile phones in social time	✓							
Taking photos on mobile phones / cameras*		✓					✓	
Use of other mobile devices e.g. tablets, gaming devices	✓					✓		
Use of personal email addresses in school, or on school network	✓				✓			
Use of school email for personal emails	✓			✓				
Use of messaging apps	✓					✓		
Use of social media		✓					✓	
Use of blogs		✓					✓	

**Photographs should be deleted as soon as possible in line with professional working practice. Any photographs that are stored will be done so in line with data protection regulation.*

When using communication technologies the academy considers the following as good practice:

- The official academy email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and students should therefore use only the academy email service to communicate with others when in school, or on academy systems (e.g. by remote access).
- Users must immediately report, to the nominated person – in accordance with academy policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.

- Any digital communication between staff and students or parents / carers (email, chat, VLE etc.) must be professional in tone and content. These communications may only take place on official (monitored) academy systems. Personal email addresses, text messaging or social media must not be used for these communications.
- Students should be taught about online safeguarding issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.
- Personal information should not be posted on the academy website and only official email addresses should be used to identify members of staff.
- Language within all communication should be appropriate to a business environment and the tone should be business-like at all times. The school maintains the right to access and check all school email accounts as agreed in the ICT network and internet access policy.

7. Unsuitable/inappropriate activities

The school believes that the activities referred to in the following section would be inappropriate in a school context and that users, as defined below, should not engage in these activities in school or outside school when using school equipment or systems. The school policy restricts usage as follows:

User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	pornography				X	
	promotion of any kind of discrimination				X	X
	threatening behaviour, including promotion of physical violence or mental harm				X	X
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Using school systems to run a private business					X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school / academy					X	
Infringing copyright					X	X
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)					X	X
Creating or propagating computer viruses or other harmful files					X	X
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)					X	
On-line gaming (educational)		X				
On-line gaming (non educational)					X	
On-line gambling					X	
On-line shopping / commerce			X			
File sharing			X			
Use of social media				X		
Use of messaging apps			X			
Use of video broadcasting e.g. Youtube			X			

8. Cultivating a safe environment

“All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs” (DfE, 2019).

Children should be educated in an age-appropriate way around:

- ✓ How to evaluate what they see online
- ✓ How to recognise techniques for persuasion
- ✓ Their online behaviour
- ✓ How to identify online risks
- ✓ How and when to seek support

8.1 Evaluate: How to evaluate what they see online

This will enable students to make judgements about what they see online and not automatically assume that what they see is true, valid or acceptable.

Hodgson Academy will help students to consider questions including:

- Is this website/URL/email fake? How can I tell?
- What does this cookie do and what information am I sharing?
- Is this person who they say they are?
- Why does someone want me to see this?
- Why does someone want me to send this?
- Why would someone want me to believe this?

8.2 Recognise: How to recognise techniques used for persuasion

This will enable students to recognise the techniques that are often used to persuade or manipulate others. A strong grasp of knowledge across many areas makes people less vulnerable to these techniques and better equipped to recognise and respond appropriately to strongly biased intent or malicious activity.

Hodgson Academy will help students to recognise:

- Online content which tries to make people believe something false is true and/or mislead (misinformation and disinformation).
- Techniques that companies use to persuade people to buy something.
- Ways in which games and social media companies try to keep users online longer (persuasive/sticky design)
- Criminal activities such as grooming.

8.3 Online Behaviour

This will enable students to understand what acceptable and unacceptable online behaviour looks like. The academy will teach students that the same standard of behaviour and honesty applies online and offline, including the importance of respect for others. The academy will also teach students to recognise unacceptable behaviour in others.

Hodgson Academy will help students to recognise acceptable and unacceptable behaviour by:

- Looking at why people behave differently online. For example, how anonymity (you do not know me) and invisibility (you cannot see me) affect what people do.
- Looking at how online emotions can be intensified resulting in mob mentality.
- Teaching techniques (relevant on and offline) to defuse or calm arguments (for example, a disagreement with friends) and disengage from unwanted contact or content online; and
- Considering unacceptable online behaviours often passed off as so-called social norms or just banter. For example, negative language that can be used, and in some cases is often expected, as part of online gaming and the acceptance of misogynistic, homophobic and racist language that would never be tolerated offline.

8.4 Identify: How to identify online risks

This will enable students to identify possible online risks and make informed decisions about how to act. This should not be about providing a list of what not to do online. The focus should be to help students assess a situation, think through the consequences of acting in different ways and decide on the best course of action.

Hodgson Academy will help students to identify and manage risk by:

- Discussing the ways in which someone may put themselves at risk online.
- Discussing risks posed by another person's online behaviour.
- Discussing when risk taking can be positive and negative.
- Discussing "online reputation" and the positive and negative aspects of an online digital footprint. This could include longer-term considerations; i.e. how past online behaviours could impact on their future when applying for a place at university or a job for example.
- Discussing the risks vs the benefits of sharing information online and how to make a judgement about when and how to share and who to share with.
- Asking questions such as what might happen if I post something online? Who will see it? Who might they send it to?

8.5 How and when to seek support

This will enable students to understand safe ways in which to seek support if they are concerned or upset by something they have seen online.

Hodgson Academy will help students by:

- Helping them to identify who trusted adults are.
- Looking at the different ways to access support from the school, police, the National Crime Agency's Click CEOP reporting service for children and 3rd sector organisations, such as Childline and the Internet Watch Foundation. This should link to wider school policies and processes around reporting of safeguarding and child protection incidents and concerns to school staff (see Keeping Children Safe in Education).
- Helping them to understand that various platforms and apps will have ways in which inappropriate contact or content can be reported.

9. Responding to Online Safety Concerns

The safety of the child and young person is of paramount importance. Immediate action may be required to safeguard investigations and any other children and young people. Any concern that children and young people may be at risk of harm or abuse must immediately be reported. Reputational issues must be managed appropriately by discussion with the relevant communications team.

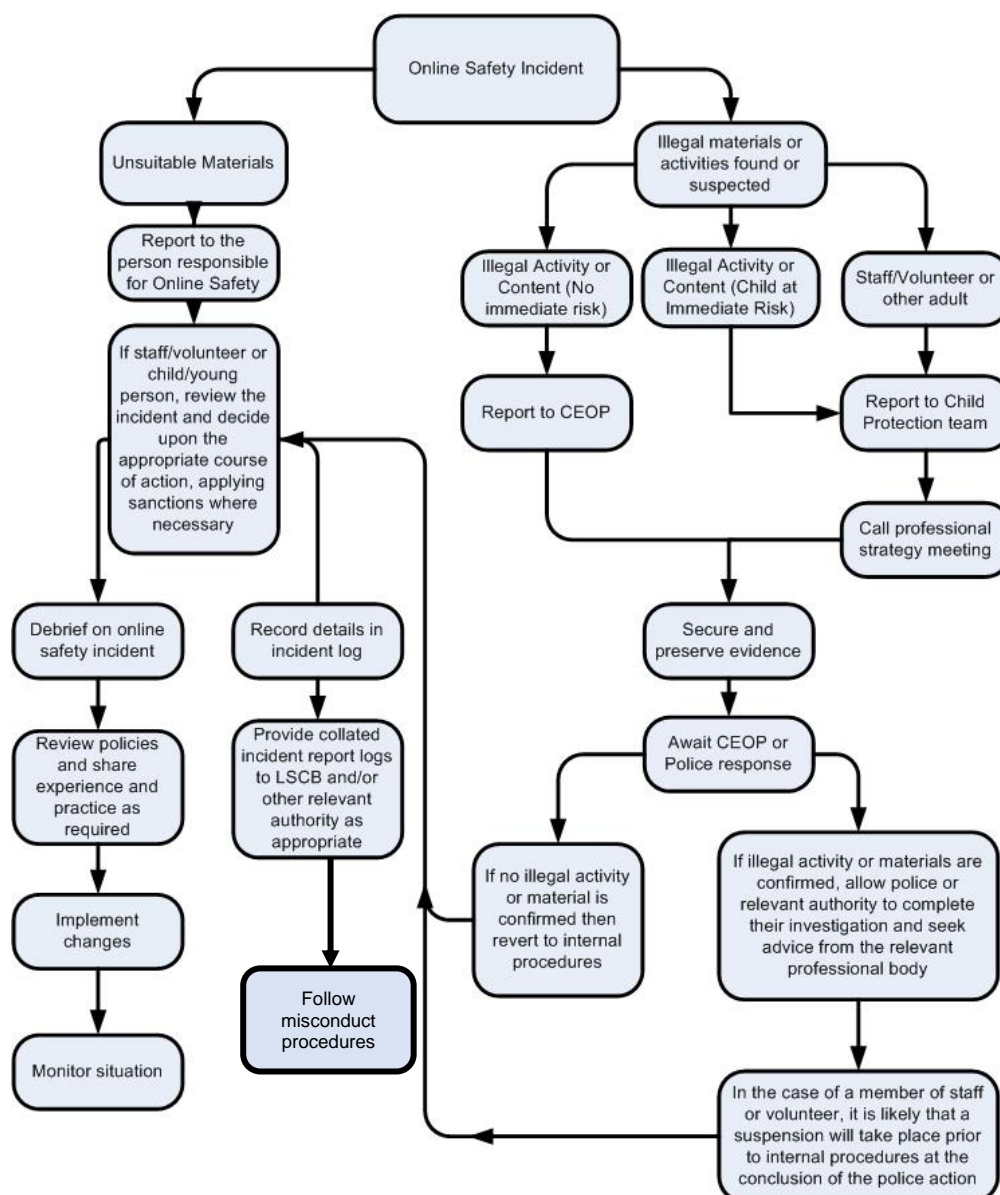
Online safety is recognised as part of the education settings safeguarding responsibilities – the DSL should take lead responsibility for online safety concerns which should be recorded and actioned. Children and young people will be enabled (at a level appropriate to their age and ability) to share online concerns.

Remember:

- Child welfare is of principal concern – the best interests of children take precedence.
- If there is any immediate danger, contact the police on 999.
- Refer to all appropriate agencies as per the academy processes.
- Always adhere to safeguarding procedures and report to the DSL and Headteacher within the academy where applicable.

Illegal Incidents

If there is any suspicion that the web site(s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right hand side of the Flowchart for responding to online safety incidents and report immediately to the police.



Other Incidents

It is hoped that all members of the academy community will be responsible users of digital technologies, who understand and follow academy policy. However, there may be times when infringements of the policy could take place, through careless or irresponsible or, very rarely, through deliberate misuse.

In the event of suspicion, all steps in this procedure should be followed:

- Have more than one senior member of staff / volunteer involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of

the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below)

- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does then appropriate action will be required and could include the following:
 - Internal response or discipline procedures
 - Involvement by Local Authority or national / local organisation (as relevant).
 - Police involvement and/or action
- **If content being reviewed includes images of Child abuse then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:**
 - incidents of 'grooming' behaviour
 - the sending of obscene materials to a child
 - adult material which potentially breaches the Obscene Publications Act
 - criminally racist material
 - other criminal conduct, activity or materials
- **Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.**

It is important that all of the above steps are taken as they will provide an evidence trail for the academy and possibly the police and demonstrate that visits to these sites were carried out for child protection purposes. The completed form should be retained by the group for evidence and reference purposes.

Academy Actions & Sanctions

It is more likely that the academy will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the academy community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour /disciplinary procedures. Not following this policy could lead to a warning, suspension or disciplinary action. If any individual was suspected of the breaking the law they would be referred to the police.

E-safe

The Academy are registered with e-safe to ensure that any safeguarding incidents that arise from computer use by students is identified and an incident report is sent to the online safeguarding officer, the Headteacher and the Deputy Headteacher. The incident depending on its severity can then be referred to the relevant staff members and/or external agencies. In addition to this any use of inappropriate language or searches will also be highlighted so that they may be dealt with accordingly. All students and staff have been made aware of the installation of e-safe across school and how it works.

10. Responding to Complaints

There are a number of sources from which a complaint or allegation might arise, including those from:

- A child or young person
- An adult
- A parent/carer
- A member of the public (including a friend or relative)
- A colleague

There may be up to three components in the consideration of an allegation:

- A police investigation of a possible criminal offence.
- Enquiries and assessment by children's social care or adult social care relating to whether a child, young person or adult at risk is in need of protection or services.
- Consideration by an employer of disciplinary action in respect of the individual (including suspension).

It is also the responsibility of the member of staff to inform their line manager if they are being investigated in relation to children, young people or adults at risk with respect to protection concerns outside of work. They should also report if their own children/stepchildren/children they are living with become subject to child protection matters or an adult related to them or living with them become subject to adult protection matters. The line manager must report this to the Headteacher.

9. Monitoring and Compliance

Monitoring Requirements	Analysing of incident logs CPOMS and eSafe Curriculum overview on teaching of online safety Student and parents and carers questionnaires and engagement Governors update
Monitoring Prepared by	Shabnam Khan (Deputy Headteacher) Fiona Bate (Deputy Headteacher) Laura Foley (Assistant Headteacher)
Monitoring Presented to	Governors and SLT
Frequency of Reporting	Annual