On-Line Safety Policy

This policy applies to all members of the school community (including staff, pupils, volunteers, parents / carers, visitors, community users) who have access to and are users of school digital technology systems, both in and out of the school.

The Education and Inspections Act 2006 empowers Head Teachers to such extent as is reasonable, to regulate the behaviour of pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of online-bullying or other Online Safety incidents covered by this policy, which may take place outside of the school, but is linked to membership of the school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data. In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

The school will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents / carers of incidents of inappropriate Online Safety behaviour that take place out of school.

Roles and Responsibilities

The following section outlines the online safety roles and responsibilities of individuals and groups within the school:

Governors

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the Governors receiving regular information about online safety incidents and monitoring reports. A member of the Governing Body has taken on the role of Online Safety Governor (it is suggested that the role may be combined with that of the Child Protection / Safeguarding Governor). The role of the Online Safety Governor will include:

- regular meetings with the Online Safety Co-ordinator
- attendance at Online Safety Group meetings
- regular monitoring of online safety incident logs
- regular monitoring of filtering / change control logs
- reporting to relevant Governors meeting

Head Teacher and Senior Leaders

- The Head Teacher has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety will be delegated to the Online Safety Officer.

- The Head Teacher and (at least) another member of the Senior Leadership Team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff. (see flow chart on dealing with online safety incidents – included in a later section – "Responding to incidents of misuse" and relevant Local Authority disciplinary procedures). • The Head Teacher / Senior Leaders are responsible for ensuring that the Online Safety Officer and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.

- The Head Teacher / Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.

- The Senior Leadership Team will receive regular monitoring reports from the Online Safety Officer.

Online Safety Officer

- leads the Online Safety Group.

- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies / documents.

- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.

- provides training and advice for staff.

- liaises with the Local Authority.

- liaises with school technical staff.

- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments.

- meets regularly with Online Safety Governor to discuss current issues, review incident logs and filtering / change control logs.

- attends relevant meetings.

- reports regularly to Senior Leadership Team.

Network Manager / Technical staff

The Network Manager / Technical Staff is responsible for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack.
- that the school meets required online safety technical requirements and Local Authority / other relevant body Online Safety Policy / Guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed.
- the filtering policy (if it has one), is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person.
- that they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant.
- that the use of the network / internet / Learning Platform / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Head Teacher/ Senior Leader; Online Safety Officer for investigation / action / sanction.
- that monitoring software / systems are implemented and updated as agreed in school policies.

Teaching and Support Staff

Are responsible for ensuring that:

- they have an up to date awareness of online safety matters and of the current school Online Safety Policy and practices.
- they have read, understood and signed the Staff Acceptable Use Policy / Agreement (AUP).
- they report any suspected misuse or problem to the Head Teacher / Senior Leader ; Online Safety Officer for investigation / action / sanction.
- all digital communications with pupils / parents / carers should be on a professional level and only carried out using official school systems.
- online safety issues are embedded in all aspects of the curriculum and other activities.
- pupils understand and follow the Online Safety Policy and acceptable use policies.
- pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations.
- they monitor the use of digital technologies, mobile devices, cameras etc. in lessons and other school activities (where allowed) and implement current policies with regard to these devices.

- in lessons where internet use is pre-planned pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.

Designated Safeguarding Lead

Should be trained in Online Safety issues and be aware of the potential for serious child protection / safeguarding issues to arise from:

- sharing of personal data.
- access to illegal / inappropriate materials.
- inappropriate on-line contact with adults / strangers.
- potential or actual incidents of grooming.
- online-bullying.

Parents / Carers

Parents / Carers play a crucial role in ensuring that their children understand the need to use the internet / mobile devices in an appropriate way. The school will take every opportunity to help parents understand these issues through parents' meetings, newsletters, letters, website / Learning Platform and information about national / local online safety campaigns / literature. Parents / carers will be encouraged to support the school in promoting good online safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events.
- access to parents' sections of the website / Learning Platform and on-line pupil records.

Community Users

Community Users who access school systems / website / Learning Platform as part of the wider school provision will be expected to sign a Community User AUA before being provided with access to school systems.

Policy Statements

Education – Pupils

Whilst regulation and technical solutions are very important, their use must be balanced by educating pupils to take a responsible approach. The education of pupils in online safety / digital literacy is therefore an essential part of the school's online safety provision. Children and young people need the help and support of the school to recognise and avoid online safety risks and build their resilience.

Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways:

- A planned online safety curriculum should be provided as part of Computing / PHSE / other lessons and should be regularly revisited.

- Key online safety messages should be reinforced as part of a planned programme of assemblies / pastoral activities.

- pupils should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information.

- pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet.

- pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. N.b. additional duties for schools under the Counter Terrorism and Securities Act 2015, which requires schools to ensure that children are safe from terrorist and extremist material on the internet.

- pupils should be helped to understand the need for the pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school.

- Staff should act as good role models in their use of digital technologies, the internet and mobile devices.

- in lessons where internet use is pre-planned, it is best practice that pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.

- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.

- It is accepted that from time to time, for good educational reasons, students may need to research topics (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

Education – Parents / Carers

Many parents / carers have only a limited understanding of online safety risks and issues, yet they play an essential role in the education of their children and in the monitoring / regulation of the children's online behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

The school will therefore seek to provide information and awareness to parents / carers through: (select / delete as appropriate)

- Curriculum activities
- Letters, newsletters, web site
- Parents / Carers evenings / sessions
- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant web sites / publications e.g. swgfl.org.uk www.saferinternet.org.uk/ http://www.childnet.com/parents-and-carers

Training – Governors

Governors should take part in online safety training / awareness sessions, with particular importance for those who are members of any subcommittee / group involved in technology / online safety / health and safety /safeguarding. This may be offered in a number of ways:

- Attendance at training provided by the Local Authority /National Governors Association / or other relevant organisation.
- Participation in school training / information sessions for staff or parents.

Technical – infrastructure / equipment, filtering and monitoring.

If the school has a managed ICT service provided by an outside contractor, it is the responsibility of the school to ensure that the managed service provider carries out all the online safety measures that would otherwise be the responsibility of the school, as suggested below. It is also important that the managed service provider is fully aware of the school Online Safety Policy / Acceptable Use Agreements. The school should also check with the Local Authority /other relevant body policies on these technical issues.

The school will be responsible for ensuring that the school infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their online safety responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements.
- There will be regular reviews and audits of the safety and security of school technical systems.
- Servers, wireless systems and cabling must be securely located and physical access restricted.
- All users will have clearly defined access rights to school technical systems and devices.

- All users will be provided with a username and secure password by Primary Tech who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password and will be required to change their password.

- The “master / administrator” passwords for the school IT systems, used by the Network Manager must also be available to the Head Teacher or other nominated senior leader and kept in a secure place.

- Primary Tech is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations (Inadequate licencing could cause the school to breach the Copyright Act which could result in fines or unexpected licensing costs).

- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored. There is a clear process in place to deal with requests for filtering changes (see appendix for more details).

- Internet filtering / monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet. N.b. additional duties for schools under the Counter Terrorism and Securities Act 2015 which requires schools to ensure that children are safe from terrorist and extremist material on the internet. (see appendix for information on “appropriate filtering”).

- The school has provided enhanced / differentiated user-level filtering (allowing different filtering levels for different ages / stages and different groups of users – staff / pupils / students etc.)

- School technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement.

- An appropriate system is in place for users to report any actual / potential technical incident / security breach to the relevant person, as agreed.

- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc. from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents / carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for cyberbullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about

potential and existing employees. The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular, they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.

- Written permission from parents or carers will be obtained before photographs of pupils are published on the school website / social media / local press (may be covered as part of the AUA signed by parents or carers at the start of the year

- Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those images should only be taken on school equipment; the personal equipment of staff should not be used for such purposes.

- Care should be taken when taking digital / video images that pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.

- Pupils must not take, use, share, publish or distribute images of others without their permission.

- Photographs published on the website, or elsewhere that include pupils will be selected carefully and will comply with good practice guidance on the use of such images.

- Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.

- Pupil's work can only be published with the permission of the pupil and parents / carers.

Data Protection

With effect from 25th May 2018, the data protection arrangements for the UK change following the European Union General Data Protection Regulation (GDPR) announced in 2016. As a result, schools are likely to be subject to greater scrutiny in their care and use of personal data. More detailed guidance is available in the appendices to this document. Schools should ensure that they take account of policies and guidance provided by local authorities or other relevant bodies. Personal data will be recorded, processed, transferred and made available according to the current data protection legislation.

The school must ensure that:

- It has a Data Protection Policy (see appendix for template policy).

- It has paid the appropriate fee to the Information Commissioner's Office (ICO).

- It has appointed a Data Protection Officer (DPO). The school may also wish to appoint a Data Manager and systems controllers to support the DPO.

- It will hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for.
- Data held must be accurate and up to date. Inaccuracies are corrected without unnecessary delay.
- The lawful basis for processing personal data (including, where relevant, consent) has been identified and documented and details provided in a Privacy Notice.
- Where special category data is processed, a lawful basis and a separate condition for processing have been identified.
- Data Protection Impact Assessments (DPIA) are carried out.
- It has clear and understood arrangements for access to and the security, storage and transfer of personal data, including, where necessary, adequate contractual clauses or safeguards where personal data is passed to third parties e.g. cloud service providers.
- Procedures must be in place to deal with the individual rights of the data subject i.e. a Subject Access Requests to see all or a part of their personal data held by the data controller.
- There are clear and understood data retention policies and routines for the deletion and disposal of data.
- There is a policy for reporting, logging, managing and recovering from an information risk incident which recognises the requirement to report relevant data breaches to the ICO within 72 hours of the breach, where feasible.
- Consideration has been given to the protection of personal data when accessed using any remote access solutions.
- All schools must have a Freedom of Information Policy which sets out how it will deal with FOI requests.
- All staff receive data handling awareness / data protection training and are made aware of their responsibilities.

Staff must ensure that they: (schools / academies may wish to include more detail about their own data / password / encryption / secure transfer processes)

- At all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse.
- Use personal data only on secure password protected computers and other devices, ensuring that they are properly “logged-off” at the end of any session in which they are using personal data.
- Transfer data using encryption and secure password protected devices.

When personal data is stored on any portable computer system, memory stick or any other removable media:

- The data must be encrypted and password protected.

- The device must be password protected (many memory sticks / cards and other mobile devices cannot be password protected).
- The device must offer approved virus and malware checking software.
- The data must be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete.

The Personal Data Advice and Guidance in the appendix provides more detailed information on the school's responsibilities and on good practice.

Responding to incidents of misuse

This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities (see "User Actions" above). Online Safety BOOST includes a comprehensive and interactive 'Incident Management Tool' that steps staff through how to respond, forms to complete and action to take when managing reported incidents (https://boost.swgfl.org.uk/)

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 (below and appendix) for responding to online safety incidents and report immediately to the police.

Other Incidents

It is hoped that all members of the school will be responsible users of digital technologies, who understand and follow school 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 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
  - 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
  - promotion of terrorism or extremism
  - 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 school and possibly the police and demonstrate that visits to these sites were carried out for safeguarding purposes. The completed form should be retained by the group for evidence and reference purposes.

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