Online Safety Policy

Background and Rationale

New technologies have become integral to the lives of children and young people in today's society, both within schools and in their lives outside school.
Our school online policy helps to ensure safe and appropriate use of ICT by children at all times.

Development and Monitoring

This online safety policy has been developed by members including the Head teacher, ICT subject leader, deputy safeguarding officer, non-teaching staff member, governor and parent.

Consultation with the whole school community has taken place through the following:

- Staff meetings
- INSET day
- Governor meeting/sub committee meeting
- Parents evenings

The school will monitor the impact of the policy using:

- Logs of reported incidents
- SWGfL monitoring logs of internet activity (including sites visited)
- Internal monitoring data for network activity
- Surveys / questionnaires of - pupils (eg CEOP ThinkUknow survey)
  parents/carers
  staff

Scope of the 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 ICT systems, both in and out of school.
The Education and Inspections Act 2006 empowers Headteachers, 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.
The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data (see appendix for template policy). 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.

Schedule for Development / Monitoring / Review

The policy will be monitored and reviewed annually. The Computing Subject Leader will report back to the DSL who will take the appropriate action required. Any incidents will be reported to full governors as part of the termly safeguarding data collection report.

Roles and Responsibilities

Governors

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. The Full Governing Body receive regular information about online safety incidents and monitoring reports. As Online Safety forms an integral part of safeguarding duties, the designated safeguarding governor will report back at Full Governing Body meetings. This will include regularly monitoring of online safety incident logs as part of the termly safeguarding report.

Head teacher, ICT Coordinator and Nominated Governor:

• The Head teacher is responsible for ensuring the safety (including online safety) of members of the school community, though the day-to-day responsibility for online safety will be shared with the Online Safety Team.
• The Headteacher and a member of the SLT/Governing Body 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 SWGfL flow chart on dealing with online safety incidents – included in a later section – "Responding to incidents of misuse" and relevant Local Authority HR /disciplinary procedures)
• that the school meets the online safety technical requirements outlined in the SWGfL Security Policy. and Acceptable Usage Policy and any relevant Local Authority Online safety Policy and guidance.
• that users may only access the school's networks through a properly enforced password protection policy.

Online Safety Team

•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 and technical support staff.
•receives reports of online safety incidents and creates a log of incidents to inform future online safety developments.
•meets with the Safeguarding Governor to discuss current issues, review incident logs and filtering/change control logs.

Network Manager/Technical Staff

Those with technical responsibilities are responsible for ensuring:

•ensures that the school's ICT infrastructure is secure and is not open to misuse or malicious attack.

•ensures that the school meets the online safety technical requirements and any Local Authority online safety policy and guidance that may apply.

•ensures that users may only access the school's networks through a properly enforced password protection policy.

•the filtering policy is applied and updated on a regular basis and that its implementation is not just the sole responsibility of a 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 networks/internet/digital technologies is regularly monitored in order that any misuse/attempted misuse can be reported to the headteacher for investigation/action/sanction.

•that monitoring software/systems are implemented and updated as agreed in school policies.

Teaching and Support Staff:

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 school Acceptable Internet Use Statement.
- they report any suspected misuse or problem to the Head teacher, Online Safety Team or Nominated Governor.
- digital communications with pupils (email / Virtual Learning Environment (VLE) / voice) 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 school activities.
- pupils understand and follow the school online safety and acceptable use policy.
- 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 / Child Protection Officer

Should be trained in online safety issues and be aware of the potential for serious child protection 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

Pupils:

Pupils are responsible for ensuring that:

• they use the school digital technology systems in accordance with the Pupil Acceptable Use Statement, which they will be expected to sign before being given access to school systems.

•have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations.

•need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so.

•will be expected to know and understand school policies on the use of mobile devices, digital cameras and hand held devices. They should also know and understand school policies on the taking / use of images and on online -bullying.

•should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school, if related to their membership of the school.

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 therefore take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website and information about online safety campaigns. 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 / VLP and on-line student / pupil records

Community Users:

Community Users who access school ICT systems/ website as part of the Extended School provision will be expected to sign a Community Use Agreement 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 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 programme should be provided as part of Computing/PSHE/literacy lessons and should be regularly revisited – this will cover both the use of ICT and new technologies in school and outside school.
- Key online safety messages should be reinforced as part of assemblies.
- Pupils should be taught in all lessons to be critically aware of the materials/content they access online 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.
- Pupils should be helped to understand the need for the pupil Acceptable Use Policy and encouraged to adopt safe and responsible use of ICT, the internet and mobile devices 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 students/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 students/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 and 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 on-line behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and be unsure about how to respond.

The school will therefore seek to provide information and awareness to parents and carers through:

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

Education – The Wider Community

The school will provide opportunities for local community groups / members of the community to gain from the school's online safety knowledge and experience. This may be offered through the following:

- Online safety messages targeted towards grandparents and other relatives as well as parents.
- The school website will provide online safety information for the wider community

Education & Training – Staff and Governors

It is essential that all staff receive online safety training and understand their responsibilities, as outlined in this policy.

Training will be offered as follows:

• The school will ensure that all staff are up to date with online safety procedures. Training will be made available as and when appropriate.

• All new staff will receive the Acceptable Use Policy as part of their induction programme.

Technical – infrastructure / equipment, filtering and monitoring

The school will be responsible for ensuring that the school 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 the online safety recommended technical requirements outlined in this policy and Acceptable Usage Policy and any relevant Local Authority Online safety Policy and guidance.

• All users will have clearly defined access rights to school technical systems and devices.

•Servers, wireless systems and cabling must be securely located and physical access restricted.

• All users (at KS2) will be provided with a username and secure password by the Online Safety Team 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 annually.

• The "administrator" passwords for the school ICT system, must also be available to the Headteacher and kept in a secure place.

• The Online Safety Team is responsible for ensuring that software license logs are accurate and up to date and that regular checks are made to reconcile the number of licenses purchased against the number of software installations.

• Internet access is filtered for all users via SWGfL.

• Internet filtering/monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet.

• School technical staff regular 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 agreed policy is in place regarding the use of memory sticks – if personal data is involved it has to be encrypted.

Mobile Technologies (including BYOD/BYOT)

Mobile technology devices may be school owned/provided or personally owned and might include: smartphone, tablet, notebook / laptop or other technology that usually has the capability of utilising the school's wireless network. The device then has access to the wider internet which may include the school's learning platform and other cloud based services such as email and data storage.

All users should understand that the primary purpose of the use mobile / personal devices in a school context is educational. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school's online safety education programme.

	School Devices			Personal Devices		
	School owned for single user	**School owned for multiple users**	**Authorised device**[1]	**Student owned**	**Staff owned**	**Visitor owned**
Allowed in school	*Yes*	*Yes*	*Yes*	*No*	*Yes*	*Yes*
Full network access	*Yes*	*Yes*	*Yes*	*No*	*No*	*No*
Internet only	*Yes*	*Yes*	*Yes*	*No*	*Yes*	*Yes (4G only)*

Use of digital and video images - Photographic, Video

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 and pupils need to be aware of the risks associated with sharing images and with posting digital images on the internet. Such images may provide avenues for online bullying 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.

• Consent from parents or carers will be obtained before photographs of pupils are published on the school website.

• In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases

[1]

protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other pupils in the digital/video images. There may be events where the school will film or photograph the event and we ask the parents not to film it personally.

- 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 or carers.

Data Protection

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.
- It has paid the appropriate fee to the Information Commissioner's Office (ICO) and included details of the Data Protection Officer (DPO).
- It has appointed a Data Protection Officer (DPO) who has a high level of understanding and is free from any conflict of interest.
- It has an 'information asset register' in place and knows exactly what personal data it holds, where this data is held, why and which member of staff has responsibility for managing it.
- The information asset register records the lawful basis for processing personal data (including, where relevant, how consent was obtained and refreshed). Where special category data is processed, an additional lawful basis will have also been recorded.
- It will hold only 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. The school should develop and implement a 'retention policy" to ensure there are clear and understood policies and routines for the deletion and disposal of data to support this. Personal data held must be accurate and up to date where this is necessary for the purpose it is processed for. Have systems in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals.
- It provides staff, parents, volunteers, teenagers and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice.
- Procedures must be in place to deal with the individual rights of the data subject, e.g. one of the 8 data subject rights applicable is that of Subject Access which enables an individual to see to have a copy of the personal data held about them (subject to certain exceptions which may apply).

- Data Protection Impact Assessments (DPIA) are carried out where necessary. For example, to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier (this may also require ensuring that data processing clauses are included in the supply contract or as an addendum).
- IT system security is ensured and regularly checked. Patches and other security essential updates are applied promptly to protect the personal data on the systems. Administrative systems are securely ring fenced from systems accessible in the classroom/to learners.
- It has undertaken appropriate due diligence and has required data processing clauses in contracts in place with any data processors where personal data is processed.
- It understands how to share data lawfully and safely with other relevant data controllers.
- It **reports any relevant breaches to the Information Commissioner** within 72hrs of becoming aware of the breach in accordance with UK data protection law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents.
- If a maintained school, it must have a Freedom of Information Policy which sets out how it will deal with FOI requests.
- All staff receive data protection training at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff.

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.
- 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.

Staff must ensure that they:

- At all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse.
- Can recognise a possible breach, understand the need for urgency and know who to report it to within the school.
- Can help data subjects understands their rights and know how to handle a request whether verbal or written. Know who to pass it to in the school.
- 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.
- Will not transfer any school/personal data to personal devices except in line with school policy.
- Access personal data sources and records 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.

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:

	Staff & other adults				Students / Pupils			
Communication Technologies	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 or other camera devices		□*						□
Use of hand held devices eg PDAs, PSPs		□						□
Use of personal email addresses in school, or on school network		□						□
Use of school email for personal emails				□	□			
Use of chat rooms / facilities				□				□
Use of instant messaging		□						□
Use of social networking sites				□				□
Use of blogs	□						□	

- *Unless used for a school specific task, e.g. recording for a webinar, contractors recording photographic evidence. Permission will be sought and a record kept. Photographs removed on task completion. Used in reference with the adult acceptable use policy and other school policies. A school google form will be requested to be completed by any person using their mobile/device in this way.

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

• The official school email service may be regarded as safe and secure and is monitored. Users need to be aware that email communications may be monitored

• Users must immediately report, to the nominated person – in accordance with the school policy, the receipt of any email that makes them feel uncomfortable, is offensive, threatening or bullying in nature and must not respond to any such email.
• Any digital communication between staff and pupils or parents/carers must be professional in tone and content.

Social Media – Protecting Professional Identity

All schools and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Schools and local authorities could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, online bully, discriminate on the grounds of sex, race or disability or who defame a third party may render the school or local authority liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to pupils, staff and the school through:
• Ensuring that personal information is not published.
• Training is provided including: acceptable use; social media risks; checking of settings; data protection; reporting issues.
• Clear reporting guidance, including responsibilities, procedures and sanctions.
• Risk assessment, including legal risk.

School staff should ensure that:
• No reference should be made in social media to students/pupils, parents/carers or school staff.
• They do not engage in online discussion on personal matters relating to members of the school community.
• Personal opinions should not be attributed to the *school* or local authority.
• Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.

Personal Use:
• Personal communications are those made via a personal social media accounts. In all cases, where a personal account is used which associates itself with the school or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.
• Personal communications which do not refer to or impact upon the school are outside the scope of this policy.
• Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken.

Dealing with unsuitable/inappropriate activities

Some internet activity e.g. accessing child abuse images or distributing racist material is illegal and would obviously be banned from school and all other technical systems. Other activities e.g. cyberbullying would be banned and could lead to criminal prosecution. There are however a range of activities which may, generally, be legal but would be inappropriate in a school context, either because of the age of the users or the nature of those 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 /or outside the school when using school equipment or systems. The school policy restricts usage as follows:

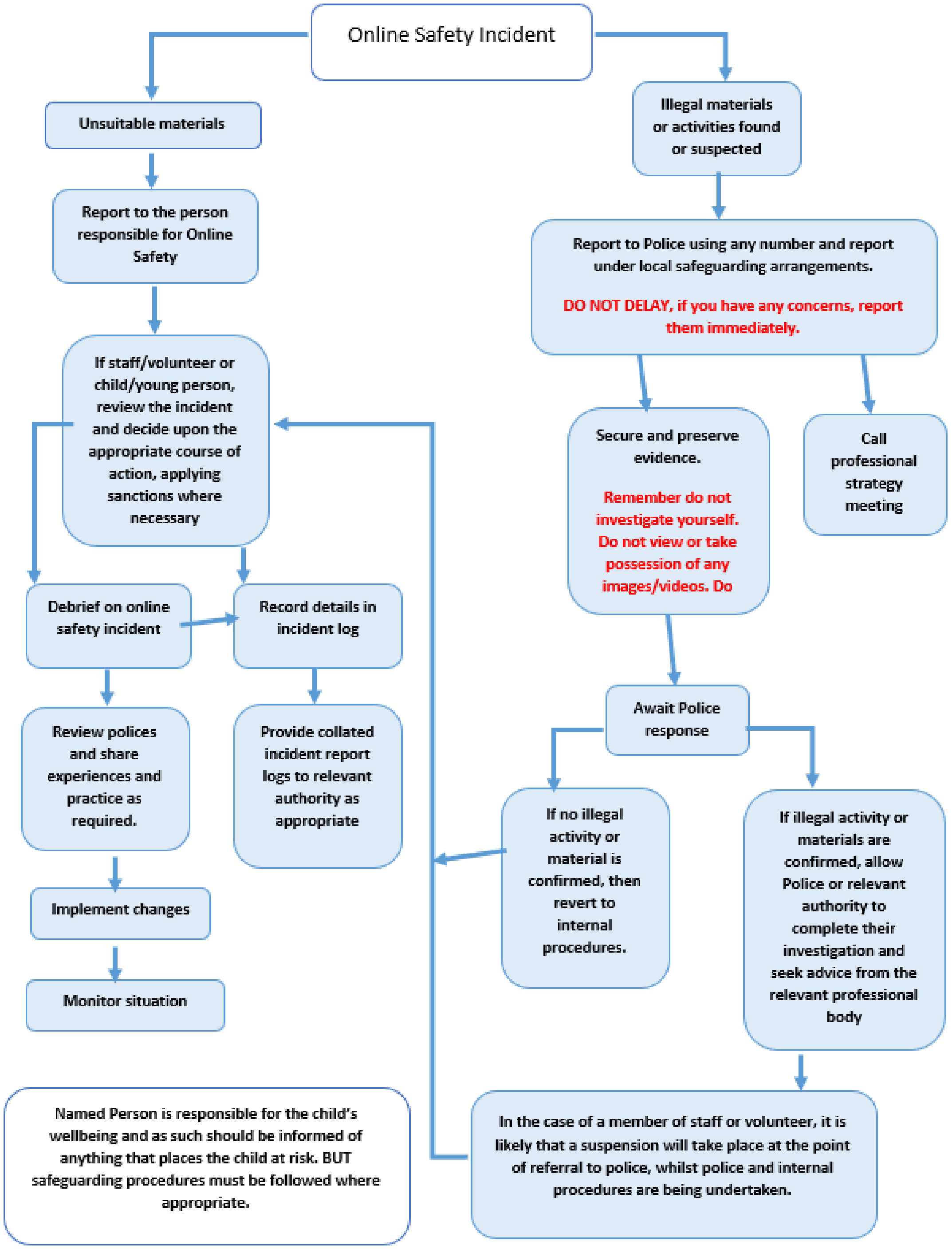
User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	**Child 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	
	Threatening behaviour, including promotion of physical violence or mental harm				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	
Activities that might be classed as cyber-crime under the Computer Misuse Act: ● Gaining unauthorised access to school networks, data and files, through the use of computers/devices ● Creating or propagating computer viruses or other harmful files ● Revealing or publicising confidential or proprietary information (e.g. financial / personal information, databases, computer / network access codes and passwords) ● Disable/Impair/Disrupt network functionality through the use of computers/devices ● Using penetration testing equipment (without relevant permission)						X
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school					X	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)					X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)					X	
Using school systems to run a private business					X	
Infringing copyright					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		

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).

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


Online Safety Incident
Unsuitable materials
Illegal materials or activities found or suspected
Report to the person responsible for Online Safety
Report to Police using any number and report under local safeguarding arrangements.
DO NOT DELAY, if you have any concerns, report them immediately.
If staff/volunteer or child/young person, review the incident and decide upon the appropriate course of action, applying sanctions where necessary
Secure and preserve evidence.
Remember do not investigate yourself. Do not view or take possession of any images/videos. Do
Call professional strategy meeting
Debrief on online safety incident
Record details in incident log
Await Police response
Review polices and share experiences and practice as required.
Provide collated incident report logs to relevant authority as appropriate
If no illegal activity or material is confirmed, then revert to internal procedures.
If illegal activity or materials are confirmed, allow Police or relevant authority to complete their investigation and seek advice from the relevant professional body
Implement changes
Monitor situation
Named Person is responsible for the child's wellbeing and as such should be informed of anything that places the child at risk. BUT safeguarding procedures must be followed where appropriate.
In the case of a member of staff or volunteer, it is likely that a suspension will take place at the point of referral to police, whilst police and internal procedures are being undertaken.

Other incidents

It is hoped that all members of the school community will be responsible users of digital technology, who understand and follow this 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 school 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.

School Actions & Sanctions

Pupils — Actions/Sanctions

Incidents	Refer to class teacher	Refer to Head of Department	Refer to Head teacher	Refer to police	Refer to technical support staff for action re. filtering/security etc.	Inform parents/carers	Removal of network /internet access rights	Warning	Further sanction e.g exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		X	X	X		X		X	
Unauthorised use of non-educational sites during lessons	X	X	X		X	X		X	
Unauthorised use of mobile phone / digital camera / other mobile device	X	X	X		X	X		X	
Unauthorised use of social media / messaging apps / personal email	X	X	X		X	X		X	
Unauthorised downloading or uploading of files	X	X	X			X		X	
Allowing others to access school / academy network by sharing username and passwords	X	X	X			X		X	
Attempting to access or accessing the school / academy network, using another student's / pupil's account	X	X	X			X		X	
Attempting to access or accessing the school / academy network, using the account of a member of staff	X	X	X			X		X	
Corrupting or destroying the data of other users	X	X	X			X	X	X	
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X	X	X			X	X	X	
Continued infringements of the above, following previous warnings or sanctions	X	X	X	X		X	X		
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school			X			X	X	X	
Using proxy sites or other means to subvert the school's / academy's filtering system		X	X		X			X	
Accidentally accessing offensive or pornographic material and failing to report the incident	X	X	X		X	X			
Deliberately accessing or trying to access offensive or pornographic material	X	X	X	X		X	X	X	
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act	X	X	X			X			

School Actions & Sanctions (cont.)

Staff

Incidents	Refer to line manager	Refer to Head teacher	Refer to Local Authority/HR	Refer to police	Refer to Technical Support Staff for action re filtering, etc	Warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).	X	X	X	X		X		X
Inappropriate personal use of the internet / social media / personal email		X				X		X
Unauthorised downloading or uploading of files		X				X		X
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account		X			X	X		X
Careless use of personal data eg holding or transferring data in an insecure manner		X				X		X
Deliberate actions to breach data protection or network security rules	X	X			X	X		X
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	X	X			X	X		X
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X	X	X			X		X
Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with students / pupils		X				X		X
Actions which could compromise the staff member's professional standing	X	X	X			X		X
Actions which could bring the school / academy into disrepute or breach the integrity of the ethos of the school / academy	X	X	X			X		X
Using proxy sites or other means to subvert the school's / academy's filtering system		X	X		X	X		
Accidentally accessing offensive or pornographic material and failing to report the incident		X			X			X
Deliberately accessing or trying to access offensive or pornographic material	X	X	X	X			X	X
Breaching copyright or licensing regulations		X				X		
Continued infringements of the above, following previous warnings or sanctions	X	X	X					X

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Every effort has been made to ensure that the information included in this document is accurate, as at the date of publication in January 2020. However, SWGfL cannot guarantee its accuracy, nor can it accept liability in respect of the use of the material.

Appendix

Appendix 1
School Technical Security Policy Template (including filtering and passwords)

Appendix 2
Acceptable Use Policies – Staff and Volunteers
Older Children (Key Stage 2)
Younger Children (Reception/Key Stage 1)

Appendix 1

School Technical Security Policy (including filtering and passwords)

Introduction

Effective technical security depends not only on technical measures, but also on appropriate policies and procedures and on good user education and training. The school will be responsible for ensuring that the *school infrastructure/network* is as safe and secure as is reasonably possible and that:

- users can only access data to which they have right of access
- no user should be able to access another's files (other than that allowed for monitoring purposes within the school's policies).
- access to personal data is securely controlled in line with the school's personal data policy
- logs are maintained of access by users and of their actions while users of the system
- there is effective guidance and training for users
- there are regular reviews and audits of the safety and security of school computer systems
- there is oversight from senior leaders and these have impact on policy and practice.

Responsibilities

The management of technical security will be the responsibility of Online Safety Team which consists of the lead administrator, headteacher and a technical support consultant.

Technical Security

Policy statements

The school will be responsible for ensuring that their 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 receive guidance and training and will be effective in carrying out their responsibilities:

- school technical systems will be managed in ways that ensure that the school/academy 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
- appropriate security measures are in place to protect the servers, firewalls, switches, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school/academy systems and data
- responsibilities for the management of technical security are clearly assigned to appropriate and well trained staff
- all users will have clearly defined access rights to school technical systems. *Details of the access rights available to groups of users will be recorded by the online safety team and will be reviewed, at least annually.*
- users will be made responsible for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security *(see password section below)*
- *the online safety team 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*
- *remote management tools are used by staff to control workstations and view users activity*
- an agreed policy is in place for the provision of temporary access of "guests", (e.g. trainee teachers, supply teachers, visitors) onto the school system

Password Security

Policy Statements:

These statements apply to all users.

- All school networks and systems will be protected by secure passwords.
- All users have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the Network Manager (or other person) and will be reviewed, at least annually, by the online safety team.
- All users (adults and students/pupils) have responsibility for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.
- Passwords must not be shared with anyone.
- All users will be provided with a username and password by the lead administrator who will keep an up to date record of users and their usernames.

Password requirements:

- Passwords should be long. Good practice highlights that passwords over 12 characters in length are considerably more difficult to compromise than shorter passwords. Passwords generated by using a combination of unconnected words that are over 16 characters long are extremely difficult to crack. Password length trumps any other special requirements such as uppercase/lowercase letters, number and special characters. Passwords should be easy to remember, but difficult to guess or crack. Some passwords follow a system set by the online provider.
- Passwords should be different for different accounts, to ensure that other systems are not put at risk if one is compromised and should be different for systems used inside and outside of school
- Passwords must not include names or any other personal information about the user that might be known by others
- Passwords must be changed on first login to the system

Learner passwords:

- Records of learner usernames and passwords for foundation and key stage one pupils can be kept in an electronic or paper-based form, but they must be securely kept when not required by the user.
- All pupils have individual log in and passwords for various educational sites.
- Users will be required to change their password if it is compromised.
- Pupils will be taught the importance of password security, this should include how passwords are compromised, and why these password rules are important.

Notes for technical staff/teams

- Each administrator should have an individual administrator account, as well as their own user account with access levels set at an appropriate level. Consideration should also be given to using two factor authentication for such accounts.
- An administrator account password for the school/academy systems should also be kept in a secure place e.g. school safe. This account and password should only be used to recover or revoke access. Other administrator accounts should not have the ability to delete this account.
- Any digitally stored passwords are encrypted and have limited user access.
- Suitable arrangements should be in place to provide visitors with appropriate access to systems which expires after use.
- In good practice, the account is “locked out” following six successive incorrect log-on attempts.

- Passwords shall not be displayed on screen, and shall be securely hashed when stored (use of one-way encryption).

Training/Awareness:

Members of staff will be made aware of the school/academy's password policy:

- at induction
- through the school's online safety policy
- through the acceptable use agreement

Students/pupils will be made aware of the school's password policy:

- in lessons
- through the acceptable use agreement

Audit/Monitoring/Reporting/Review:

The responsible person, the lead administrator will ensure that full records are kept of:

- User Ids and requests for password changes
- *User logons*
- *Security incidents related to this policy*

Filtering

Introduction

The filtering of internet content provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context. The filtering system cannot, however, provide a 100% guarantee that it will do so, because the content on the web changes dynamically and new technologies are constantly being developed. It is important, therefore, to understand that filtering is only one element in a larger strategy for online safety and acceptable use. It is important that the school has a filtering policy to manage the associated risks and to provide preventative measures which are relevant to the situation in this school.

Responsibilities

The responsibility for the management of the school's filtering policy will be held by the online safety team. They will manage the school filtering, in line with this policy and will keep records/logs of changes and of breaches of the filtering systems.

To ensure that there is a system of checks and balances and to protect those responsible, changes to the school filtering service must

- **be logged in change control logs**
- **be reported to a second responsible person - headteacher**:

All users have a responsibility to report immediately to headteacher any infringements of the school's filtering policy of which they become aware or any sites that are accessed, which they believe should have been filtered. Users must not attempt to use any programmes or software that might allow them to bypass the filtering/security systems in place to prevent access to such materials.

Policy Statements

Internet access is filtered for all users. Differentiated internet access is available for staff and customised filtering changes are managed by the school. Illegal content is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list and other illegal content lists. Filter content lists are regularly updated and internet use is logged and frequently monitored. The monitoring process alerts the school to breaches of the filtering policy, which are then acted upon. There is a clear route for reporting and managing changes to the filtering system. Where personal mobile devices are allowed internet access through the school network, filtering will be applied that is consistent with school practice.

- *The school maintains and supports the managed filtering service provided by the Internet Service Provider*
- *The school has provided enhanced/differentiated user-level filtering through the use of the RM Buzz and SWGfL filtering programme. (Allowing different filtering levels for different ages/stages and different groups of users – staff/pupils/students etc.)*
- *In the event of the technical staff needing to switch off the filtering for any reason, or for any user, this must be logged and carried out by a process that is agreed by the Headteacher.*
- *Any filtering issues should be reported immediately to the filtering provider.*
- *Requests from staff for sites to be removed from the filtered list will be considered by the technical staff. If the request is agreed, this action will be recorded and logs of such actions shall be reviewed regularly by the Online Safety Group.*

Education/Training/Awareness

Pupils will be made aware of the importance of filtering systems through the online safety education programme. They will also be warned of the consequences of attempting to subvert the filtering system.

Staff users will be made aware of the filtering systems through:

- the acceptable use agreement
- induction training
- staff meetings, briefings, Inset.

Parents will be informed of the school's filtering policy through the acceptable use agreement and through online safety awareness sessions/newsletter etc.

Changes to the Filtering System

Users who gain access to, or have knowledge of others being able to access, sites which they feel should be filtered (or unfiltered) should report this in the first instance to the online safety team who will decide whether to make school level changes.

Monitoring

No filtering system can guarantee 100% protection against access to unsuitable sites. The school will therefore monitor the activities of users on the school network and on school equipment as indicated in the school online safety policy and the acceptable use agreement.

Audit/Reporting

Logs of filtering change controls and of filtering incidents will be made available to:

- Online Safety Team
- External Filtering provider/Local Authority/Police on request

The filtering policy will be reviewed in the response to the evidence provided by the audit logs of the suitability of the current provision.

Appendix 2

Whimple Primary School

Staff (and Volunteer) Acceptable Use Policy

School Policy

New technologies have become integral to the lives of children and young people, both within schools and outside school. The internet and other digital information and communications technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. All users should have an entitlement to safe access to the internet and digital technologies at all times.

This Acceptable Use Policy is intended to ensure:

- that staff and volunteers will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that staff are protected from potential risk in their use of technology in their everyday work.

The school will try to ensure that staff and volunteers will have good access to digital technology to enhance their work, to enhance learning opportunities for pupils learning and will, in return, expect staff and volunteers to agree to be responsible users.

Acceptable Use Policy Agreement

I understand that I must use school systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users. I recognise the value of the use of the use of digital technology for enhancing learning and will ensure that pupils receive opportunities to gain from the use of digital technology. I will, where possible, educate the young people in my care in the safe use of digital technology and embed online safety in my work with young people.

<u>For my professional and personal safety:</u>

- I understand that the school will monitor my use of the school digital technology and communication systems.
- I understand that the rules set out in this agreement also apply to use of these technologies (e.g. laptops, email, VLE, etc) out of school, and to the transfer of personal data (digital or paper based) out of school.
- I understand that the school digital technology systems are primarily intended for educational use and that I will only use the systems for personal or recreational use within the policies and rules set down by the school.
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.

- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.

I will be professional in my communications and actions when using school ICT systems:

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner, I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and/or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital/video images. I will not use my personal equipment to record these images, unless I have permission to do so. Where these images are published (e.g. on the school website/VLE) it will not be possible to identify by name or other personal information, those who are featured.
- I will not use chat and social networking sites in school in accordance with the school's policies.
- I will only communicate with pupils and parents/carers using official school systems. Any such communication will be professional in tone and manner.
- I will not engage in any on-line activity that may compromise my professional responsibilities.

The school and the local authority have the responsibility to provide safe and secure access to technologies and ensure the smooth running of the school:

- When I use my mobile devices (laptops/mobile phones/tablets/USB devices) in school, I will follow the rules set out in this agreement, in the same way as if I was using school equipment. I will also follow any additional rules set by the school about such use. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses.
- I will not use personal email addresses on the school ICT systems.
- I will not open any hyperlinks in emails or any attachments to emails, unless the source is known and trusted, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes.
- I will ensure that my data is regularly backed up.
- I will not try to upload, download or access any materials which are illegal (child sexual images, criminally racist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a machine, or store programmes on a computer, nor will I try to alter computer settings, unless I am given permission.
- I will not disable or cause damage to school equipment, or the equipment belonging to others.
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in the school/LA Personal Data Policy. Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper based Protected and Restricted data must be held in lockable storage.

- I understand that the data protection policy requires that any staff or pupil data, to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by school policy to disclose such information to an appropriate authority.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.

<u>When using the internet in my professional capacity or for school sanctioned personal use:</u>

- I will ensure that I have permission to use the original work of others in my own work.
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).

<u>I understand that I am responsible for my actions in and out of the school:</u>

- I understand that this Acceptable Use Policy applies not only to my work and use of school digital technology equipment in school, but also applies to my use of school systems and equipment off the premises and my use of personal equipment on the premises or in situations related to my employment by the school.
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I could be subject to disciplinary action. This could include a warning, a suspension, referral to Governors and/or the Local Authority and in the vent of illegal activities the involvement of the police.

I have read and understand the above and agree to use the school digital technology systems (both in and out of school) and my own devices (in school and when carrying out communications related to the school) within these guidelines.

Staff / Volunteer Name

Signed

Date