Online Safety Policy

The Stonehill School
Stonehill Avenue
Leicester
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Background/Rationale

SWGfL/UK Safer Internet Centre
ALP Leicester have adapted the online safety policy from the 'The South West Grid for Learning Trust'. This is an educational trust with an international reputation for supporting schools with online safety.

SWGfL, along with partners Childnet and IWF, launched the UK Safer Internet Centre (UKSIC) in January 2011 as part of the European Commission's Safer Internet Programme. The Safer Internet Centre is, for example, responsible for the organisation of Safer Internet Day each February. More information about UKSIC services and resources can be found on the website: www.saferinternet.org.uk. SWGfL is a founding member of UKCIS (UK Council for Internet Safety). It has contributed to conferences across the world and has worked with government and other agencies in many countries. More information about its wide-ranging online safety services for schools can be found on the SWGfL website – swgfl.org.uk

An effective Online Safety Policy must be tailored to the needs of each school and an important part of the process will be the discussion and consultation which takes place during the writing or review of the policy. This will help ensure that the policy is owned and accepted by the whole school/academy community.

It is suggested that consultation in the production of this policy should involve:

- Headteacher / SMT /DSL
- Teachers
- Support Staff
- ICT Technical staff
- Executive Board

This Policy should be read in conjunction with the following policies:

- Electronic Information and Communication Systems
- Monitoring Policy
- Social Media Policy

Development/Monitoring/Review of this Policy

This e-safety policy has been developed by a committee made up of:

- Headteacher / SMT /DSL
- Teachers
- Support Staff
- ICT Technical staff
- Executive Board

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

- Staff meetings

- Local Management Council
- Executive Board meeting / Management Committee meeting
- School newsletters/ Learner voice mechanisms

Schedule for Development/Monitoring/Review

Schedule for Review

This online safety policy was approved by the Executive Board on the:	*Insert date*
The implementation of this online safety policy will be monitored by the:	*Headteacher(s), DSL and technical staff (ICT Specialist)*
Monitoring will take place at regular intervals: Annually	*Annually*
The Executive Board Committee will receive a report on the implementation of the online safety policy generated by the monitoring group (which will include anonymous details of online safety incidents) at regular intervals: At Termly Executive Board Meeting	*Termly Executive Board Meetings*
The online safety policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place. The next anticipated review date will be: May 2021	*May 2021*
Should serious online safety incidents take place, the following external persons/agencies should be informed:	*School DSL, DDSL, LA Safeguarding Officer, LADO, Police*

The school will monitor the impact of the policy using:

- Logs of reported incidents
- Monitoring logs of internet activity (including sites visited)
- Internal monitoring data for network activity
- Google analytics reports for user monitoring and website filtering.
- Google Education secure vault tracking reports for user movement and activity
- Wifi activity logs
- Surveys / questionnaires of
  - Learner (eg Ofsted "Tell-us" survey / CEOP Think/know survey)
  - Parents / carers
  - Staff

Scope of the Policy

This policy applies to all members of the school community (including staff, learners, 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 Headteachers to such extent as is reasonable, to regulate the behaviour of learners/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 (see appendix for 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.

Roles and Responsibilities

The following section outlines the roles and responsibilities for e-safety of individuals and groups within the school:

Executive Board

The Executive Board are responsible for the approval of the E-Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the Executive Board receiving regular information about e-safety incidents and monitoring reports.

- regular meetings with the Online Safety lead/DSL
- attendance at Online Safety Group meetings
- regular monitoring of online safety incident logs
- regular monitoring of filtering/change control logs
- reporting to relevant Executive Board

Headteachers and SMT

- The Headteacher 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 Lead/DSL.
- The Headteacher and (at least) another member of the Senior Management 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 Headteacher and Senior Leaders are responsible for ensuring that the Online Safety Lead/DSL 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 Headteacher and 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. This will take the form of regular supervision and training.
- The Senior Management Team will receive regular monitoring reports from the Online Safety Lead/DSL

Online Safety Lead/DSL

- 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 Director to discuss current issues, review incident logs and filtering/change control logs
- attends relevant meetings of Executive Board
- reports regularly to Senior Management Team

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/AUA)
- they report any suspected misuse or problem to the Headteacher/Senior Leader/Online Safety Lead /DSL for investigation/action/sanction
- all digital communications with Learner 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
- Learners understand and follow the Online Safety Policy and acceptable use policies
- Learners 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 learners 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

Online Safety Group

The Online Safety Group (IT department /ICT leads) provides a consultative group that has wide representation from the school's community, with responsibility for issues regarding online safety and the monitoring the Online Safety Policy including the impact of initiatives. Depending on the size or structure of the school this group may be part of the safeguarding group. The group will also be responsible for regular reporting to the *Executive Board.*

Members of the Online Safety Group (or other relevant group) will assist the Online Safety Lead with:

- the production/review/monitoring of the school online safety policy/documents.

- mapping and reviewing the online safety/digital literacy curricular provision – ensuring relevance, breadth and progression
- monitoring network/internet/filtering/incident logs
- consulting stakeholders – including parents/carers and the learners/pupils about the online safety provision
- monitoring improvement actions identified through use of the 360 degree safe self-review tool

Learners

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement
- 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 policies on the use of mobile devices and digital cameras. They should also know and understand 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 take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website, social media and information about national/local online safety campaigns/literature. Parents and carers will be encouraged to support the school/academy 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 student/pupil records
- their children's personal devices in the school (where this is allowed)

Community Users

Community Users who access school/academy systems or programmes 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 – Learners

Whilst regulation and technical solutions are very important, their use must be balanced by educating *learners* to take a responsible approach. The education of learners 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 ICT/PSD/other lessons and should be regularly revisited
- Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial/pastoral activities
- Learners 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.

- Learners should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Learners 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.
- Learners should be helped to understand the need for the Learners 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 learners 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 learners 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, learners 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 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 and carers through:

- Curriculum activities
- Letters, newsletters, web site, Learning Platform
- 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 (see appendix for further links/resources)

Education – The Wider Community

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

- Providing family learning courses in use of new digital technologies, digital literacy and online safety
- Online safety messages targeted towards grandparents and other relatives as well as parents.
- The school website/Parent Mail will provide online safety information for the wider community
- Sharing their online safety expertise/good practice with other local schools and alternative providers

Education & Training – Staff/Volunteers

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:

- A planned programme of formal online safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly.
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school/academy online safety policy and acceptable use agreements.
- It is expected that some staff will identify online safety as a training need within the performance management process.
- The Online Safety Lead (or other nominated person) will receive regular updates through attendance at external training events (e.g. from SWGfL/LA/other relevant organisations) and by reviewing guidance documents released by relevant organisations.
- This online safety policy and its updates will be presented to and discussed by staff in staff/team meetings/training sessions.
- The Online Safety Lead (or other nominated person) will provide advice/guidance/training to individuals as required.

Education – Executive Board Training

Executive Board should take part in e-safety training part in online safety training/awareness sessions, with particular importance for those who are members of any 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/MAT/National Governors Association/or other relevant organisation (e.g. SWGfL).
- Participation in school training/information sessions for staff or parents

Technical – Infrastructure, Equipment, Filtering and Monitoring

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 e-safety responsibilities.

Our Cloud based system is called: Google Education Suite

This is also monitored by Google themselves and has a structured layering of security enabling us to ensure our responsibilities in terms of protecting data and privacy are upheld. This means there are certain standard levels of security already in place. In addition to this:

- School ICT systems will be managed in ways that ensure the school meets the e-safety technical requirements outlined in the 'Teaching Online Safely in Schools' document June 2019.
- There will be regular reviews and audits of the safety and security of school ICT systems
- Network hardware, routers and wireless systems and cabling must be securely located and physical access restricted.
- All users will have clearly defined access rights to school ICT systems.
- All users will be provided with a username and password
- The "master / administrator" access to the school ICT system, used by the Network Manager/IT department must also be accessible to the company directors and kept secure.
- The IT manager and Finance director are 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.
- Internet access is filtered for all users. Illegal content is filtered by the filtering provider discussed overleaf. 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 via the ticketing system on Staffnet.
- Internet filtering and monitoring discussed overleaf ensures that children are safe from terrorist and extremist material when accessing the internet.
- The academy has provided differentiated user-level filtering allowing different filtering levels for different groups of users.
- The academy 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. This is done by staff via the ticketing system on Staffnet.
- 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 devices are protected by up to date virus software.

- An agreed procedure is in place for the provision of temporary access of "guests" (e.g. trainee teachers, supply teachers, visitors and Ofsted Inspectors) onto the school systems. All guests must tick to agree to the academy's IT terms and conditions before accessing their desk top.
- An agreed policy is in place in the Electronic Information and Communications Systems Policy regarding the extent of personal use that users such as staff and learners and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place as above regarding the use of removable media (e.g. memory sticks/CDs/DVDs) by users on school devices. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

The filter we use is called: Draytek Firewalls with Content Control and App Enforcement This is in addition to the Internet Provider Monitoring and Google Education security measures with safe content filtering and black and white lists.

- This means the network is constantly monitored to ensure effectiveness.
- It also features blacklist and whitelist modules which allow the administrator to permanently block a website which can be accessed normally or allow any website we require to be allowed for use.
- To promote safeguarding, welfare and prevent over blocking in the school, the staff monitor their activities while they use our school systems.
- This is useful because even though we filter websites, it does **not** fully reduce the likelihood of finding all inappropriate content.
- For example, finding inappropriate content on an image search engine or a video portal (Google, YouTube). The school uses these websites for educational reference and therefore we do not block these search engines and certain other websites such as YouTube..
- If they encounter such content, then the staff intervene and explain as to why they should not access such content in school. We find this the most suited practise as the staff can communicate effectively with them while reducing the risk of an incident.

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. The mobile technologies policy should be consistent with and inter-related to other relevant school polices including but not

limited to the safeguarding policy, behaviour policy, bullying policy, acceptable use policy, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school's online safety education programme.

Please refer to the Electronic Information and Communications Systems Policy, Monitoring Policy and Social Media Policy for further information.

Use of Digital and Video Images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and learners/pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and learners/pupils need to be aware of the risks associated with publishing 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 learners/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 learners/pupils are published on the school website/social media/local press in the form of a Media consent form.
- 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 in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other *learners/pupils* in the digital/video images.
- 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 learners/pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school/academy into disrepute.
- Learners must not take, use, share, publish or distribute images of others without their permission

- Photographs published on the website, or elsewhere that include learners/pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Learners full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Student's/Pupil's work can only be published with the permission of the student/pupil and parents or carers

Data Protection

With effect from 25th May 2018, the data protection arrangements for the UK changed following the European Union General Data Protection Regulation (GDPR). 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/MAT/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.
- it implements the data protection principles and is able to demonstrate that it does so through use of policies, notices and records.
- it has paid the appropriate fee Information Commissioner's Office (ICO) and included details of the Data Protection Officer (DPO).
- it has appointed an appropriate Data Protection Officer (DPO) who has a high level of understanding of data protection law and is free from any conflict of interest. The school/academy may also wish to appoint a Data Manager and Systems Controllers to support the DPO
- 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/academy looks after their data and what their rights are in a clear Privacy Notice (see Privacy Notice section in the appendix)

- 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 mobile device or removable media the:

- data must be encrypted and password protected.
- device must be password protected.
- device must be protected by up to date virus and malware checking software
- data must be securely deleted from the device, in line with school/academy 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
- where personal data is stored or transferred on mobile or other devices (including USBs) these must be encrypted and password protected.
- will not transfer any school/academy personal data to personal devices except as 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				learners / 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	x						x	
Use of mobile phones in lessons				x				x
Use of mobile phones in social time	x						x	
Taking photos school camera devices	x						x	
Taking photos with mobile phones							x	
Use of hand held devices eg PDAs, PSPs		x					x	
Use of personal email addresses in school, or on school network	x							x
Use of school email for personal emails	x							x
Use of chat rooms / facilities				x				x
Use of instant messaging				x				x
Use of social networking sites				x				x

Use of blogs		x				x		

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. Staff and learners / pupils should therefore use only the school email service to communicate with others when in school, or on school systems (eg by remote access).
- 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 learners / pupils or parents / carers must be professional in tone and content. These communications may only take place on official (monitored) school systems. Personal email addresses, text messaging or public chat / social networking programmes must not be used for these communications.
- Learners should be taught about email safety issues, such as the risks attached to the use of personal details. They should also be taught strategies to deal with inappropriate emails and be reminded of the need to write emails clearly and correctly and not include any unsuitable or abusive material. Whole class/group email addresses may be used at KS1, while learners at KS2 and above will be provided with individual school email addresses for educational use.
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

All schools, academies, MATs and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Schools/academies, MATs and local authorities could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, engage in online bullying, discriminate on the grounds of sex, race or disability or who defame a third party may render the school/academy or local authority/MAT 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 learners, 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 /academy or local authority/MAT
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information

When official school social media accounts are established there should be:

- A process for approval by senior leaders
- Clear processes for the administration and monitoring of these accounts – involving at least two members of staff
- A code of behaviour for users of the accounts, including
- Systems for reporting and dealing with abuse and misuse
- Understanding of how incidents may be dealt with under school/academy disciplinary procedures

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
- The school permits reasonable and appropriate access to private social media sites

Monitoring of Public Social Media:

- As part of active social media engagement, it is considered good practice to pro-actively monitor the Internet for public postings about the school
- The school should effectively respond to social media comments made by others according to a defined policy or process

The school's use of social media for professional purposes will be checked regularly by the senior risk officer and Online Safety Group to ensure compliance with the school policies.

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. cyber-bullying 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/academy 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 school or outside school when using school equipment or systems. The school policy restricts certain internet 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
	promotion or conduct of illegal acts, eg under the child protection, obscenity, computer misuse and fraud legislation					x
	adult material that potentially breaches the Obscene Publications Act in the UK					x
	criminally racist material in UK					x
	pornography				x	
	promotion of any kind of discrimination				x	
	promotion of racial or religious hatred				x	

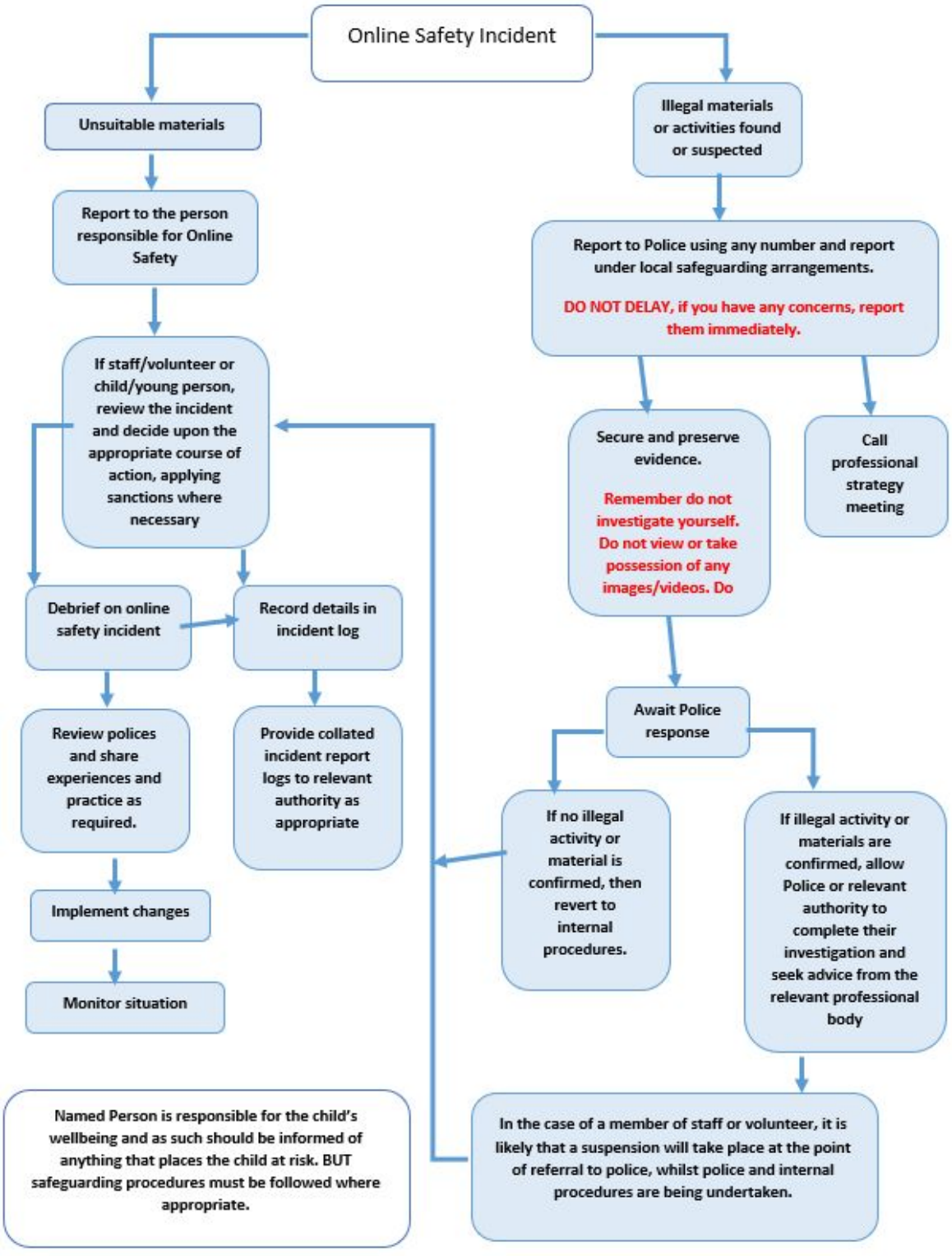
	threatening behaviour, including promotion of physical violence or mental harm				x	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				x	
Activities that might be classed as cyber-crime under the Computer 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 school systems to run a private business					x	
Use systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by SWGfL and / or the school					x	
Uploading, downloading or transmitting commercial software or any copyrighted materials belonging to third parties, without the necessary licensing permissions					x	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)					x	
Creating or propagating computer viruses or other harmful files					x	
Carrying out sustained or instantaneous high volume network traffic (downloading / uploading files) that causes network congestion and 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 networking sites			x		
Use of video broadcasting eg Youtube			x		

Responding to incidents of misuse
It is hoped that all members of the school community will be responsible users of ICT, 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. Listed below are the responses that will be made to any apparent or actual incidents of misuse:

If any apparent or actual misuse appears to involve illegal activity ie.
- **child sexual abuse images**
- **adult material which potentially breaches the Obscene Publications Act**
- **criminally racist material**
- **other criminal conduct, activity or materials**

the flow chart – below and http://www.swgfl.org.uk/safety/default.asp should be consulted and actions followed in line with the flow chart, in particular the sections on reporting the incident to the police and the preservation of evidence.


Online Safety Incident
Unsuitable materials
Report to the person responsible for Online Safety
If staff/volunteer or child/young person, review the incident and decide upon the appropriate course of action, applying sanctions where necessary
Debrief on online safety incident
Record details in incident log
Review polices and share experiences and practice as required.
Provide collated incident report logs to relevant authority as appropriate
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.
Illegal materials or activities found or suspected
Report to Police using any number and report under local safeguarding arrangements.
DO NOT DELAY, if you have any concerns, report them immediately.
Secure and preserve evidence.
Remember do not investigate yourself. Do not view or take possession of any images/videos. Do
Call professional strategy meeting
Await Police response
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
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 technologies, who understand and follow school/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 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/Academy Group 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
    - promotion of terrorism or extremism
    - offences under the Computer Misuse Act (see User Actions chart above)
    - 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.

School actions & sanctions

If members of staff suspect that misuse might have taken place, but that the misuse is not illegal (as above) it is essential that correct procedures are used to investigate, preserve evidence and protect those carrying out the investigation.

It is more likely that the school 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 school 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 as follows:

learners / Pupils	Actions / Sanctions								
Incidents:	Refer to class teacher / tutor	Refer to Head of Department / Head of Year / other	Refer to Headteacher	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 eg detention / 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					
Unauthorised use of non-educational sites during lessons	x								
Unauthorised use of mobile phone / digital camera / other handheld device	x								
Unauthorised use of social networking / instant messaging / personal email			x						
Unauthorised downloading or uploading of files	x								

Allowing others to access school network by sharing username and passwords	x								
Attempting to access or accessing the school network, using another student's / pupil's account	x								
Attempting to access or accessing the school network, using the account of a member of staff	x								
Corrupting or destroying the data of other users	x								
Sending an email, text or instant message that is regarded as offensive, harassment or of a bullying nature			x	x					
Continued infringements of the above, following previous warnings or sanctions				x					
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school			x						
Using proxy sites or other means to subvert the school's filtering system			x						
Accidentally accessing offensive or pornographic material and failing to report the incident			x		x				
Deliberately accessing or trying to access offensive or pornographic material			x	x					
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act	x								

Staff	Actions / Sanctions

Incidents:	Refer to line manag err	Refer to Headt eacher	RRefer 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				
Excessive or inappropriate personal use of the internet / social networking sites / instant messaging / personal email		x						
Unauthorised downloading or uploading of files		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						
Careless use of personal data eg holding or transferring data in an insecure manner		x						
Deliberate actions to breach data protection or network security rules		x						
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software		x						
Sending an email, text or instant message that is regarded as offensive, harassment or of a bullying nature		x						
Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with learners / pupils		x						

Actions which could compromise the staff member's professional standing		x						
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school		x						
Using proxy sites or other means to subvert the school's filtering system		x						
Accidentally accessing offensive or pornographic material and failing to report the incident		x						
Deliberately accessing or trying to access offensive or pornographic material				x				
Breaching copyright or licensing regulations		x						
Continued infringements of the above, following previous warnings or sanctions								