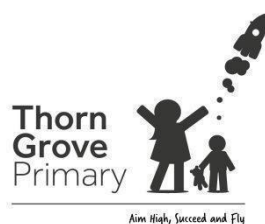


Online Safety Policy



Thorn Grove Primary School

| | |
|------------------------------------|--|
| Approved by the Governing Body on: | 27th March 2023 |
| <i>L. Vose</i> Headteacher | <i>C. Alcock</i> Chair of Governors |
| Next review due by: | March 2024 |

Contents

| | |
|---|----------|
| Development / Monitoring / Review of this Policy | 2 |
| Schedule for Development / Monitoring / Review | 2 |
| Scope of the Policy | 1 |
| Roles and Responsibilities | 2 |
| Governors | 2 |
| Headteacher and Senior Leaders | 2 |
| Online Safety Lead | 3 |
| Network Manager and Technical staff | 3 |
| Teaching and Support Staff | 3 |
| Designated Safeguarding Lead | 4 |
| Pupils: | 4 |
| Parents and Carers | 4 |
| Community Users | 4 |
| Policy Statements | 4 |
| Education – Students / Pupils | 4 |
| Education – Parents / Carers | 5 |
| Education – The Wider Community | 5 |
| The school will provide opportunities for local community groups / members of the community to gain from the school's online knowledge and experience. This may be offered through the following: | 5 |
| Education and Training – Staff and Volunteers | 5 |
| Training – Governors | 5 |
| Technical – infrastructure / equipment, filtering and monitoring | 6 |
| Mobile Technologies | 7 |
| Use of digital and video images | 7 |
| Data Protection | 8 |
| Communications | 8 |
| Social Media - Protecting Professional Identity | 9 |
| Dealing with unsuitable / inappropriate activities | 10 |
| Responding to incidents of misuse | 10 |
| Illegal Incidents | 10 |
| Other Incidents | 11 |
| School Actions & Sanctions | 13 |
| Appendix | 13 |
| Acknowledgements | 13 |

Development / Monitoring / Review of this Policy

This Online Safety policy has been developed by a working group / committee made up of:

- Headteacher / Principal / Senior Leaders
- Online Safety Lead
- Staff – including Teachers, Support Staff, Technical staff
- Governors / Board
- Parents and Carers
- Community users

Consultation with the whole school community has taken place through a range of formal and informal meetings.

Schedule for Development / Monitoring / Review

| | |
|---|--|
| This Online Safety policy was approved by the Governing Body on: | <i>March 2023</i> |
| The implementation of this Online Safety policy will be monitored by the: | <i>Headteacher Deputy Headteacher Link Governor and Safeguarding Governor Designated Safeguarding Leads Online Safety Lead</i> |
| Monitoring will take place at regular intervals: | <i>Annually</i> |
| The Governing Body 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: | <i>Annually</i> |
| 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: | <i>March 2024</i> |
| Should serious online safety incidents take place, the following external persons / agencies should be informed: | <i>DSL In school (DHT and HT) hi-impact - Steve Walsh Local Area Designated Officer - LADO (Safeguarding Officer), Police</i> |

The school will monitor the impact of the policy using:

- Logs of reported incidents
- Monitoring logs of internet activity (including sites visited) / filtering
- Internal monitoring data for network activity
- Surveys / questionnaires of
 - o students / pupils
 - o parents / carers
 - o staff

Scope of the Policy

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

The Education and Inspections Act 2006 empowers 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, 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 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.

Roles and Responsibilities

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

Governors

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the *Governors* receiving regular information about online safety incidents and monitoring reports. A member of the *Governing Body* has taken on the role of *Safeguarding Governor*.

The role of the *Safeguarding Governor* will include:

- regular meetings with the Designated Safeguarding Lead
- regular monitoring of online safety incident via CPOMS
- reporting to relevant Governors
- ensure that school systems and equipment is not used for the promotion of terrorism and /or violent extremism activities

Headteacher and Senior Leaders

- 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*.
- The Headteacher and (at least) another member of the Senior Leadership Team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff. (see flow chart on dealing with online safety incidents – included in a later section – “Responding to incidents of misuse” and relevant *Local Authority* disciplinary procedures).
- The Headteacher and Senior Leaders are responsible for ensuring that the Online Safety Lead 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 will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive regular monitoring reports from the Online Safety Officer Lead.

Online Safety Lead

The current Designated Safeguarding Leads will oversee data monitoring with the day-to-day responsibility for e-safety led by G Wilson. Key responsibilities will be to:

- take day to day responsibility for online safety issues and establish and review the school online safety policies / documents
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provide training and advice for staff
- liaise with the Local Authority
- liaise with school technical staff
- receive reports of online safety incidents and creates a log of incidents to inform future online safety developments
- meet regularly with the Safeguarding Governor to discuss current issues, review incident logs and filtering / change control logs
- attend relevant meeting / committee of *Governors*
- report regularly to Senior Leadership Team

Network Manager and Technical staff

The Hi Impact Network Manager is responsible for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- that the school meets required online safety technical requirements and any Local Authority Online Safety Policy / Guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
- the filtering policy (if it has one), is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person.
- that they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant

- that the use of the network / internet / remote access and email is regularly monitored in order that any misuse / attempted misuse can be reported to the Headteacher
- that monitoring software / systems are implemented and updated as agreed in school policies

Teaching and Support Staff

Are responsible for ensuring that:

- they have an up to date awareness of online safety matters and of the current school Online Safety Policy and practices
- they have read, understood and signed the Staff Acceptable Use Policy (AUP)
- they report any suspected misuse or problem to the Headteacher, Senior Leader ; Online Safety Lead for investigation
- all digital communications with students , pupils, parents , carers is on a professional level and only carried out using official school systems
- pupils understand and follow the Online Safety Policy and acceptable use policies
- pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor the use of digital technologies, mobile devices, cameras etc in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- in lessons where internet use is pre-planned pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches

Designated Safeguarding Lead

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

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

Pupils:

- are responsible for using the school digital technology systems in accordance with the Pupil 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 and 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, the website and providing information about national/local online safety campaigns where relevant. Parents and 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 and learning platforms.

Community Users

It is not envisaged that members of the community will ordinarily have access to, either regularly or irregularly, the school's network, computers (including ancillary equipment e.g. iPads), or any other part of the electronic system to access school data files, records or internet use.

Any changes to this commitment will need to be agreed by the Full Governing Board after consultation and deliberation.

Policy Statements

Education – Students / Pupils

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

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

- A planned online safety curriculum is provided as part of Computing, PHSE and other lessons and will be regularly revisited
- Key online safety messages will be reinforced as part of a planned programme of assemblies and activities
- Pupils should be taught in all lessons to be critically aware of the materials and content they access on-line and be guided to validate the accuracy of information.
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils will be supported in building resilience to radicalisation by providing a safe environment for discussing controversial issues and helping them to understand them if required
- Pupils will be helped to understand the need for the pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school.
- Staff will act as good role models in their use of digital technologies, the internet and mobile devices
- In lessons where internet use is pre-planned, pupils will be guided to sites checked as suitable for their use and processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where pupils are allowed to freely search the internet, staff will 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 (eg racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff will request that the Technical Staff (In consultation with the Headteacher or Deputy Headteacher and Online Safety Lead) 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 and 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,
- Parents / Carers evenings / sessions
- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant websites / publications

Education – The Wider Community

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

- Providing family relative information in the use of new digital technologies, digital literacy and online safety
- Online safety messages targeted towards parents, grandparents and other relatives as well as parents.
- The school website will provide online safety information and web-site links for the wider community

- Supporting enquiring community groups e.g. Early Years Settings, Child-minders, youth / sports / voluntary groups to enhance their e-safety provision

Education and Training – Staff and 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 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 will receive online safety training as part of their induction programme, ensuring that they fully understand the school Online Safety Policy and Acceptable Use Agreements.
- The Online Safety Lead will receive regular updates through attendance at external training events (LA or 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
- The Online Safety Lead will provide advice, guidance or training to individuals as required.

Training – Governors

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

- Attendance at training provided by the Local Authority, National Governors Association or other relevant organisation (e.g. SWGfL).
- Participation in school 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 online safety responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements outlined in the Local Authority policy and guidance
- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school technical systems and devices.
- All users will be provided with a username and secure password by hi-impact 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 at intervals dictated by hi-impact policy
- The “master/administrator” passwords for the school ICT systems, used by the Network Manager must also be available to the Headteacher or other nominated senior leader and kept in a secure place
- Mrs Hawkins is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored. There is a clear process in place to deal with requests for filtering changes
- Internet filtering / monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet.

- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.
- An agreed policy is in place for the provision of temporary access of “guests” (eg trainee teachers, supply teachers, visitors) onto the school systems.
- An agreed policy is in place (see Acceptable Use Policy) regarding the extent of personal use that users (staff /pupils) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place (see Acceptable Use Policy) that provides information and guidance to staff about downloading executable files and installing programmes on school devices.
- An agreed policy is in place (see Acceptable Use Policy) regarding the use of removable media (eg 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.

Mobile Technologies

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 platforms and other cloud based services such as email and data storage.

All users should understand that the primary purpose of the use of mobile / personal devices in a school context is educational. The mobile technologies policy links with and is inter-related to other relevant school policies 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 is an integral part of the school's Online Safety education programme.

- The school Acceptable Use Agreements for staff, pupils/students and parents / carers will give consideration to the use of mobile technologies
- The school allows:

| | School Devices | | | Personal Devices | | |
|---------------------|------------------------------|---------------------------------|-------------------|------------------|-------------|---------------|
| | School owned for single user | School owned for multiple users | Authorised device | Pupil owned | Staff owned | Visitor owned |
| Allowed in school | Yes | Yes | Yes | Yes | Yes | Yes |
| Full network access | Yes | Yes | Yes | No | No | No |
| Internet only | | | | No | Yes | Yes |

Thorn Grove Primary School endeavours to provide sufficient hardware PC's, laptops and other mobile devices for use in school and therefore does not permit the use of Bring Your Own Device (BYOD) for use in school at any time.

Staff and authorised visitors will be permitted to bring their own mobile devices on site but will not be allowed access to the network or wireless connections unless agreed specifically with the Online Safety Lead and Headteacher

Use of digital and video images

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

- When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.
- Written permission from parents or carers will be obtained before photographs of students / pupils are published on the school website / social media / local press
- 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 protection, these images should not be published or made publicly available on social networking sites, nor should parents / carers comment on any activities involving other *pupils* in the digital or video images.
- Staff and volunteers are allowed to take digital or video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those images will 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 will ensure that:

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

Staff must ensure that they:

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

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

- The data must be encrypted and password protected.
- The device must be password protected.
- The device must offer approved virus and malware checking software.
- The data must be securely deleted from the device, in line with school policy once it has been transferred or its use is complete.

Communications

A wide-range of rapidly developing communications technologies have 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 | | | | Pupils | | | |
|---|----------------------|--------------------------|----------------------------|-------------|---------|--------------------------|-------------------------------|-------------|
| | Allowed | Allowed at certain times | Allowed for selected staff | Not allowed | Allowed | Allowed at certain times | Allowed with staff permission | Not allowed |
| Communication Technologies | | | | | | | | |
| Mobile phones may be brought to the school | ✓ | | | | | | | ✓ |
| Use of mobile phones in lessons | | | ✓ | | | | | ✓ |
| Use of mobile phones in social time | ✓ | | | | | | | ✓ |
| Taking photos on mobile phones | | | | ✓ | | | | ✓ |
| Use of other mobile devices (school I pads) | | | | ✓ | | | ✓ | |
| Use of personal email addresses in school, or on school network | | | | ✓ | | | | ✓ |
| Use of school email for personal emails | | | | ✓ | | | | ✓ |
| Use of messaging apps in school | | ✓ | | | | | | ✓ |
| Use of social media on the school network | | | | ✓ | | | | ✓ |
| Use of blogs | | | ✓ | | | | ✓ | |

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 should be aware that email communications are monitored.
- Users must immediately report, to the nominated person – in accordance with the school policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and pupils or parents / carers (email, blogs) must be professional in tone and content. These communications may only take place on official (monitored) school systems. Personal email addresses, text messaging or social media must not be used for these communications.
- pupils will be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

The school and local authority 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, engage in online bullying, 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 have been put 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 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

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 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 within the guidelines set out in this policy

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.

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. 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 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:

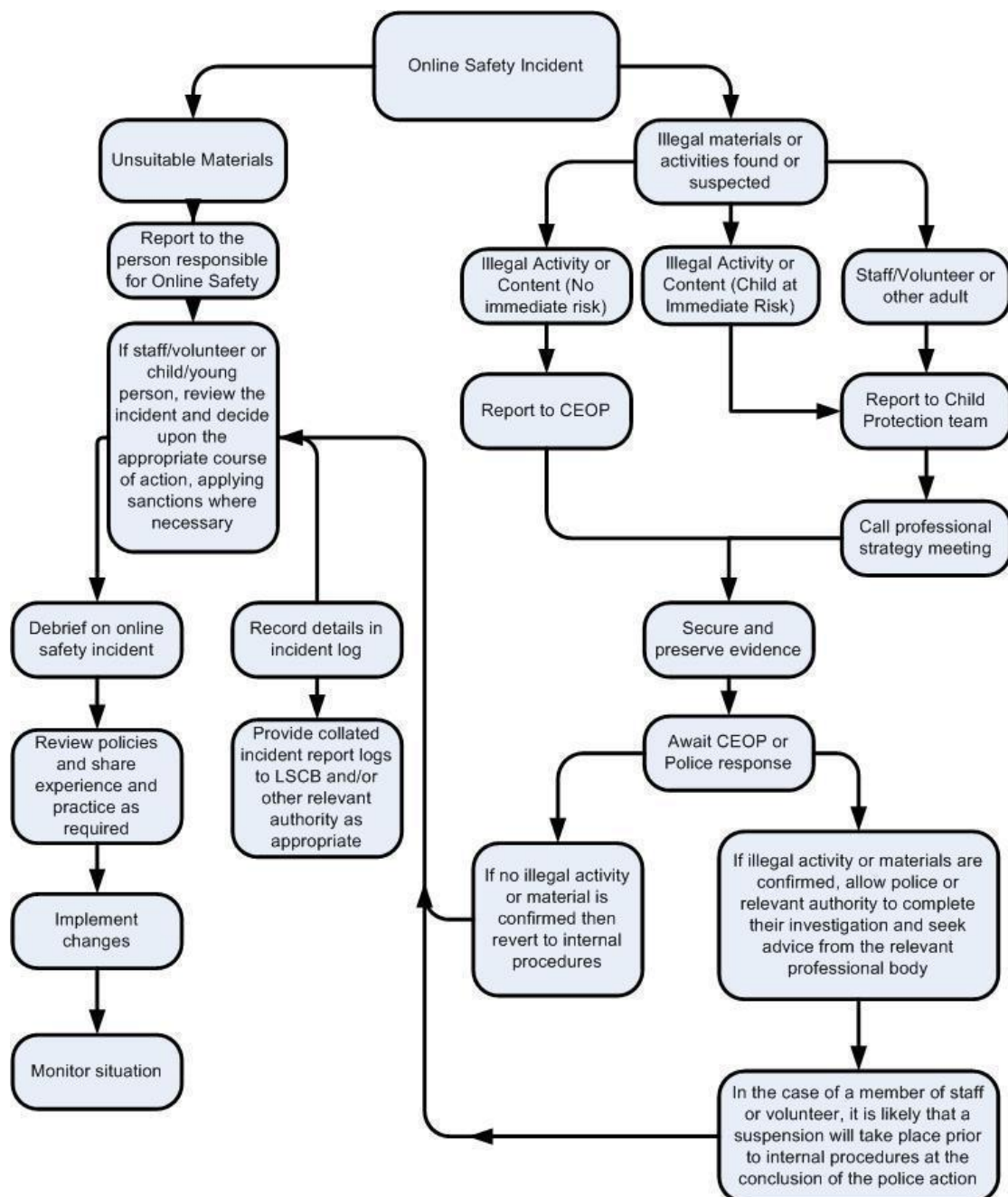
| User Actions | | Acceptable | Acceptable at certain times | Acceptable for nominated users | Unacceptable | Unacceptable and illegal |
|--|--|------------|-----------------------------|--------------------------------|--------------|--------------------------|
| Users shall not visit Internet sites, 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 | |
| | Promotion of extremism or terrorism | | | | X | |
| | Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute | | | | X | |
| Using school systems to run a private business | | | | | X | |
| Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school | | | | | X | |
| Infringing copyright | | | | | X | |
| Revealing or publicising confidential or proprietary information (e.g. financial / personal information, databases, computer / network access codes and passwords) | | | | | X | |
| Creating or propagating computer viruses or other harmful files | | | | | X | |
| Unfair usage (downloading / uploading large files that hinders others in their use of the internet) | | | | | X | |
| On-line gaming (educational) | | | | X | | |
| On-line gaming (non-educational) | | | | | X | |
| On-line gambling | | | | | X | |
| On-line shopping / commerce | | | | X | | |
| File sharing | | | | X | | |
| Use of social media on school equipment or systems | | | | | X | |
| Use of messaging apps on school equipment or systems | | | | | 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 and appendix) for responding to online safety incidents and report immediately to the police.



Other Incidents

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

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

- Have more than one senior member of staff involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below)
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does then appropriate action will be required and could include the following:
 - o Internal response or discipline procedures
 - o Involvement by Local Authority or national / local organisation (as relevant).
 - o 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:**
 - o incidents of 'grooming' behaviour
 - o the sending of obscene materials to a child
 - o adult material which potentially breaches the Obscene Publications Act
 - o criminally racist material
 - o promotion of terrorism or extremism
 - o 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

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:

| | Actions / Sanctions | | | | | | | | |
|--|------------------------|---------------------------|----------------------|-----------------|--|-------------------------|---|---------|---|
| Pupil Incidents | Refer to class teacher | Refer to Key Stage Leader | 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 e.g. 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 | | X | X | | |
| Unauthorised use of non-educational sites during lessons | | X | X | | | | | | |
| Unauthorised / inappropriate use of mobile phone / digital camera / other mobile device | | X | X | | | X | | | |
| Unauthorised / inappropriate use of social media / messaging apps / personal email | | X | X | | | X | | | |
| Unauthorised downloading or uploading of files | | X | X | | | | | | |
| Allowing others to access school network by sharing username and passwords | | X | X | | | X | | | |
| Attempting to access or accessing the school network, using another student's / pupil's account | | X | X | | | X | | | |
| Attempting to access or accessing the school network, using the account of a member of staff | | X | X | | | X | | | |
| Corrupting or destroying the data of other users | | X | X | | | X | | | |
| Sending an email, text or 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 | X | | X | | | |
| Actions which could bring the school into disrepute or breach the integrity of the ethos of the school | | | X | | | X | | | |
| Using proxy sites or other means to subvert the school's filtering system | | | X | | | 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 | | X | | | |
| Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act | | X | X | | | X | | | |

Appendix

Copies of the more detailed template policies and agreements, contained in the appendix, can be downloaded from:

<http://www.swgfl.org.uk/Staying-Safe/Creating-an-E-Safety-policy>

Acknowledgements

SWGfL would like to acknowledge a range of individuals and organisations whose policies, documents, advice and guidance have contributed to the development of this School Online Safety Policy Template and of the 360 degree safe Online Safety Self Review Tool:

- Members of the SWGfL Online Safety Group
- Avon and Somerset Police
- Representatives of SW Local Authorities
- Plymouth University Online Safety
- NEN / Regional Broadband Grids

Copyright of these Template Policies is held by SWGfL.

Schools / Academies and other educational institutions are permitted free use of the Template Policies for the purposes of policy writing, review and development. Any person or organisation wishing to use the document for other purposes should seek consent from SWGfL (onlinesafety@swgfl.org.uk) and acknowledge its use.

Every effort has been made to ensure that the information included in this document is accurate, as at the date of publication in April 2018. However, SWGfL cannot guarantee its accuracy, nor can it accept liability in respect of the use of the material.

© South West Grid for Learning Trust Ltd 2018