Flushing C of E Primary School

Online Safety Policy

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

- Headteacher
- Online Safety Coordinator
- Staff
- Governors

Schedule for Development / Monitoring / Review

This Online Safety policy was approved by the Curriculum and Staffing Committee on:	*3/11/16*
The implementation of this Online Safety policy will be monitored by the:	*Coordinator and C&S Committee*
Monitoring will take place at regular intervals:	*October every year*
The C&S 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) every	*Autumn meeting of C&S*
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:	*Autumn meeting of C&S*
Should serious online safety incidents take place, the following external persons / agencies should be informed:	*LA Safeguarding Officer, LADO, Police (depending upon incident) .*

The school will monitor the impact of the policy using:

- Logs of reported incidents
- Information from SWGfL filtering
- Monitoring data for network activity
- Discussions/feedback from
  - students / pupils
  - parents / carers
  - 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 ICT 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 cyber-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. The safeguarding governor takes on the role of *Online Safety Governor*). The role of the Online Safety *Governor* will include:

- meetings with the Online Safety Co-ordinator
- attendance at C&S meetings
- monitoring of online safety incidents

- monitoring of filtering provided by SWGfL
- reporting to relevant Committee

Headteacher:

- 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 Co-ordinator Officer*.
- The Headteacher and the Deputy CPO must know what to do in response to an incident see – "Responding to incidents of misuse" and relevant *Local Authority HR* disciplinary procedures.
- *The Headteacher is responsible for ensuring that the Online Safety Coordinator and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.*

Online Safety Coordinator / Officer:

- leads the Online Safety Group
- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies / documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provides training and advice for staff
- liaises with the Local Authority / relevant body
- liaises with school technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments
- Meets with the Online Safety *Governor* to discuss current issues and controls
- attends relevant committee of *Governors*

Online Safety Coordinator – Tamsin Lamberton

Deputy OS Coordinator – Helen French

Online Safety Governor – Robert Hurrell

Network Manager / Technical staff:

SWGfL provide a full filtering, monitoring system and controls for the school

Microcomms provide ICT support of the network and hardware.

They ensure 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 system.

Teaching and Support Staff

Are responsible for ensuring that:

- they have an up to date awareness of online safety matters and of the current *school* Online Safety Policy and practices
- they have read, understood and signed the Staff Acceptable Use Policy / Agreement (AUP)
- they report any suspected misuse or problem to the *Online Safety Coordinator* for investigation / action / sanction
- all digital communications with students / pupils / parents / carers should be on a professional level *and only carried out using official school systems*
- online safety issues are embedded in all aspects of the curriculum and other activities
- pupils understand and follow the Online Safety Policy and acceptable use policies

- pupils have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor the use of digital technologies, mobile devices, cameras etc in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- *in lessons where internet use is pre-planned pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches*

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 cyber-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 and information about national / local online safety campaigns / literature.* 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.

Community Users

Community Users who access the school network will be expected to sign a Community User AUA before being provided with access to school systems.

Policy Statements

Education – Pupils

Whilst regulation and technical solutions are very important, their use must be balanced by educating *pupils* to take a responsible approach. The education of *pupils* in online safety 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:

- The online safety curriculum should be provided as part of Computing / PHSE / other lessons and should be regularly revisited
- Pupils should be taught in lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information.
- Pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- *Pupils should be helped to understand the need for the pupil Acceptable Use 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 students / pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.*

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

- The school allows:

	School Devices			Personal Devices		
	School owned for single user	School owned for multiple users		Student owned	Staff owned	Visitor owned
Allowed in school	*Yes*	*Yes*		*No*	*Yes**	*Yes**
Full network access	*Yes*	*Yes*		*No*	*No*	*No*
Internet	*Yes*	*Yes*		*No*	*Yes**	*Yes**
Network access	*Yes*	*Yes*		*No*	*No*	*No*

***Reason for use and content needs to be cleared with Head in advance.**

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 / 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 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 (via a fomr) 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 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 *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 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 in association with photographs.

Data Protection

Personal data will be recorded, processed, transferred and made available according to the Data Protection Act 1998 which states that personal data must be:

- Fairly and lawfully processed
- Processed for limited purposes

- Adequate, relevant and not excessive
- Accurate
- Kept no longer than is necessary
- Processed in accordance with the data subject's rights
- Secure
- Only transferred to others with adequate protection.

The school must ensure that:

- 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.
- Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay.
- All personal data will be fairly obtained in accordance with the "Privacy Notice" and lawfully processed in accordance with the "Conditions for Processing".
- It has a Data Protection Policy (see appendix for template policy)
- It is registered as a Data Controller for the purposes of the Data Protection Act (DPA)

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

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			Pupils				
Communication Technologies	Allowed	Allowed at certain times	Not Allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed	
Mobile phones may be brought to the school	X						X	
Use of mobile phones in school session times			X				X	
Use of mobile phones for school business on trips etc	X						X	
Taking photos on personal mobile phones			X					
Use of school tablets	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 messaging apps		X					X	
Use of social media to communicate with pupils/ex-pupils			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. 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.

- Pupils in KS2 m ay be given temporary school email addresses as part of curriculum work and will be bound by the regulations within this policy.
- Pupils will be taught safety issues linked to the use of emails.
- Communication between staff and parents / carers (email etc) must be professional in tone and content.
  It should only take place on the school email service.

Social Media - Protecting Professional Identity

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

The school academy 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; ; data protection; reporting issues. Clear reporting guidance, including responsibilities, procedures and sanctions through explanation of this policy
- 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 academy 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

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. At present the school does not use this service.

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 / or outside the school when using school equipment . 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	

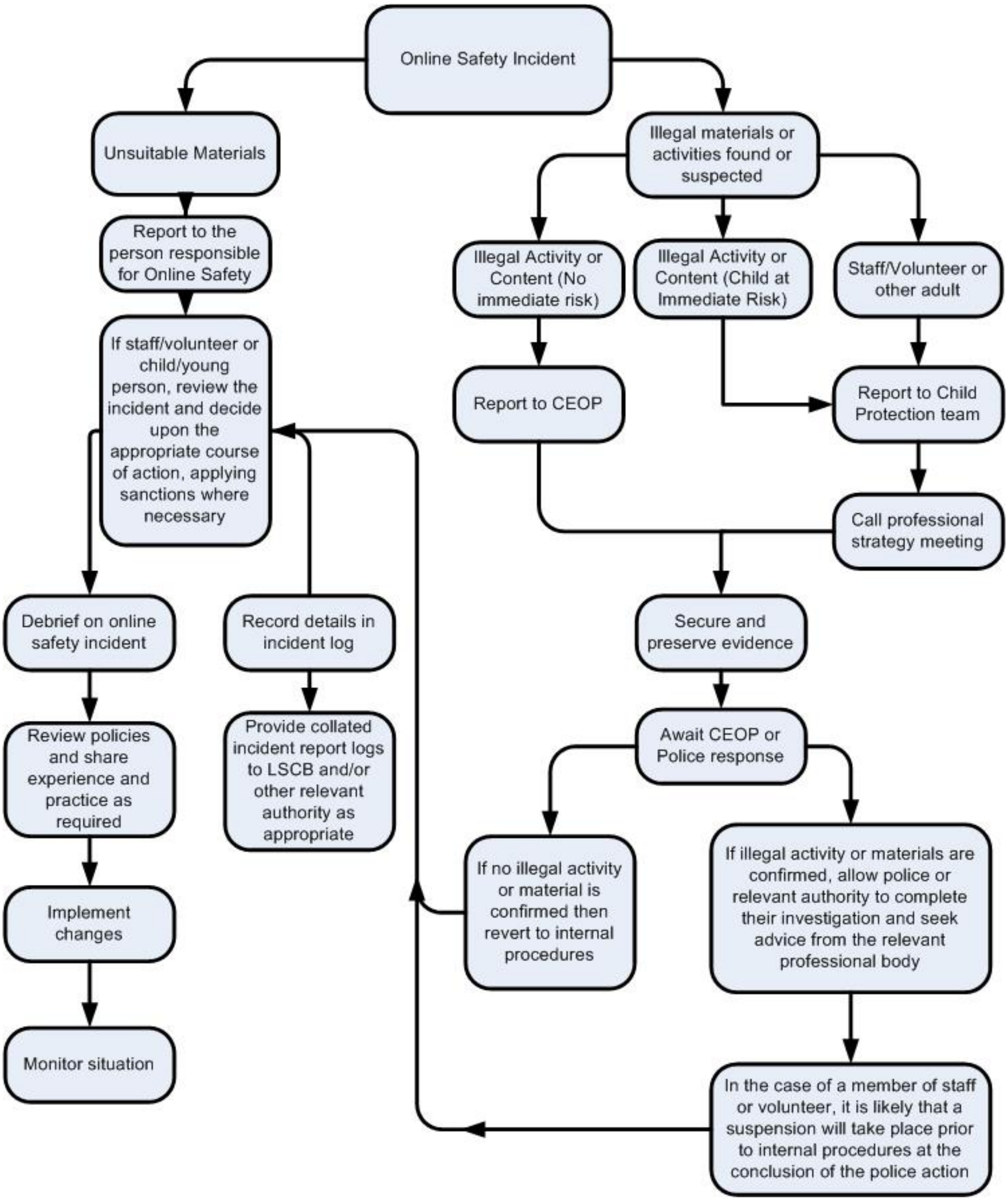
	Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Using school systems to run a private business					X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school / academy					X	
Infringing copyright					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	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)					X	
On-line gaming (educational)		X				
On-line gaming (non-educational)					X	
On-line gambling					X	
On-line shopping / commerce			X			
File sharing			X			
Use of social media			X			
Use of messaging apps			X			
Use of video broadcasting e.g. Youtube			X			

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.


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
Review policies and share experience and practice as required
Implement changes
Monitor situation
Record details in incident log
Provide collated incident report logs to LSCB and/or other relevant authority as appropriate
Illegal materials or activities found or suspected
Illegal Activity or Content (No immediate risk)
Illegal Activity or Content (Child at Immediate Risk)
Staff/Volunteer or other adult
Report to CEOP
Report to Child Protection team
Call professional strategy meeting
Secure and preserve evidence
Await CEOP or 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 prior to internal procedures at the conclusion of the police action

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/governor 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
  - 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 / academy will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the 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								
Pupils Incidents	Refer to class teacher	Refer to Head of Department / 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		X						
Unauthorised / inappropriate use of mobile phone / digital camera / other mobile device			X			X			
Unauthorised / inappropriate use of social media / messaging apps / personal email			X			X			
Unauthorised downloading or uploading of files			X			X			
Allowing others to access school academy network by sharing username and passwords			X			X			
Attempting to access or accessing the school network, using another student's / pupil's account			X			X			
Attempting to access or accessing the school network, using the account of a member of staff			X			X			
Corrupting or destroying the data of other users			X			X			
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature			X			X		X	
Continued infringements of the above, following previous warnings or sanctions			X	X		X			X
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school			X			X		X	
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						
Deliberately accessing or trying to access offensive or pornographic material			X	X		X		X	X
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act			X			X			

	Actions / Sanctions							
Staff Incidents	Refer to line managerr	Refer to Headteacher Principal	Refer to Local Authority / HR	Refer to Police	Refer to Technical Support Staff for action re filtering etc.	Warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		X	X	X				

In all other areas it would be reportable to the Head/Chair of Governors and the school would take advice about the appropriate action/sanction.

Record of reviewing devices / internet sites (responding to incidents of misuse)

Group: --

Date: --

Reason for investigation: --

Details of first reviewing person

Name: --

Position: --

Signature: --

Details of second reviewing person

Name: --

Position: --

Signature: --

Name and location of computer used for review (for web sites)

Web site(s) address / device	Reason for concern

Conclusion and Action proposed or taken
