









Together We Learn, Together We Succeed

Rusper Primary School Online Safety Policy

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Development / Monitoring / Review of this Policy

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

- Headteacher
- Staff
- Governors
- Parents and Carers

Schedule for Development / Monitoring / Review

This Online Safety policy was approved by the Governing Body on:	16. 7. 2019
The implementation of this Online Safety policy will be monitored	Designated Safeguarding Lead
by the:	Deputy Designated
	Safeguarding Lead
	Computing lead
	Designated Safeguarding
	Governor
Monitoring will take place at regular intervals:	Annually in Summer term
The Governing Body will receive a report on the implementation	
of the Online Safety Policy generated by the monitoring group	Annually in Summer term
(which will include anonymous details of online safety incidents)	
at regular intervals:	
The Online Safety Policy will be reviewed annually, or more	
regularly in the light of any significant new developments in the use	July 2020
of the technologies, new threats to online safety or incidents that	
have taken place. The next anticipated review date will be:	
Should serious online safety incidents take place, the following	LA Safeguarding Officer
external persons / agencies should be informed:	LADO
	Police

The school will monitor the impact of the policy using:

- Logs of reported incidents on CPOMS
- Monitoring logs of internet activity (including sites visited) / filtering
- Surveys / questionnaires of
 - ✓ students / pupils
 - ✓ parents / carers

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 / Principals to such extent as is reasonable, to regulate the behaviour of students / 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 / Board of Directors

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

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

Headteacher / Principal and Senior Leaders

Headteacher and Senior Leaders

- The Headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community, including the day to day responsibility for online safety
- 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 / MAT / other relevant body disciplinary procedures). Online Safety BOOST includes an 'Incident Response Tool' that outlines the steps (and forms to complete) any staff facing an issue, disclosure or report, need to follow. More information is available at: https://boost.swgfl.org.uk/
- The Headteacher / 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.
 Online Safety BOOST includes access to unlimited online webinar training – further details are at https://boost.swgfl.org.uk/
- The Online safety governor will receive regular monitoring reports from the Headteacher

Online Safety Officer / Lead

This is the Headteacher

- 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, (Examples of suitable log sheets may be
 found later in this document). Online Safety BOOST includes access to Whisper,
 an anonymous reporting app that installs onto a school website and extends the
 schools ability to capture reports from staff, children and parents
 https://boost.swgfl.org.uk/
- meets regularly with Online Safety Governor to discuss current issues, review incident logs and filtering / change control logs
- reports regularly to Online Safety governor

Network Manager / Technical staff

The IT contractor 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 is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person (see appendix "Technical Security Policy Template" for good practice)
- 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 / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Headteacher / Senior Leader; for investigation / action / sanction
- that monitoring software / systems are implemented and updated as agreed in school policies

Teaching and Support Staff

Are responsible for ensuring that:

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

Designated Safeguarding Lead / Designated Person / Officer

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

This will consist of the Headteacher, staff, parent and governor representatives, computing subject lead and selected pupils,

The Online Safety Group provides a consultative group that has wide representation from the school community, with responsibility for issues regarding online safety and the monitoring the Online Safety Policy including the impact of initiatives. The group will also be responsible for regular reporting to the Governing Body.

Members of the Online Safety Group will assist with:

- the production / review / monitoring of the school Online Safety Policy / documents.
- the production / review / monitoring of the school filtering policy (if the school chooses to have one) and requests for filtering changes.
- mapping and reviewing the online safety / digital literacy curricular provision ensuring relevance, breadth and progression
- monitoring network / internet / incident logs
- consulting stakeholders including parents / carers and the pupils about the online safety provision
- monitoring improvement actions identified through use of the 360 degree safe self-review tool

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 / 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

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 should be provided as part of Computing / PHSE / other lessons and should be regularly revisited
- Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial / pastoral activities
- Pupils should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information.
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- Pupils should be helped to understand the need for the pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school.
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices

- in lessons where internet use is pre-planned, it is best practice that pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (eg 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:

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

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:

- An audit of the online safety training needs of all staff will be carried out regularly. Online Safety BOOST includes unlimited online webinar training for all, or nominated, staff (https://boost.swgfl.org.uk/)
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school Online Safety Policy and Acceptable Use Agreements. Online Safety BOOST includes an array of presentations and resources that can be presented to new staff (https://boost.swgfl.org.uk/)
- It is expected that some staff will identify online safety as a training need within the performance management process.
- The Online Safety Officer / Lead (or other nominated person) will receive regular updates through attendance at external training events (eg 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 / INSET days.
- The Online Safety Officer / Lead (or other nominated person) will provide advice / guidance / training to individuals as required. Online Safety BOOST includes an array of presentation resources that the Online Safety coordinator can access to deliver to staff (https://boost.swgfl.org.uk/) It includes presenter notes to make it easy to confidently cascade to all staff

Training – Governors

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

- Attendance at training provided by the Local Authority / National Governors Association / or other relevant organisation (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 online safety responsibilities:

School technical systems will be managed in ways that ensure that the school meets recommended technical requirements.

There will be regular reviews and audits of the safety and security of school technical systems

- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school technical systems and devices.
- All users in Year 5 & 6 will be provided with a username and secure password by the school's technical support worker. The Online Safety Officer/Headteacher 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 every year
- The "master / administrator" passwords for the school ICT systems, used by the Network Manager (or other person) must also be available to the Headteacher or other nominated senior leader and kept in a secure place (eg school safe)

- The school business manager 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.
- The school has provided differentiated user-level filtering
- School technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement.
- An appropriate system is in place (CPOMS for pupils and Confidential Reporting policy for staff) for users to report any actual / potential technical incident / security breach to the relevant person, as agreed).
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.
- An agreed policy is in place for the provision of temporary access of "guests" (eg trainee teachers, supply teachers, visitors) onto the school systems – these users log on as "supply"
- An agreed policy is in place regarding the extent of personal use that users (staff) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place that forbids staff from downloading executable files and installing programmes on school devices – requests for this should be made to the technical staff
- An agreed policy is in place 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 (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.

- 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	School owned	Authorised	Student	Staff	Visitor		
	owned for	for multiple	device ¹	owned	owned	owned		
	single user	users						
Allowed in school	Yes	Yes	No	No ²	Yes	Yes		
Full network access	Yes	Yes	n/a	n/a				
Internet only					Yes	Yes		
No network access								

School owned / provided devices:

Are allocated to staff needing to use remote access from home

- Personal use is permitted (within the parameters of acceptable use)
- Technical support from JSPC to resolve issues is permitted
- Devices are returned when a user leaves employment of the school or no longer needs remote access
- Documents and images should be stored on the school network through remote access rather than on the computer's hard drive

Personal devices:

 Staff and visitors may use personal devices in school but may not connect to the network

- Staff should not use personal devices for school business unless previously agreed with the headteacher
- No technical support is available for personal devices
- Staff using personal devices for personal use should do so away from children (ie in staff room or outside during the school day)
- No documents or images should be stored on personal devices a school SD card is available for staff to use
- The school accepts no liability for loss/damage or malfunction following access to the Network

¹ Authorised device – purchased by the pupil/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school. The school does not currently subscribe to such schemes.

² The school should add below any specific requirements about the use of mobile / personal devices in school

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and students / 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 / 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 be taken on
 school equipment where possible. If the personal equipment of staff is used,
 permission must be sought from the Headteacher, in advance, and a school SD
 card must be used to store images.
- 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.
- Pupils' work can only be published with the permission of the pupil and parents or carers.

Data Protection

Personal data will be recorded, processed, transferred and made available according to the current data protection legislation.

The school must ensure that:

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

Staff must ensure that they:

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

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

- The data must be encrypted and password protected.
- The device must be password protected.
- 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 8	& other	adults		Studen	pils		
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 the school / academy	✓							√
Use of mobile phones in lessons				~				✓
Use of mobile phones in social time	✓							√
Taking photos on mobile phones / cameras		✓	✓					√
Use of other mobile devices e.g. tablets, gaming devices				~	/			√
Use of personal email addresses in school / academy, or on school / academy network				~				✓
Use of school / academy email for personal emails				~				✓
Use of messaging apps	✓							✓

Use of social media	✓	✓	li		✓
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. Staff and pupils should therefore use only the school email service to communicate with others when in school, or on school systems (e.g. by remote access).
- 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. (Online Safety BOOST includes an
 anonymous reporting app Whisper https://boost.swgfl.org.uk/)
- Any digital communication between staff and students / pupils or parents / carers (email, social media, chat, blogs, VLE etc) 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.
- Whole class / group email addresses may be used at KS1 and Y3/4, while pupils in Y5 & Y6 will be provided with individual school email addresses for educational use.
- Pupils should 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

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 or local authority liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to pupils, staff and the school through:

- Ensuring that personal information is not published
- Training is provided regarding acceptable use; Online Safety BOOST includes unlimited webinar training on this subject: https://boost.swgfl.org.uk/)

• Clear reporting guidance, including responsibilities, procedures and sanctions

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

Monitoring of Public Social Media

- As part of active social media engagement, it is considered good practice to proactively 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 Act	ions	Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
oad, data posals 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
oad, uplo rks, proj itain or i	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
s shall not visit Internet sites, make, post, download, upload, data ransfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	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
tes, make, pass on, ma comme	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
rnet si te or p	Pornography				X	
t Inter unica	Promotion of any kind of discrimination				X	
l not visi rr, comm	threatening behaviour, including promotion of physical violence or mental harm				X	
s shall ansfe	Promotion of extremism or terrorism				X	
Users	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	ol systems to run a private business				X	
	ms, applications, websites or other mechanisms that bypass the 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)	✓				
On-line gaming (non-educational)				✓	
On-line gambling				✓	
On-line shopping / commerce		✓	✓		
File sharing		✓			
Use of social media		✓	✓		
Use of messaging apps	✓				
Use of video broadcasting e.g. Youtube		✓	✓		

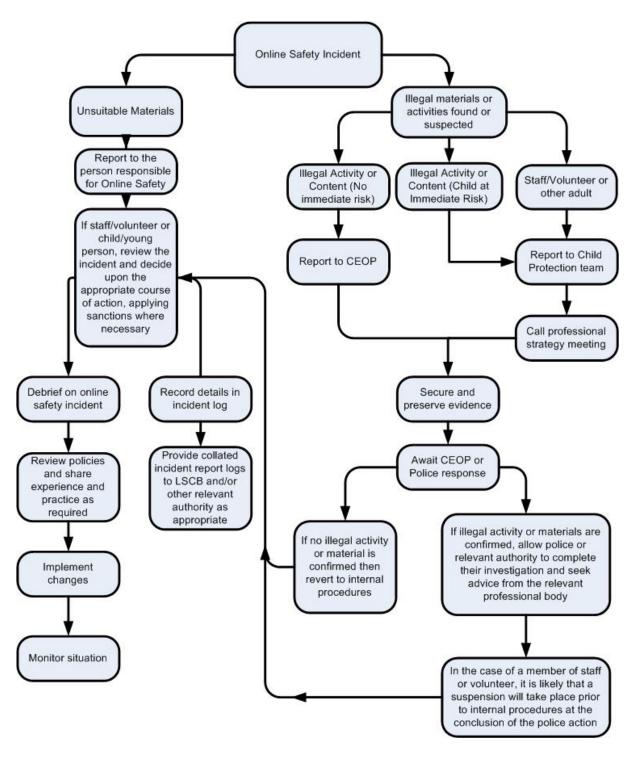
Responding to incidents of misuse

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:
- Internal response or discipline procedures
- Involvement by Local Authority or national / local organisation (as relevant).
- Police involvement and/or action
- If content being reviewed includes images of child abuse then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:
- incidents of 'grooming' behaviour
- the sending of obscene materials to a child
- adult material which potentially breaches the Obscene Publications Act
- criminally racist material
- 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 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:

Pupils Incidents	Refer to class teacher	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 exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		-	<u> </u>		✓		✓	<u> </u>
Unauthorised use of non-educational sites during lessons	✓	✓			✓			
Unauthorised / inappropriate use of mobile phone / digital camera / other mobile device	✓	✓			✓			
Unauthorised / inappropriate use of social media / messaging apps / personal email	✓	✓			✓			
Unauthorised downloading or uploading of files	✓	✓			✓			
Allowing others to access school network by sharing username and passwords	✓	✓			✓			
Attempting to access or accessing the school network, using another pupil's account	✓	✓			✓			
Attempting to access or accessing the school network, using the account of a member of staff		✓			✓			
Corrupting or destroying the data of other users	✓	✓			√			

Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	✓	✓		✓		
Continued infringements of the above, following previous warnings or sanctions		✓		✓		✓
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school		✓		✓	✓	
Using proxy sites or other means to subvert the school's filtering system		✓		✓	✓	
Accidentally accessing offensive or pornographic material and failing to report the incident		✓		✓		
Deliberately accessing or trying to access offensive or pornographic material		✓		✓	✓	
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act		√		✓		

Staff Incidents	Refer to Headteacher / Local Authority / HR as appropriate	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).	✓	✓				✓
Inappropriate personal use of the internet / social media / personal email	✓					
Unauthorised downloading or uploading of files	✓		✓			
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	√					
Careless use of personal data e.g. holding or transferring data in an insecure manner	✓					
Deliberate actions to breach data protection or network security rules	✓			✓		
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	✓		✓	✓		
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	✓			✓		
Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with students / pupils	√			✓		
Actions which could compromise the staff member's professional standing	✓					
Actions which could bring the school / academy into disrepute or breach the integrity of the ethos of the school	✓					
Using proxy sites or other means to subvert the school's filtering system	✓		✓	✓		
Accidentally accessing offensive or pornographic material and failing to report the incident	✓					
Deliberately accessing or trying to access offensive or pornographic material	✓	√			✓	
Breaching copyright or licensing regulations	✓			✓		

Continued infringements of the above, following previous	1			1
warnings or sanctions	·			·

Appendix

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

SWGfL Online Safety Policy Templates

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
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- Representatives of SW Local Authorities
- Plymouth University Online Safety
- NEN / Regional Broadband Grids

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Appendices

Acceptable Use Policy Agreement for Y5 & Y6 pupils

I understand that I must use school systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users. For my own personal safety:

- I understand that the school will monitor my use of the systems, devices and digital communications.
- I will keep my username and password safe and secure I will not share it, nor
 will I try to use any other person's username and password. I understand that I
 should not write down or store a password where it is possible that someone
 may steal it.
- I will be aware of "stranger danger", when I am communicating on-line.
- I will not disclose or share personal information about myself or others when online (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc)
- I will not arrange to meet people off-line that I have communicated with on-line
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it on-line. I understand that everyone has equal rights to use technology as a resource and:
- I understand that the school systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not use the school systems or devices for any activity that my teacher has not given permission for I will act as I expect others to act toward me:
- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission. I recognise that the school has a responsibility to maintain the security and integrity of the technology it offers me and to ensure the smooth running of the school:
- I understand the risks and will not try to upload, download or access any
 materials which are illegal or inappropriate or may cause harm or distress to
 others, nor will I try to use any programmes or software that might allow me to
 bypass the filtering / security systems in place to prevent access to such
 materials.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.
- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person / organisation who sent the email, or if I have any

- concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will not install or attempt to install or store programmes of any type on any school device, nor will I try to alter computer settings.
- I will not bring my own device to school without permission from the Headteacher
- I will not try to access any social media sites in school

When using the internet for research or recreation, I recognise that:

- I should ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not try to download copies (including music and videos)
- When I am using the internet to find information, I should take care to check that the information that I access is accurate, as I understand that the work of others may not be truthful and may be a deliberate attempt to mislead me.

I understand that I am responsible for my actions, both in and out of school:

- I understand that the school also has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of school and where they involve my membership of the school community (examples would be cyber-bullying, use of images or personal information).
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I will be subject to disciplinary action. This may include loss of access to the school network / internet, time-outs, fixed term exclusion, contact with parents and in the event of illegal activities involvement of the police.

Please complete the sections on the next page to show that you have read, understood and agree to the rules included in the Acceptable Use Agreement. If you do not sign and return this agreement, access will not be granted to school systems and devices.

Pupil Acceptable Use Agreement Form for Y5 & Y6 pupils

This form relates to the Pupil Acceptable Use Agreement, to which it is attached. Please complete the sections below to show that you have read, understood and agree to the rules included in the Acceptable Use Agreement. If you do not sign and return this agreement, access will not be granted to school systems.

I have read and understand the above and agree to follow these guidelines when:

- I use the school systems and devices (both in and out of school)
- I use my own equipment out of the school in a way that is related to me being a member of this school eg communicating with other members of the school, accessing school email, website etc.

This is how we stay safe when we use computers:

- I will ask a teacher or suitable adult if I want to use the computers
- I will only use activities that a teacher or suitable adult has told or allowed me to use
- I will take care of the computer and other equipment
- I will ask for help from a teacher or suitable adult if I am not sure what to do or if I think I have done something wrong
- I will tell a teacher or suitable adult if I see something that upsets me on the screen
- I know that if I break the rules I might not be allowed to use a computer

Name of Student / Pupil:	······
Group / Class:	
Signed:	
Date:	

Pupil Acceptable Use Policy Agreement for YR - Y4

This is how we stay safe when we use computers:

- I will ask a teacher or suitable adult if I want to use the computers
- I will only use activities that a teacher or suitable adult has told or allowed me to use
- I will take care of the computer and other equipment
- I will ask for help from a teacher or suitable adult if I am not sure what to do or if I think I have done something wrong
- I will tell a teacher or suitable adult if I see something that upsets me on the screen
- I know that if I break the rules I might not be allowed to use a computer

Parent / Carer Acceptable Use Agreement Template

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies provide powerful tools, which open up new opportunities for everyone. They can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This Acceptable Use Policy is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that parents and carers are aware of the importance of online safety and are involved in the education and guidance of young people with regard to their online behaviour.

The school will try to ensure that pupils will have good access to digital technologies to enhance their learning and will, in return, expect the pupils to agree to be responsible users. A copy of the Pupil Acceptable Use Policy is attached to this permission form, so that parents / carers will be aware of the school expectations of the young people in their care. Parents are requested to sign the permission form below to show their support of the school in this important aspect of the school's work.

Under new GDPR guidelines, parents are asked to note the following information regarding how the school will use and store pupils' personal data:

regarding now the school will use and store pupils	personal data.
Who will have access to this form	
Where this form will be stored	
How long this form will be stored for	
How this form will be destroyed	
Where any digital/video images may be published,	
e.g. Twitter, Facebook, the school website, local press,	
etc. (see relevant section of form below)	
Who will have access to the images	
Where the images will be stored	
How long the images will be stored for	
How the images will be destroyed	
How a request for deletion of the images can be made	

Permission Form

Parent / Carer's Name:	
Pupil's Name:	
As the parent / carer of the access to the internet and t	e above pupil, I give permission for my son / daughter to have to ICT systems at school.
daughter and that they have	ol has discussed the Acceptable Use Agreement with my son / re received, or will receive, online safety education to help rtance of safe use of technology and the internet – both in
received, or will receive, or	nter has signed an Acceptable Use Agreement and has nline safety education to help them understand the echnology and the internet – both in and out of school.
monitoring and filtering sy use the internet and system	ol will take every reasonable precaution, including stems, to ensure that young people will be safe when they ns. I also understand that the school cannot ultimately be ture and content of materials accessed on the internet and
that the school will contact Acceptable Use Policy. I will encourage my child to	/ daughter's activity on the systems will be monitored and me if they have concerns about any possible breaches of the adopt safe use of the internet and digital technologies at chool if I have concerns over my child's online safety.
Signed:	
Date: _	

Use of Digital / Video Images

The use of digital / video images plays an important part in learning activities. Pupils and members of staff may use digital cameras to record evidence of activities in lessons and out of school.

These images may then be used in presentations in subsequent lessons. Images may also be used to celebrate success through their publication in newsletters, on the school website and occasionally in the public media. Where an image is publically shared by any means, this will either be un-named or only your child's first name will be used.

The school will comply with the Data Protection Act and request parent / carer's permission before taking images of members of the school. We will also ensure that when images are published that the young people cannot be identified by the use of their names.

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.

Parents / carers are requested to sign the permission form below to allow the school to take and use images of their children and for the parents / carers to agree.

Digital Images/ Video permissions form



Name of Child (Block capitals)

Rusper Primary School			
Name of person responsible for the child			
I understand that: • the school will take digital and /or video images of my child to support activities	port learning		
 "the media" may take images of activities that celebrate success an work of the school e.g. drama and musical performances, sports actively photographers acting on behalf of the school or the Local Authority for use in displays, in publications or on a website; embarrassing or distressing images will not be used; 	vities;		
• the images will not be associated with distressing or sensitive issue establishment will regularly review and delete unwanted material.	es; and the		
Having read the above statement, do you give your consent for photo images to be taken of your child? Please tick only one of the 3 boxes below that best describes how you images to be used.			
I do give permission for pictures of my child to be displayed in the school and published, with their first names and ages in: the press, and on school, Local Authority or press websites.			
I do give permission for pictures of my child to be displayed in the school and published in the press, and on school, Local Authority or press websites but not for them to be named .			
I do give permission for pictures to be taken and used within the school but not to be used in the press or on the websites.			
Please tick the following box if you give permission for images of you to support professional teaching.	ır child to be used		
I do give permission for pictures of my child to be used in lectures/seminars given by members of staff – I note that these are never retained by the participating university.			
I agree that if I take digital or video images at, or of school events whi	9		
of children, other than my own, I will not post these on social media Signature of person responsible for the child	31153		
organical of person responsible for the child			
Relationship to the child	Date		

Staff (and Volunteer) Acceptable Use Policy Agreement Template

School Policy

New technologies have become integral to the lives of children and young people in today's society, both within schools and in their lives outside school. The internet and other digital information and communications technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. They also bring opportunities for staff to be more creative and productive in their work. All users should have an entitlement to safe access to the internet and digital technologies at all times.

This Acceptable Use Policy is intended to ensure:

- that staff and volunteers will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that staff are protected from potential risk in their use of technology in their everyday work.
- The school will try to ensure that staff and volunteers will have good access to digital technology to enhance their work, to enhance learning opportunities for pupils' learning and will, in return, expect staff and volunteers to agree to be responsible users.

Under new GDPR guidelines, staff are asked to note the following information regarding how the school will use and store personal data:

Who will have access to this form	
Where this form will be stored	
How long this form will be stored for	
How this form will be destroyed	
Where any digital/video images may be published, e.g. Twitter, Facebook, the school website, local press, etc. (see relevant section of form below)	
Who will have access to the images	
Where the images will be stored	
How long the images will be stored for	

How the images will be destroyed	
How a request for deletion of the images can be made	

Acceptable Use Policy Agreement

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

For my professional and personal safety:

- I understand that the school will monitor my use of the school digital technology and communications systems.
- I understand that the rules set out in this agreement also apply to use of these technologies (e.g. laptops, email etc.) out of school, and to the transfer of personal data (digital or paper based) out of school
- I understand that the school digital technology systems are primarily intended for educational use and that I will only use the systems for personal or recreational use within the policies and rules set down by the school.
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.
- I will be professional in my communications and actions when using school ICT systems:
- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner, I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and / or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital / video images.
- I will not use my personal equipment to record these images, unless I have permission to do so. Where these images are published (eg on the school website) it will not be possible to identify by name, or other personal information, those who are featured.
- I will only communicate with parents / carers using official school systems. Any such communication will be professional in tone and manner. I will not use personal emails or social media to contact parents/carers on school business

• I will not engage in any on-line activity that may compromise my professional responsibilities.

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

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

When using the internet in my professional capacity or for school sanctioned personal use:

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

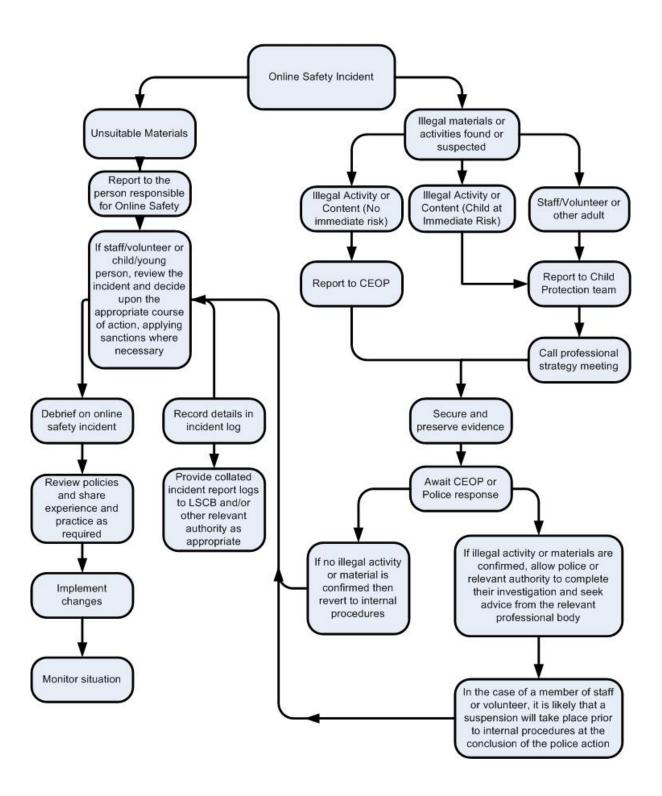
I understand that I am responsible for my actions in and out of the school:

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

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

Signed:		 	
Date:	_		

Responding to incidents of misuse – flow chart



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

Group:	
Date:	
Reason for investigation:	
Details of first reviewing perso	on
Name:	
Position:	
Signature:	
Details of second reviewing pe	rson
Name:	<u></u>
Position:	<u></u>
Signature:	
Name and location of compute	r used for review (for web sites)
Web site(s) address / device	Reason for concern
Conclusion and Action propose	ed or taken





Reporting Log						
Group:					,	
Date	Time	Incident	Action Taken		Incident	Signature
			What?	By Whom?	Reported By	





Training Needs Audit Log					
Group:					
Relevant training the last 12 months		To be met by	Cost	Review Date	





School Technical Security Policy Template (including filtering and passwords)

Introduction

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

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

Responsibilities

The management of technical security will be the responsibility of the Headteacher in consultation with JSPC

Technical Security

Policy statements

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 receive guidance and training and will be effective in carrying out their responsibilities:

School technical systems will be managed in ways that ensure that the school meets recommended technical requirements

- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- Appropriate security measures are in place to protect the servers, firewalls, switches, routers, wireless systems, work stations, mobile devices etc. from accidental or malicious attempts which might threaten the security of the school systems and data.
- Responsibilities for the management of technical security are clearly assigned to appropriate and well trained staff





- All users will have clearly defined access rights to school technical systems. Details of
 the access rights available to groups of users will be recorded by the Technical Staff and
 will be reviewed, at least annually, by the Online Safety Group
- Users will be made responsible for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.
- The school business manager 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
- Mobile device security and management procedures are in place
- School technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement.
- Remote management tools are used by staff to control workstations and view users' activity
- An appropriate system is in place (confidential reporting policy) for users to report any actual / potential technical incident to the Online Safety Coordinator / Network Manager / Technician (or other relevant person, as agreed).
- An agreed policy is in place for the provision of temporary access of "guests" (e.g. trainee teachers, supply teachers, visitors) onto the school system.
- An agreed policy is in place regarding the downloading of executable files and the installation of programmes on school devices by users
- An agreed policy is in place regarding the extent of personal use that users (staff) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place regarding the use of removable media (eg memory sticks / CDs / DVDs) by users on school devices.
- The school infrastructure and individual workstations are protected by up to date software to protect against malicious threats from viruses, worms, trojans etc
- Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

Password Security

A safe and secure username / password system is essential if the above is to be established and will apply to all school technical systems, including networks, devices and email.

Policy Statements

- All users will have clearly defined access rights to school technical systems and devices.
 Details of the access rights available to groups of users will be recorded by the Network
 Manager (or other person) and will be reviewed, at least annually, by the Online Safety
 Group (or other group).
- All school networks and systems will be protected by secure passwords that are regularly changed
- The "master / administrator" passwords for the school systems, used by the technical staff must also be available to the Headteacher or other nominated senior leader and kept in a secure place eg school safe. Consideration should also be given to using two factor authentication for such accounts.
- All users (adults and young people) will have responsibility for the security of their username and password must not allow other users to access the systems using their





log on details and must immediately report any suspicion or evidence that there has been a breach of security.

- Passwords for new users, and replacement passwords for existing users will be allocated by JSPC. Any changes carried out must be notified to the manager of the password security policy (above).
- Users will change their passwords at regular intervals as described in the staff and pupil sections below
- Where passwords are set / changed manually requests for password changes should be authenticated by the Headteacher to ensure that the new password can only be passed to the genuine user

Staff Passwords

- All staff users will be provided with a username and password by JSPC who will keep an up to date record of users and their usernames.
- the password should be a minimum of 8 characters long and must include three of uppercase character, lowercase character, number, special characters
- must not include proper names or any other personal information about the user that might be known by others
- the account should be "locked out" following six successive incorrect log-on attempts
- temporary passwords e.g. used with new user accounts or when users have forgotten their passwords, shall be enforced to change immediately upon the next account log-on passwords shall not be displayed on screen, and shall be securely hashed (use of one-way encryption)
- Passwords should be
- different for different accounts, to ensure that other systems are not put at risk if one is compromised and should be different for systems used inside and outside of school
- should be changed at least every 60 to 90 days
- should not re-used for 6 months and be significantly different from previous passwords created by the same user.

Pupil Passwords

- All users at Y5 & Y6 will be provided with a username and password by JSPC who will keep an up to date record of users and their usernames.
- Users will be required to change their password every year
- Pupils will be taught the importance of password security
- School password routines should model good password practice for users
- The complexity (i.e. minimum standards) will be set with regards to the cognitive ability of the children.

Training / Awareness

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

- at induction
- through the school's online safety policy and password security policy
- through the Acceptable Use Agreement





Pupils will be made aware of the school's password policy:

- in lessons
- through the Acceptable Use Agreement
- Audit / Monitoring / Reporting / Review

The responsible person (JSPC) will ensure that full records are kept of:

- User Ids and requests for password changes
- User log-ins
- Security incidents related to this policy

Filtering

Introduction

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

It is important that the school has a filtering policy to manage the associated risks and to provide preventative measures which are relevant to the situation in this school.

Responsibilities

The responsibility for the management of the school's filtering policy will be held by JSPC. They will manage the school filtering, in line with this policy and will keep records / logs of changes and of breaches of the filtering systems. To ensure that there is a system of checks and balances and to protect those responsible, changes to the school filtering service must

- be logged in change control logs
- be reported to and authorised by a second responsible person (Headteacher) prior to changes being made
- be reported to the Online Safety Group every 12 months in the form of an audit of the change control logs

All users have a responsibility to report immediately to the Headteacher any infringements of the school's filtering policy of which they become aware or any sites that are accessed, which they believe should have been filtered.

Users must not attempt to use any programmes or software that might allow them to bypass the filtering / security systems in place to prevent access to such materials.

Policy Statements

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





changes to the filtering system. Where personal mobile devices are allowed internet access through the school network, filtering will be applied that is consistent with school practice.

- The school maintains and supports the managed filtering service provided by the Internet Service Provider (or other filtering service provider)
- The school has provided enhanced / differentiated user-level filtering through the use of the Quantum filtering programme.
- In the event of the technical staff needing to switch off the filtering for any reason, or for any user, this must be logged and carried out by a process that is agreed by the Headteacher (or other nominated leader).
- Mobile devices that access the school internet connection (whether school or personal devices) will be subject to the same filtering standards as other devices on the school systems
- Any filtering issues should be reported immediately to the filtering provider.
- Requests from staff for sites to be removed from the filtered list will be considered by the technical staff and authorised by the Headteacher. If the request is agreed, this action will be recorded and logs of such actions shall be reviewed regularly by the Online Safety Group.

Education / Training / Awareness

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

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

- the Acceptable Use Agreement
- induction training
- staff meetings, briefings, Inset.

Parents will be informed of the school's filtering policy through the Acceptable Use Agreement and through online safety awareness sessions / newsletter etc.

Changes to the Filtering System

• Users may request changes to the filtering by logging a request to JSPC, which may or may not be authorised by the headteacher

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

Monitoring

No filtering system can guarantee 100% protection against access to unsuitable sites. The school will therefore monitor the activities of users on the school network and on school equipment as indicated in the School Online Safety Policy and the Acceptable Use Agreement.

Audit / Reporting

Logs of filtering change controls and of filtering incidents will be made available to: (schools should amend as relevant)

• the second responsible person (Headteacher)





- Online Safety Group
- Online Safety Governor / Governors' committee
- External Filtering provider / Local Authority / Police on request

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

Further Guidance

Schools in England (and Wales) are required "to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering" (Revised Prevent Duty Guidance: for England and Wales, 2015).

Furthermore the Department for Education published proposed changes to 'Keeping Children Safe in Education' for consultation in December 2015. Amongst the proposed changes, schools will be obligated to "ensure appropriate filters and appropriate monitoring systems are in place. Children should not be able to access harmful or inappropriate material from the school or colleges IT system" however, schools will need to "be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding."

In response UKSIC produced guidance on – information on "Appropriate Filtering" NEN Technical guidance: http://www.nen.gov.uk/e-security-managing-and-maintaining-e-securitycybersecurity-in-schools/

Somerset Guidance for schools – this checklist is particularly useful where a school uses external providers for its technical support / security:

https://360safe.org.uk/Files/Documents/Somerset-Questions-for-Technical-Support-v4.aspx





School Personal Data Advice and Guidance

School Personal Data Handling

Recent publicity about data breaches suffered by organisations and individuals continues to make thearea of personal data protection a current and high profile issue for schools, academies and other organisations. It is important that the school has a clear and well understood personal data handling policy in order to minimise the risk of personal data breaches. A breach may arise from a theft, a deliberate attack on your systems, the unauthorised or malicious use of personal data by a member of staff, accidental loss, or equipment failure. In addition:

- No school or individual would want to be the cause of a data breach, particularly as the impact of data loss on individuals can be severe and cause extreme embarrassment, put individuals at risk and affect personal, professional or organisational reputation.
- Schools are "data rich" and the introduction of electronic storage and transmission of data has created additional potential for the loss of data
- The school will want to avoid the criticism and negative publicity that could be generated by any personal data breach.
- The school is subject to a wide range of legislation related to data protection and data use, with significant penalties for failure to observe the relevant legislation.
- It is a legal requirement for all schools to have a Data Protection Policy.

Schools have always held personal data on the pupils in their care, and increasingly this data is held digitally and accessible not just in the school but also from remote locations. It is important to stress that the data protection laws applies to all forms of personal data, regardless of whether it is held on paper or in electronic format. However, as it is part of an overall online safety policy template, this document will place particular emphasis on data which is held or transferred digitally.

Schools will need to carefully review their policy, in the light of pertinent Local Authority regulations and guidance and changes in legislation.

Introduction

Schools and their employees must do everything within their power to ensure the safety and security of any material of a personal or sensitive nature, including personal data. It is the responsibility of all members of the school community to take care when handling, using or transferring personal data that it cannot be accessed by anyone who does not:

- have permission to access that data
- need to have access to that data.

Data breaches can have serious effects on individuals and / or institutions concerned, can bring the school into disrepute and may well result in disciplinary action, criminal prosecution and fines imposed by the Information Commissioner's Office. Particularly, all transfer of data is subject to risk of loss or contamination.

Anyone who has access to personal data must know, understand and adhere to the relevant school policy which brings together the statutory requirements contained in relevant data





protection legislation and relevant regulations and guidance (where relevant from the Local Authority).

Legislative Context

With effect from 25th May 2018, the data protection arrangements for the UK change following the European Union General Data Protection Regulation (GDPR) announced in 2016. This represents a significant shift in legislation and replaces the Data Protection Act 1998. The UK legislation was announced on the 14th September 2017. The Data Protection Bill's (DP Bill) journey through parliament and the associated text has been published online. The EU GDPR gives members states, like the UK, limited opportunities to make unique provision for how the regulation applies. However, the GDPR and the DP Bill should not be considered separately from each other.

Are schools in England and Wales required to comply?

In short, yes. Any natural or legal person, public authority, agency or other body which processes personal data is considered a 'data controller'. Given the nature of schools and the personal data required in a variety of forms to operate a School this means that an educational college in the UK is required to comply.

Guidance for schools is available on the Information Commissioner's Office website including information about the new regulations.

Freedom of Information Act

All schools must have a Freedom of Information Policy which sets out how it will deal with FOI requests.

Good advice would encourage the School to:

- Delegate to the Headteacher day-to-day responsibility for FOI policy and the provision of advice, guidance, publicity and interpretation of the school's policy
- Consider designating an individual with responsibility for FOI, to provide a single point
 of reference, coordinate FOI and related policies and procedures, take a view on
 possibly sensitive areas and consider what information and training staff may need
- Consider arrangements for overseeing access to information and delegation to the appropriate governing body
- Proactively publish information with details of how it can be accessed through a Publication Scheme (see Model Publication Scheme below) and review this annually
- Ensure that a well-managed records management and information system exists in order to comply with requests
- Ensure a record of refusals and reasons for refusals is kept, allowing the school to review its access policy on an annual basis

Model Publication Scheme

The Information Commissioner's Office provides schools and organisations with a model publication scheme which they should complete. The school's publication scheme should be reviewed annually. The ICO produce guidance on the model publication scheme for schools. This is designed to support schools complete the Guide to Information for Schools.

Personal Data

The school and its employees will have access to a wide range of personal information and data. The data may be held in a digital format or on paper records. Personal data is defined as





any combination of data items that identifies an individual and provides specific information about them, their families or circumstances. This will include:

- Personal information about members of the school community including pupils, members of staff and parents / carers e.g. names, addresses, contact details, legal guardianship contact details, health records, disciplinary records
- Curricular / academic data e.g. class lists, pupil / student progress records, reports, references
- Professional records e.g. employment history, taxation and national insurance records, appraisal records and references
- Any other information that might be disclosed by parents / carers or by other agencies working with families or staff members.

Fee

The School should pay the relevant fee to the ICO.

Responsibilities

Every maintained school in the UK is required to appoint a Data Protection Officer as a core function of 'the business' includes:

- regular and systematic monitoring of individuals on a large scale;
- [the processing of] special categories³ of data on a large scale and data relating to criminal convictions and offences

³ 'Special categories of data' is the type of data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership;

The Data Protection Officer (DPO) can be internally or externally appointed. They must have:

- Expert knowledge
- Timely and proper involvement in all issues relating to data protection
- The necessary resources to fulfil the role
- Access to the necessary personal data processing operations
- A direct reporting route to the highest management level

The data controller must:

- Not give the DPO instructions regarding the performance of tasks
- Ensure that the DPO does not perform a duty or role that would lead to a conflict of interests
- Not dismiss or penalise the DPO for performing the tasks required of them

As a minimum a Data Protection Officer must:

- Inform, as necessary, the controller, a processor or an employee of their obligations under the data protection laws
- Provide advice on a data protection impact assessment
- Co-operate with the Information Commissioner
- Act as the contact point for the Information Commissioner
- Monitor compliance with policies of the controller in relation to the protection of personal data





• Monitor compliance by the controller with data protection laws

The school may also wish to appoint a Data Manager. Schools are encouraged to separate this role from that of Data Protection Officer, where possible. This person will keep up to date with current legislation and guidance and will:

- determine and take responsibility for the school's information risk policy and risk assessment
- oversee the System Controllers

The school may also wish to appoint System Controllers for the various types of data being held (e.g. pupil information / staff information / assessment data etc.). These Controllers will manage and address risks to the information and will understand:

- what information is held, for how long and for what purpose,
- how information has been amended or added to over time, and genetic data, biometric data or data concerning health or sex life and sexual orientation
- who has access to the data and why.

Everyone in the school has the responsibility of handling protected or sensitive data in a safe and secure manner.

Governors are required to comply fully with this policy in the event that they have access to personal data, when engaged in their role as a Governor.

Information to Parents / Carers - the Privacy Notice and Consent

In order to comply with the fair processing requirements in data protection law, the school will inform parents / carers of all pupils of the data they collect, process and hold on the pupils, the purposes for which the data is held and the third parties (e.g. LA, DfE, etc.) to whom it may be passed. This privacy notice will be passed to parents / carers for example in the prospectus, newsletters, reports or a specific letter / communication. Parents / carers of young people who are new to the school will be provided with the privacy notice through an appropriate mechanism.

More information about the suggested wording of privacy notices can be found on the DfE website

The DFE only publishes documents for England. But these template privacy notices may be suitable for amendment by schools in other UK nations.

Consent under the regulation has changed. Consent is defined as:

"in relation to the processing of personal data relating to an individual, means a freely given, specific, informed and unambiguous indication of the individual's wishes by which the individual, by a statement or by a clear affirmative action, signifies agreement to the processing of the personal data"

This means that where a school is relying on consent as the basis for processing personal data that consent has to be clear, meaning that pre-ticked boxes, opt-out or implied consent are no longer suitable.

Pupils aged 13 or over (the age proposed in the Data Protection Bill, subject to Parliamentary approval) may be able to consent to their data being processed for the purposes of information society services. The GDPR does not specify an age of consent for general processing bur schools should consider the capacity of pupils to freely give their informed consent.





Schools should satisfy themselves that their consent forms are clear and written in plain language.

Consent should also detail in a very clear and specific way why this is necessary, what will happen to the data, and, how and when it will be disposed of.

Consent is just one of the six lawful bases for processing data:

- 1. Consent:
- 2. Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- 3. Legal obligation: the processing is necessary for you to comply with the law
- 4. Vital interests: the processing is necessary to protect someone's life.
- 5. Public task: the processing is necessary for you to perform a task in the public interest or for official functions, and the task or function has a clear basis in law.
- 6. Legitimate interests: processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. (This cannot apply if you are a public authority processing data to perform your official tasks.)

Previously maintained schools were able to rely on the 'legitimate interests' justification. But under the new laws, this has been removed for Public Bodies (which includes schools as defined in Schedule 1 of the Freedom of Information Act 2000 and referenced in the UK Data Protection Bill 2017). This now means that should you wish to process the personal data of a child a risk assessment must be completed and justification documented.

Parental permission for use of cloud hosted services

Schools that use cloud hosting services are advised to seek appropriate consent to set up an account for pupils.

Data Protection Impact Assessments (DPIA)

According to the ICO, Data Protection Impact Assessments (DPIA): "help organisations to identify the most effective way to comply with their data protection obligations and meet individuals' expectations of privacy."

These will be carried out by Data Managers under the support and guidance of the DPO. These are intended to be carried out before processing activity starts, although some may need to be retrospective in the early stages of compliance activity.

The risk assessment will involve:

- Recognising the risks that are present
- Judging the level of the risks (both the likelihood and consequences)
- Prioritising the risks.

According to the ICO a DPIA should contain:

- A description of the processing operations and the purpose.
- An assessment of the necessity and proportionality of the processing in relation to the purpose.
- An assessment of the risks to individuals.
- The measures in place to address risk, including security and to demonstrate that you comply.





Or more simply and fully:

- Who did you talk to about this?
- What is going to happen with the data and how collection, storage, usage, disposal
- How much personal data will be handled (number of subjects)
- Why you need use personal data in this way
- What personal data (including if it's in a 'special category') are you using
- At what points could the data become vulnerable to a breach (loss, stolen, malicious)
- What are the risks to the rights of the individuals if the data was breached
- What are you going to do in order to reduce the risks of data loss and prove you are compliant with the law

DPIA is an ongoing process and should be re-visited at least annually to verify that nothing has changed since the processing activity started.

Special categories of personal data

The following list is a list of personal data listed in the GDPR as a 'special category'. "revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation"

In order to lawfully process special category data, you must identify both a lawful basis and a separate condition for processing special category data. You should decide and document this before you start processing the data.

Training & awareness

All staff must receive data handling awareness / data protection training and will be made aware of their responsibilities, through opportunities such as:

- Induction training for new staff
- Staff meetings / briefings / INSET
- Day to day support and guidance from System Controllers

Secure storage of and access to data

The school should ensure that systems are set up so that the existence of protected files is hidden from unauthorised users and that users will be assigned a clearance that will determine which files are accessible to them. Access to protected data will be controlled according to the role of the user. Members of staff will not, as a matter of course, be granted access to the whole management information system.

Good practice suggests that all users will use strong passwords made up from a combination of simpler words. User passwords must never be shared.

Personal data may only be accessed on machines that are securely protected. Any device that can be used to access personal data must be locked if left (even for very short periods) and set to auto lock if not used for five minutes.

All storage media must be stored in an appropriately secure and safe environment that avoids physical risk, loss or electronic degradation.

Personal data should only be stored on school equipment. Private equipment (i.e. owned by the users) must not be used for the storage of school personal data.





When personal data is stored on any portable computer system, USB 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.

The school will need to set its own policy as to whether data storage on removal media is allowed, even if encrypted. Some organisations do not allow storage of personal data on removable devices.

The school should have a clear policy and procedures for the automatic backing up, accessing and restoring all data held on school systems, including off-site backups.

The school should have clear policy and procedures for the use of "Cloud Based Storage Systems" (for example Dropbox, Microsoft 365, Google drive) and is aware that data held in remote and cloud storage is still required to be protected in line with the Data Protection Act. The school will ensure that it is satisfied with controls put in place by remote / cloud based data services providers to protect the data.

The ICO produced guidance about cloud storage for organisations in 2012.

As a Data Controller, the school is responsible for the security of any data passed to a "third party".

Data Protection clauses must be included in all contracts where personal data is likely to be passed to a third party.

All paper based personal data must be held in lockable storage, whether on or off site.

Subject Access Requests

Data subjects have a number of rights in connection with their personal data:

- Right to be informed Privacy notices
- Right of access Subject Access Request
- Right to rectification correcting errors
- Right to erasure deletion of data when there is no compelling reason to keep it
- Right to restrict processing blocking or suppression of processing
- Right to portability Unlikely to be used in a School context
- Right to object objection based on grounds pertaining to their situation
- Rights related to automated decision making, including profiling

Clearly several of these have the opportunity to impact on schools, one being the right of access. Procedures must be in place to deal with Subject Access Requests i.e. a written request to see all or a part of the personal data held by the data controller in connection with the data subject. Data subjects have the right to know: if the data controller holds personal data about them; a description of that data; the purpose for which the data is processed; the sources of that data; to whom the data may be disclosed; and a copy of all the personal data that is held about them. The school must provide the information free of charge, however a 'reasonable fee' may be charged where the request is manifestly unfounded or excessive, especially if this is a repetitive request. See later information on Records of Processing Activity.





Secure transfer of data and access out of school

The school recognises that personal data may be accessed by users out of school, or transferred to the LA or other agencies. In these circumstances:

- Users may not remove or copy sensitive or restricted or protected personal data from the school or authorised premises without permission and unless the media is encrypted and password protected and is transported securely for storage in a secure location
- Users must take particular care that computers or removable devices which contain personal data must not be accessed by other users (e.g. family members) when out of school
- When restricted or protected personal data is required by an authorised user from outside the organisation's premises (for example, by a member of staff to work from their home), they should preferably have secure remote access to the management information system or learning platform
- If secure remote access is not possible, users must only remove or copy personal or sensitive data from the organisation or authorised premises if the storage media, portable or mobile device is encrypted and is transported securely for storage in a secure location
- Users must protect all portable and mobile devices, including media, used to store and transmit personal information using approved encryption software
- Particular care should be taken if data is taken or transferred to another country, particularly outside Europe, and advice should be taken from the local authority (if relevant) in this event.

Disposal of data

The school should implement a document retention schedule that defines the length of time data is held before secure destruction. The Information and Records Management Society Toolkit for schools provide support for this process. The school must ensure the safe destruction of personal data when it is no longer required.

The disposal of personal data, in either paper or electronic form, must be conducted in a way that makes reconstruction highly unlikely. Electronic files must be securely disposed of, and other media must be shredded, incinerated or otherwise disintegrated.

A Destruction Log should be kept of all data that is disposed of. The log should include the document ID, classification, date of destruction, method and authorisation.

Audit Logging / Reporting / Incident Handling

Organisations are required to keep records of processing activity. This must include:

- The name and contact details of the data controller
- Where applicable, the name and contact details of the joint controller and data protection officer
- The purpose of the processing
- To whom the data has been/will be disclosed
- Description of data subject and personal data
- Where relevant the countries it has been transferred to
- Under which condition for processing the data has been collected
- Under what lawful basis processing is being carried out
- Where necessary, how it is retained and destroyed
- A general description of the technical and organisational security measures.





Clearly, in order to maintain these records good auditing processes must be followed, both at the start of the exercise and on-going throughout the lifetime of the requirement. Therefore audit logs will need to be kept to:

- provide evidence of the processing activity and the DPIA
- record where, how and to whom data has been shared
- log the disposal and destruction of the data
- enable the School to target training at the most at-risk data
- record any breaches that impact on the data

It then follows that in the event of a data breach, the school should have a policy for reporting, managing and recovering from information risk incidents, which establishes:

- a "responsible person" for each incident
- a communications plan, including escalation procedure
- and results in a plan of action for rapid resolution
- a plan of action of non-recurrence and further awareness raising

All significant data protection incidents must be reported through the DPO to the Information Commissioner's Office based upon the local incident handling policy and communication plan. The new laws require that this notification should take place within 72 hours of the breach being detected, where feasible.

Data Mapping

The process of data mapping is designed to help schools identify with whom their data is being shared in order that the appropriate contractual arrangements can be implemented. If a third party is processing personal data on your behalf about your students then this processor has obligations on behalf of the school to ensure that processing takes place in compliance with data protection laws.

Privacy and Electronic Communications

Schools should be aware that they are subject to the Privacy and Electronic Communications Regulations in the operation of their websites.





Social Media Policy

Social media (e.g. Facebook, Twitter, LinkedIn) is a broad term for any kind of online platform which enables people to directly interact with each other. However some games, for example Minecraft or World of Warcraft and video sharing platforms such as You Tube have social media elements to them.

The school recognises the numerous benefits and opportunities which a social media presence offers, but does not currently have an online presence beyond its website. However, there are some risks associated with social media use, especially around the issues of safeguarding, bullying and personal reputation. This policy aims to encourage the safe use of social media by the school, its staff, parents, carers and children.

Scope

This policy is subject to the school's Codes of Conduct and Acceptable Use Agreements. This policy:

- Applies to all staff and to all online communications which directly or indirectly, represent the school.
- Applies to such online communications posted at any time and from anywhere.
- Encourages the safe and responsible use of social media through training and education
- Defines the monitoring of public social media activity pertaining to the school

The school respects privacy and understands that staff and pupils may use social media forums in their private lives. However, personal communications likely to have a negative impact on professional standards and/or the school's reputation are within the scope of this policy.

Professional communications are those made through official channels, posted on a school account or using the school name. All professional communications are within the scope of this policy.

Personal use

Staff

- 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.

• Pupils

• It is strongly recommended that staff do not follow or engage with current or prior pupils (under the age of 16) of the school on any personal social media network account.





- The school's education programme should enable the pupils to be safe and responsible users of social media.
- Pupils are encouraged to comment or post appropriately about the school. Any offensive or inappropriate comments will be resolved by the use of the school's behaviour policy

• Parents/Carers

• Parents/Carers are encouraged to comment or post appropriately about the school. In the event of any offensive or inappropriate comments being made, the school will ask the parent/carer to remove the post and invite them to discuss the issues in person. If necessary, refer parents to the school's complaints procedures.

Monitoring posts about the school

- 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.

Acknowledgements

With thanks to Rob Simmonds of Well Chuffed Comms (wellchuffedcomms.com) and Chelmsford College for allowing the use of their policies in the creation of this policy.

School Policy – Online Safety Group Terms of Reference

1. Purpose

To provide a consultative group that has wide representation from the school 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 Full Governing Body.

2. Membership

2.1 The online safety group will seek to include representation from all stakeholders. The composition of the group should include (n.b. in small schools one member of staff may hold more than one of these posts):

- SLT member/s
- Child Protection/Safeguarding officer
- Teaching staff member
- Support staff member
- Online safety coordinator (not ICT coordinator by default)
- Governor
- Parent / Carer
- ICT Technical Support staff (where possible)
- Pupil representation for advice and feedback.





2.2. Other people may be invited to attend the meetings at the request of the Chairperson on behalf

of the committee to provide advice and assistance where necessary.

- 2.3. Committee members must declare a conflict of interest if any incidents being discussed directly involve themselves or members of their families.
- 2.4. Committee members must be aware that many issues discussed by this group could be of a sensitive or confidential nature
- 2.5. When individual members feel uncomfortable about what is being discussed they should be allowed to leave the meeting with steps being made by the other members to allow for these sensitivities

3. Chairperson

The Committee should select a suitable Chairperson from within the group. Their responsibilities include:

- Scheduling meetings and notifying committee members;
- Inviting other people to attend meetings when required by the committee;
- Guiding the meeting according to the agenda and time available;
- Ensuring all discussion items end with a decision, action or definite outcome;
- Making sure that notes are taken at the meetings and that these with any action points are distributed as necessary

4. Duration of Meetings

Meetings shall be held at least once a year. A special or extraordinary meeting may be called when and if deemed necessary.

5. Functions

These are to assist the Online Safety Lead (or other relevant person) with the following

- To keep up to date with new developments in the area of online safety
- To (at least) annually review and develop the online safety policy in line with new technologies and incidents
- To monitor the delivery and impact of the online safety policy
- To monitor the log of reported online safety incidents (anonymous) to inform future areas of teaching / learning / training.
- To co-ordinate consultation with the whole school community to ensure stakeholders are up to date with information, training and/or developments in the area of online safety. This could be carried out through:
- Staff meetings
- Pupil forums (for advice and feedback)
- Governors' meetings
- Surveys/questionnaires for pupils, parents / carers and staff
- Parents' evenings
- Website/Newsletters
- Online safety events
- Internet Safety Day (annually held on the second Tuesday in February)
- Other methods
- To ensure that monitoring is carried out of Internet sites used across the school
- To monitor filtering / change control logs (e.g. requests for blocking / unblocking sites).





- To monitor the safe use of data across the [school]
- To monitor incidents involving cyberbullying for staff and pupils

6. Amendments

The terms of reference shall be reviewed annually from the date of approval. They may be altered to meet the current needs of all committee members, by agreement of the majority

The above Terms of Reference for Rusper Primary School have been agreed Signed by (SLT):

Date:

Date for review:

Acknowledgement

This template terms of reference document is based on one provided to schools by Somerset County Council





Legislation

Schools should be aware of the legislative framework under which this Online Safety Policy template and guidance has been produced. It is important to note that in general terms an action that is illegal if committed offline is also illegal if committed online.

It is recommended that legal advice is sought in the advent of an e safety issue or situation.

Computer Misuse Act 1990

This Act makes it an offence to:

- Erase or amend data or programs without authority;
- Obtain unauthorised access to a computer;
- "Eavesdrop" on a computer;
- Make unauthorised use of computer time or facilities;
- Maliciously corrupt or erase data or programs;
- Deny access to authorised users.

Data Protection Act 1998

This protects the rights and privacy of individual's data. To comply with the law, information about individuals must be collected and used fairly, stored safely and securely and not disclosed to any third party unlawfully. The Act states that person data must be:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate.
- Not kept longer than necessary.
- Processed in accordance with the data subject's rights.
- Secure
- Not transferred to other countries without adequate protection.

Freedom of Information Act 2000

The Freedom of Information Act gives individuals the right to request information held by public authorities. All public authorities and companies wholly owned by public authorities have obligations under the Freedom of Information Act. When responding to requests, they have to follow a number of set procedures.

Communications Act 2003

Sending by means of the Internet a message or other matter that is grossly offensive or of an indecent, obscene or menacing character; or sending a false message by means of or persistently making use of the Internet for the purpose of causing annoyance, inconvenience or needless anxiety is guilty of an offence liable, on conviction, to imprisonment. This wording is important because an offence is complete as soon as the message has been sent: there is no need to prove any intent or purpose.

Malicious Communications Act 1988

It is an offence to send an indecent, offensive, or threatening letter, electronic communication or other article to another person.

Regulation of Investigatory Powers Act 2000

It is an offence for any person to intentionally and without lawful authority intercept any communication. Monitoring or keeping a record of any form of electronic communications is permitted, in order to:

- Establish the facts;
- Ascertain compliance with regulatory or self-regulatory practices or procedures;
- Demonstrate standards, which are or ought to be achieved by persons using the system;
- Investigate or detect unauthorised use of the communications system;
- Prevent or detect crime or in the interests of national security;





- Ensure the effective operation of the system.
- Monitoring but not recording is also permissible in order to:
- Ascertain whether the communication is business or personal;
- Protect or support help line staff.
- The school reserves the right to monitor its systems and communications in line with its rights under this act.

Trade Marks Act 1994

This provides protection for Registered Trade Marks, which can be any symbol (words, shapes or images) that are associated with a particular set of goods or services. Registered Trade Marks must not be used without permission. This can also arise from using a Mark that is confusingly similar to an existing Mark.

Copyright, Designs and Patents Act 1988

It is an offence to copy all, or a substantial part of a copyright work. There are, however, certain limited user permissions, such as fair dealing, which means under certain circumstances permission is not needed to copy small amounts for non-commercial research or private study. The Act also provides for Moral Rights, whereby authors can sue if their name is not included in a work they wrote, or if the work has been amended in such a way as to impugn their reputation. Copyright covers materials in print and electronic form, and includes words, images, and sounds, moving images, TV broadcasts and other media (e.g. youtube).

Telecommunications Act 1984

It is an offence to send a message or other matter that is grossly offensive or of an indecent, obscene or menacing character. It is also an offence to send a message that is intended to cause annoyance, inconvenience or needless anxiety to another that the sender knows to be false.

Criminal Justice & Public Order Act 1994

This defines a criminal offence of intentional harassment, which covers all forms of harassment, including sexual. A person is guilty of an offence if, with intent to cause a person harassment, alarm or distress, they

- Use threatening, abusive or insulting words or behaviour, or disorderly behaviour; or
- Display any writing, sign or other visible representation, which is threatening, abusive or insulting, thereby causing that or another person harassment, alarm or distress.

Racial and Religious Hatred Act 2006

This Act makes it a criminal offence to threaten people because of their faith, or to stir up religious hatred by displaying, publishing or distributing written material which is threatening. Other laws already protect people from threats based on their race, nationality or ethnic background.

Protection from Harrassment Act 1997

A person must not pursue a course of conduct, which amounts to harassment of another, and which he knows or ought to know amounts to harassment of the other. A person whose course of conduct causes another to fear, on at least two occasions, that violence will be used against him is guilty of an offence if he knows or ought to know that his course of conduct will cause the other so to fear on each of those occasions.

Protection of Children Act 1978

It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is a anyone under the age of 18. Viewing an indecent image of a child on your computer means that you have made a digital image. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence may face up to 10 years in prison





Sexual Offences Act 2003

A grooming offence is committed if you are over 18 and have communicated with a child under 16 at least twice (including by phone or using the Internet) it is an offence to meet them or travel to meet them anywhere in the world with the intention of committing a sexual offence. Causing a child under 16 to watch a sexual act is illegal, including looking at images such as videos, photos or webcams, for your own gratification. It is also an offence for a person in a position of trust to engage in sexual activity with any person under 18, with whom they are in a position of trust. (Typically, teachers, social workers, health professionals, connexions staff fall in this category of trust). Any sexual intercourse with a child under the age of 13 commits the offence of rape.

Public Order Act 1986

This Act makes it a criminal offence to stir up racial hatred by displaying, publishing or distributing written material which is threatening. Like the Racial and Religious Hatred Act 2006 it also makes the possession of inflammatory material with a view of releasing it a criminal offence. Children, Families and Education Directorate page 38 April 2007.

Obscene Publications Act 1959 and 1964

Publishing an "obscene" article is a criminal offence. Publishing includes electronic transmission.

Human Rights Act 1998

This does not deal with any particular issue specifically or any discrete subject area within the law. It is a type of "higher law", affecting all other laws. In the school context, human rights to be aware of include:

- The right to a fair trial
- The right to respect for private and family life, home and correspondence
- Freedom of thought, conscience and religion
- Freedom of expression
- Freedom of assembly
- Prohibition of discrimination
- The right to education

These rights are not absolute. The school is obliged to respect these rights and freedoms, balancing them against those rights, duties and obligations, which arise from other relevant legislation.

The Education and Inspections Act 2006

Empowers Headteachers, to such extent as is reasonable, to regulate the behaviour of students / pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour.

The Education and Inspections Act 2011

Extended the powers included in the 2006 Act and gave permission for Headteachers (and nominated staff) to search for electronic devices. It also provides powers to search for data on those devices and to delete data. (see template policy in these appendices and for DfE guidance - http://www.education.gov.uk/schools/pupilsupport/behaviour/behaviourpolicies/f0076897/screeningsearching-and-confiscation)

The Protection of Freedoms Act 2012

Requires schools to seek permission from a parent / carer to use Biometric systems

The School Information Regulations 2012

Requires schools to publish certain information on its website: https://www.gov.uk/guidance/what-maintained-schools-must-publish-online

Serious Crime Act 2015

Introduced new offence of sexual communication with a child. Also created new offences and orders





around gang crime (including CSE)





Links to other organisations or documents

The following links may help those who are developing or reviewing a school online safety policy:

UK Safer Internet Centre

Safer Internet Centre - https://www.saferinternet.org.uk/

South West Grid for Learning - https://swgfl.org.uk/products-services/online-safety/

Childnet - http://www.childnet-int.org/

Professionals Online Safety Helpline - http://www.saferinternet.org.uk/about/helpline

Internet Watch Foundation - https://www.iwf.org.uk/

CEOP

CEOP - http://ceop.police.uk/

ThinkUKnow - https://www.thinkuknow.co.uk/

Others

LGfL - Online Safety Resources

Kent - Online Safety Resources page

INSAFE / Better Internet for Kids - https://www.betterinternetforkids.eu/

UK Council for Child Internet Safety (UKCCIS) - www.education.gov.uk/ukccis

Netsmartz - http://www.netsmartz.org/

Tools for Schools

Online Safety BOOST - https://boost.swgfl.org.uk/

360 Degree Safe – Online Safety self-review tool – https://360safe.org.uk/

360Data - online data protection self review tool: www.360data.org.uk

Bullying / Online-bullying / Sexting / Sexual Harrassment

Enable – European Anti Bullying programme and resources (UK coordination / participation

through SWGfL & Diana Awards) - http://enable.eun.org/

Scottish Anti-Bullying Service, Respectme - http://www.respectme.org.uk/

Scottish Government - Better relationships, better learning, better behaviour -

http://www.scotland.gov.uk/Publications/2013/03/7388

DfE - Cyberbullying guidance -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cybe

rbullying Advice for Headteachers and School Staff 121114.pdf

Childnet – Cyberbullying guidance and practical PSHE toolkit:

http://www.childnet.com/our-projects/cyberbullying-guidance-and-practical-toolkit

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Childnet - Project deSHAME - Online Sexual Harrassment

UKSIC - Sexting Resources

Anti-Bullying Network - http://www.antibullying.net/cyberbullying1.htm

Ditch the Label - Online Bullying Charity

Diana Award – Anti-Bullying Campaign

Social Networking

Digizen - Social Networking

UKSIC - Safety Features on Social Networks

Children's Commissioner, TES and Schillings - Young peoples' rights on social media

Curriculum

SWGfL Digital Literacy & Citizenship curriculum

UKCCIS - Education for a connected world framework

Teach Today - www.teachtoday.eu/

Insafe - Education Resources

Mobile Devices / BYOD

Cloudlearn Report Effective practice for schools moving to end locking and blocking





NEN - Guidance Note - BYOD

Data Protection

360data - free questionnaire and data protection self review tool

ICO Guide for Organisations (general information about Data Protection)

ICO Guides for Education (wide range of sector specific guides)

DfE advice on Cloud software services and the Data Protection Act

ICO Guidance on Bring Your Own Device

ICO Guidance on Cloud Computing

ICO - Guidance we gave to schools - September 2012

IRMS - Records Management Toolkit for Schools

NHS - Caldicott Principles (information that must be released)

ICO Guidance on taking photos in schools

Dotkumo - Best practice guide to using photos

Professional Standards / Staff Training

DfE - Keeping Children Safe in Education

DfE - Safer Working Practice for Adults who Work with Children and Young People

Childnet - School Pack for Online Safety Awareness

UK Safer Internet Centre Professionals Online Safety Helpline

Infrastructure / Technical Support

UKSIC - Appropriate Filtering and Monitoring

Somerset - Questions for Technical Support

NEN - Advice and Guidance Notes

Working with parents and carers

SWGfL Digital Literacy & Citizenship curriculum

Online Safety BOOST Presentations - parent's presentation

Vodafone Digital Parents Magazine

Childnet Webpages for Parents & Carers

Get Safe Online - resources for parents

Teach Today - resources for parents workshops / education

The Digital Universe of Your Children - animated videos for parents (Insafe)

Cerebra - Learning Disabilities, Autism and Internet Safety - a Parents' Guide

Insafe - A guide for parents - education and the new media

Research

EU Kids on Line Report - "Risks and Safety on the Internet" - January 2011

Futurelab - "Digital participation - its not chalk and talk any more!"

Ofcom - Media Literacy Research





Glossary of Terms

AUP / AUA Acceptable Use Policy / Agreement – see templates earlier in this document **CEOP** Child Exploitation and Online Protection Centre (part of UK Police, dedicated to protecting children from sexual abuse, providers of the Think U Know programmes.

CPD Continuous Professional Development

FOSI Family Online Safety Institute

ICO Information Commissioners Office

ICT Information and Communications Technology

ICTMark Quality standard for schools provided by NAACE

INSET In Service Education and Training

IP address The label that identifies each computer to other computers using the IP (internet protocol)

ISP Internet Service Provider

ISPA Internet Service Providers' Association

IWF Internet Watch Foundation

LA Local Authority

LAN Local Area Network

MIS Management Information System

NEN National Education Network – works with the Regional Broadband Consortia (e.g. SWGfL) to provide the safe broadband provision to schools across Britain.

Ofcom Office of Communications (Independent communications sector regulator)

SWGfL South West Grid for Learning Trust – the Regional Broadband Consortium of SW Local Authorities – is the provider of broadband and other services for schools and other organisations in the SW

SWGfL Online Safety School /

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TUK Think U Know – educational online safety programmes for schools, young people and parents.

VLE Virtual Learning Environment (a software system designed to support teaching and learning in an educational setting,

WAP Wireless Application Protocol

UKSIC UK Safer Internet Centre – EU funded centre. Main partners are SWGfL, Childnet and Internet Watch Foundation.

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