Castleway Primary School
Online Safety Policy

Reviewed: September 2021
Date of Review: September 2022

Roles and Responsibilities

- Governors
- Headteacher and Senior Leaders
- E-Safety Coordinator / Officer
- IT Support Team
- Teaching and Support Staff
- Child Protection / Safeguarding Designated Person / Officer
- E-Safety Committee
- Pupils
- Parents / Carers
- Community Users

Policy Statements

- Education – Pupils
- Education – Parents / Carers
- Education – The Wider Community
- Education and training – Staff / Volunteers
- Training – Governors
- Technical – infrastructure / equipment, filtering and monitoring
- Use of digital and video images
- Data protection
- Communications
- Social Media - Protecting Professional Identity
- User Actions - unsuitable / inappropriate activities
- Responding to incidents of misuse

Appendices:

- Pupil Acceptable Use Policy Agreement Template – older children
- Pupil Acceptable Use Policy Agreement Template – younger children
- Parents / Carers Acceptable Use Policy Agreement Template
- Use of Digital Images and Videos
- Use of Cloud Permissions
- Staff and Volunteers Acceptable Use Policy Agreement Template
- Community Users Acceptable Use Agreement
- FS/KS1 E-Safety Rules
- KS2 E-Safety Rules
- Safe Blogging Rules
- Responding to incidents of misuse – flowchart
- School Reporting Log template
- School Training Needs Audit template
- School Technical Security Policy template (includes password security and filtering)
- School Personal Data Policy
- School Policy Template – Electronic Devices – Search and Deletion
- School E-Safety Group Terms of Reference
- Legislation
- Links to other organisations and documents
- Glossary of Terms

Development / Monitoring / Review of this Policy

This E-Safety policy was approved by the Governing Body / Governors Sub Committee on:	September 2021
The implementation of this E-Safety policy will be monitored by the:	E-Safety Governor, Senior Leadership Team and IT Support Team
Monitoring will take place at regular intervals:	Termly
The Governing Body will receive a report on the implementation of the E-Safety policy generated by the monitoring group (which will include anonymous details of E-Safety incidents) at regular intervals:	Termly
The E-Safety Policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to E-Safety or incidents that have taken place. The next anticipated review date will be:	September 2022
Should serious E-Safety incidents take place, the following external persons / agencies should be informed:	LA Safeguarding Officer – ICT Support (MGL and/or SimplicIT) & If needed, Social Services, Judicium

The school will monitor the impact of the policy using: •

- Logs of reported incidents (SLT)
- Monitoring logs of internet activity (including sites visited) (On-site Technical Support Person, MGL)
- Internal monitoring data for network activity (On-site Technical Support Person, MGL)
- Surveys / questionnaires of:
  - pupils
  - parents / carers
  - staff

School IT Support team

- **Stuart Mycroft - Headteacher** - IT Accounts Administrator, Tech Issues first point of contact. GDPR support. E-Safety Lead
- **Sophie Smith** - Computing Curriculum, Social Media Administrator
- **Ben Watts (MGL)** - Technician for Curriculum machines, Website Administer,
- **SimplicIT** - Office Technical support

No actions can be taken by the IT support Team without prior authorisation of the Headteacher.

Scope of the Policy

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

The Education and Inspections Act 2006 empowers Headteachers to such extent as is reasonable, to regulate the behaviour of pupils when they are off the *school* site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of cyber-bullying, or other E-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). In the case of both acts, action may 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 E-Safety behaviour that take place out of school.

Roles and Responsibilities

The following section outlines the E-Safety roles and responsibilities of individuals and groups within the school:

Governors:

Governors are responsible for the approval of the E-Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the Governors Teaching and Learning Sub Committee receiving regular information about E-Safety incidents and monitoring reports. A member of the Governing Body has taken on the role of E-Safety. The role of the E-Safety Governor will include:

- regular meetings with the member(s) of SLT responsible for E-Safety
- regular monitoring of E-Safety incident logs
- regular monitoring of filtering / change control logs • reporting to relevant Governors meetings

Headteacher and Senior Leaders:

- **The Headteacher has a duty of care for ensuring the safety (including E-Safety) of members of the school community**; the day to day responsibility for E-Safety will be delegated to all SLT.
- **The Headteacher and the other members of the Senior Leadership Team should be aware of the procedures to be followed in the event of a serious E-Safety allegation being made against a member of staff.** (see flowchart on dealing with E-Safety incidents – included in a later section – "Responding to incidents of misuse" and relevant Local Authority HR).
- The Headteacher / Senior Leaders are responsible for ensuring that Year Leaders and other relevant staff receive suitable training to enable them to carry out their E-Safety roles and to train other colleagues, as relevant.
- The Headteacher / Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal E-Safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive regular monitoring reports from Year Leaders.

E-Safety Lead:

- takes day to day responsibility for E-Safety issues and has a leading role in establishing and reviewing the school E-Safety policies / documents.
- ensures that all staff are aware of the procedures that need to be followed in the event of an E-Safety incident taking place.
- organises training for staff
- liaises with the Local Authority if necessary
- liaises with technical support staff
- receives reports of E-Safety incidents and creates a log of incidents to inform future E-Safety developments,
- meets regularly with E-Safety Governor to discuss current issues, review incident logs and filtering control logs.
- attends relevant training and committee of Governors meetings
- reports regularly to other members of the Senior Leadership Team

IT Support Team

The Network Manager / Technical Staff for Computing are 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 E-Safety technical requirements and any statutory guidance that may apply.**
- **that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are changed where and when appropriate**
- the filtering policy, is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person (currently the responsibility of the LA)
- that they keep up to date with E-Safety technical information in order to effectively carry out their E-Safety role and to inform and update others as relevant.
- that the use of the network / internet / Virtual Learning Environment / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Headteacher / Senior Leader; E-Safety Lead for investigation / action / sanction. The approach needs to be evaluated regularly in light of new developments and methods.
- 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 E-Safety matters and of the current school E-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 / Senior Leader; E-Safety Lead 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**
- E-Safety issues are embedded in all aspects of the curriculum and other activities
- pupils understand and follow the E-Safety 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.

Child Protection Officer

should be trained in E-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
- cyber-bullying

IT support team, Headteacher, Staff and Governors

Have a joint responsibility for issues regarding E-Safety and the monitoring the E-Safety policy including the impact of initiatives. Headteacher is responsible for reporting, termly, to the *Governing Body on any E-Safety related issues*.

IT support team, Headteacher, Staff and Governors will assist the E-Safety Lead with:

- the production / review / monitoring of the school E-Safety policy / documents.
- *the production / review / monitoring of the school filtering policy and requests for filtering changes.*
- mapping and reviewing the E-Safety curricular provision – ensuring relevance, breadth and progression
- monitoring network / internet / incident logs
- consulting stakeholders – including parents / carers and the pupils about the E-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 Policy. have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations. need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so.
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking / use of images and on cyber-bullying.
- should understand the importance of adopting good E-Safety practice when using digital technologies out of school and realise that the *school's* E-Safety Policy covers their actions out of school, if related to their membership of the school.
- will experience E-Safety training as part of their curriculum each year.

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 / VLE and information about national / local E-Safety campaigns / literature.* Parents and carers will be encouraged to support the *school* in promoting good E-Safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to parents' sections of the website / VLE and on-line / pupil records
- their children's personal devices in the school (where this is allowed)

Students/Work Experience/Volunteers/Community Users

Students/Work Experience/Volunteers/Community Users who access school systems / website / VLE as part of the wider *school* provision will be expected to sign a Community User AUA (Acceptable Use Agreement) before being provided with access to school systems.

Policy Statements

Education – pupils

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

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

- A planned E-Safety curriculum should be provided as part of Computing / PHSE / other lessons and should be regularly revisited
- Key E-Safety messages should be reinforced as part of a planned programme of assemblies and class council and 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 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 and insist in the use of safe search engines.**
- **It is accepted that from time to time, for good educational reasons, s may need to research topics 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 E-Safety risks and issues, yet they play an essential role in the education of their children and in the monitoring / regulation of the children's on-line behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

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

- *Curriculum activities*
- *Letters, newsletters, website, VLE*
- *Parents / Carers evenings / sessions*
- *High profile events / campaigns e.g.* ***Safer Internet Day***
- *Reference to the relevant web sites / publications e.g.* **www.saferinternet.org.uk/ http://www.childnet.com/parents-and-carers** (see school website and appendix for further links / resources)

Education – The Wider Community

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

- Providing family learning courses in use of new digital technologies, digital literacy and E-Safety ● E-Safety messages targeted towards grandparents and other relatives as well as parents.
- The school website will provide E-Safety information for the wider community

- Where and when appropriate supporting community groups e.g. Early Years Settings, Child-minders, youth / sports / voluntary groups to enhance their E-Safety provision. *(www.onlinecompass.org.uk)*

Education & Training – Staff / Volunteers

It is essential that all staff receive E-Safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- **A planned programme of formal E-Safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the E-Safety training needs of all staff will be carried out regularly.** *It is expected that some staff will identify E-Safety as a training need within the performance management process.*
- **All new staff should receive E-Safety training as part of their induction programme, ensuring that they fully understand the school E-Safety policy and Acceptable Use Agreements.**
- *The E-Safety Lead will receive regular updates through attendance at external training events (e.g. from LA / other relevant organisations) and by reviewing guidance documents released by relevant organisations.*
- *This E-Safety policy and its updates will be presented to and discussed by staff in staff meetings / INSET days.* • *The E-Safety Lead will provide advice / guidance /* and organise *for individuals as required.*

Training – Governors / Directors

Governors / Directors should take part in E-Safety training / awareness sessions, with particular importance for those who are members of any subcommittee / group involved in technology / E-Safety / health and safety / child protection. This may be offered in a number of ways:

- Attendance at training provided by the Local Authority / National Governors Association / or other relevant organisation.
- Participation in school training / information sessions for staff or parents (this may include attendance at assemblies / lessons).

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 previous sections will be effective in carrying out their E-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.**
- **All users will have clearly defined access rights to school technical systems and devices.**
- **All users will be provided with a username and secure password** by **in house technical support**
- Allocated members of the IT support team will keep an up to date record of users and their usernames. Staff users are responsible for the security of their username and password and will be required to change their password where and when appropriate.
- **The "master / administrator" passwords for the school ICT system, used by the Network Manager must also be available to the *Headteacher*** and **kept in a sealed envelope in a secure place.**
- **IT support in liaison with the technician 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 is filtered by the broadband/filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored by Wirral LA
- 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. (see appendix)

- An appropriate system is in place 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" (e.g. trainee teachers, supply teachers, visitors) onto the school systems.

- *An agreed policy is in place regarding the extent of personal use that users (staff / pupils / community users) and their family members are allowed on school devices that may be used out of school.*
- *An agreed policy is in place that allows staff to / forbids staff from downloading executable files and installing programmes on school devices.*
- *An agreed policy is in place regarding the use of removable media (e.g. memory sticks / CDs / DVDs) by users on school devices. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.*

Use of digital and video images

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

- **When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular, they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.**
- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other *pupils* in the digital / video images.
- *Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images.* ***Those images should only be taken on school equipment, the*** use of ***personal equipment*** belonging to staff ***can only be used once permission is obtained and guidelines of use agreed upon by both user, Technical support team and Headteacher.***
- *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.*
- *Written permission from parents or carers will be obtained before photographs of pupils are published on the school website (*covered as part of the AUA signed by parents or carers at the start of Foundation Stage or when the child joins the school - see Parents / Carers Acceptable Use Agreement in the appendix)
- *Pupil's work can only be published with the permission of the / pupil and parents or carers.*

Data Protection

Personal data will be recorded, processed, transferred and made available according to the **General Data Protection Regulation** (**GDPR**) May **2018** which states that personal data must be:

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

The school must ensure that:

- **It will hold the minimum personal data necessary to enable it to perform its function and will not hold it for longer than necessary for the purposes it was collected for as, set out in the school's data retention policy.**
- **Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay.**
- **All personal data will be fairly obtained in accordance with the "Privacy Notice" and lawfully processed in accordance with the "Conditions for Processing".**
- **It has a Data Protection Policy**

- **It is registered as a Data Controller for the purposes of the Data Protection Act (DPA)**
- Risk assessments are carried out
- It has clear and understood arrangements for the security, storage and transfer of personal data
- Data subjects have rights of access and there are clear procedures for this to be obtained

- There are clear and understood policies and routines for the deletion and disposal of data
- There is a policy for reporting, logging, managing and recovering from information risk incidents
- There are clear Data Protection clauses in all contracts where personal data may be passed to third parties
- There are clear policies about the use of cloud storage / cloud computing which ensure that such data storage meets the requirements laid down by the Information Commissioner's Office.

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, 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 (many memory sticks / cards and other mobile devices cannot 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:

	School Staff				Pupils			
Communication Technologies	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Mobile phones may be brought to school	✓				✓*			
Use of mobile phones in lessons				✓				✓
Use of mobile phones in social time i.e. lunch break		✓ Not in the presence of pupils.						✓
Taking photos on mobile phones / cameras				✓				✓
Use of other personal mobile devices e.g. tablets, gaming devices		✓ Not in the presence of pupils.						✓
Use of personal email addresses on school network				✓				
Use of school email for personal emails				✓				
Use of messaging apps for personal use on school network				✓				✓
Use of social media for personal use on school network				✓				✓
Use of blogs for personal use school net work				✓				✓
Use of messaging apps, social media, blogs for educational purposes on school network or devices			✓**				✓	

***Pupils are permitted to bring mobile phones to school but these must be handed to class teacher on entering the class room, who will safely store mobile phone until the end of the day. At no point during the school are pupils permitted to use the phones.

Staff need to check with IT support before using **messaging apps, social media or blogs on school network and need to gain permission from Headteacher for use, this use will be logged. The only exception to this is when it is part of the school curriculum, the planning for the curriculum will state which apps/software is permitted for use.

Staff use of personal devices for personal use

See school’s Social Media Policy and Electronic Info and Communications Policy

Unsuitable / inappropriate activities

The school believes that the activities referred to in the following section would be inappropriate in a school context and that users, as defined below, should not engage in these activities in school or outside school when using school equipment or systems. The school policy restricts usage as follows:

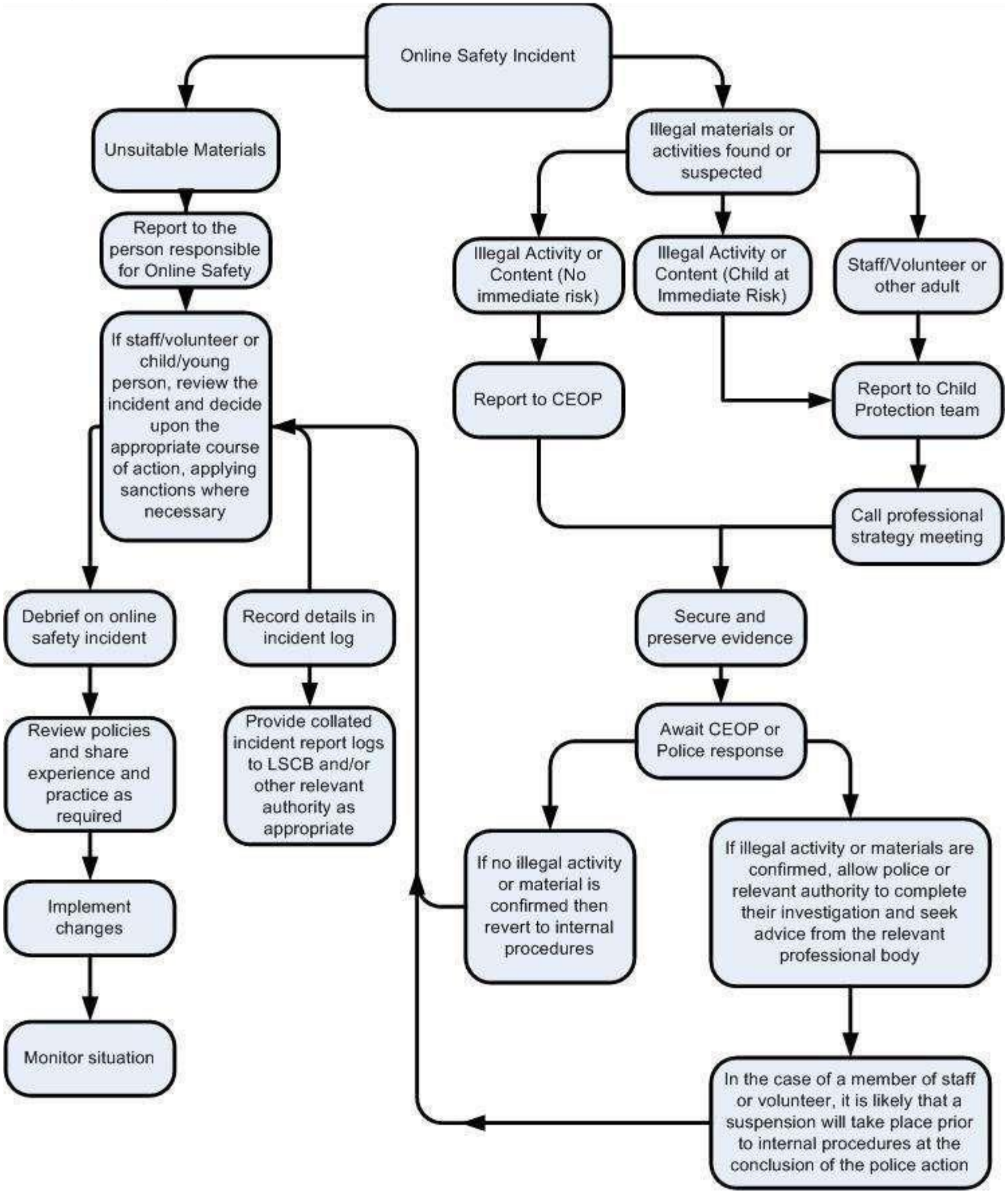
User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	pornography				X	
	promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Using school systems to run p rivate business					X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school					X	
Infringing copyright					X	
Revealing or publicising confidential or proprietary information (e.g. financial / personal information, databases, computer / network access codes					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					X	
On-line gaming (educational)			X			
On-line gaming (no educational)			X			
On-line gambling					X	
On-line shopping / commerce			X			
File sharing				X		
Use of social media			X			
Use of messaging apps			X			
Use of video broadcasting YouTube			X			

Responding to incidents of misuse

This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities (see "User Actions" on previous page).

Illegal Incidents

If there is any suspicion that the web site(s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right hand side of the Flowchart (below and appendix) for responding to online safety incidents and report immediately to the police.



Online Safety Incident
Unsuitable Materials
Report to the person responsible for Online Safety
If staff/volunteer or child/young person, review the incident and decide upon the appropriate course of action, applying sanctions where necessary
Debrief on online safety incident
Review policies and share experience and practice as required
Implement changes
Monitor situation
Record details in incident log
Provide collated incident report logs to LSCB and/or other relevant authority as appropriate
Illegal materials or activities found or suspected
Illegal Activity or Content (No immediate risk)
Illegal Activity or Content (Child at Immediate Risk)
Staff/Volunteer or other adult
Report to CEOP
Report to Child Protection team
Call professional strategy meeting
Secure and preserve evidence
Await CEOP or Police response
If no illegal activity or material is confirmed then revert to internal procedures
If illegal activity or materials are confirmed, allow police or relevant authority to complete their investigation and seek advice from the relevant professional body
In the case of a member of staff or volunteer, it is likely that a suspension will take place prior to internal procedures at the conclusion of the police action

Other Incidents

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

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

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

It is important that all of the above steps are taken as they will provide an evidence trail for the *school* and possibly the police and demonstrate that visits to these sites were carried out for child protection purposes. The completed form should be retained by the group for evidence and reference purposes.

School Actions & Sanctions

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

Possible Actions / Sanctions

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

Staff

Possible Actions / Sanctions

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

Appendices

Can be found on the following pages:

Pupil Acceptable Use Agreement for Key Stage 2 Pupils

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These 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. 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 digital 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.

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.

Acceptable Use Policy Agreement

I understand that I must use school ICT systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the ICT 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 on-line (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc.)
- If I arrange to meet people off-line that I have communicated with on-line, I will do so in a public place and take an adult with me.
- 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 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 on-line gaming, file sharing, or video broadcasting (e.g. YouTube), unless I have permission of a member of staff to do so.

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 will not use any personal device within school unless given permission to do so by the Headteacher.
- 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.
- 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 only use social media sites with permission and at the times that are allowed. Kidblog E-Schools

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, internal exclusion, fixed term exclusion, contact with parents and in the event of illegal activities involvement of the police.

Please sign 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.

Signed (child):……………………………………………

Signed (parent): …………………………………………..

Pupil Acceptable Use Policy Agreement – for younger pupils (Foundation / KS1)

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.

Signed (child):……………………………………………

Signed (parent): …………………………………………..

Parent / Carer
Acceptable Use Agreement

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 E-Safety and are involved in the education and guidance of young people with regard to their on-line 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.

Permission Form

Parent / Carers Name

Pupil Name

As the parent / carer of the above *pupils*, I give permission for my son / daughter to have access to the internet and to ICT systems at school.

I know that my son / daughter has signed an Acceptable Use Agreement and has received, or will receive, E-Safety education to help them understand the importance of safe use of technology and the internet – both in and out of school.

I understand that the school will take every reasonable precaution, including monitoring and filtering systems, to ensure that young people will be safe when they use the internet and ICT systems. I also understand that the school cannot ultimately be held responsible for the nature and content of materials accessed on the internet and using mobile technologies.

I understand that my son's / daughter's activity on the ICT systems will be monitored and that the school will contact me if they have concerns about any possible breaches of the Acceptable Use Policy.

I will encourage my child to adopt safe use of the internet and digital technologies at home and will inform the school if I have concerns over my child's E-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 publication in newsletters, on the school's website, Facebook and twitter accounts, media created by school but shared in public, such as church services and occasionally by other schools and educational settings we visited or visit our school.

The school will comply with the Data Protection Act and request parent's / carers 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 / Video Images Permission Form

Parent / Carers Name	
Pupil Name	

As the parent / carer of the above *pupil*, I agree to the school taking and using digital / video images of my child / children. I understand that the images will only be used to support learning activities or in publicity that reasonably celebrates success and promotes the work of the school. Yes / No

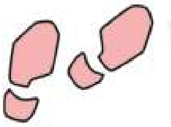
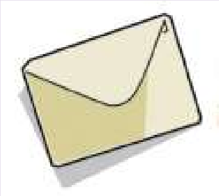
I agree that if I take digital or video images at, or of, – school events which include images of children, other than my own, I will abide by these guidelines in my use of these images. Yes / No

Signed	
Date	

Castleway Primary School's Foundation Stage and KS1 E-Safety Code

Think then click...

These rules help us to stay safe on the Internet

	We only use the internet when an adult is with us.
	We can click on the buttons or links when we know what they do.
	We can search the Internet with an adult.
	We always ask if we get lost on the Internet.
	We can send and open emails together.
	We can write polite and friendly emails to people that we know.

Castleway Primary School’s KS2 E-Safety Code Think then click...

We ask permission before using the internet.

We only use websites our teacher has chosen.

We tell an adult if we see anything we are uncomfortable with.

We immediately close any webpage we are uncomfortable with.

We only email people an adult has approved.

We send e-mails that are polite and friendly.

We never give out personal information or passwords.

We never arrange to meet anyone we don't know.

We do not open e-mails sent by anyone we don't know.

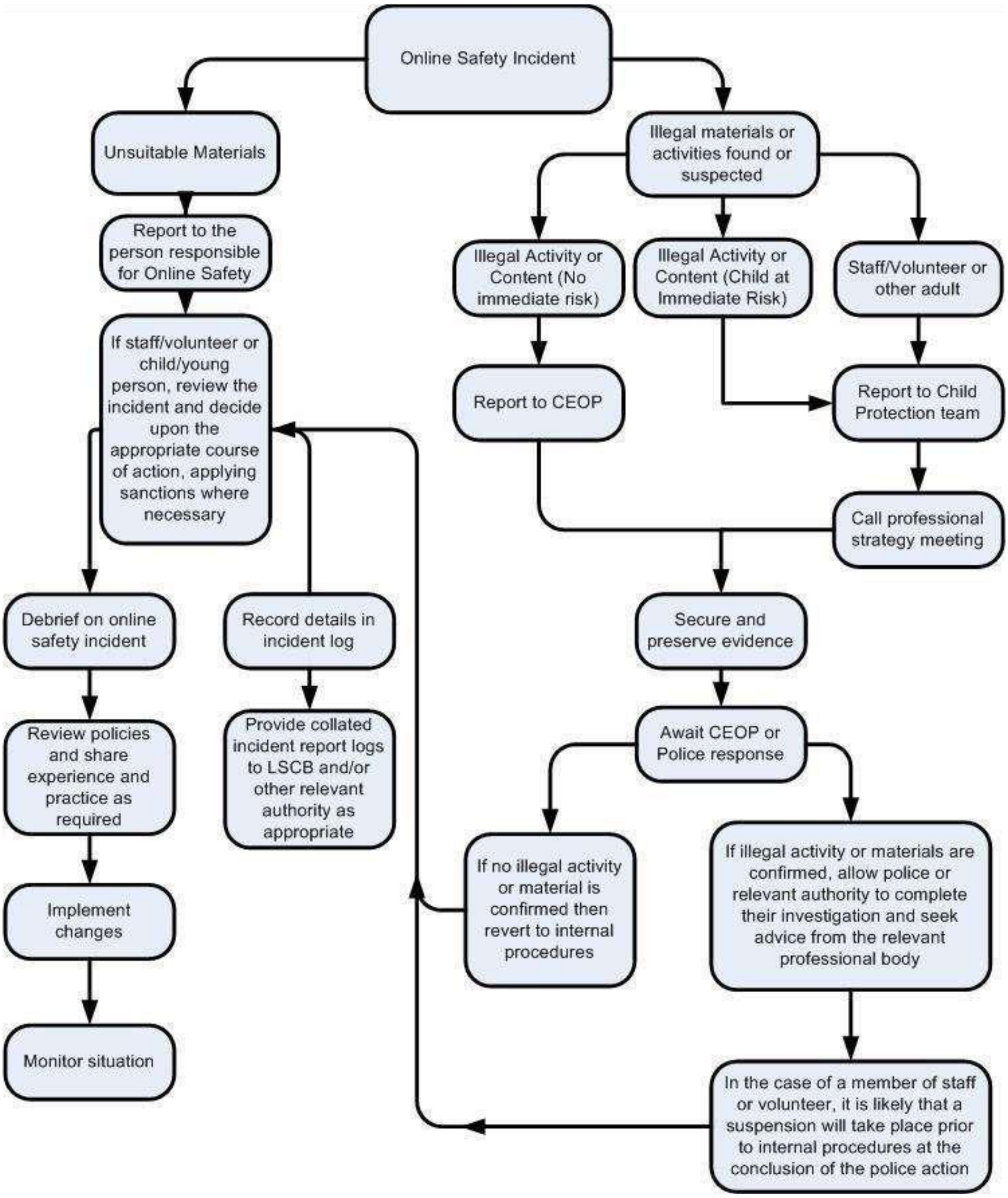
We only use school based chat rooms/messaging.

Safe Blogging Rules

We have a few simple guidelines that we need to keep to in order to make the most of our school blog.

1	Children are to only use their first name when commenting. *(You could also do this on other websites. Maybe use a nickname, not your real name. e.g. FootyBoy123)*
2	Parents who leave comments are asked to use their first name only so as not to identify their child. Or post comments as “Jack’s Mum” or “Juliet's Grandfather”.
3	All posts will be checked by a teacher before they are published to the blog.
4	All comments are moderated by a teacher before they appear on the blog.
5	Always be respectful of other people's work - be positive if you are going to comment.
6	All posts should relate to school life and should not include any personal details or information about individual pupils, staff, parents or carers.
7	No text talk please - write in full sentences and read your comments back carefully before submitting.

Everyone at Castleway Primary School must please follow these guidelines.


Online Safety Incident
Unsuitable Materials
Report to the person responsible for Online Safety
If staff/volunteer or child/young person, review the incident and decide upon the appropriate course of action, applying sanctions where necessary
Debrief on online safety incident
Review policies and share experience and practice as required
Implement changes
Monitor situation
Record details in incident log
Provide collated incident report logs to LSCB and/or other relevant authority as appropriate
Illegal materials or activities found or suspected
Illegal Activity or Content (No immediate risk)
Illegal Activity or Content (Child at Immediate Risk)
Staff/Volunteer or other adult
Report to CEOP
Report to Child Protection team
Call professional strategy meeting
Secure and preserve evidence
Await CEOP or Police response
If no illegal activity or material is confirmed then revert to internal procedures
If illegal activity or materials are confirmed, allow police or relevant authority to complete their investigation and seek advice from the relevant professional body
In the case of a member of staff or volunteer, it is likely that a suspension will take place prior to internal procedures at the conclusion of the police action

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

Individual/Group/Class	
Date	
Reason for investigation	

Details of first reviewing person

Name	
Position	
Signature	

Details of second reviewing person

Name	
Position	
Signature	

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

Web site(s) address / device Reason for concern

Conclusion and Action proposed or taken

Risk Assessment Reviewed

E–Safety Reporting Log

Date	Time	Incident	**Action taken** By whom?	Incident Reported by	E-Safety Gov. Sig. and Date

Training Needs Audit Log Group .... Date ....

Name	Position	Relevant training in last 12 months	Identified training need	To be met by:	Cost	Review date

School Technical Security Policy (Including filtering and passwords) – reviewed

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.

As the school has a managed ICT service provided by an outside contractor, it is the responsibility of the school to ensure that the managed service provider carries out all the E-Safety measures that might otherwise be carried out by the *school* itself (as suggested below). It is also important that the managed service provider is fully aware of the *school* E-Safety Policy / Acceptable Use Agreements). The *school* will also check the Local Authority / other relevant body policies / guidance on these technical issues.

Responsibilities

The management of technical security will be the responsibility of Castleway IT support team.

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 will 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 members of the* **Schools IT Support Team** *and will be reviewed, at least annually, by the Governing Body.*

- Users will be made responsible for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security. *(See Password section below).*

Schools IT Support team are responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations

- *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 for users to report any actual / potential technical incident to the E-Safety Lead / 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 / pupils / community users) 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 (e.g. 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, email and Virtual Learning Environment (VLE).

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 **Schools IT Support Team** *and will be reviewed, at least annually, by the Governing Body.*

- **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*** and **kept in a secure place e.g. school safe. Consideration should also be given to using two factor authentication for such accounts. (We should never allow one user to have sole administrator access)**
- Passwords for new users, and replacement passwords for existing users will be allocated by Ben Watts (IT Support) any changes carried out must be notified to the manager of the password security policy (above).
- 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.
- Users will change their passwords at regular intervals – as described in the staff and pupil sections below.
- The level of security required may vary for staff and pupil accounts and the sensitive nature of any data accessed through that account.
- Requests for password changes should be authenticated by Joanne Davies or Ben Watts to ensure that the new password can only be passed to the genuine user (the school will need to decide how this can be managed – possibly by requests being authorised by a line manager for a request by a member of staff or by a member of staff for a request by a pupil. Password request need to be made by the account user either directly to Joanne Davies or Ben Watts or by logging them in the IT jobs request book, new passwords will be given directly to the account user, pupils passwords will be given to the pupils' class teacher and added to the pupil password log.

Staff passwords:

- **All staff users will be provided with a username and password** by Joanne Davies or Ben Watts who *will keep an up to date record of users and their usernames.*
- *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*

Pupil passwords

- **All users** (at KS1/2 and above) **will be provided with a username and password** by *(In house technical support) who will keep an up to date record of users and their usernames.*
- Pupils will be taught the importance of password security.
- 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 E-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 persons with in the school will ensure that full records are kept of:

- User IDs
- User log-ons.
- 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 E-Safety and acceptable use. It is important that the school has a filtering policy to manage the associated risks and to provide preventative measures which are relevant to the situation in this school.

Responsibilities

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

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

- be logged in change control logs.
- be reported to and authorised by a second responsible person prior to changes being made.
- be reported to the IT support team regularly in the form of an audit of the change control logs.
-

All users have a responsibility to report immediately to (IT support 1st point of contact) 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 broadband or filtering provider (SimplicIT) 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 LA through their designated Internet Service Provider.*
- *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 senior 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 LA.*
- *Requests from staff for sites to be removed from the filtered list will be considered by the* Schools IT Support team and a member of the SLT. *If the request is agreed, this action will be recorded and logs of such actions shall be reviewed regularly by the IT support team.*

Education / Training / Awareness

Pupils will be made aware of the importance of filtering systems through the E-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 E-Safety awareness sessions / newsletter etc.

Changes to the Filtering System

Users who gain access to, or have knowledge of others being able to access, sites which they feel should be filtered (or unfiltered) should report this in the first instance to in-house technical support and SLT 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 E-Safety Policy and the Acceptable Use Agreement.

Audit / Reporting

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

- *the SLT*
- *E-Safety Group*
- *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 may wish to seek further guidance. The following is recommended:
NEN Technical guidance: http://www.nen.gov.uk/advice/266/nen-guidance-notes.html

School Policy: Electronic Devices - Searching & Deletion (amended November 2014)

Introduction

The changing face of information technologies and ever increasing pupil / use of these technologies has meant that the Education Acts have had to change in an attempt to keep pace. Within Part 2 of the Education Act 2011 (Discipline) there have been changes to the powers afforded to schools by statute to search pupils in order to maintain discipline and ensure safety. Schools are required to ensure they have updated policies which take these changes into account. No such policy can on its own guarantee that the school will not face legal challenge, but having a robust policy which takes account of the Act and applying it in practice will however help to provide the school with justification for what it does.

The particular changes we deal with here are the added power to search for items 'banned under the school rules' and the power to 'delete data' stored on seized electronic devices.

Items banned under the school rules are determined and publicised by the Headteacher (section 89 Education and Inspections Act 1996).
An item banned by the school rules may only be searched for under these new powers if it has been identified in the school rules as an item that can be searched for. It is therefore important that there is a school policy which sets out clearly and unambiguously the items which:

- are banned under the school rules; and
- are banned AND can be searched for by authorised school staff

The act allows authorised persons to examine data on electronic devices if they think there is a good reason to do so. In determining a 'good reason' to examine or erase the data or files the authorised staff member must reasonably suspect that the data or file on the device in question has been, or could be, used to cause harm, to disrupt teaching or could break the school rules.
Following an examination, if the person has decided to return the device to the owner, or to retain or dispose of it, they may erase any data or files, if they think there is a good reason to do so.

The *Head Teacher* must publicise the school behaviour policy, in writing, to staff, parents / carers and pupils at least once a year.

DfE advice on these sections of the Education Act 2011 can be found in the document: "Screening, searching and confiscation - Advice for head teachers, staff and governing bodies"
http://www.education.gov.uk/schools/pupilsupport/behaviour/behaviourpolicies/f0076897/screening -searching-and-confiscation

Relevant legislation:

- Education Act 1996
- Education and Inspections Act 2006
- Education Act 2011 Part (Discipline)
- The School Behaviour (Determination and Publicising of Measures in Academies) Regulations 2012
- Health and Safety at Work etc. Act 1974
- Obscene Publications Act 1959
- Children Act 1989
- Human Rights Act 1998
- Computer Misuse Act 1990
- General Data Protection Act 2018

This is not a full list of Acts involved in the formation of this advice. Further information about relevant legislation can be found via the above link to the DfE advice document.

Responsibilities

The *Headteacher* is responsible for ensuring that the school policies reflect the requirements contained within the relevant legislation. The formulation of these policies may be delegated to other individuals or groups. The policies will normally be taken to Governors for approval. The Headteacher will need to authorise those staff who are allowed to carry out searches.

This policy has been written by and will be reviewed by: Senior Leadership team in collaboration Key Governors and IT Support Team.

The *Headteacher* will authorised, when needed, members of staff to carry out searches for and of electronic devices and the deletion of data / files on those devices. Where possible this will be a familiar adult that the child feels comfortable and specified members of IT support team. (these requests will be logged).

Training / Awareness

Members of staff are made aware of the school's policy on "Electronic devices – searching and deletion":

- at induction
- at regular updating sessions on the school's E-Safety policy

Policy Statements Search:

The school Behaviour Policy refers to the policy regarding searches with and without consent for the wide range of items covered within the Education Act 2011 and lists those items. This policy refers only to the searching for and of electronic devices and the deletion of data / files on those devices.

Pupils are allowed to bring mobile phones or other personal electronic devices to school and use them only within the rules laid down by the school. The sanctions for breaking these rules can be found in the Possible Actions/Sanctions part of this policy.

Authorised staff (defined in the responsibilities section above) have the right to search for such electronic devices where they reasonably suspect that the data or file on the device in question has been, or could be, used to cause harm, to disrupt teaching or break the school rules.

- Searching without consent - Authorised staff may only search without the pupil's consent for anything which is either 'prohibited' (as defined in Section 550AA of the Education Act 1996) or appears in the school rules as an item which is banned and may be searched for.

In carrying out the search:

The authorised member of staff must have reasonable grounds for suspecting that a *pupil* is in possession of a prohibited item i.e. an item banned by the school rules and which can be searched for.

The authorised member of staff should take reasonable steps to check the ownership of the mobile phone / personal electronic device before carrying out a search.

The authorised member of staff should take care that, where possible, searches should not take place in public places e.g. an occupied classroom, which might be considered as exploiting the pupil being searched.

The authorised member of staff carrying out the search must be, where possible, the same gender as the *pupil* being searched and there must be a witness (also a staff member) and, if at all possible, they too should be the same gender as the *pupil* being searched.

There is a limited exception to this rule: Authorised staff can carry out a search of a *pupil* of the opposite gender including without a witness present, but **only where you reasonably believe that there is a risk that serious harm will be caused to a person if you do not conduct the search immediately and where it is not reasonably practicable to summon another member of staff.**

Extent of the search:

The person conducting the search may not require the */ pupil* to remove any clothing other than outer clothing.

Outer clothing means clothing that is not worn next to the skin or immediately over a garment that is being worn as underwear (outer clothing includes hats; shoes; boots; coat; blazer; jacket; gloves and scarves).

'Possessions' means any goods over which the *pupil* has or appears to have control – this includes desks, lockers and bags.

A pupil's possessions can only be searched in the presence of the *pupil* and another member of staff, except where there is a risk that serious harm will be caused to a person if the search is not conducted immediately and where it is not reasonably practicable to summon another member of staff.

The power to search without consent enables a personal search, involving removal of outer clothing and searching of pockets; but not an intimate search going further than that, which only a person with more extensive powers (e.g. a police officer) can do.

Use of Force – force cannot be used to search without consent for items banned under the school rules regardless of whether the rules say an item can be searched for.

Electronic devices

An authorised member of staff finding an electronic device may access and examine any data or files on the device if they think there is a good reason to do so (i.e. the staff member must reasonably suspect that the data or file on the device in question has been, or could be, used to cause harm, to disrupt teaching or break the school rules).

The examination of the data / files on the device should go only as far as is reasonably necessary to establish the facts of the incident. Any further intrusive examination of personal data may leave the school open to legal challenge. It is important that authorised staff should have training and sufficient knowledge of electronic devices and data storage.

If inappropriate material is found on the device it is up to the authorised member of staff to decide whether they should delete that material, retain it as evidence (of a criminal offence or a breach of school discipline) or whether the material is of such seriousness that it requires the involvement of the police. Examples of illegal activity would include:

- **child sexual abuse images (including images of one child held by another child)**
- **adult material which potentially breaches the Obscene Publications Act**
- **criminally racist material**
- **other criminal conduct, activity or materials**

Members of staff may require support in judging whether the material is inappropriate or illegal. One or more Senior Leaders should receive additional training to assist with these decisions. Care should be taken not to delete material that might be required in a potential criminal investigation.

The school should also consider their duty of care responsibility in relation to those staff who may access disturbing images or other inappropriate material whilst undertaking a search. Seeing such material can be most upsetting. There should be arrangements in place to support such staff. The school may wish to add further detail about these arrangements.

Deletion of Data

Following an examination of an electronic device, if the authorised member of staff has decided to return the device to the owner, or to retain or dispose of it, they may erase any data or files, if they think there is a good reason to do so. (i.e. the staff member must reasonably suspect that the data or file on the device in question has been, or could be, used to cause harm, to disrupt teaching or break the school rules).

If inappropriate material is found on the device, it is up to the authorised member of staff to decide whether they should delete that material, retain it as evidence (of a possible criminal offence or a breach of school discipline) or whether the material is of such seriousness that it requires the involvement of the police.

A record should be kept of the reasons for the deletion of data / files. (DfE guidance states and other legal advice recommends that there is no legal reason to do this, best practice suggests that the school can refer to relevant documentation created at the time of any search or data deletion in the event of a pupil, parental or other interested party complaint or legal challenge.

Care of Confiscated Devices

School staff are reminded of the need to ensure the safe keeping of confiscated devices, to avoid the risk of compensation claims for damage / loss of such devices (particularly given the possible high value of some of these devices).

Audit / Monitoring / Reporting / Review

The responsible person (Headteacher) will ensure that full records are kept of incidents involving the searching for and of mobile phones and electronic devices and the deletion of data / files.

These records will be reviewed by the *Governing Body* at regular intervals.

This policy will be reviewed by the Headteacher and Governors annually and in response to changes in guidance and evidence gained from the records.

Legislation

Schools should be aware of the legislative framework under which this E-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

General Data Protection Regulation (GDPR) May 25, 2018,

GDPR was designed to modernise laws that protect the personal information of individuals.
The GDPR sets out seven key principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

https://www.wired.co.uk/article/what-is-gdpr-uk-eu-legislation-compliance-summary-fines-2018

https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/principles/

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 Harassment 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 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

The new 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 of13 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.

Education and Inspections Act 2006

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

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/screening-searching-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: http://www.education.gov.uk/schools/toolsandinitiatives/cuttingburdens/b0075738/reducing-bureaucracy/requirements/changestoschoolinformationregulations

Links to other organisations or documents

The following links may help those who are developing or reviewing a school E-Safety policy.

UK Safer Internet Centre

Safer Internet Centre -Childnet
Professionals Online Safety Helpline
Internet Watch Foundation

CEOP

http://ceop.police.uk/
ThinkUKnow

Others:

INSAFE - http://www.saferinternet.org/ww/en/pub/insafe/index.htm
UK Council for Child Internet Safety (UKCCIS) www.education.gov.uk/ukccis
Netsmartz http://www.netsmartz.org/index.aspx

Support for Schools

Cyberbullying

Scottish Anti-Bullying Service, Respectme - http://www.respectme.org.uk/
Scottish Government Better relationships, better learning, better behaviour
DCSF - Cyberbullying guidance
DfE – Preventing & Tackling Bullying – Advice to school leaders, staff and Governing Bodies
Anti-Bullying Network - http://www.antibullying.net/cyberbullying1.htm
Cyberbullying.org - http://www.cyberbullying.org/

Social Networking

Digizen – Social Networking
SWGfL - Facebook - Managing risk for staff and volunteers working with children and young people
Connectsafely Parents Guide to Facebook
Facebook Guide for Educators

Curriculum

SWGfL Digital Literacy & Citizenship curriculum
Glow - http://www.educationscotland.gov.uk/usingglowandict/
Alberta, Canada - digital citizenship policy development guide.pdf
Teach Today – www.teachtoday.eu/
Insafe - Education Resources
Somerset - e-Sense materials for schools

Mobile Devices / BYOD

Cloudlearn Report Effective practice for schools moving to end locking and blocking
NEN - Guidance Note - BYOD

Data Protection

Information Commissioners Office:
Your rights to your information – Resources for Schools - ICO
ICO pages for young people
Guide to Data Protection Act - Information Commissioners Office
Guide to the Freedom of Information Act - Information Commissioners Office
ICO guidance on the Freedom of Information Model Publication Scheme
ICO Freedom of Information Model Publication Scheme Template for schools (England)
ICO - Guidance we gave to schools - September 2012 (England)
ICO Guidance on Bring Your Own Device
ICO Guidance on Cloud Hosted Services

Information Commissioners Office good practice note on taking photos in schools
ICO Guidance Data Protection Practical Guide to IT Security
ICO – Think Privacy Toolkit
ICO – Personal Information Online – Code of Practice
ICO – Access Aware Toolkit
ICO - Subject Access Code of Practice
ICO – Guidance on Data Security Breach Management
SWGfL - Guidance for Schools on Cloud Hosted Services
LGfL - Data Handling Compliance Check List
Somerset - Flowchart on Storage of Personal Data
NEN - Guidance Note - Protecting School Data

Professional Standards / Staff Training

DfE - Safer Working Practice for Adults who Work with Children and Young People
Kent - Safer Practice with Technology
Childnet / TDA - Social Networking - a guide for trainee teachers & NQTs
Childnet / TDA - Teachers and Technology - a checklist for trainee teachers & NQTs
UK Safer Internet Centre Professionals Online Safety Helpline

Infrastructure / Technical Support

Somerset - Questions for Technical Support
NEN - Guidance Note - esecurity

Working with parents and carers

SWGfL / Common Sense Media Digital Literacy & Citizenship Curriculum
SWGfL BOOST Presentations - parents presentation
Connect Safely - a Parents Guide to Facebook
Vodafone Digital Parents Magazine
Childnet Webpages for Parents & Carers
DirectGov - Internet Safety for parents
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
The Cybersmile Foundation (cyberbullying) - advice for parents

Research

EU Kids on Line Report - "Risks and Safety on the Internet" - January 2011
Futurelab - "Digital participation - its not chalk and talk any more!"

Glossary of terms

AUP	Acceptable Use Policy – 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.
CPC	Child Protection Committee
CPD	Continuous Professional Development
CYPS	Children and Young Peoples Services (in Local Authorities)
FOSI	Family Online Safety Institute
EA	Education Authority
ES	Education Scotland
HWB	Health and Wellbeing
ICO	Information Commissioners Office
ICT	Information and Communications Technology
ICT Mark	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) to provide the safe broadband provision to schools across Britain.
Ofcom	Office of Communications (Independent communications sector regulator)
TUK	Think U Know – educational E-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