Scotholme Primary and Nursery

Online Safety

South West Grid for Learning Trust Ltd, Belvedere House, Woodwater Park, Pynes Hill, Exeter, EX2 5WS

Contents

Scotholme Primary And Nursery School Online Safety Policy

South West Grid for Learning Trust Ltd, Belvedere House, Woodwater Park, Pynes Hill, Exeter, EX2 5WS
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Development / Monitoring / Review of this Policy

This Online Safety policy has been developed by a working group / committee (or insert name of group) made up of:

- Headteacher
- Online Safety Coordinator
- Staff – including Teachers, Support Staff, Technical staff
- Governors
- Parents and Carers
- Pupils in the school
- Community users

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

Schedule for Development / Monitoring / Review

This Online Safety policy was approved by the Board of Directors / Governing Body / Governors Sub Committee on:	Insert date
The implementation of this Online Safety policy will be monitored by the:	Online Safety Coordinator
Monitoring will take place at regular intervals:	AT THE END OF EACH TERM
The Governing Body will receive a report on the implementation of the Online Safety Policy generated by the monitoring group (which will include anonymous details of online safety incidents) at regular intervals:	AT THE END OF EACH TERM
The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	DECEMBER 2019
Should serious online safety incidents take place, the following external persons / agencies should be informed:	Academy Group Officials, LADO, Police

The school will monitor the impact of the policy using:

- Logs of reported incidents
- Monitoring logs of internet activity (including sites visited) / filtering
- Internal monitoring data for network activity □ Surveys / questionnaires of:

    ○ pupils ○
    parents /
    carers ○ staff

Scope of the Policy

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

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 academy site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of online-bullying or other Online Safety incidents covered by this policy, which may take place outside of the academy, but is linked to membership of the academy. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data (see appendix for template policy). In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

The academy will deal with such incidents within this policy and associated behaviour and antibullying policies and will, where known, inform parents / carers of incidents of inappropriate Online Safety behaviour that take place out of school.

Roles and Responsibilities

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

Governors

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

Body has taken on the role of Online Safety Governor. The role of the Online Safety Governor / Director will include:

- termly meetings with the Online Safety Co-ordinator
- attendance at Online Safety Group meetings (once a term)
- regular monitoring of online safety incident logs
- regular monitoring of filtering / change control logs
- reporting to relevant Governors / Committee / meeting

Headteacher and Senior Leaders

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

Online Safety Coordinator

- leads the Online Safety Group
- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies
- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place
- provides training and advice for staff
- liaises with the Local Authority / MAT
- liaises with school technical staff

- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments,
- meets regularly with Online Safety Governor to discuss current issues, review incident logs and filtering / change control logs
- attends relevant meeting / committee of Governors
- reports regularly to Senior Leadership Team

Co-ordinator for ICT

The Co-ordinator for ICT is responsible for ensuring:

- **that the academy's technical infrastructure is secure and is not open to misuse or malicious attack**
- **that the academy meets required online safety technical requirements and any MAT Online Safety Policy that may apply.**
- **that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed (from the appropriate age – currently Year 4 and upwards)**
- the filtering policy (included within this policy), is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person
- that they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- that the use of the network / internet / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Headteacher or Online Safety Coordinator for investigation / action / sanction
- that monitoring software / systems are implemented and updated as agreed in academy policies

Teaching and Support Staff

Are responsible for ensuring that:

- **they have an up to date awareness of online safety matters and of the current academy Online Safety Policy and practices**
- **they have read, understood and signed the Staff Acceptable Use Policy (StAUP)**
- **they report any suspected misuse or problem to the Headteacher; Online Safety Coordinator 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 i.e. e-mail through the school**

system, School Comms, the school website or Class Dojo (see Class Dojo Policy)

- online safety issues are embedded in all aspects of the curriculum and other activities
- pupils understand and follow the Online Safety Policy and Pupil Acceptable Use Policies (PAUP)
- 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 (this should be highlighted in planning) and that processes are in place for dealing with any unsuitable material that is found in internet searches

Designated Safeguarding Lead / Designated Person / Officer

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

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

Online Safety Group

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

Members of the Online Safety Group will assist the Online Safety Coordinator with:

- the production / review / monitoring of the school Online Safety Policy / documents.

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

Pupils:

- **are responsible for using the academy digital technology systems in accordance with the Pupil Acceptable Use Policy (one for KS1; one for KS2)**
- have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking / use of images and on online-bullying.
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the academy's Online Safety Policy covers their actions out of school, if related to their membership of the school

Parents / Carers

Parents / Carers play a crucial role in ensuring that their children understand the need to use the internet / mobile devices in an appropriate way. The academy will take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website and information about national / local online safety campaigns. Parents and carers will be encouraged to support the academy in promoting good online safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to parents' sections of the website and on-line pupil records

Community Users

Community Users who access academy systems / website as part of the wider academy provision will be expected to sign a Community Acceptable Usage Policy before being provided with access to academy systems.

Policy Statements

Education – Pupils

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

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

- **A planned online safety curriculum should be provided as part of Computing / PHSE / other lessons and should be regularly revisited**
- **Key online safety messages should be reinforced as part of a planned programme of assemblies and other activities**
- **The academy will run activities / learning related to Safer Internet Day each February.**
- **Pupils should be taught in all lessons to be critically aware of the materials / content they access both on and off-line and be guided to validate the accuracy of information.**
- **Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet**
- **Pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making**
- Pupils should be helped to understand the need for the Pupil Acceptable Use Policy and be encouraged to adopt safe and responsible use both within and outside the academy.

- Staff should act as good role models in their use of digital technologies, the internet and mobile devices.
- In lessons where internet use is pre-planned, it is best practice that pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (eg racism, drugs, and discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Online Safety Coordinator can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

Education – Parents / Carers

Many parents and carers have only a limited understanding of online safety risks and issues, yet they play an essential role in the education of their children and in the monitoring / regulation of the children's online behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

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

- Curriculum activities
- Letters, newsletters, web-sites
- Parents' / Carers' evenings / sessions
- High profile events / campaigns e.g. Safer Internet Day, Anti-Bullying Week
- Reference to the relevant web-sites / publications

Education – The Wider Community

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

- Providing family learning courses in use of new digital technologies, digital literacy and online safety
- Online safety messages targeted towards other relatives as well as parents.
- The academy website will provide online safety information for the wider community
- Supporting community groups where appropriate e.g. Early Years Settings, Childminders, youth / sports / voluntary groups to enhance their Online Safety provision

Education & Training – Staff / Volunteers

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

- **A planned programme of formal online safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out at least once a year.**
- **All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the academy Online Safety Policy and Acceptable Use Policies.**
- It is expected that some staff will identify online safety as a training need within the performance management process.
- The Online Safety Coordinator (or other nominated person) will receive regular updates through attendance at external training events and by reviewing guidance documents released by relevant organisations.
- This Online Safety Policy and its updates will be presented to and discussed by staff in staff meetings / INSET days.
- The Online Safety Coordinator will provide advice / guidance / training to individuals as required.

Training – Governors

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

- Attendance at training provided by the Local Authority / MAT / National Governors Association / or other relevant organisation (e.g. SWGfL).
- Participation in academy training / information sessions for staff or parents.

Technical – infrastructure / equipment, filtering and monitoring

The academy will be responsible for ensuring that the academy infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their online safety responsibilities: **Academy technical systems will be managed in ways that ensure that the academy meets recommended technical requirements.**

- **There will be regular reviews and audits of the safety and security of academy technical systems**
- **Servers, wireless systems and cabling must be securely located and physical access restricted**
- **All users will have clearly defined access rights to academy technical systems and devices.**
- **All users from Year 4 upwards will be provided with a username and secure password by the Online Safety Coordinator who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password** and will be required to change their password every term
- The "master / administrator" passwords for the academy ICT systems, used by the Network Manager (or other person) must also be available to the Headteacher or other nominated senior leader and kept in a secure place (eg academy safe)*
- Online Safety Coordinator is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- **Internet access is filtered for all users.** Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored. There is a clear process in place to deal with requests for filtering changes.
- **Internet filtering / monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet.**
- The academy has provided enhanced / differentiated user-level filtering through the EMBC filters and locally through Impero software.
- Academy technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Policy

- 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 through IMS 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, agreed with IMS for the provision of temporary access of "guests" (eg trainee teachers, supply teachers, visitors) onto the school systems.
- An agreed policy is in place regarding the extent of personal use that users staff and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place forbids staff from downloading executable files and installing programmes on school devices, unless given permission to do so by the ICT Coordinator or if this is the staff member's school laptop. Any software installed must be from a reputable source and removed if required to do so by the ICT Coordinator or Headteacher.
- Staff will not use removable media to transfer data. **Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured**.
- Any cloud based storage will have school e-mail addresses linked to them, and any data relating to children/staff/parents will be password protected

Mobile Technologies (including BYOD/BYOT)

Mobile technology devices may be school owned/provided or personally owned and might include: smartphone, tablet, notebook / laptop or other technology that usually has the capability of utilising the academy's wireless network. The device then has access to the wider internet which may include the academy's learning platform and other cloud-based services such as email and data storage.

All users should understand that the primary purpose of the use mobile / personal devices in a school context is educational. The mobile technologies policy should be consistent with and interrelated to other relevant school polices including but not limited to the Safeguarding Policy, Behaviour Policy, Bullying Policy, Acceptable Use Policy, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the academy's Online Safety education programme.

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

	School Devices			Personal Devices		
	School owned for single user	**School owned for multiple users**	**Authorised device[1]**	**Student owned**	**Staff owned**	**Visitor owned**
Allowed in school	Yes	Yes	Yes	Yes But locked away	Yes but used away from children except in extenuating circumstances	Yes but only used in certain areas
Full network access	Yes	Yes	Yes	No	No	No
Internet only				No	Yes	Yes as long as credentials removed afterwards

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents / carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for cyberbullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for

[1] Authorised device – purchased by the pupil/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school.

employers to carry out internet searches for information about potential and existing employees. The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- **When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular, they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.**
- **Written permission from parents or carers will be obtained before photographs of pupils are published on the school website / social media / local press**
- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at academy events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other pupils in the digital / video images.
- Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow academy policies concerning the sharing, distribution and publication of those images. Those images should only be taken on academy equipment, the personal equipment of staff should not be used for such purposes.
- Care should be taken when taking digital / video images that pupils are appropriately dressed and are not participating in activities that might bring the individuals or the academy into disrepute.
- Pupils must not take, use, share, publish or distribute images of others without their permission.
- Photographs published on the website, or elsewhere (e.g. Class Dojo) that include pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Students' / Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Student's / Pupil's work can only be published with the permission of the student / pupil and parents or carers.

Data Protection

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

The academy must ensure that:

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

Staff must ensure that they:

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

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

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

Communications

A wide range of rapidly developing communications technologies has the potential to enhance learning. The following table shows how the school currently considers the benefit of using these technologies for education outweighs their risks / disadvantages:

	Staff and other adults				Pupils			
	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Mobile phones may be brought to the academy	x						x	
Use of mobile phones in lessons		x						x
Use of mobile phones in social time	x							x

Taking photos on mobile school cameras/tablets	x					x		
Use of other mobile devices to take photos				x				x
Use of personal email addresses in regard academy business				x				x
Use of academy email for personal emails	x							x
Use of messaging apps		x					x	
Use of social media				x				x
Use of blogs	x					x		

When using communication technologies, the academy considers the following as good practice:

- **The official academy email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored.** Staff and pupils should therefore use only the academy email service to communicate with others when in school, or on academy systems (e.g. by remote access).
- **Users must immediately report, to the nominated person (Headteacher, DSL or Online Safety Coordinator) – in accordance with the academy policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.**
- **Any digital communication between staff and pupils or parents / carers (e-mail, Class Dojo etc.) must be professional in tone and content.** These communications may only take place on official (monitored) academy systems. Personal email addresses, text messaging or social media must not be used for these communications.
- Whole class / group email addresses may be used at both KS1 and KS2 where deemed appropriate
- Pupils should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.
- Personal information should not be posted on the academy website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

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

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

- Ensuring that personal information is not published;
- Training is provided including: acceptable use; social media risks; checking of settings; data protection; reporting issues;
- Clear reporting guidance, including responsibilities, procedures and sanctions; Risk assessment, including legal risk.

Academy staff should ensure that:

- No reference should be made in social media to pupils, parents / carers or academy staff
- They do not engage in online discussion on personal matters relating to members of the school community;
- Personal opinions should not be attributed to the academy or MAT;
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.

When official academy social media accounts are established, including the use of ClassDojo, there should be:

- A process for approval or checking of communication by senior leaders;
- Clear processes for the administration and monitoring of these accounts – involving at least two members of staff (see ClassDojo policy)
- A code of behaviour for users of the accounts, including:
  ○ Systems for reporting and dealing with abuse and misuse ○ Understanding of how incidents may be dealt with under academy disciplinary procedures

Personal Use:

- Personal communications are those made via a personal social media account. In all cases, where a personal account is used which associates itself with the academy or impacts on the academy, it must be made clear that the member of staff is not communicating on behalf of the academy with an appropriate disclaimer. Such personal communications are within the scope of this policy;

- Personal communications which do not refer to or impact upon the school are outside the scope of this policy;
- Where personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken;
- The academy permits reasonable and appropriate access to private social media sites.

Monitoring of Public Social Media

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

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

Dealing with unsuitable / inappropriate activities

Some internet activity e.g. accessing child abuse images or distributing racist material is illegal and would obviously be banned from academy and all other technical systems. Other activities e.g. cyber-bullying would be banned and could lead to criminal prosecution. There are however a range of activities which may, generally, be legal but would be inappropriate in an academy context, either because of the age of the users or the nature of those activities.

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

User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	Criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	Pornography				X	
	Promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	Promotion of extremism or terrorism				X	
	Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	

User Actions	Acceptable	Acceptable at certain	Acceptable for nominated	Unacceptable	Unacceptable and illegal
Using school systems to run a private business				X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the academy				X	
Infringing copyright				X	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)				X	
Creating or propagating computer viruses or other harmful files				X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)				X	
On-line gaming (educational)		x			
On-line gaming (non-educational)			x		
On-line gambling				x	
On-line shopping / commerce					
File sharing				x	

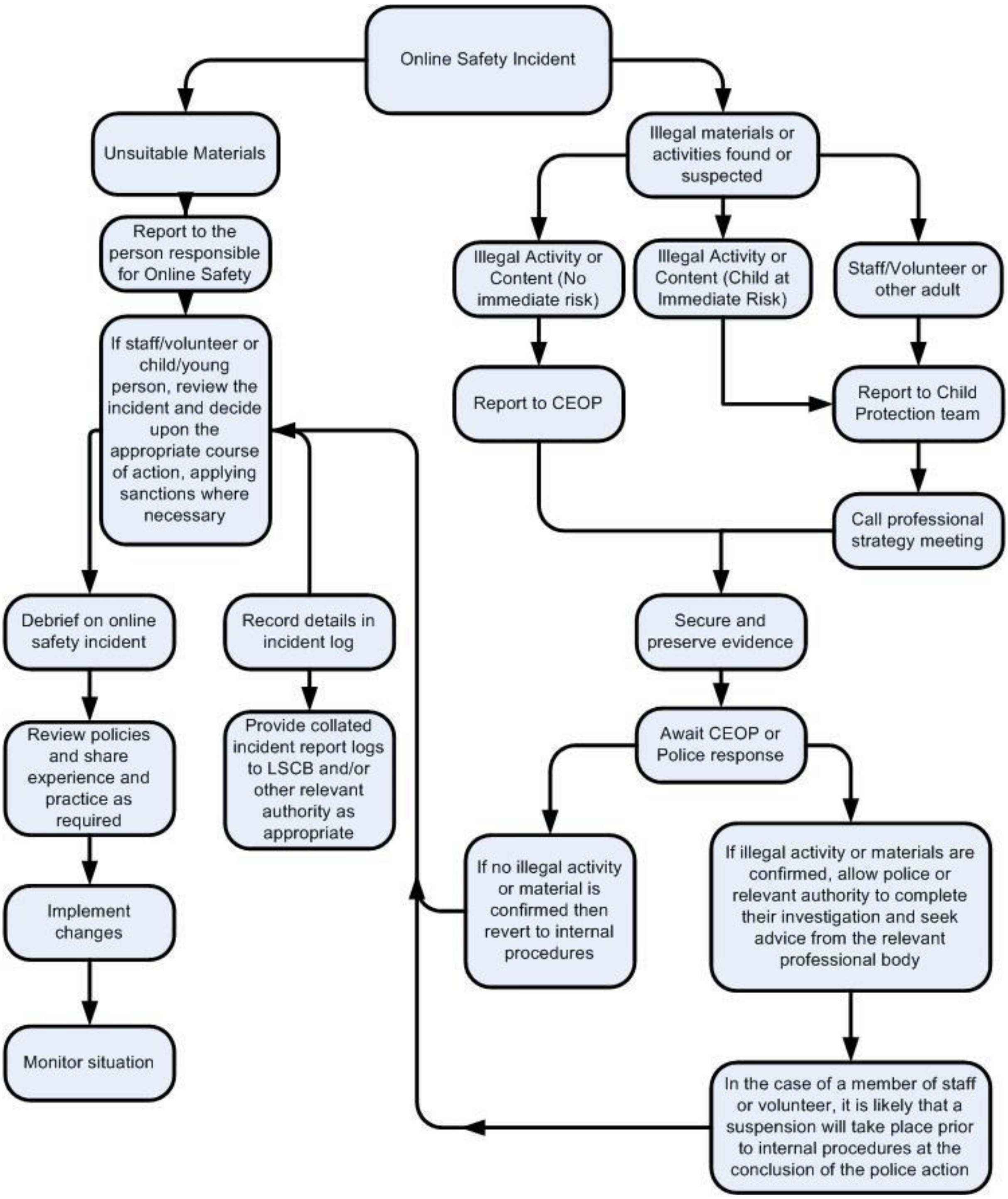
Use of social media			x		
Use of messaging apps			x		
Use of video broadcasting e.g. Youtube			x		

Responding to incidents of misuse

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

Illegal Incidents

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


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

Other Incidents

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

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

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

Academy Actions & Sanctions

It is more likely that the academy will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour / disciplinary procedures as follows:

	Actions / Sanctions								
Pupils Incidents	Refer to class teacher / tutor	Refer to Online Safety Officer	Refer to Headteacher	Refer to Police	Refer to technical support staff for action re filtering / security etc.	Inform parents / carers	Removal of network / internet access rights	Warning	Further sanction eg detention / exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		X	X	X	x	x	x		x
Unauthorised use of non-educational sites during lessons	x				x			x	
Unauthorised / inappropriate use of mobile phone / digital camera / other mobile device	x	x			x	x		X	
Unauthorised / inappropriate use of social media / messaging apps / personal email	x	x			x	x		X	
Unauthorised downloading or uploading of files		x			x		x		
Allowing others to access academy network by sharing username and passwords	x	x					x	x	
Attempting to access or accessing the academy network, using another student's / pupil's account	x	x						x	
Attempting to access or accessing the academy network, using the account of a member of staff	x	x					x	x	

Corrupting or destroying the data of other users	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	X	X	X	
Continued infringements of the above, following previous warnings or sanctions	X	X				X	X		X
Actions which could bring the academy into disrepute or breach the integrity of the ethos of the school	X	X	X			X			
Using proxy sites or other means to subvert the academy's / academy's filtering system	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 material	X	X	X			X	X		
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act	X	X			X			X	

	Actions / Sanctions							
Staff Incidents	Refer to line managerr	Refer to Headteacher	Refer to Local Authority /	Refer to Police	Refer to Technical 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			
Unauthorised downloading or uploading of files	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		
Deliberate actions to breach data protection or network security rules		x						
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software		x			X			
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature		x			X			
Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with pupils		x				X		
Actions which could compromise the staff member's professional standing		X						
Actions which could bring the academy into disrepute or breach the integrity of the ethos of the academy		X						
Using proxy sites or other means to subvert the academy's / academy's filtering system		x			X			
Accidentally accessing offensive or pornographic material and failing to report the incident		x				X		
Deliberately accessing or trying to access offensive or pornographic material		x					X	
Breaching copyright or licensing regulations					x			
Continued infringements of the above, following previous warnings or sanctions		x				x		

Appendix

Please see other polices or documents relating to this document:

Acceptable Use Policies:

- Foundation / Key Stage 1
- Key Stage 2
- Staff

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

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

Staff (and Volunteer) Acceptable Use Policy Agreement

School Policy

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

This Acceptable Use Policy is intended to ensure:

- that staff and volunteers will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school ICT systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that staff are protected from potential risk in their use of ICT in their everyday work.

The school will try to ensure that staff and volunteers will have good access to ICT to enhance their work, to enhance learning opportunities for pupils learning and will, in return, expect staff and volunteers to agree to be responsible users.

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. I recognise the value of the use of ICT for enhancing learning and will ensure that pupils receive opportunities to gain from the use of ICT. I will, where possible, educate the young people in my care in the safe use of ICT and embed online safety in my work with young people.

For my professional and personal safety:

- I understand that the school will monitor my use of the ICT systems, email and other digital communications.
- I understand that the rules set out in this agreement also apply to use of school ICT systems (e.g. laptops, email, iPads or camera equipment) out of school, and to the transfer of personal data (digital or paper based) out of school.
- I understand that the school ICT systems are primarily intended for educational use and that I will only use the systems for personal or recreational use outside of core school hours or during my break period.
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.

I will be professional in my communications and actions when using school ICT systems:

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner, I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital / video images. I will not use my personal equipment to record these images, unless I have permission from the Headteacher to do so. Where these images are published (on the school website) it will not be possible to identify by name, or other personal information, any children who are featured.
- I will only use chat and social networking sites in school if it is directly related to teaching the pupils within school.
- I will only communicate with pupils and parents / carers using official school systems. Any such communication will be professional in tone and manner. I understand that all of this communication may be monitored.
- I will not engage in any on-line activity that may compromise my professional responsibilities.

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

- When I use my mobile devices (PDAs / laptops / mobile phones / USB devices etc) in school, I will follow the rules set out in this agreement, in the same way as if I was using school equipment. I will also follow any additional rules set by the school about such use. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses.
- I will only use personal e-mail addresses for communications between colleagues. Where school business is conducted, I will use the school e-mail address.

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

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

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

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

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

When using the iPads designated for staff use only:

- I will ensure that the auto-lock feature is set to less than 5 minutes and a passcode has been set which is at least 6 digits long.
- I will not allow any children to use the iPad at any time.
- I will not allow any person who is not connected with the school to use the iPad at any time.
- I will use the iPad for work use ONLY.
- I will ensure that the iPad is in school when required by any member of the SLT or IT Coordinator.
- I will cover the cost of any excess if an insurance claim has to be made if the claim is due to the loss or theft of the iPad owing to a lack of security.

- I will cover the cost of any excess if an insurance claim has to be made if the claim is due to the damage through a lack of care including delivery.
- I will only install paid for apps after asking for permission from the IT Coordinator.
- I will only transfer photos to and from the school server and I will remove any photos on the device as soon as possible to reduce the risk of photos being on the machine in case of theft.

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

Signed

Date

Written in April 2016 using SWGfL information as a template.