ST JOHN HENRY NEWMAN CATHOLIC SCHOOL

ONLINE SAFETY POLICY & PROCEDURES

Approved by	
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Review date[2]:	July 2022

REVIEW SHEET

The information in the table below details earlier versions of this document with a brief description of each review and how to distinguish amendments made since the previous version date (if any).

Version Number	Version Description	Date of Revision
1	Original	February 2012
2	Front Cover ONLY updated to take account of revised Statutory Policy Guidance issued by the DfE	March 2013
3	Minor changes to reinforce the need for parents to act responsibly when using Facebook or other social networking sites	November 2013
4	Reformatted only	April 2014
5	Amended to include references to extremism, radicalisation and child sexual exploitation and minor changes to text	September 2015
6	Updated to remove statutory references to home-school agreement, change of title to 'Online Safety Policy and procedures' in line with Ofsted terminology and the document split into Policy and Procedures	March 2016
7	Updated to reflect changes as a result of updated 'Keeping Children Safe in Education' – September 2016	August 2016
8	Minor changes and updates to reflect introduction of GDPR and the Data Protection Act 2018	April 2018
9	Original. Complete rewrite to take into account current national guidance on Online Safety	November 2019
10	Updated in line with Keeping Children Safe in Education 2020. No legal or significant policy changes just updates to link document mentions to the latest versions of them online (not highlighted). Minor policy addition in Section 3 to draw attention to policy or procedure addendums staff and others must be aware of (usually Covid-19 related). Minor policy clarification in Section 9.1 (BYOD procedures) just to specifically reference wearable technologies and the broadcasting of location data (highlighted).	September 2020
11	Updated to include additional information on sharing nude and semi-nude images and online challenges and hoaxes.	March 2021

Why does a School or Setting need an Online Safety Policy and procedures?

This School Model Online Safety Policy and procedures is intended to help school leaders produce a suitable document which will consider all current and relevant issues, in a whole school context, linking with other relevant Policies, such as the Overarching Safeguarding Statement, Child Protection, Data Protection and Whole School Behaviour Policies for example.

It is essential for schools to take a leading role in Online Safety. Schools should support parents in understanding the issues and risks associated with children's use of digital technologies. Furthermore, all schools have should have acceptable use agreements, and ensure that parents are aware of the procedures for Online safety within the school. Recognising the growing trend for home-school links and extended school activities, schools should take an active role in providing information and guidance for parents on promoting online safety messages in home use of ICT, too.

The Byron Review "Safer Children in a Digital World" stressed the role of schools:

> *"One of the strongest messages I have received during my Review was about the role that schools and other services for children and families have to play in equipping children and their parents to stay safe online. To empower children and raise the skills of parents, I make recommendations to Government in the following areas: delivering online safety through the curriculum, providing teachers and the wider children's workforce with the skills and knowledge they need, reaching children and families through Extended Schools and taking steps to ensure that Ofsted holds the system to account on the quality of delivery in this area."*

The development and expansion of the use of ICT, and particularly of the Internet, has transformed learning in schools in recent years. Children and young people will need to develop high level ICT skills, not only to maximise their potential use as a learning tool, but also to prepare themselves as lifelong learners and for future employment. There is a large body of evidence that recognises the benefits that ICT can bring to teaching and learning. Schools have made a significant investment both financially and physically to ensure these technologies are available to all learners. The benefits are perceived to "outweigh the risks." However, schools must, through their Online Safety Policy and procedures, ensure that they meet their statutory obligations to ensure that children and young people are safe and are protected from potential harm, both within and outside school. The Policy and procedures will also form part of the school's protection from legal challenge, relating to the use of ICT.

Schools are expected to evaluate their level of online safety in the Ofsted Self Evaluation Form (SEF) and will be subject to an increased level of scrutiny by Ofsted Inspectors during school inspections.

The model suggests policy statements which would be essential in any school Online Safety Policy, based on good practice and the experience of incidents at schools across the country. In addition, there are a range of alternative statements that schools may consider and choose those that are most suitable, given their circumstances. The model reflects the view that safe internet access is an entitlement for all learners from EYFS right through to 6th Form.

An effective School Online Safety Policy and procedures must be tailored to the needs of each school and an important part of the process will be the discussion and consultation which takes place during the writing or review of the policy. This will help ensure that the Policy is owned and accepted by the whole school community.

It is suggested that consultation in the production of this Policy and procedures should involve:

- Governors
- Teaching Staff and Support Staff
- Pupils
- Parents
- Community users and any other relevant groups.

Due to the ever-changing nature of Information and Communication Technologies, it is best practice that the school reviews the Online Safety Policy and procedures at least annually and, if necessary, more frequently in response to any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place.

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APPENDICES

POLICY

1. Background/Rationale

New technologies have become integral to the lives of children and young people in society, both within schools and in their lives outside school.

The Internet and other digital and information technologies are powerful tools, which open new opportunities for everyone. Electronic communication helps teachers and pupils learn from each other. These technologies can stimulate discussion, promote creativity and increase awareness of context to promote effective learning. Children and young people have an entitlement to safe internet access.

The requirement to ensure that children and young people can use online and related communications technologies appropriately and safely is addressed as part of the wider duty of care to which all who work in schools are bound. The school Online Safety Policy and procedures will help to ensure safe and appropriate use. The development and implementation of such a strategy will involve all the stakeholders in a child's education from the Head teacher and Governors to the senior leaders and classroom teachers, support staff, parents, members of the community and the pupils themselves.

The use of these exciting and innovative tools in school and at home has been shown to raise educational standards and promote pupil achievement. However, the use of these new technologies can put young people at risk within and outside the school. Some of the dangers they may face include:

- Access to illegal, harmful or inappropriate images or other content;
- Unauthorised access to/loss of/sharing of personal information;
- The risk of being subject to grooming by those with whom they make contact on the internet;
- The risk of being targeted by extremists in order to promote and encourage radicalisation;
- The risk of being targeted by those involved in child sexual exploitation;
- The sharing/distribution of personal images without an individual's consent or knowledge;
- Being drawn into taking part in unsuitable online challenges and/or hoaxes;
- Inappropriate communication/contact with others, including strangers;
- Cyber-bullying;
- Access to unsuitable video/internet games;
- An inability to evaluate the quality, accuracy and relevance of information on the internet;
- Plagiarism and copyright infringement;
- Illegal downloading of music or video files;
- The potential for excessive use which may impact on the social and emotional development and learning of the young person.

Many of these risks reflect situations in the off-line world and it is essential that this Online Safety Policy and procedures is used in conjunction with other school Policies including the Overarching Safeguarding Statement, Child Protection, Data Protection and Whole School Behaviour.

As with all other risks, it is impossible to eliminate those risks completely. It is therefore essential, through good educational provision to build pupils' resilience to the risks to which they may be exposed, so that they have the confidence and skills to face and deal with these risks.

The school must demonstrate that it has provided the necessary safeguards to help ensure that they have done everything that could reasonably be expected of them to manage and reduce these risks. The Online Safety Policy and procedures that follows explains how we intend to do this, while also addressing wider educational issues to help young people (and their parents) to be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.

2. Definitions

For the purposes of this document a child, young person, pupil or student is referred to as a 'child' or a 'pupil' and they are normally under 18 years of age.

Wherever the term 'parent' is used this includes any person with parental authority over the child concerned e.g. carers, legal guardians etc.

Wherever the term 'Head teacher' is used this also refers to any Manager with the equivalent responsibility for children.

3. Associated School Policies and procedures

This Policy should be read in conjunction with the following school Policies/procedures:

- Overarching Safeguarding Statement
- Child Protection Policy and procedures
- GDPR Policy including procedures for CCTV
- Health and Safety Policy and procedures
- Rewards and Behaviour Policy
- Whistleblowing procedures
- Code of Conduct for staff and other adults

4. Communication/Monitoring/Review of this Policy and procedures

This Policy and procedures will be communicated to staff, pupils and the wider community in the following ways:

- Posted Dept. drive - V:\Online Safety
- Policy and procedures to be discussed as part of the school induction pack for new staff and other relevant adults including (where relevant) the staff Acceptable Use Agreement
- Acceptable Use Agreements discussed with pupils at the start of each year
- Acceptable Use Agreements to be issued to external users of the school systems (e.g. Governors) usually on entry to the school
- Acceptable Use Agreements to be held in pupil and personnel files

The Online Safety Policy is referenced from within other school Policies and procedures as outlined above.

The review period for this Policy and procedures is as determined by the Governing Body/Proprietors and indicated on the front cover.

5. Scope of the Policy

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

The Education and Inspections Act 2006 empowers Head teachers/Principals, to such extent as is reasonable, to regulate the behaviour of pupils when they are off the School/Academy site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of cyber-bullying, or other online safety related incidents covered by this Policy and procedures, which may take place out of 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. In the case of both acts, action can only be taken with regard to issues covered by the published Rewards and Behaviour Policy and procedures.

The School will deal with such incidents within this Policy and procedures and the Rewards and Behaviour Policy which includes anti-bullying procedures and will, where known, inform parents of incidents of inappropriate online safety behaviour that take place out of school.

PROCEDURES

1. Roles and Responsibilities

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

1.1 Governors

The role of the Governors/online safety Governor is to:

- ensure that the school follows all current online safety advice to keep the children and staff safe;
- approve the Online Safety Policy and procedures and review its effectiveness. This will be carried out by the Governors/Governors Sub-committee 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
- support the school in encouraging parents and the wider community to become engaged in online safety activities;
- regular review with the Online Safety Coordinator (including incident logs, filtering/change control logs etc.)
- ensure a member of the Governing Body is elected to the role of Online Safety Governor;
- ensure an appropriate senior member of staff from the school leadership team is appointed to the role of DSL with lead responsibility for safeguarding and child protection (including online safety with the appropriate status, authority, time, funding, training, resources and support;
- ensure that the school follows all current online safety advice to keep both pupils and staff safe;
- approve the Online Safety Policy and procedures and review its effectiveness. This will be carried out by the Governors/Governors Sub-committee receiving regular information about online safety incidents and monitoring reports and making use of the document from the UK Council for Internet Safety (UKCIS) Online safety in schools and colleges: Questions from the Governing Board;
- support the school in encouraging parents and the wider community to become engaged in online safety activities;
- have regular reviews with the Online Safety Coordinator/Designated Safeguarding Lead (DSL) and incorporate online safety into standing discussions of safeguarding at Governors meetings (including incident logs, filtering/change control logs etc.)
- ensure that where the online safety coordinator is not the named DSL or deputy DSL, there is regular review and open communication between these roles and that the DSL's clear overarching responsibility for online safety is not compromised;
- work with the Data Protection Officer (DPO), DSL and Head teacher to ensure a UK GDPR compliant framework for storing data, helping to ensure that child protection is always at the forefront and data protection processes support careful and legal sharing of information;
- check that Annex C - Online Safety which forms part of 'Keeping Children Safe in Education' reflects practice in the school;
- ensure that all staff undertake safeguarding and child protection training (including online safety) at induction which is regularly updated in line with advice from the Local Safeguarding Children Partnership (SCP);
- ensure that appropriate filters and appropriate monitoring systems are in place. Consideration should be given to 'over-blocking' which may lead to unreasonable restrictions as to what pupils can be taught in relation to online teaching and safeguarding;
- ensure pupils are taught how to keep themselves safe, including online as part of providing a broad and balanced curriculum with clear procedures on the use of mobile technology.

1.2 Head teacher

The Head teacher has overall responsibility for online safety provision. The day-to-day responsibility for online safety may be delegated to the Online Safety Coordinator/Designated Safeguarding Lead (DSL).

The Head teacher will:

- take overall responsibility for data and data security;
- foster a culture of safeguarding where online safety is fully integrated into whole school safeguarding;
- oversee the activities of the DSL and ensure that the DSL responsibilities listed in the section below are being followed and fully supported;
- ensure that Policies and procedures are followed by all staff;
- undertake training in offline and online safety, in accordance with statutory guidance and relevant Local Safeguarding Partnership recommendations;
- liaise with the designated safeguarding lead on all online-safety issues which might arise and receive regular updates on school issues and broader policy and practice information;
- take overall responsibility for data management and information security ensuring the school's provision follows best practice in information handling; work with the DPO, DSL and Governors to ensure a Data Protection Act 2018 (DPA) compliant framework for storing data, but helping to ensure that child protection is always put first and data-protection processes support careful and legal sharing of information;
- ensure the school implements and makes effective use of appropriate ICT systems and services including school-safe filtering and monitoring, protected email systems and that all technology including cloud systems are implemented according to child-safety first principles;
- be responsible for ensuring that all staff receive suitable training to carry out their child protection and online safety roles;
- understand and make all staff aware of procedures to be followed in the event of a serious online safeguarding incident or allegation against a member of staff or other adult (see flowchart on dealing with online safety incidents – Appendix I;
- ensure suitable risk assessments are undertaken so the curriculum meets needs of pupils, including the risk of children being radicalised;
- ensure that there is a system in place to monitor and support staff (e.g., network manager) who carry out internal technical online safety procedures;
- ensure Governors are regularly updated on the nature and effectiveness of the school's arrangements for online safety;
- ensure the school website meets statutory requirements
- ensure the school uses an approved, filtered Internet Service, which complies with current statutory requirements;
- ensure that the Online Safety Coordinator and other relevant staff receive suitable CPD to enable them to carry out their online safety roles and to train other colleagues, as relevant;
- 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;
- receive regular monitoring reports from the Online Safety Coordinator;
- be aware of the procedures to be followed in the event of a serious online safety incident or an allegation being made against a member of staff or volunteer (see flow chart on dealing with online safety incidents – Appendix D, and relevant Local Authority HR/school disciplinary procedures). The procedures for dealing with allegations against staff or volunteers can be found within the school Child Protection Policy and all staff/volunteers are provided with a copy on induction.

1.3 Designated Safeguarding Lead (DSL)/Online Safety Lead (OSL)

The DSL may delegate certain online safety duties e.g. to the OSL, but not the day-to-day responsibility; this assertion and all quotes below are taken from Keeping Children Safe in Education. Where the online-safety co-ordinator is not the named DSL or deputy DSL, there must be a regular review and open communication

between these roles to ensure that the DSL's clear overarching responsibility for online safety is not compromised.

- take lead responsibility for safeguarding and child protection (including online safety);
- be the first point of contact for any concerns the wider staff and other adults working in the school may have in relation to child protection and online safety harmful behaviour e.g., sharing nude or semi-nude images/online challenges or hoaxes and refer to the UKCIS and DfE guidance on these subjects;
- ensure an effective approach to online safety is in place that empowers the school to protect and educate the whole school community in their use of technology and establish mechanisms to identify, intervene in and escalate any incident where appropriate;
- promote an awareness and commitment to online safety throughout the school community with strong focus on parents, who are often appreciative of school support in this area, but also including 'hard-to-reach' parents;
- liaise with other agencies in line with 'Working together to Safeguard Children' statutory guidance;
- take day-to-day responsibility for online safety issues and be aware of the potential for serious child protection concerns;
- ensure that online safety education is embedded in line with DfE guidance 'Teaching Online Safety in schools' across the curriculum (e.g. by use of the UKCIS framework 'Education for a Connected World') and beyond, in the wider school community;
- work with the Head teacher, Data Protection Officer, Governors and the school ICT technical staff to ensure a DPA compliant framework for storing data, helping to ensure that child protection is always at the fore and data protection processes support careful and legal sharing of information;
- keep up to date with the latest local and national trends in online safety;
- review and update this Policy and procedures, other online safety documents (e.g., Acceptable Use Agreements) and the strategy on which they are based (in line with Policies and procedures for behaviour and child protection) and submit for review on a regular basis to the Governors/Trustees;
- liaise with school technical, pastoral, and support staff as appropriate;
- communicate regularly with SLT and the designated online safety Governor/committee to discuss current issues (anonymised), review incident logs and filtering/change control logs;
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident and that these are logged in the same way as any other child protection incident;
- oversee and discuss 'appropriate filtering and monitoring' with Governors (both physical and technical) and ensure staff are aware of its necessity;
- ensure the DfE guidance on sexual violence and harassment is followed throughout the school and that staff adopt a zero-tolerance approach to this as well as to bullying generally;
- facilitate training and advice for staff and others working in the school:
  - all staff must read and understand KCSiE Part one and all those working with children, Annex A;
  - it would also be advisable for all staff to be aware of Annex C (Online safety);
  - cascade knowledge of risks and opportunities throughout the organisation;
- be aware of emerging online safety issues and legislation, and of the potential for serious child protection issues to arise from:
  - sharing of personal data;
  - access to illegal/inappropriate materials;
  - inappropriate online contact with adults/strangers;
  - potential or actual incidents of grooming;
  - cyberbullying and the use of social media.
- ensure that an online safety log is kept up to date;

1.4 Network Manager/Technical staff

The Network Manager will:

- report any online safety related issues that arise, to the Head teacher or E Safety Co-ordinator who will notify the Head Teacher;

- ensure that users may only access the school's networks through an authorised and properly enforced password protection procedures, in which passwords are regularly changed;
- ensure that the school's ICT infrastructure is secure and is not open to misuse or malicious attack e.g. keeping virus protection up to date;
- ensure that the school meets the online safety technical requirements outlined in the School Acceptable Use Agreements and any relevant Local Authority Online Safety Policy and guidance;
- the school's procedures on web filtering, is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person;
- ensure that access controls/encryption exist to protect personal and sensitive information held on school-owned devices;
- that he/she keeps up to date with the school's Online Safety Policy and procedures and technical information to effectively carry out their Online safety role and to inform and update others as relevant;
- that the use of the network/Virtual Learning Environment (VLE)/remote access/email is regularly monitored in order that any misuse/attempted misuse can be reported to the E-Safety Coordinator for investigation/action/sanction;
- ensure that appropriate backup procedures exist so that critical information and systems can be recovered in the event of a disaster and to complement the business continuity process;
- keep up-to-date documentation of the school's e-security and technical procedures.
- all as listed in the 'all staff' section above;
- keeping up to date with the school's Online safety Policy and technical information to effectively carryout their online safety role and to inform and update others as relevant;
- working closely with the DSL/OSL/DPO to ensure that school systems and networks reflect school Policy;
- ensuring that the above stakeholders understand the terms of existing services and how any changes to these systems (especially in terms of access to personal and sensitive records/data and to systems such as YouTube mode, web filtering settings, sharing permissions for files on cloud platforms etc.) might affect the system functions and safety online;
- supporting and providing advice on the implementation of 'appropriate filtering and monitoring' as determined by the DSL and Senior Leadership Team;
- ensuring that users may only access the school's networks through an authorised and properly enforced password protection procedures, in which passwords are regularly changed;
- ensuring that the school's ICT infrastructure is secure and is not open to misuse or malicious attack e.g., keeping virus protection up to date;
- ensuring that access controls/encryption exist to protect personal and sensitive information held on school-owned devices;
- monitoring the use of the network/Virtual Learning Environment (VLE)/remote access/email and social media presence and that any misuse/attempted misuse is reported to the DSL/OSL in line with school Policy;
- ensuring that appropriate backup procedures exist so that critical information and systems can be recovered in the event of a disaster and to complement the business continuity process;
- maintaining up-to-date documentation of the school's online security and technical procedures;
- working with the Head teacher to ensure the school website meets statutory DfE requirements;
- reporting online safety issues that come to their attention in line with school Policy.

1.5 Data Manager

It is the responsibility of the IT Manager to ensure that all data held on pupils on school office machines have appropriate access controls in place and that systems and procedures comply with the General Data Protection Regulations.

1.6 All Staff

It is the responsibility of all staff to:

- understand that online safety is a core part of safeguarding; as such it is part of everyone's role. Never think that 'someone else will pick it up';
- know who the Designated Safeguarding Lead and Online Safety Lead are;
- read and understand Part 1, Annex A and Annex C of 'Keeping Children Safe in Education' statutory guidance – whilst Part 1 is statutory for all staff, Annex A for SLT and whose working directly with children, it is good practice for all staff to read all three sections;
- read, understand and help promote the school's Online Safety Policy and procedures in conjunction with the Child Protection and other related school Policies and procedures;
- read, sign and follow the school Staff Acceptable Use Agreement and staff Code of Conduct;
- be aware of online safety issues related to the use of mobile technology e.g., phones, cameras and other hand-held devices and follow school procedures in relation to these devices;
- ensure the security of their username and password for the school system, not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security. Passwords will be changed on a regular basis and at least every 6 months;
- record online safety incidents in the same way as any child protection incident and report incidents to the DSL/OSL in accordance with school procedures;
- notify the DSL/OSL if policy does not reflect practice in the school and follow escalation procedures if concerns are not promptly acted upon;
- identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting curriculum/stage/subject leads, and making the most of unexpected learning opportunities as they arise;
- whenever overseeing the use of technology (devices, the Internet, new technology such as augmented reality, etc.) in school or setting as homework tasks, encourage sensible use, monitor what pupils are doing and consider potential dangers and the age appropriateness of websites (check what appropriate filtering and monitoring processes are in place);
- carefully supervise and guide pupils when engaged in learning activities involving online technology, supporting them with search skills, critical thinking (e.g., fake news), age-appropriate materials and signposting, and legal issues such as copyright and data law;
- prepare and check all online source and resources before using in the classroom;
- encourage pupils to follow their Acceptable Use Agreement, regularly remind them about it and enforce school sanctions where there is a breach of the Agreement;
- notify the DSL/OSL of new trends and issues before they become a problem;
- take a zero-tolerance approach to bullying and low-level sexual harassment either offline or online;
- receive and act upon regular updates from the DSL/OSL and have a healthy curiosity for online safety issues;
- model safe, responsible and professional behaviours in their own use of technology. This includes outside the school hours and site, and on social media, in all aspects upholding the reputation of the school and the professional reputation of all staff;
- ensure that any digital communications with pupils are on a professional level and only through school-based systems, never through personal mechanisms, e.g., email, text, mobile phones or social media messaging or posts.

1.7 PSHE/RSHE Lead(s)

Responsibilities of PSHE/RSHE Leads include:

- all as listed in the 'all staff' section above;
- ensuring that consent, mental wellbeing, healthy relationships and staying safe online is embedded into the PSHE/Relationships education, relationships and sex education (RSE) and health education curriculum. This will include being taught what positive, healthy and respectful online relationships

look like, the effects of the pupils' online actions on others and knowing how to recognise and display respectful behaviour online. Throughout these subjects, teachers will address online safety and appropriate behaviour in an age-appropriate way that is relevant to their pupils' lives (KCSiE);
- complementing the computing curriculum which covers the principles of online safety at all key stages, with progression in the content to reflect the different and escalating risks that pupils face. This includes how to use technology safely, responsibly, respectfully and securely, and where to go for help and support when the pupil has concerns about content or contact on the Internet or other online technologies;
- working closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messages within PSHE/RSHE.

1.8 Computing/Subject Lead(s)

Responsibilities of the Computing Lead include:

- all as listed in the 'all staff' section above;
- the overseeing delivery of the online safety element of the Computing curriculum in accordance with the national curriculum;
- working closely with the DSL/OSL and all other staff to ensure an understanding of the issues, approaches and messages within Computing;
- collaboration with technical staff and others responsible for ICT use in school to ensure a common and consistent approach, in line with Acceptable Use Agreements.

1.9 Data Protection Officer (DPO)

The DPO will be familiar with references to the relationship between data protection and safeguarding in key DfE documents 'Keeping Children Safe in Education' and 'Data protection: a toolkit for schools'.

Neither the Data Protection Act 2018 nor UK GDPR prevent, or limit, the sharing of information for the purposes of keeping children safe. Information which is sensitive and personal will be treated as 'special category personal data' for the purposes of compliance with DPA 2018. Legal and secure information sharing between schools, Children's Social Care and other local agencies is essential for keeping children safe and ensuring they get the support they need. Information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information **must not** be allowed to stand in the way of promoting the welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards will be in place.

Other responsibilities of the DPO include:

- working with the DSL, Head teacher and Governors to ensure frameworks are in place for the protection of data and of safeguarding information sharing as outlined above;
- ensuring that all access to safeguarding data is limited as appropriate, monitored and audited.

1.10 Volunteers and contractors

The key responsibilities of volunteers and contractors are to:

- read, understand, sign and adhere to any Acceptable Use Agreement issued by the school;
- report any concerns, no matter how small, to the DSL/OSL without delay;
- maintain an awareness of current online safety issues and guidance;
- model safe, responsible and professional behaviours in their own use of technology.

1.11 Pupils

Taking into account the age and level of understanding, the key responsibilities of pupils are to:

- use the school ICT systems in accordance with the Pupil Acceptable Use Agreement – see Appendix B, which they and/or their parents will be expected to sign before being given access to school systems;

- ensure the security of their username and password for the school system, 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;
- understand the importance of reporting abuse, misuse or access to inappropriate materials including those involving hoaxes and on-line challenges and know how to do so;
- know what action to take if they or someone they know feels worried or vulnerable when using online technology including the report bullying button on the school website.
- understand the importance of adopting safe and responsible behaviours and good online safety practice when using digital technologies outside of school and realise that the school's acceptable use agreements cover their actions out of school, including on social media;
- know and understand school procedures on the use of mobile phones, digital cameras and hand-held digital devices;
- know and understand school procedures on the taking/use of images and on cyberbullying/sharing nude and semi-nude images;
- understand the benefits/opportunities and risks/dangers of the online world and know who to talk to at school if there are problems.
- have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations;

1.12 Parents

Parents play a crucial role in ensuring that their children understand the need to use the Internet/mobile devices in an appropriate way. Research shows that many parents do not fully understand the issues and are less experienced in the use of ICT than their children. The school will therefore take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website/VLE and information about national/local online safety campaigns/literature. The key responsibilities for parents are to:

- support the school in promoting online safety which includes the pupils' use of the Internet and the school's use of photographic and video images;
- read, sign and promote the Pupil Acceptable Use Agreement and encourage their child to follow it;
- consult with the school if they have any concerns about their children's use of technology;
- promote positive online safety and model safe, responsible and positive behaviours in their own use of technology (including on social media) by ensuring that they themselves do not use the Internet/social network sites/other forms of technical communication in an inappropriate or defamatory way;
- support the school's approach to online safety by not uploading or posting to the Internet any images or details of others without permission and refraining from posting pictures, video or text that could upset, offend or threaten the safety of any member of the school community or bring the school into disrepute.

2. Teaching and Learning

The following subjects have the clearest online safety links (see relevant role descriptors above for more information):

- RSHE
- Computing

It is, however, the role of all staff to identify opportunities to thread online safety through all school activities, both outside the classroom and within the curriculum, supporting subject lead staff and making the most of unexpected learning opportunities as they arise.

Whenever overseeing the use of technology (devices, the Internet, new technology such as augmented reality, etc) in school or setting as homework tasks, all staff will encourage sensible use, monitor what pupils are doing and consider potential dangers and the age appropriateness of websites.

Equally, all staff should carefully supervise and guide pupils when engaged in learning activities involving online technology (including, extra-curricular and extended school activities if relevant), supporting them with search skills, critical thinking (e.g., fake news), age-appropriate materials and signposting, and legal issues such as copyright, plagiarism and data law.

We recognise that online safety and broader digital resilience must be included throughout the curriculum.

2.1 How internet use enhances learning

This school:

- has a clear, progressive online safety education programme as part of the Computing/PSHE curriculum. This covers the teaching of a range of skills and behaviours which are appropriate to the age and experience of the pupils concerned and include those to:
    - STOP and THINK before they CLICK;
    - develop a range of strategies to evaluate and verify information before accepting its accuracy;
    - be aware that the author of a website/page may have a particular bias or purpose and to develop skills to recognise what that may be;
    - know how to narrow down or refine a search;
    - [for older pupils] understand how search engines work and to understand that this affects the results they see at the top of the listings;
    - understand acceptable behaviour when using an online environment/email, i.e., be polite, no bad or abusive language or other inappropriate behaviour; keeping personal information private;
    - understand how photographs can be manipulated and how web content can attract unwanted or inappropriate attention;
    - understand why they should not post or share detailed accounts of their personal lives, contact information, daily routines, location, photographs and videos and to know how to ensure they have turned-on privacy settings;
    - understand why they must not post pictures or videos of others without their permission;
    - know not to download any files – such as music files – without permission;
    - have strategies for dealing with receipt of inappropriate materials;
    - [for older pupils] understand why and how some people will 'groom' young people for sexual or extremist ideology reasons;
    - understand the impact of cyberbullying, sharing inappropriate images and trolling and know how to seek help if they are affected by any form of online bullying;
    - know how to report any abuse including cyberbullying; and how to seek help if they experience problems when using the Internet and related technologies, i.e., parent, teacher or trusted staff member, or an organisation such as ChildLine or the CLICK CEOP button.
- plans internet use carefully to ensure that it is age-appropriate and supports the learning objectives for specific curriculum areas;
- will remind pupils about their responsibilities through an end-user Acceptable Use Agreement which will be displayed throughout the school or when they log on to the school's network;
- ensures staff model safe and responsible behaviour in their own use of technology during lessons;
- ensures that when copying materials from the web, staff and pupils understand issues around plagiarism; how to check copyright and know that they must respect and acknowledge copyright/intellectual property rights;
- ensures that staff and pupils understand the issues around aspects of the commercial use of the Internet, as age appropriate. This may include risks in pop-ups; buying online, online gaming/gambling etc.

2.2 Pupils with additional needs

We use a wide range of strategies to support children with additional needs who might need extra support to keep themselves safe, especially online.

- Sensitively check pupil's understanding and knowledge of general personal safety issues using reminders and explicit prompts to link their existing knowledge of "how to keep safe" to the rules that will apply specifically to, for instance, internet use.
- Apply rules consistently to embed understanding.
- Communicate rules clearly to parents and seek their support in implementing school rules at home. Working with parents and sharing information with them is relevant to all children, but this group especially.
- Careful explanations about why rules might change in different situations i.e., why it is ok to give your name and address to an adult if you are lost in town, but not when using the Internet.
- Consistent use of cause and effect linking the rules to consequences teaching realistic and practical examples of what might happen if… without frightening pupils.

3. Handling online safety concerns and incidents

Our staff recognise that online safety is only one element of the wider safeguarding agenda as well as being a curriculum strand of Computing, PSHE/RSHE and Citizenship.

General concerns will be handled in the same way as any other child protection concern. Early reporting to the DSL/OSL is vital in order to ensure that the information contributes to the overall picture or highlights what might not yet be a problem.

Support staff will often have a unique insight and opportunity to find out about issues first in the playground, corridors, toilets and other communal areas outside the classroom (particularly relating to bullying and sexual harassment and violence).

Procedures for dealing with online safety, concerns and incidents are detailed in the following Policies:

- Child Protection Policy and procedures
- Child on Child abuse Policy and procedures
- Rewards and Behaviour Policy and procedures (includes anti-bullying procedures)
- Acceptable Use Agreements
- Prevent Risk Assessment
- Data Protection Policy, agreements and other documentation (e.g., privacy statement, consent forms for data sharing image use etc.)

We are committed to taking all reasonable precautions to ensure online safety but recognise that incidents will occur both inside and outside school. All members of the school community are encouraged to report issues swiftly to school staff so that they can be dealt with quickly and sensitively through the school's escalation processes.

Any suspected online risk or infringement should be reported to the DSL/OSL on the same day wherever possible or, if out of school, the following school day.

Any concern/allegation about misuse by staff or other adult in school will always be referred directly to the Head teacher unless the concern is about the Head teacher, in which case, the complaint will be directed to the Chair of Governors. Staff may also use the NSPCC Whistleblowing Helpline. Call 0800 028 0285 or email: help@nspcc.org.uk.

The school will actively seek support from other agencies as needed (i.e., Local Authority Safeguarding Hub, UK Safer Internet Centre's Professionals' Online Safety Helpline (03443814772), NCA CEOP, Cumbria Police Prevent Officer, Cumbria Police, Internet Watch Foundation (IWF)). We will inform parents of online safety incidents involving their child and the Police where staff or pupils engage in or are subject to behaviour which we consider is particularly disturbing or is considered illegal. See Sections below for procedures for dealing with sharing nude and semi-nude images, upskirting and online bullying.

- In this school there is strict monitoring and application of the Online Safety Policy and a differentiated and appropriate range of sanctions.
- All members of the school community will be informed about the procedure for reporting online safety concerns (such as breaches of filtering, cyberbullying, illegal content etc.).
- The Designated Safeguarding Lead will record all reported incidents and actions taken in the School Online Safety incident log and other in any relevant areas e.g., Bullying or Child protection log which will then be escalated appropriately – See Child Protection Policy and procedures for dealing with concerns.
- The school will manage Online Safety incidents in accordance with the school discipline/behaviour policy where appropriate.
- The school will inform parents of any incidents or concerns as and when required.
- After any investigations are completed, the school will debrief, identify lessons learnt and implement any changes required.
- Where there is cause for concern or fear that illegal activity has taken place or is taking place then the school will contact the Safeguarding Hub **and** escalate the concern to the Police.
- If the school is unsure how to proceed with any incidents of concern, then the incident may be escalated to the Safeguarding Hub – see Child Protection Policy and procedures.

Incidents will be dealt with as soon as possible in a proportionate manner through normal behaviour/disciplinary procedures. It is important that, where necessary, members of the school community are made aware that incidents have been dealt with.

3.1 Sharing nude and semi-nude images

Where incidents of the sharing of nude and semi-nude images via the internet or mobile phone by those under the age of 18 are discovered , we will refer to the UK Council for (UKCIS) guidance 'Sharing nude and semi-nude images'. A copy of this document is available from the school office. Where one of the parties is over the age of 18, we will refer to it as child sexual abuse.

All staff and other relevant adults have been issued with a copy of the UKCIS overview document (Sharing nudes and semi-nudes: how to respond to an incident) in recognition of the fact that it is generally someone other than the DSL or OSL who will first become aware of an incident. Staff, other than the DSL, must not attempt to view, share or delete the image or ask anyone else to do so but must report the incident to the DSL as soon as possible.

It is the responsibility of the DSL to follow the guidance issued by UKCIS, decide on the next steps and whether to involve other agencies as appropriate.

It is important to understand that whilst the sharing of nude and semi-nude images illegal, pupils should be encouraged to discuss with staff situations if they have made a mistake or had a problem with this issue.

The UKCIS advice outlines how to respond to an incident of nudes and semi-nudes being shared including:

- risk assessing situations;
- safeguarding and supporting children and young people;
- handling devices and images;
- recording incidents, including the role of other agencies.
- informing parents and carers

The types of incidents which this advice covers are:

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18;
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18;
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

3.2 Upskirting

All staff are aware that 'upskirting' (taking a photo of someone under their clothing) is now a criminal offence, but that pupils should be encouraged to discuss with staff situations if they have made a mistake or had a problem with this issue. If staff or other adults become aware of an incident of 'upskirting', the issue must be reported to the DSL as soon as possible.

3.3 Online bullying

Online bullying (also known as cyberbullying) will be treated in the same way as any other form of bullying and the Whole School Behaviour Policy and procedures will be followed in relation to sanctions taken against the bully. It is important not to treat online bullying separately to offline bullying and to recognise that some bullying will have both online and offline elements. Support will be provided to both the victim and the perpetrator. In some cases, it may be necessary to inform or involve the Police.

Many young people and adults find that using the Internet and mobile phones is a positive and creative part of their everyday life. Unfortunately, technologies can also be used negatively. When children are the target of bullying via mobile phones, gaming or the Internet, they can often feel very alone, particularly if the adults around them do not understand cyberbullying and its effects. A once previously safe and enjoyable environment or activity can become threatening, harmful and a source of anxiety. It is essential that young people, school staff and parents understand how cyberbullying is different from other forms of bullying, how it can affect people and how to respond and combat misuse. Promoting a culture of confident users will support innovation and safety.

There are several statutory obligations on schools in relation to behaviour which establish clear responsibilities to respond to bullying. In particular, section 89 of the Education and Inspections Act 2006:

- every school must have measures to encourage good behaviour and prevent all forms of bullying amongst pupils. These measures should be part of the school's Behaviour Policy which must be communicated to all pupils, school staff and parents;
- gives Head teachers the ability to ensure that pupils behave when they are not on school premises or under the lawful control of school staff.

Where bullying outside school (such as online or via text) is reported to the school, it will be investigated and acted on.

Although bullying in itself is not a specific criminal offence in the UK, it is important to bear in mind that some types of harassing or threatening behaviour or communications could be a criminal offence, for example under the Protection from Harassment Act 1997, the Malicious Communications Act 1988, the Communications Act 2003, and the Public Order Act 1986. If school staff feels that an offence may have been committed, they should seek assistance from the Police.

DfE and Childnet have produced resources and guidance that we expect staff to use to give practical advice and guidance on cyberbullying:

- Cyberbullying (along with all other forms of bullying) of any member of the school community will not be tolerated. Full details are set out in the Whole School Behaviour Policy and procedures.
- There are clear procedures in place to support anyone in the school community affected by cyberbullying.
- All incidents of cyberbullying reported to the school will be recorded.
- There will be clear procedures in place to investigate incidents or allegations of cyberbullying.
- Pupils, staff and parents will be advised to keep a record of the bullying as evidence.
- The school will take steps to identify the bully, where possible and appropriate. This may include examining school system logs, identifying and interviewing possible witnesses, and contacting the service provider and the police, if necessary.
- Pupils, staff and parents will be required to work with the school to support the approach to cyberbullying and the school's online safety ethos.
- Sanctions for those involved in cyberbullying may include:

- The bully will be asked to remove any material deemed to be inappropriate or offensive.
- A service provider may be contacted to remove content if the bully refuses or is unable to delete content.
- Internet access may be suspended at school for the user for a period of time. Other sanctions for pupils and staff may also be used in accordance with the Whole School Behaviour Policy, Acceptable Use Agreement and Disciplinary Procedures.
- Parents of pupils will be informed.
- The Police will be contacted if a criminal offence is suspected.

3.4 Harmful online challenges or hoaxes

An online challenge will generally involve users recording themselves taking a challenge and then distributing the resulting video through social media sites, often inspiring or daring others to repeat the challenge. Whilst many will be safe and fun, others can be potentially harmful and even life threatening.

If staff are confident children and young people are aware of, and engaged in, a real challenge that may be putting them at risk of harm, then it would be appropriate for this to be directly addressed by either the DSL or a senior leader in school. Careful consideration will be given on how best to do this and it may be appropriate to offer focussed support to a particular age group or individual children at risk. We will take account of the fact that even with real challenges, many children and young people may not have seen it and may not be aware of it and will carefully weigh up the benefits of institution-wide highlighting of the potential harms related to a challenge against needlessly increasing children and young people's exposure to it.

Where staff become aware of a potentially harmful online hoax or challenge, they will immediately inform the Designated Safeguarding Lead who will take the appropriate action either with the child concerned or with the wider group where the incident involves more than one child.

Where the DSL considers it necessary to directly address an issue, this can be achieved without exposing children and young people to scary or distressing content. In the response, we will consider the following questions:

- is it factual?
- is it proportional to the actual (or perceived) risk?
- is it helpful?
- is it age and stage of development appropriate?
- is it supportive?

A hoax is a deliberate lie designed to seem truthful. The internet and social media provide a perfect platform for hoaxes, especially hoaxes about challenges or trends that are said to be harmful to children and young people to be spread quickly.

We will carefully consider if a challenge or scare story is a hoax. Generally speaking, naming an online hoax and providing direct warnings is not helpful. Concerns are often fuelled by unhelpful publicity, usually generated on social media, and may not be based on confirmed or factual occurrences or any real risk to children and young people. There have been examples of hoaxes where much of the content was created by those responding to the story being reported, needlessly increasing children and young people's exposure to distressing content.

Evidence from Childline shows that, following viral online hoaxes, children and young people often seek support after witnessing harmful and distressing content that has been highlighted, or directly shown to them (often with the best of intentions), by parents, carers, schools and other bodies. In this respect, staff will be mindful of the advice provided by the UK Safer Internet Centre which provides guidance on dealing with online hoaxes or challenges.

In any response, reference will be made to the DfE guidance 'Harmful online challenges and online hoaxes'

3.5 Sexual violence and harassment

DfE guidance on sexual violence and harassment is referenced in 'Keeping Children Safe in Education' and separate guidance exists on this issue 'Sexual violence and sexual harassment between children in schools and colleges'. All staff are aware of this guidance.

We take all forms of sexual violence and harassment seriously and will act appropriately on information which suggests inappropriate behaviour regardless of the considered seriousness. Any incident of sexual harassment or violence (online or offline) must be reported to the DSL at the earliest opportunity. The DSL will follow the guidance as outlined in the Child Protection Policy and procedures.

3.6 Misuse of school technology (devices, systems, networks or platforms)

Clear and well communicated rules and procedures are essential to govern pupil and adult use of school networks, connections, internet connectivity and devices, cloud platforms and social media (both when on school site and outside of school).

These rules are defined in the relevant Acceptable Use Agreements as provided to pupils, staff and Governors.

Where pupils contravene these rules, the Rewards and Behaviour Policy and procedures will be applied; where staff contravene these rules, action will be taken as outlined in the staff code of conduct and, where necessary, the school disciplinary procedures.

The school reserves the right to withdraw, temporarily or permanently, any or all access to such technology or the right to bring mobile technology devices onto school property.

3.7 Social media incidents

Social media incidents are governed by Acceptable Use Agreements. Breaches will be dealt with in line with these procedures, the Whole School Behaviour Policy and procedures (for pupils) and the staff Code of Conduct/Disciplinary procedures (for staff and other adults).

Where an incident relates to an inappropriate, upsetting, violent or abusive social media post by an identifiable member of the school community, we will request that the post be deleted and will expect this to the actioned promptly.

Where an offending post has been made by a third party or is anonymous, the school may report it to the hosting platform, the Police or may contact the Professionals' Online Safety Helpline (UK Safer Internet Centre) for support or assistance in accelerating the process of removal.

4. Data protection and data security

All pupils, staff, Governors, parents and other adults working in or visiting school are bound by the school's Data Protection Policy and procedures a copy of which is available on the school website.

There are references to the relationship between data protection and safeguarding in key DfE documents i.e. 'Keeping Children Safe in Education' and 'Data protection: a toolkit for schools' which the DPO and DSL will seek to apply.

The Head teacher, DPO and Governors work together to ensure a DPA compliant framework for storing data, but which ensures that child protection is always the primary consideration and data protection processes support careful and legal sharing of information. The Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Information which is sensitive and personal will be treated as 'special category personal data' for the purposes of compliance with the DPA. Legal and secure information sharing between schools, Children's Social Care and other local agencies is essential for keeping children safe and ensuring they get the support they need. Information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information **must not** be allowed to stand in the way of promoting the welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards will be in place.

All pupils, staff, Governors, volunteers, contractors and parents are bound by the school's Data Protection Policy and procedures.

4.1 Maintaining Information Systems Security

Local Area Network (LAN) security issues include:

- Users must act reasonably e.g., the downloading of large files or viewing sporting events during the working day will affect the service that others receive.
- Users must take responsibility for their network use. For staff, flouting the school Acceptable Use Agreement may be regarded as a reason for dismissal.
- Workstations should be secured against user mistakes and deliberate actions.
- Servers will be located securely and physical access restricted.
- The server operating system is secured and kept up to date.
- Virus protection for the whole network is installed and current.
- Access by wireless devices will be proactively managed and secured with a minimum of WPA2 encryption.

Wide Area Network (WAN) security issues include:

- Broadband firewalls and local CPEs (Customer Premises Equipment) are configured to prevent unauthorised access between schools.
- Decisions on WAN security are made in partnership between school and our network provider.

The following statements apply in our school:

- The security of the school information systems and users will be reviewed regularly.
- Virus protection will be updated regularly.
- Personal data sent over the Internet or taken off site will be encrypted.
- Portable media must be scanned by an anti-virus/malware scan before use.
- Unapproved software will not be allowed in work areas or attached to email.
- Files held on the school's network will be regularly checked.
- The ICT coordinator/network manager will review system capacity regularly.
- Use of user logins and passwords to access the school network will be enforced – see Section 6.2 below.

The school broadband and online suppliers are Advantex.

The Head teacher, Data Protection Officer and Governors work together to ensure a DPA compliant framework for storing data, but which ensures that child protection is always put first and data protection processes support careful and legal sharing of information.

4.2 Password Security

We will ensure that the school 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 is able to access another's files without permission (or as allowed for monitoring purposes within the school's procedures); access to personal data is securely controlled in line with the school's personal data procedures; logs are maintained of access by users and of their actions while users of the system.

All users (adults and young people) will have responsibility for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.

Passwords for new users, and replacement passwords for existing users can be allocated by contacting ICT Support. Any changes carried out must be notified to the member of staff responsible for issuing and coordinating password security.

Training/Awareness:

It is essential that users are made aware of the need to keep passwords secure, and the risks attached to unauthorised access/data loss.

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

- at induction;
- through the school's Online Safety Policy and procedures;
- through the Acceptable Use Agreement.

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

- in Computing/ICT and/or Online Safety lessons;
- through the Acceptable Use Agreement.

The following rules apply to the use of passwords:

- staff passwords must be changed every 6 months;
- student passwords are changed when required as they are school set passwords;
- the last four passwords cannot be re-used;
- the password will be a minimum of 8 characters long and must include three of – uppercase character, lowercase character, number, special character;
- 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);
- requests for password changes should be authenticated by OSL to ensure that the new password can only be passed to the genuine user. Network manager to log any requests for password changes on a spreadsheet in

The "master/administrator" passwords for the school ICT system, used by the Network Manager (or other person) are made available to the Head teacher or other nominated senior leader and kept in a secure place.

Audit/Monitoring/Reporting/Review:

The responsible person, Network Manager will ensure that full records are kept of:

- User Ids and requests for password changes;
- User log-ons;
- Security incidents related to this Policy and procedures.

In the event of a serious security incident, the Police may request and will be allowed access to passwords used for encryption. Local Authority Auditors also have the right of access to passwords for audit investigation purposes.

User lists, IDs and other security related information must be given the highest security classification and stored in a secure manner. These records will be reviewed by Online Safety Coordinator regular intervals.

5. Electronic Communications

5.1 Managing Email

Our general principles for email use are as follows:

- Pupils may only use approved email accounts for school purposes.
- Pupils must immediately tell a designated member of staff if they receive an offensive email or one which upsets or worries them.
- Pupils must not reveal personal details of themselves or others in email communication or arrange to meet anyone without specific permission from an adult.

- Staff will only use official school provided email accounts to communicate with pupils and parents, as approved by the Senior Leadership Team. Any deviation from this must be agreed with the DSL/Head teacher.
- Any digital communication between staff and pupils or parents (email, chat, VLE etc.) must be professional in tone and content. These communications may only take place on official (monitored) school systems. Personal email addresses, text messaging or public chat/social networking programmes must not be used for these communications. Any unauthorised attempt to use a different system may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Head teacher (if by a staff member).
- Staff are not permitted to use personal email accounts for professional purposes.
- Pupils and staff are permitted to use the school email system for personal use and should be aware that all use is monitored, their emails may be read and the same rules of appropriate behaviour apply at all times. Emails using inappropriate language, images, malware or to adult sites may be blocked and not arrive at their intended destination.
- Appropriate behaviour is expected at all times, and the system should not be used to send inappropriate materials or language which is or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise inappropriate, or which (for staff) might bring the school into disrepute or compromise the professionalism of staff.
- Users must immediately report, to the DSL the receipt of any email that makes them feel uncomfortable, is offensive, threatening or bullying in nature and must not respond to any such email.
- Pupils will be taught about email safety issues, such as the risks attached to the use of personal details. They will also be taught strategies to deal with inappropriate emails and be reminded of the need to write emails clearly and correctly and not include any unsuitable or abusive material.
- Personal information must not be posted on the school website and only official email addresses will be used to identify members of staff.
- Spam, phishing and virus attachments can make email dangerous. The school ICT provider ensures mail is virus checked (ingoing and outgoing), includes spam filtering and backs emails up daily.

5.2 Emailing personal, sensitive, confidential or classified information

Staff or pupil personal data should never be sent/shared/stored in emails and any data must be encrypted prior to being sent.

- Assess whether the information can be transmitted by other secure means before using email - emailing confidential data is not recommended and should be avoided where possible;
- The use of Hotmail, BTInternet, G-mail or any other Internet based webmail service for sending email containing sensitive information is not permitted;
- Use egress switch wherever possible
- Where your conclusion is that email must be used to transmit such data:
    - Obtain express consent from your manager to provide the information by email;
    - Exercise caution when sending the email and always follow these checks before releasing the email:
        - Verify the details, including accurate email address, of any intended recipient of the information;
        - Verify (by phoning) the details of a requestor before responding to email requests for information;
        - Do not copy or forward the email to any more recipients than is necessary.
    - Do not send the information to any person whose details you have been unable to separately verify (usually by phone);
    - Send the information as a password protected email;
    - Provide the password by a **separate** contact with the recipient(s) e.g., by telephone or in a separate email;
    - Do not identify such information in the subject line of any email;
    - Request confirmation of safe receipt.

5.3 Zombie accounts

Zombie accounts refer to accounts belonging to users who have left the school and therefore no longer have authorised access to the school's systems. Such Zombie accounts when left active can cause a security threat by allowing unauthorised access.

- Ensure that all user accounts are disabled once the member of the school has left;
- Prompt action on disabling accounts will prevent unauthorised access;
- Regularly change generic passwords to avoid unauthorised access (Microsoft© advise every 42 days).

Staff will refer to further advice available at IT Governance as necessary.

6. School Website

The school website is a key public-facing information portal for the school community (both existing and prospective stakeholders) with a key reputational value. SAHT has day to day editorial responsibility for online content published by the school on the school website and will ensure that content published is accurate and appropriate. The school website is managed hosted by Lightbulb.

The DfE has determined information which must be available on a school website. 'What schools must publish online' (maintained schools), and 'What academies, free schools and colleges should publish online' (academies and free schools).

Where other staff submit information for the website, they are asked to consider the following principles:

- The contact details on the website are the school address, email and telephone number. Staff, Governors or pupils' personal information are not published.
- The school website will comply with the school's guidelines for publications including respect for intellectual property rights, privacy procedures and copyright.
- Where pupil work, images or videos are published on the website, their identities are protected and full names are not published including publishing images with a filename that includes a pupil's full name.

7. 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, pupils and parents need to be aware of the risks associated with sharing images and with posting digital images on the Internet. Those images may remain available on the Internet forever and may cause harm or embarrassment to individuals in the short or longer term. There are many reported incidents of employers carrying out internet searches for information about potential and existing employees. The school will inform and educate users about these risks and will implement procedures to reduce the likelihood of the potential for harm:

- We gain parental permission for the use of digital photographs, student work or video involving their child as part of the school agreement form when their child joins the school so they have a chance to object as is their legal right under DPA 2018.. This is a once in a school lifetime consent. Parents are required to inform the school if their consent changes.
- We seek consent for the publication of images from pupils.
- We do not identify pupils in online photographic materials or include the full names of pupils in the credits of any published school produced digital materials. Photo file names/tags do not include full names to avoid accidentally sharing them.
- When using digital images, staff will inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. Pupils are advised to be very careful about placing any personal photos on any 'social' online network space. They are taught to understand the need to maintain privacy settings so as not to make public, personal information.

- Staff are governed by their contract of employment, the staff Code of Conduct and sign the school's Acceptable Use Agreement. This includes a clause on the use of mobile phones/personal equipment for taking pictures of pupils.
- The school blocks/filter access to social networking sites or newsgroups unless there is a specific approved educational purpose.
- Staff are permitted to take digital/video images to support educational aims, but must follow school procedures concerning the sharing, distribution and publication of those images. Those images will, wherever possible only be taken on school equipment. Members of staff may occasionally use personal phones to capture photos or videos of pupils. These will be appropriate, linked to school activities, taken without secrecy and not captured in a one-to-one situation. Photos will always be moved to school storage as soon as possible after which they are deleted from personal devices and/or cloud services and backups.
- Staff will ensure that 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.
- Digital images/videos are stored on the school network in line with the retention schedule of the school Data Protection Policy.
- Pupils are taught about how images can be manipulated in their online safety education programme and are taught to consider how to publish for a wide range of audiences which might include Governors, parents or younger children as part of their ICT scheme of work;
- Pupils are taught that they should not post images or videos of others without their consent. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location, such as house number, street name or school. We teach them about the need to keep their data secure and what to do if they or a friend are subject to bullying or abuse.
- Staff and parents are regularly reminded about the importance of not sharing without consent, due to child protection concerns (e.g., children looked-after often have restrictions for their own protection) data protection, religious or cultural reasons or simply for reasons of personal privacy.

8. Cloud Platforms

Many schools are recognising the benefits of cloud computing platforms, not just for cost savings, but to enhance teaching and learning. This school adheres to the principles of the DfE document 'Cloud computing services: guidance for school leaders, school staff and governing bodies'. As more and more systems move to the cloud, it becomes easier to share and access data. Our Data Protection Policy and procedures includes the use of Cloud services.

For online safety, basic rules of good password management, expert administration and training is used to keep staff and pupils safe and to avoid incidents. The DPO and network manager will analyse and document systems and procedures before they are implemented and regularly review them.

The following principles apply:

- Pupils and staff are only given access and/or sharing rights when they can demonstrate an understanding of what data may be stored and how it can be seen.
- All stakeholders understand the difference between consumer and education products (e.g., a private Gmail account or Google Drive and those belonging to a managed educational domain).

9. Social Media

9.1 Managing social networking, social media and personal publishing sites

This school operates on the principle that if we don't manage our social media reputation, someone else will. Online reputation management is about understanding and managing our digital footprint (everything that can be seen or read about the school online). Negative coverage almost always causes some level of disruption and can result in distress to individuals.

We therefore manage our social media footprint carefully to know what is being said about the

school and in order to respond to criticism and praise in a fair, responsible manner.

The school has an official Facebook account which is managed by the school and will respond to general enquiries about the school, but we ask parents not to use these channels to communicate about their children or other personal matters.

Email is the official electronic communication channel between parents and the school, and between staff and pupils.

9.2 Staff, pupils' and parents Social Media presence:

Social media is a fact of modern life and, as a school, we accept that many parents, staff and pupils will use it. However, as stated in the Acceptable Use Agreements and our Whole School Behaviour Policy and procedures we expect everybody to behave in a positive manner, engaging respectfully with the school and each other on social media, in the same way as they would face to face.

This positive behaviour can be summarised as not making any posts which are, or could be construed as bullying, aggressive, rude, insulting, illegal or otherwise derogatory or inappropriate or which might bring the school, student body or teaching profession into disrepute. This applies to both public pages and to private posts e.g., parent chats, pages or groups.

If parents have a concern about the school, we urge them to contact us directly and in private to resolve the matter. If an issue cannot be resolved in this way, the school complaints procedure (available via the school website) should be followed. Sharing complaints on social media is unlikely to help resolve the matter but can cause upset to staff, pupils and parents, also undermining staff morale and the reputation of the school.

Many social media platforms have a minimum age of 13 but the school regularly deals with issues arising on social media with pupils under the age of 13. We ask parents to respect age ratings on social media platforms wherever possible and not encourage or condone underage use. However, the school accept that there is a balance between not encouraging underage use whilst at the same time needing to acknowledge reality in order to best help our pupils to avoid or cope with issues if they arise. Online safety lessons will look at social media and other online behaviour, how to be a good friend online and how to report bullying, misuse, intimidation or abuse. However, children will often learn most from the models of behaviour they see and experience. Parents can best support this by talking to their children about the apps, sites and games they use, with whom, for how long, and when (late at night is not helpful for a good night's sleep and productive teaching and learning at school the next day).

Pupils are not allowed[1] to be 'friends' with or make a 'friend request[2]' to any staff, Governors, volunteers or regular school contractors or otherwise communicate via social media. Pupils are discouraged from 'following' staff, Governors, volunteers or regular school contractors public accounts (e.g., following a staff member with a public Instagram account). However, we accept that this can be difficult to control and that familial links may occur. This, however, highlights the need for staff to remain professional in their private lives. Conversely staff must not follow public pupil accounts.

Staff are reminded that they should not bring the school or profession into disrepute and the best way to avoid this is to have the strictest privacy settings and avoid inappropriate sharing and oversharing online. Staff must never discuss the school or its stakeholders on social media and ensure that their personal opinions are not attributed to the school.

The following principles apply:

- The school will control access to social media and social networking sites.

[1] Exceptions may be made, e.g. for pre-existing family links, but these must be approved by the Head teacher and should be declared upon entry of the pupil or staff member to the school.

[2] Any attempt to do so may be a safeguarding concern or disciplinary matter and should be notified to the DSL (if by a child) or to the Head teacher (if by a staff member).

- Pupils will be advised never to give out personal details of any kind which may identify them and / or their location. Examples would include real name, address, mobile or landline phone numbers, school attended, IM and email addresses, full names of friends/family, specific interests and clubs etc.
- Staff wishing to use Social Media tools with pupils as part of the curriculum will risk assess the sites before use and check the sites terms and conditions to ensure the site is age appropriate. Staff will obtain documented consent from the Senior Leadership Team before using Social Media tools in the classroom.
- Staff official blogs or wikis will be password protected and run from the school website with approval from the Senior Leadership Team. Members of staff are advised not to run social network spaces for pupil use on a personal basis.
- Pupils will be advised on security and privacy online and will be encouraged to set passwords, deny access to unknown individuals and to block unwanted communications.
- Pupils will be encouraged to approve and invite known friends only on social networking sites and to deny access to others by making profiles private.
- All members of the school community are advised not to publish specific and detailed private thoughts, especially those that may be considered threatening, hurtful or defamatory.
- Newsgroups will be blocked unless a specific use is approved.
- Concerns regarding a pupil's use of social networking, social media and personal publishing sites (in or out of school) will be raised with their parents, particularly when concerning the underage use of sites.
- Staff personal use of social networking, social media and personal publishing sites will be discussed as part of staff induction and outlined in the school Staff Acceptable Use Agreement – see Appendix F.
- Further guidance can be found in the document 'Safe Use of Facebook and Other Social Networking Sites' on the KAHSC website.

9.3 Personal devices and bring your own device (BOYD) procedures:

We recognise the widespread use of personal devices makes it essential that schools take steps to ensure mobile phones and devices, including wearable or "smart" technologies like health or fitness trackers, are used responsibly at school and it is essential that pupil use of their devices does not impede teaching, learning and good order in classrooms. Staff will be given clear boundaries on professional use.

Mobile devices can present a number of problems when not used appropriately:

- They are valuable items which may be stolen or damaged;
- Their use can render pupils or staff subject to cyberbullying;
- Apps or mobile devices which broadcast location data can make staff or pupils vulnerable to behaviours like stalking and can provide perpetrators with information to take cyberbullying into the real world.
- Internet access on phones and personal devices can allow pupils to bypass school security settings and filtering;
- They can undermine classroom discipline as they can be used on "silent" mode;
- Mobile phones with integrated cameras could lead to child protection, bullying and data protection issues in relation to inappropriate capture, use or distribution of images of pupils or staff;

Permitted use of mobile phones and personal devices is a school decision and the following will apply:

- The use of mobile phones and other personal devices by pupils and staff in school will be decided by the school and covered in the school Acceptable Use Agreement.
- The sending of abusive or inappropriate messages or content via mobile phones or personal devices is forbidden by any member of the school community and any breaches will be dealt with as part of the school discipline/Behaviour Policy.
- The school reserves the right to search the content of any mobile or handheld devices on the school premises where there is a reasonable suspicion that it may contain undesirable materials, including those which promote pornography, violence or bullying. Staff mobiles or hand-held devices may be searched at any time as part of routine monitoring.
- School staff may confiscate a phone or device if they believe it is being used to contravene the school's behaviour Policy or bullying procedures.

- If there is suspicion that the material on the mobile may provide evidence relating to a criminal offence the phone will be handed over to the police for further investigation.
- Mobile phones and personal devices will not be used during lessons or formal school time unless as part of an approved and directed curriculum-based activity with consent from a member of staff. They should be switched off (not placed on silent) and stored out of sight on arrival at school. Staff members may use their phones during school break times. All visitors are requested to keep their phones on silent whilst in the school.
- The recording, taking and sharing of images, video and audio on any mobile phone is to be avoided, except where it has been explicitly agreed otherwise by the Head teacher. Such authorised use is to be monitored and recorded. All mobile phone use is to be open to scrutiny and the Head teacher is authorised to withdraw or restrict authorisation for use at any time if it is deemed necessary. Where permission is given by the Head teacher, no images or videos are to be taken on mobile phones or personally-owned mobile devices without the prior consent of the person or people in the image.
- The Bluetooth function of a mobile phone should always be switched off and not be used to send images or files to other mobile phones.
- Electronic devices of all kinds that are brought into school are the responsibility of the user. The school accepts no responsibility for the loss, theft or damage of such items. Nor will the school accept responsibility for any adverse health effects caused by any such devices either potential or actual.
- Where parents or pupils need to contact each other during the school day, they should do so only through the School's telephone. Staff may use their phones during break times. If a staff member is expecting a personal call, they may leave their phone with the school office to answer on their behalf or seek specific permissions to use their phone at other than their break time.
- Mobile phones and personal devices are not permitted to be used in certain areas within the school site such as changing rooms and toilets.

Pupil use of personal devices:

- The school strongly advise that pupil mobile phones should not be brought into school. However, the school accepts that there may be circumstances in which a parent wishes their child to have a mobile phone for their own safety. Personal devices can only be used at approved break times and outside of the main building.
- If a pupil breaches the school procedures, then the phone or device will be confiscated and will be held in a secure place in the school office.
- Phones and devices must not be taken into examinations. Pupils found in possession of a mobile phone during an exam will be reported to the appropriate examining body. This may result in the pupil's withdrawal from either that examination or all examinations.
- If a pupil needs to contact his/her parent, they will be allowed to use a school phone. Parents are advised not to contact their child via their mobile phone during the school day, but to contact the school office.
- Pupils should protect their phone numbers by only giving them to trusted friends and family members.
- Pupils will be instructed in safe and appropriate use of mobile phones and personal devices and will be made aware of boundaries and consequences.
- Pupils will be provided with school mobile phones or other hand-held personal devices to use in specific learning activities under the supervision of a member of staff. Such mobile phones will be set up so that only those features required for the activity will be enabled.

Staff use of personal devices:

- Staff are not permitted to use their own personal phones or devices for contacting children, young people and their families within or outside of the setting in a professional capacity.
- Staff will be issued with a school phone where contact with pupils or parents is required.
- Mobile phones and personally owned devices will be switched off or switched to 'silent' mode; Bluetooth communication should be "hidden" or switched off, location data switched off unless being used only for the duration of a specific task like route directions on a school trip, and mobile phones or

personally owned devices will not be used during teaching periods unless permission has been given by a member of Senior Leadership Team for emergency circumstances.

- If members of staff have an educational reason to allow children to use mobile phones or personal devices as part of an educational activity, then it will only take place when approved by the Senior Leadership Team.
- Staff should not use personal devices such as mobile phones or cameras to take photos or videos of pupils as work-provided equipment is available for this purpose. If equipment is not available and staff have to use personal devices then the data should be uploaded to the school network immediately and then deleted from personal devices.
- Where members of staff are required to use a mobile phone for school duties, for instance in case of emergency during off-site activities, or for contacting pupils or parents, then a school mobile phone will be provided and used. In an emergency where a staff member does not have access to a school-owned device, they should use their own device and hide their own mobile number for confidentiality purposes.
- If a member of staff breaches the school Policy and procedures, then disciplinary action may be taken.

Parents are asked to keep phones out of sights whilst on the school premises. They must ask permission before taking any photos e.g., of displays in corridors or classrooms and avoid capturing other children. Parents are asked not to call pupils on their mobile phones during the school day; urgent messages can be passed via the school office.

9.4 Network/internet access on school devices

Pupils are not allowed networked file access via personal devices. However, 6th Formers are permitted to access the school wireless internet network for school-related internet use/limited personal use within the framework of the Acceptable Use Agreement. All such use is monitored.

9.5 Searching, Screening and Confiscation

In line with the DfE guidance 'Searching, screening and confiscation: advice for schools', the Head teacher and staff authorised by them have a statutory power to search pupils/property on school premises. This includes the content of mobile phones and other devices, for example as a result of a reasonable suspicion that a device contains illegal or undesirable material, including but not exclusive to sexual images, pornography, upskirting, violence or bullying. Further details are available in the Rewards and Behaviour Policy and procedures.

10. Managing filtering

The following issues will be addressed in relation to the management of filtering:

- The school's broadband access will include filtering appropriate to the age and maturity of pupils.
- The school will have a clear procedure for reporting breaches of filtering. All members of the school community (all staff and all pupils) will be aware of this procedure.
- If staff or pupils discover unsuitable sites, the URL will be reported to the School Online Safety Coordinator who will then record the incident and escalate the concern as appropriate.
- The School filtering system will block all sites on the Internet Watch Foundation (IWF) list.
- Changes to the school filtering procedures will be risk assessed by staff with educational and technical experience prior to any changes and where appropriate with consent from the Senior Leadership Team.
- The School Senior Leadership Team will ensure that regular checks are made to ensure that the filtering methods selected are effective.
- Any material that the school believes is illegal will be reported to appropriate agencies such as IWF, the Police or CEOP.

11. Webcams and CCTV

The school uses CCTV for security and safety. The only people with access to the CCTV system are ICT support, Head Teacher and School Bursar . Notification of CCTV use is displayed at the front of the school and at various points throughout the building so that individuals are aware that CCTV is in operation. Staff

will refer to the Information Commissioners Office (ICO) for further guidance and the school CCTV procedures.

In relation to webcams:

- We do not use publicly accessible webcams in school.
- Misuse of the webcam by any member of the school community will result in sanctions.
- Webcams can be found on some school laptops.
- As for all images, content captured by webcams can only be published if pupil and parental consent is valid.

12. Managing emerging technologies

Many emerging communications technologies offer the potential to develop new teaching and learning tools, including mobile communications, internet access, collaboration and multimedia tools. The safest approach is to deny access until a risk assessment has been completed and safe practice has been established.

Virtual online classrooms and communities widen the geographical boundaries of learning. Approaches such as mentoring, online learning and parental access are becoming embedded within school systems. Online communities can also be one way of encouraging a disaffected pupil to keep in touch.

The safety and effectiveness of virtual communities depends on users being trusted and identifiable. This may not be easy, as authentication beyond the school may be difficult as demonstrated by social networking sites and other online tools such as Facebook, YouTube, Skype and Twitter. The registering of individuals to establish and maintain validated electronic identities is essential for safe communication but is often not possible. Video conferencing introduces new dimensions; webcams are increasingly inexpensive and, with faster internet access, enable video to be exchanged across the Internet. The availability of live video can sometimes increase safety - you can see who you are talking to - but if inappropriately used, a video link could reveal security details.

New applications are continually being developed based on the Internet, the mobile phone network, wireless, Bluetooth or infrared connections. Users can be mobile using a phone, games console or personal digital assistant with wireless internet access. This can offer immense opportunities for learning as well as dangers such as a pupil using a phone to video a teacher's reaction in a difficult situation.

Schools should keep up to date with new technologies, including those relating to mobile phones and handheld devices, and be ready to develop appropriate strategies. For instance, text messaging via mobile phones is a frequent activity for many pupils and families; this could be used to communicate a pupil's absence or send reminders for exam coursework. There are dangers for staff however if personal phones are used to contact pupils and therefore we will endeavour to make a school owned phone available if this kind of contact is necessary.

The inclusion of inappropriate language or images is difficult for staff to detect. Pupils may need reminding that such use is inappropriate and conflicts with school Policy and procedures. Abusive messages should be dealt with under the Whole School Behaviour Policy.

- Emerging technologies will be examined for educational benefit.
- Pupils will be instructed about safe and appropriate use of personal devices both on and off site in accordance with the school Acceptable Use Agreement/Mobile Phone procedures.

13. Policy Decisions

13.1 Authorising internet access

The school will allocate internet access to staff and pupils based on educational need. It will be clear who has internet access and who has not. Normally most pupils will be granted internet access. We will not prevent pupils from accessing the Internet unless the parents have specifically denied permission or the child is subject to a sanction as part of the Rewards and Behaviour policy.

- The school will maintain a current record of all staff and pupils who are granted access to the school's electronic communications.
- All staff and volunteers will read and sign the Staff Acceptable Use Agreement before using any school ICT resources.
- Parents will be asked to read and sign the School Acceptable Use Agreement for pupil access and discuss it with their child, where appropriate.
- When considering access for vulnerable members of the school community (such as with children with special education needs) the school will make decisions based on the specific needs and understanding of the pupil(s).
- Pupils will apply for internet access individually by agreeing to comply with the School online safety rules and Acceptable Use Agreement

13.2 Assessing risks

As the quantity and breadth of information available through the Internet continues to grow it is not possible to guard against every undesirable situation. The school will need to address the fact that it is not possible to completely remove the risk that pupils might access unsuitable materials via the school system.

Risks can be considerably greater where tools are used which are beyond the school's control such as most popular social media sites.

- The school will take all reasonable precautions to ensure that users access only appropriate material. However, due to the global and connected nature of internet content, it is not possible to guarantee that access to unsuitable material will never occur via a school computer. Neither the school nor the LA can accept liability for the material accessed, or any consequences resulting from internet use.
- The school will audit ICT use to establish if the Online Safety Policy and procedures is adequate and that the implementation of the Online Safety Policy is appropriate – see Appendix A for a sample Online Safety Audit.
- The use of computer systems without permission or for inappropriate purposes could constitute a criminal offence under the Computer Misuse Act 1990 and breaches will be reported to the Police using 101 or the appropriate online report from available from our local Constabulary website.
- Methods to identify, assess and minimise risks will be reviewed regularly.

14. Communicating Policy and procedures

14.1 Introducing the Policy and procedures to Pupils

Many pupils are very familiar with the culture of mobile and internet use and we will involve them in designing the School Online Safety Policy, possibly through a pupil council. As pupils' perceptions of the risks will vary, the online safety rules will be explained or discussed in an age-appropriate manner.

Posters covering online safety rules are displayed in every room with a computer to remind pupils of the rules at the point of use.

Online safety programmes we can use include:

- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com

The following apply in our school:

- All users will be informed that network and internet use will be monitored.
- An online safety programme is established across the school to raise the awareness and importance of safe and responsible internet use amongst pupils.
- Pupil instruction regarding responsible and safe use will precede internet access.
- An online safety module will be included in the PSHE, and/or ICT programmes covering both safe school and home use.
- Online safety training will be part of the transition programme across the Key Stages and when moving between schools or other educational or training settings.

- Online Safety rules or copies of the pupil Acceptable Use Agreement will be posted in all rooms with internet access.
- Safe and responsible use of the Internet and technology will be reinforced across the curriculum and subject areas.
- Particular attention to Online Safety education will be given where pupils are considered to be vulnerable.

14.2 Discussing the Policy and procedures with Staff

It is important that all staff feel confident to use new technologies in teaching and the School Online Safety Policy and procedures will only be effective if all staff subscribe to its values and methods. Staff will be given opportunities to discuss the issues and develop appropriate teaching strategies. It would be unreasonable, for instance, if cover or supply staff were asked to take charge of an internet activity without preparation.

If a member of staff is concerned about any aspect of their ICT or internet use either on or off site, they should discuss this with their line manager to avoid any possible misunderstanding.

Consideration is given when members of staff are provided with devices by the school which may be accessed outside of the school network. Staff are made aware of their responsibility to maintain confidentiality of school information.

ICT use is widespread and all staff including administration, midday supervisors, caretakers, Governors and volunteers are included in awareness raising and training. Induction of new staff includes a discussion about the school Online Safety Policy and procedures.

- The Online Safety Policy and procedures will be formally provided to, and discussed, with all members of staff.
- To protect all staff and pupils, the school will implement Acceptable Use Agreements.
- Staff will be made aware that internet traffic can be monitored and traced to the individual user. Discretion and professional conduct are essential.
- Up-to-date and appropriate staff training in safe and responsible internet use, both professionally and personally, will be provided for all members of staff.
- Staff who manage filtering systems or monitor ICT use will be supervised by the Senior Leadership Team and have clear procedures for reporting issues.
- The School will highlight useful online tools which staff should use with children in the classroom. These tools will vary according to the age and ability of the pupils.
- All members of staff will be made aware that their online conduct out of school could have an impact on their role and reputation within school. Civil, legal or disciplinary action could be taken if they are found to bring the profession or institution into disrepute, or if something is felt to have undermined confidence in their professional abilities.

14.3 Enlisting Parents' Support

Internet use in pupils' homes is increasing rapidly, encouraged by low-cost access and developments in mobile technology. Unless parents are aware of the dangers, pupils may have unrestricted and unsupervised access to the Internet in the home. The school may be able to help parents plan appropriate, supervised use of the Internet at home and educate them about the risks. Parents will also be advised to check whether their child's use elsewhere in the community is covered by an appropriate Acceptable Use Agreement.

- Parents' attention will be drawn to the school Online Safety Policy and procedures in newsletters, and on the school website.
- Parents will be asked to read and sign the school Acceptable Use Agreement for pupils and discuss its implications with their children with support to do this offered if required.
- Information and guidance for parents on online safety will be made available to parents in a variety of formats.

- Advice on useful resources and websites, filtering systems and educational and leisure activities which include responsible use of the Internet will be made available to parents.
- Interested parents will be referred to organisations listed in the "online safety Links" at Appendix K.

15. Complaints

The school will take all reasonable precautions to ensure online safety. However, owing to the international scale and linked nature of internet content, the availability of mobile technologies and speed of change, it is not possible to guarantee that unsuitable materials will never appear on a school computer or mobile device. Neither the school staff nor the Governing Body/Board of Directors can accept liability for material accessed, or any consequences of internet access.

- Complaints about the misuse of on-line systems will be dealt with under the school's Complaints procedure.
- Complaints about cyberbullying are dealt with in accordance with our Anti-bullying procedures.
- Complaints related to child protection are dealt with in accordance with school/LA Child Protection Policy and procedures.
- Any complaints about staff misuse will be referred to the Head teacher.
- All online safety complaints and incidents will be recorded by the school including any actions taken (see Appendix J).

Staff and pupils are given information about infringements in use and possible sanctions. Sanctions available include:

- Interview/counselling by class teacher/Head of Year/Online Safety Coordinator/Head teacher;
- Informing parents;
- Removal of internet or computer access for a period, which could ultimately prevent access to files held on the system, including examination coursework);
- Referral to the Police.

NEWMAN CATHOLIC SCHOOL ONLINE SAFETY AUDIT

This self-audit should be completed by the member of the Senior Leadership Team (SLT) responsible for Online Safety. Staff that could contribute to the audit include: Designated Safeguarding Lead, SENCO, Online Safety Coordinator, Network Manager and Head teacher.

Does the school have an Online Safety Policy and procedures		**YES**
Date of latest update:	June 2021	
Date of future review:	September 2022	
The school Online Safety Policy and procedures was agreed by governors on:		
The Policy and procedures is available for staff to access at:	V:\Online Safety	
The Policy and procedures is available for parents to access at:	School Website	
The responsible member of the Senior Leadership Team is:	Jackie Brough	
The Governor responsible for Online Safety is:	Amanda Yellowley	
The Designated Safeguarding Lead is:	Amanda McAree	
The Online Safety Coordinator is:	Jackie Brough	
Were all stakeholders (e.g. pupils, staff and parents) consulted when updating the school Online Safety Policy and procedures?		**YES**
Has up-to-date Online Safety training been provided for all members of staff? (not just teaching staff)		**YES**
Do all members of staff sign an Acceptable Use Agreement on appointment?		**YES**
Are all staff made aware of the schools expectation around safe and professional online behaviour?		**YES**
Is there a clear procedure for staff, pupils and parents to follow when responding to or reporting an online safety incident of concern?		**YES**
Have online safety materials from CEOP, Childnet and UKCCIS etc. been obtained?		**YES**
Is online safety training provided for all pupils (appropriate to age and ability and across all Key Stages and curriculum areas)?		**YES**
Are online safety rules displayed in all rooms where computers are used and expressed in a form that is accessible to all pupils?		**YES**
Do parents or pupils sign an Acceptable Use Agreement?		**YES**
Are staff, pupils, parents and visitors aware that network and Internet use is closely monitored and individual usage can be traced?		**YES**
Has an ICT security audit been initiated by SLT?		**YES**
Is personal data collected, stored and used according to the principles of the Data Protection Act/GDPR?		**YES**
Is Internet access provided by an approved educational Internet service provider which complies with DfE requirements?		**YES**
Has the school filtering been designed to reflect educational objectives and been approved by SLT?		**YES**
Are members of staff with responsibility for managing filtering, network access and monitoring systems adequately supervised by a member of SLT?		**YES**
Does the school log and record all online safety incidents, including any action taken?		**YES**
Are the Governing Body and SLT monitoring and evaluating the school Online Safety Policy and procedures on a regular basis?		**YES**

St John Henry Newman Catholic School Pupil Acceptable Use Policy

These e-Safety Rules help to protect students, staff and the school by describing acceptable and unacceptable ICT use anywhere on the school premises.

- The school owns the computer network and can set rules for its use. All network and Internet use must be appropriate to education.
- I must not use mobile phones, games consoles or musical devices in the school buildings unless instructed to by a teacher. It is strongly recommended that students leave all electronic devices at home.
- Irresponsible use of school systems may result in the loss of network or Internet access and/or the right to bring digital imaging equipment or mobile phones to school.
- Mobile phones are not allowed to be switched on or used inside the school building unless with permission.
- You must ask a person's permission before videoing, editing or taking their photograph. I am aware that when I take images of pupils and/or staff, that I must only store and use these for school purposes and in line with school procedures and must never distribute these outside the school network without the permission of all parties involved, including in school breaks and all occasions when you are in school uniform or when otherwise representing the school.
- I will ensure that my online activity, both in school and outside school, will not cause my school, the staff, pupils or others distress or bring the school community into disrepute, including through uploads of images, video, sounds or texts.
- I understand that I am responsible for my actions, both in and out of school and that the school 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 (e.g., cyberbullying, use of images or personal information etc.)
- 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 will always respect the privacy and ownership of others' work online and will not access, copy, remove or otherwise alter any other user's files without the owner's knowledge and permission. Where work is protected by copyright, I will not try to download copies (including music and videos).
- 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 not alter computer settings.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.
- I will not open any attachments to emails unless I know and trust the person or organisation that sent the email due to the risk of the attachment containing a virus or other harmful programme.
- I will only log on to the school network/Learning Platform, other systems and resources with my own username and password, which must not be given to any other person. I am not allowed to use other people's passwords or accounts, even if they give you permission. I must not trespass in another person's folders, files or work, nor alter the data of another user.

- I am not allowed to download/upload files or install any software without permission. The running of any scripts e.g batch files is prohibited. I am not allowed to use proxy sites or attempt to bypass the school's security system.

- I will not give out my personal information or that of others such as name, phone number or address. I will not arrange to meet someone unless this is part of a school project approved by my teacher.

- I will make sure that all ICT communications with pupils, teachers or others are responsible, polite and sensible. I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions. Anonymous messages and chain letters are not permitted. I will only save files to the network that are related to schoolwork. I will not use filenames that could be considered offensive.

- I will 'log off' when leaving a computer.

- I will not deliberately browse, download, upload or forward material that could be considered offensive or illegal. If I accidentally come across any such material, I will report it immediately to my teacher.

- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it online.

- I understand that all my use of the Internet and other related technologies can be monitored and logged. I understand that these rules are designed to keep me safe and that if they are not followed, school sanctions will be applied and my parent/carer may be contacted. Any illegal activities will be reported to the Police.

Pupil Acceptable Use – Pupil and Parent Agreement

Dear Parent,

ICT including the Internet, learning platforms, email and mobile technologies and online resources are an important part of learning in our school. We expect all pupils to be safe and responsible when using any ICT. It is essential that pupils are aware of online safety and know how to stay safe when using any ICT.

Pupils are expected to read and discuss this agreement with their parent and then to sign and follow the terms of the agreement. Any concerns or explanation can be discussed with their class teacher or our online safety coordinator.

I have read, understood and agree to follow the terms of this Acceptable Use Agreement when:

- I use the school ICT systems and equipment (both in and out of school)
- I use my own equipment in school (when allowed) e.g., camera, PDA, USB stick, etc.
- I use my own equipment out of school in a way that is related to me being a member of this school e.g., communicating with other members of the school, accessing school email, VLE, website etc.
- I will use the computer, network, mobile phones, Internet access and other new technologies in a responsible way at all times.
- I know that network and Internet access may be monitored.

Parent's Consent for Web Publication of Work and Photographs

I agree that my **son/daughter's** work may be electronically published. I also agree that appropriate images, audio and video that include my **son/daughter** may be published subject to the school rule that photographs will not be accompanied by pupil names. I give permission for my child's biometric data to be used where appropriate

Name of Pupil:		**Class/Year Group:**	
Parent/Carer Signature		**Date**	
Pupil Signature		**Date**	

Acceptable Use Policy
In-School Use of Network and Internet Resources for Staff

ICT (including data) and the related technologies such as email, the Internet and mobile devices are an expected part of our daily working life in school. This Agreement is designed to ensure that all staff and volunteers are aware of their responsibilities when using any form of ICT. This applies to ICT used in school to the use of school ICT systems and equipment out of school and the use of personal equipment in school or in situations related to their employment by the school. All staff and volunteers (where they are using technology in school) are expected to sign this Agreement and always adhere to its content. Any concerns or clarification should be discussed with **Jackie Brough** (Online Safety Coordinator) or **John McAuley** (Head teacher).

This Acceptable Use Agreement is intended to ensure that:

- staff and volunteers are responsible users and stay safe while using technologies for educational, personal and recreational use;
- school ICT systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk;
- staff are protected from potential risk from the use of ICT in their everyday work and work to ensure that young people in their care are safe users.

Acceptable Use 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.

Keeping Safe

- I will not disclose my password or login name to anyone.
- I understand that all my use of the Internet and other related technologies can be monitored and logged and can be made available, on request, by the Head teacher.
- I will only use my own usernames and passwords which I will choose carefully so they cannot be guessed easily. I will also change the passwords on a regular basis at least twice a year.
- I will not use any other person's username and password.
- I will not give out my own personal details, such as mobile phone number, personal email address, personal Twitter account, or any other social media link, to pupils.
- I will ensure that my data is regularly backed up when possible.
- I will ensure that I 'log off' after my network session has finished. Under NO circumstances should you leave your computer logged-on and unattended. This results in a breach of policy and disciplinary procedures may be pursued against the individual in question if a security breach is found to be a consequence of the above. If I find an unattended machine logged on under another user's username, I will not continue using the machine – I will 'log off' immediately. Do not, under any circumstances, enter the file areas of other staff without their express permission. Always respect the privacy of other users.
- While using Internet and Email resources, do not give personal details such as addresses, telephone numbers, pictures etc. of:
    1. Any adults working at the school
    2. Any students enrolled at the school
- I will ensure that my online activity, both in school and outside school, will not bring my professional role or the school into disrepute.
- I will not accept invitations from school pupils to add me as a friend to their social networking sites, nor will I invite them to be friends on mine. As damage to professional reputations can inadvertently be caused by quite innocent postings or images, I will also be careful with who has access to my pages through friends and friends of friends, especially with those connected with my responsibilities at the school, such as parents and their children. Social networking sites must be used appropriately. It is strongly recommended that you do not allow students or parents to access your profile. It is good practice to enable the full privacy settings on any social network accounts. Inappropriate use can lead to criminal charges or internal disciplinary procedures. I will ensure that any private social networking sites/blogs etc. that I create, or actively contribute to:
    - do not reveal confidential information about the way the school operates;
    - are not confused with my school responsibilities in any way;
- I will not engage in any on-line activity that may compromise my professional responsibilities.
- I understand that data protection requires that any personal data that I have access to must be kept private and confidential, except when it is deemed necessary that I am required by law or by school procedures to disclose it an appropriate authority.

[1] Exceptions may be made, e.g. for pre-existing family links, but these must be approved by the Head teacher and should be declared upon entry of the pupil or staff member to the school.

- I will only transport, hold, disclose or share personal information about myself or others as outlined in the school personal data guidelines. Where personal data is transferred outside the secure school network, it must be encrypted. Personal data can only be taken out of school or accessed remotely when authorised, in advance, by the Head teacher or Governing Body. Personal or sensitive data taken off site in an electronic format must be encrypted, e.g., on a password secured laptop or memory stick. Staff leading a trip are expected to take relevant pupil information with them, but this must always be held securely.
- I will ensure that any private social networking sites/blogs etc. that I create, or actively contribute to:
  - do not reveal confidential information about the way the school operates;
  - are not confused with my school responsibilities in any way;
  - do not include inappropriate or defamatory comments about individuals connected with the school community;
  - support the school's approach to online safety which includes not uploading or posting to the Internet any pictures, video or text that could upset, offend or threaten the safety of any member of the school community or bring the school into disrepute;
- I will not try to bypass the filtering and security systems in place or attempt to download or install software without permission.
- I will only use my personal ICT in school for permissible activities and I will follow the rules set out in this agreement. I will ensure that any such devices are protected by up-to-date anti-virus software and are free from viruses.

Promoting Safe Use by Learners

- I will support and promote the school's Online Safety, Data Protection and Behaviour Policies and help pupils to be safe and responsible in their use of ICT and related technologies.
- I will model safe use of the Internet in school.
- I will ensure that all pupils follow the correct procedures such as logging on/off and leaving classroom tidy etc and report any damaged or unsafe items which need attention.
- I will educate young people on how to use technologies safely according to the school teaching programme.
- I will take immediate action in line with school procedures if an issue arises in school that might compromise a learner, user or school safety or if a pupil reports any concerns.

Communication

- I will only use the school's email/Internet/Intranet/Learning Platform and any related technologies for professional purposes or for uses deemed 'acceptable' by the Head teacher or Governing Body.
- I will communicate on-line in a professional manner and tone; I will not use aggressive or inappropriate language and I appreciate that others may have different opinions. Anonymous messages are not permitted.
- I will not engage in any on-line activity that may compromise my professional responsibilities.
- I will not use language that could be calculated to incite hatred against any ethnic, religious or other minority group.
- I will only communicate with pupils and parents using the school's approved, secure email system(s). Any such communication will be professional in tone and manner.
- I am aware that any communication could be forwarded to an employer or Governors.
- I will only use chat and social networking sites that are approved by the school.
- I will not use personal email addresses on the school ICT systems unless I have permission to do so.

Research and Recreation

- I will not browse, upload, download, distribute or otherwise access any materials which are illegal, discriminatory or inappropriate or may cause harm or distress to others.
- I will not (unless I have permission) make large downloads or uploads that might take up internet capacity.
- I know that all school ICT is primarily intended for educational use and I will only use the systems for personal or recreational use if this is allowed by the school.

Sharing

- I will not access, copy, remove or otherwise alter any other user's file, without their permission.
- I will always respect the privacy and ownership of others' work online and will not access, copy, remove or otherwise alter any other user's files without the owner's knowledge and permission, and will credit them if I use it.
- Where work is protected by copyright, I will not download or distribute copies (including music and videos). If I am unsure about this, I will seek advice.
- Images of pupils and/or staff will only be taken, stored and used for professional purposes using school equipment in line with school procedures.

- I will only take images/video of pupils and staff where it relates to agreed learning and teaching activities and will ensure I have parent/staff permission before I take them.
- If images are to be published online or in the media, I will ensure that parental/staff permission allows this.
- I will not use my personal equipment to record images/video unless I have permission to do so from the Head teacher or other Senior Manager.
- I will not keep images and/or videos of pupils stored on my personal equipment unless I have permission to do so. If this is the case, I will ensure that these images cannot be accessed or copied by anyone else or used for any purpose other than that for which I have permission.
- Where these images are published (e.g., on the school website/prospectus), I will ensure that it is not possible to identify the people who are featured by name or other personal information.
- I will support the school approach to online safety and not deliberately upload or add any images, video, sounds or text that could upset or offend any member of the school community.

Buying/Selling/Gaming

- I will not use school equipment for on-line purchasing, selling or gaming unless I have permission to do so.

Problems

- I will immediately report any illegal, inappropriate or harmful material or incident I become aware of, to the Online Safety Coordinator or Head teacher.
- I will not install any hardware or software on a computer or other device without permission of the Network Manager.
- I will not try to alter computer settings without the permission of the Network Manager.
- I will not cause damage to ICT equipment in school.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.
- I will not open any attachments to emails, unless the source is known and trusted, due to the risk of the attachment containing viruses or other harmful programmes.
- I understand that if I fail to comply with this Acceptable Use Agreement, I could be subject to disciplinary action. This could include a warning, a suspension, referral to Governors and in the event of illegal activities the involvement of the police.

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Staff/Volunteer Acceptable Use Agreement

I will use the school network in a responsible way and observe all the restrictions as explained in the staff ICT Acceptable Use Agreement. I agree to use ICT by these rules when:

- ✓ I use school ICT systems at school or at home when I have permission to do so.
- ✓ I use my own ICT (where permitted) in school.
- ✓ I use my own ICT out of school to access school sites or for activities relating to my employment by the school.

I am aware and acknowledge that my activity will be monitored both on site and off site. Breaches of this policy can result in disciplinary action and where a criminal offence has been deemed to have taken place, I may be liable to prosecution. I have read the above Acceptable User Policy I fully understand my responsibility to follow these guidelines and instructions as a member of staff working at St John Henry Newman Catholic School. I understand this forms part of the terms and conditions set out in my contract of employment.

Staff/Volunteer Name			
Job Title (where applicable)			
Signed		**Date:**	

GOVERNOR ACCEPTABLE USE AGREEMENT

This Agreement is designed to ensure that all Governors are aware of their responsibilities when using any form of ICT as it relates to their role in this school. This applies to ICT used in school and also applies to use of school ICT systems and equipment out of school and use of personal equipment in school or in situations related to a Governors role in the school. All Governors (where they are using technology in relation to their role) are expected to sign this Agreement and adhere at all times to its contents. Any concerns or clarification should be discussed with **Jackie Brough**(Online Safety Coordinator) or **John McAuley** (Head teacher).

This Acceptable Use Agreement is intended to ensure that:

- Governors are responsible users and stay safe while using technologies for educational, personal and recreational use;
- school ICT systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk;
- Governors are protected from potential risk from the use of ICT.

School networked resources, including SIMS, Sisra, Moodle and SIMS are intended for educational purposes and may only be used for legal activities consistent with the rules of the school. If you make a comment about the school you must state that it is an expression of your own personal view. Any use of the network that would bring the name of the school into disrepute is not permitted.

All users are required to follow the conditions laid down in the Agreement. Any breach of these conditions may lead to withdrawal of the user's access, monitoring and/or retrospective investigation of the user's use of the services, and in some instances could lead to criminal prosecution.

Personal Responsibility

- Users are responsible for their behaviour and communications.
- Governors are expected to use the resources for the purposes for which they are made available.
- It is the responsibility of the User to take all reasonable steps to ensure compliance with the conditions set out in this Agreement, and to ensure that unacceptable use does not occur.
- Users will accept personal responsibility for reporting any misuse of the network to the Head teacher/Chair of Governors

Keeping Safe

- I will not reveal any personal information (e.g. home address, telephone number, social networking details) of other users to any unauthorised person.
- I will not give out my own personal details, such as mobile phone number, personal email address, personal Twitter account, or any other social media link, to pupils without permission.
- I will only use my own user names and passwords which I will choose carefully so they cannot be guessed easily. I will also change the passwords on a regular basis and always where I think someone may have learned my password.
- I will not use any other person's user name and password or, where they are known, pass the details to any other individual.
- I will not attempt to access other users' files or folders.
- I will ensure that I 'log off' after my network session has finished.
- If I find an unattended machine logged on under another user's username, I will **not** continue using the machine – I will 'log off' immediately.
- I will not attempt to visit websites that might be considered inappropriate or illegal. I am aware that downloading some material is illegal and the police or other authorities may be called to investigate such use.
- I will report any accidental access, receipt of inappropriate materials or filtering breaches/unsuitable websites to the Head teacher as soon as I become aware of the access/receipt.
- I will not accept invitations from pupils to add me as a friend to their social networking sites, nor will I invite them to be friends on mine.

  As damage to professional reputations can inadvertently be caused by quite innocent postings or images, I will also be careful with who has access to my pages through friends and friends of friends, especially with those connected with my responsibilities as a Governor at the school, such as parents and their children.
- I will ensure that any private social networking sites/blogs etc. that I create, or actively contribute to:
  - Do not reveal confidential information about the way the school operates
  - Are not confused with my school responsibilities in any way.

Promoting Safe Use by Learners

- I will support and promote the school's Online Safety and Data Security Policies and procedures and help pupils be safe and responsible in their use of the Internet and related technologies.

Communication

- I will not create, transmit, display or publish any material that is likely to harass, cause offence, inconvenience or needless anxiety to any other person or bring the school into disrepute.
- I will use appropriate language – I will remember that I am a representative of the school on a global public system. Illegal activities of any kind are strictly forbidden.
- I will not use language that could be calculated to incite hatred against any ethnic, religious or minority group.
- I am aware that email is not guaranteed to be private. Messages relating to or in support of illegal activities will be reported to the Head teacher. Anonymous messages are not permitted.
- I will not send or publish material that violates the Data Protection Act or breaches the security this Act requires for personal data, including data held in SIMS
- I will not receive, send or publish material that violates copyright law. This includes materials sent/received using Video Conferencing or Web Broadcasting.
- I will ensure that any personal data (where the Data Protection Act applies) that is sent over the Internet (or taken off-site in any other way) will be encrypted.

Sharing

- I will not use personal digital cameras or camera phones for creating or transferring images of children or young people without the express permission of the school leadership team.

General Equipment Use

- I will not use the network in any way that would disrupt the use of the network by others.
- I will not use 'USB drives', portable hard-drives, tablets or personal laptops on the network without having them 'approved' by the school and checked for viruses.
- I will not download any unapproved software, system utilities or resources from the Internet that might compromise the network or are not adequately licensed.
- I will not attempt to harm or destroy any equipment or data of another user or network connected to the school system.
- I understand that I must comply with the Acceptable Use Agreement of any other network which is accessed via the school network.

Users of the school network are expected to inform the Head teacher/System Administrator immediately if a security problem is identified and should not demonstrate this problem to other users. Files held on the school's network will be regularly checked and monitored. Users identified as a security risk will be denied access to the network.

✂ -

Governor User Acceptable Use Agreement

As a school user of the network resources, I agree to follow the school rules (set out above) on its use. I will use the network in a responsible way and observe all the restrictions explained in the school Online Safety Policy and Acceptable Use Agreement. If I am in any doubt, I will consult the Head teacher.

If I do not follow the rules, I understand that this may result in loss of access to these resources as well as other disciplinary action. I realise that Governors under reasonable suspicion of misuse in terms of access or content may be placed under retrospective investigation or have their usage monitored.

Governor Name			
Signed		**Date:**	

SOCIAL NETWORKING SITES - FACEBOOK

GUIDANCE FOR PARENTS

There are many children of school age who have Facebook Profiles despite the permitted minimum age to use the site being 13, according to the site terms and conditions.

Our school is committed to promoting the safe and responsible use of the Internet and as such we feel it is our responsibility to raise this particular issue as a concern. Whilst children cannot access Facebook or other social networking sites at school, they could have access to it on any other computer or mobile technology. Websites such as Facebook offer amazing communication and social connections, however they are created with their audience in mind and this is specifically 13 years old. Possible risks for children under 13 using the site may include:

- Facebook use 'age targeted' advertising and therefore your child could be exposed to adverts of a sexual or other inappropriate nature, depending on the age they stated they were when they registered;
- Children may accept 'friend requests' from people they don't know in real life which could increase the risk of inappropriate contact or behaviour;
- Facebook is one of the social networking sites used by those attempting to radicalise young people;
- Language, games, groups and content posted or shared on Facebook is not moderated, and therefore can be offensive, illegal or unsuitable for children;
- Photographs shared by users are not moderated and therefore children could be exposed to inappropriate images or even post their own;
- Underage users might be less likely to keep their identities private and lying about their age can expose them to further risks regarding privacy settings and other options;
- Facebook could be exploited by bullies and for other inappropriate contact;
- Facebook cannot and does not verify its members therefore it important to remember that if your child can lie about who they are online, so can anyone else!

We feel that it is important to point out to parents the risks of underage use of such sites, so you can make an informed decision as to whether to allow your child to have a profile or not. These profiles will have been created away from school and sometimes by a child, their friends, siblings or even parents. We will take action (such as reporting aged profiles) if a problem comes to our attention that involves the safety or wellbeing of any of our children.

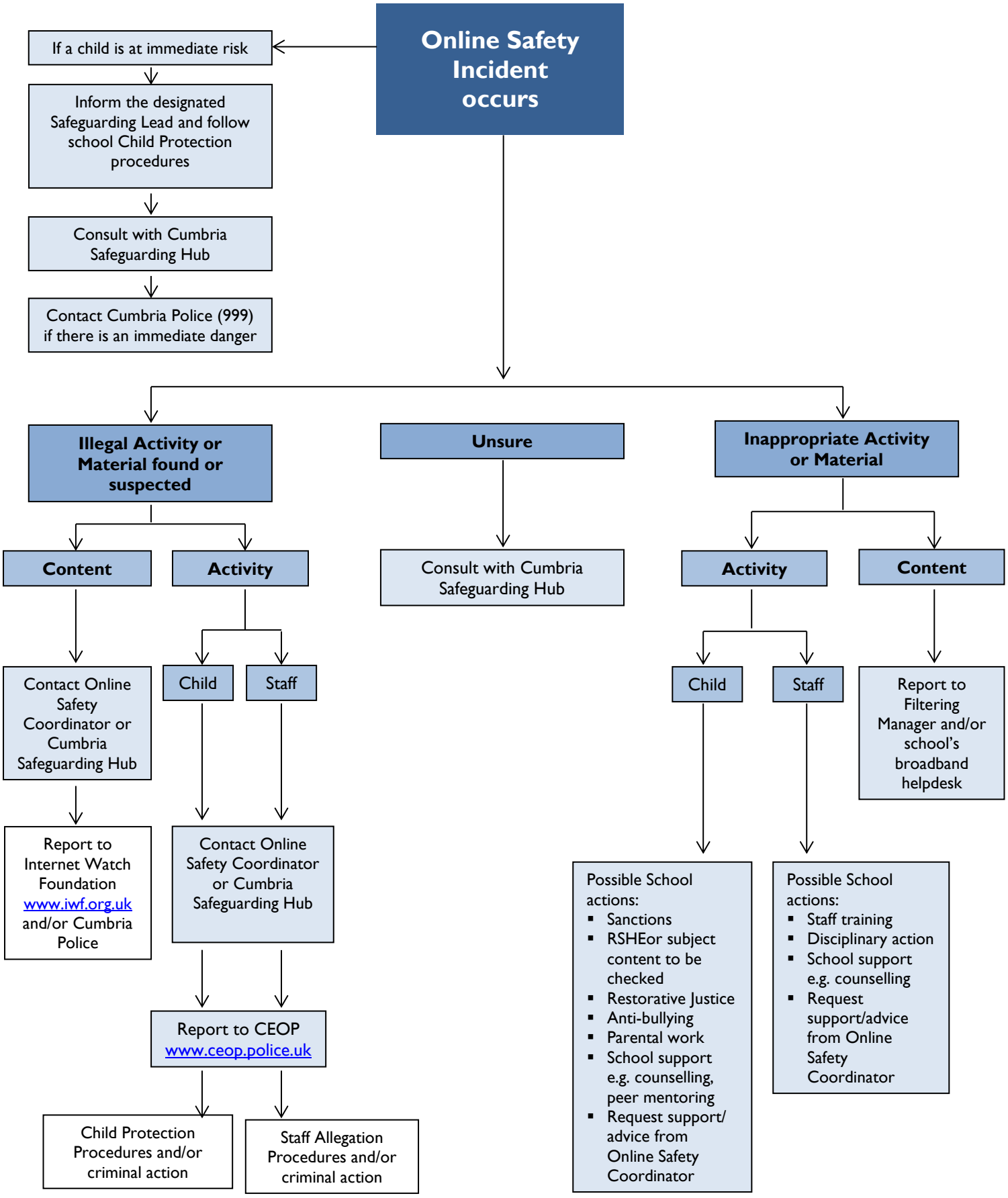
Should you decide to allow your children to have a Facebook profile we strongly advise you to:

- Check their profile is set to private and that only 'friends' can see information that is posted;
- Monitor your child's use and talk to them about safe and appropriate online behaviour such as not sharing personal information and not posting offensive messages or photos;
- Ask them to install the CEOP (Child Exploitation and Online Protection Centre) application from www.facebook.com/clickceop on their profile. This places a bookmark on their profile to CEOP and the 'Report Abuse' button which has been known to deter offenders;
- Have a look at the advice for parents from Facebook www.facebook.com/help/?safety=parents;
- Set up your own profile so you understand how the site works and ask them to add you as a friend on their profile so you can keep track of what they are posting online;
- Make sure your child understands the following rules:

  - Always keep your profile private;
  - Never accept friends you don't know in real life;
  - Never post anything which could reveal your identity;
  - Never post anything you wouldn't want your parents to see;
  - Never agree to meet someone you only know online without telling a trusted adult;
  - Always tell someone if you feel threatened or someone upsets you.

We recommend that all parents visit the CEOP ThinkUKnow website for more information on keeping your child safe online Click here to access.

RESPONSE TO AN INCIDENT OF CONCERN



Review school Online Safety Policy and procedures; record actions in Online Safety incident log and implement any changes in the future.

Appendix I

ONLINE SAFETY LINKS

The following links may help those who are developing or reviewing a school Online Safety Policy and procedures.

- **CEOP (Child Exploitation and Online Protection Centre)**
- **Childline**
- **Childnet**
- **Internet Watch Foundation (IWF)**
- **Cumbria Local Safeguarding Children Partnership (Cumbria LSCP)**
- **Think U Know website**
- **Virtual Global Taskforce — Report Abuse**
- **Information Commissioner's Office (ICO)**
- **Better Internet for Kids**
- **Cyberbullying.org**
- **UK Safer Internet Centre**
- **UK Council for Child Internet Safety (UKCIS)**
- **Wise Kids**
- **Teem**
- **Family Online Safety Institute (FOSI)**
- **e-safe Education**
- **Facebook Advice to Parents**
- **Test your online safety skills:** Click here to access

The above Internet site links were correct at the time of publishing. School staff are advised to check the content of each site prior to allowing access to pupils.

Department for Education/Home Office guidance for schools

PREVENT Duty statutory guidance for Public Bodies: England and Wales – March 2015
The PREVENT Duty – non-statutory Departmental advice for Schools and Childcare Providers – DfE – June 2015
How Social Media is used to encourage travel to Syria and Iraq – Home Office advice to schools – June 2015

LEGAL FRAMEWORK

Protection of Children Act 1978
It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is a anyone under the age of 18. Viewing an indecent image of a child on your computer means that you have made a digital image. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence may face up to 10 years in prison.

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.

Criminal Justice Act 2003
Section 146 of the Criminal Justice Act 2003 came into effect in April 2005, empowering courts to impose tougher sentences for offences motivated or aggravated by the victim's sexual orientation in England and Wales.

Sexual Offences Act 2003
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). This can include images taken by and distributed by the child themselves. A person convicted of such an offence may face up to 10 years in prison.

The offence of grooming 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 etc. fall in this category of trust).

Any sexual intercourse with a child under the age of 13 commits the offence of rape.

Communications Act 2003 (section 127)
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.

Data Protection Act 2018 / UK GDPR
The Data Protection Act 2018 came into force on 25 May 2018. The Act, which replaces the 1998 Act, provides a legal framework for data protection in the UK. It is supplemented by the General Data Protection Regulation (UK GDPR), the legal framework that sets guidelines for the collection and processing of personal information of individuals within the European Union (EU).

The General Data Protection Regulation (UK GDPR) significantly updates previous Data Protection law to reflect changes in technology and the way organisations collect and use information about people in the 21st century. It regulates the processing of personal data and gives rights of privacy protection to all living persons.

Data Controllers are responsible for, and need to be able to demonstrate that they comply with the principles set out in Article 5 of the UK GDPR which requires that:

- Personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals.

- Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data shall be kept for no longer than is necessary.
- Personal data shall be processed in a manner that ensures appropriate security of it.

The first principle of data protection is **fair, lawful and transparent processing**, and is the foundation on which everything else is built.

The Computer Misuse Act 1990 (sections 1 - 3)
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.

UK citizens or residents may be extradited to another country if they are suspected of committing any of the above offences.

Malicious Communications Act 1988 (section 1)
This legislation makes it a criminal offence to send an electronic message (email) that conveys indecent, grossly offensive, threatening material or information that is false; or is of an indecent or grossly offensive nature if the purpose was to cause a recipient to suffer distress or anxiety.

Copyright, Design and Patents Act 1988
Copyright is the right to prevent others from copying or using his or her "work" without permission. The material to which copyright may attach (known in the business as "work") must be the author's own creation and the result of some skill and judgement. It comes about when an individual expresses an idea in a tangible form. Works such as text, music, sound, film and programs all qualify for copyright protection. The author of the work is usually the copyright owner, but if it was created during employment it belongs to the employer.

It is an infringement of copyright to copy all or a substantial part of anyone's work without obtaining the author's permission. Usually, a licence associated with the work will allow a user to copy or use it for limited purposes. It is advisable always to read the terms of a licence before you copy or use someone else's material. It is also illegal to adapt or use software without a licence or in ways prohibited by the terms of the software licence.

Trademarks Act 1994
This provides protection for Registered Trademarks, which can be any symbol (words, shapes or images) that are associated with a set of goods or services. Registered Trademarks must not be used without permission. This can also arise from using a Mark that is confusingly similar to an existing Mark.

Public Order Act 1986 (sections 17 — 29)
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.

Obscene Publications Act 1959 and 1964
Publishing an "obscene" article is a criminal offence. Publishing includes electronic transmission.

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.

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 must follow a number of set procedures.

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.

Criminal Justice and Immigration Act 2008
- Section 63 – it is an offence to possess "extreme pornographic image"
- Section 63 (6) – the image must be "grossly offensive, disgusting or otherwise obscene"
- Section 63 (7) - this includes images of "threats to a person life or injury to anus, breasts or genitals, sexual acts with a corpse or animal whether alive or dead" and must also be "explicit and realistic". Penalties can be up to 3 years imprisonment.

Education and Inspections Act 2006
Education and Inspections Act 2006 outlines legal powers for schools which relate to Cyberbullying/ Bullying:

- Head teachers have the power, "to such an extent as is reasonable", to regulate the conduct of pupils off site.
- School staff can confiscate items such as mobile phones etc. when they are being used to cause a disturbance in class or otherwise contravene the school behaviour/anti-bullying procedures.

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.

Human Rights Act 1998
This does not deal with any 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.

GLOSSARY OF TERMS

Becta	British Educational Communications and Technology Agency (Government agency promoting the use of information and communications technology) – *NOTE: Becta Closed in 2011*
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.
CLEO	The Regional Broadband Consortium of Cumbria and Lancashire – is the provider of broadband and other services for schools and other organisations in Cumbria and Lancashire
CPD	Continuous Professional Development
DfE	Department for Education
FOSI	Family Online Safety Institute
HSTF	Home Secretary's Task Force on Child Protection on the Internet
ICO	Information Commissioners Office
ICT	Information and Communications Technology
ICTMark	Quality standard for schools provided by Naace
INSET	In Service Education and Training
IP address	The label that identifies each computer to other computers using the IP (internet protocol)
ISP	Internet Service Provider
ISPA	Internet Service Providers' Association
IWF	Internet Watch Foundation
JANET	Provides the broadband backbone structure for Higher Education and for the National Education Network.
KS1	Key Stage 1 (2, 3, 4 or 5) – schools are structured within these multiple age groups e.g. KS3 = years 7 to 9 (age 11 to 14)
LA	Local Authority
LAN	Local Area Network
Learning Platform	A learning platform brings together hardware, software and supporting services to support teaching, learning, management and administration.
LSCB	Local Safeguarding Children Board
MIS	Management Information System
MLE	Managed Learning Environment
NEN	National Education Network – works with the Regional Broadband Consortia (e.g. CLEO in Cumbria) to provide the safe broadband provision to schools across Britain.
Ofcom	Office of Communications (Independent communications sector regulator)
Ofsted	Office for Standards in Education, Children's Services and Skills
PDA	Personal Digital Assistant (handheld device)
PHSE	Personal, Health and Social Education
RBC	Regional Broadband Consortia (e.g. CLEO) have been established to procure broadband connectivity for schools in England. There are 13 RBCs covering most local authorities in England, Wales and Northern Ireland.

SEF	Self Evaluation Form – used by schools for self-evaluation and reviewed by Ofsted prior to visiting schools for an inspection
TUK	Think U Know – educational E-Safety programmes for schools, young people and parents.
URL	Uniform Resource Locator (URL) it is the global address of documents and other resources on the World Wide Web.
VLE	Virtual Learning Environment (a software system designed to support teaching and learning in an educational setting,
WAP	Wireless Application Protocol