# ST VINCENT'S SCHOOL

A Specialist School for Sensory Impairment and Other Needs

Policy Document Title: E Safety Policy To be read in conjunction with: ICT Policy

Pupil Mobile Phone Policy

Staff handbook

Internet Access Policy Health and Safety Policy

Reviewed: 09/19 To be reviewed: 09/20

# **Development / Monitoring / Review of this Policy**

This e-safety policy has been developed by the E-Safety Group, made up of:

- Principal / Senior Leaders
- E-Safety Officer / Coordinator
- Staff including Teachers, Support Staff, Technical staff

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

# Schedule for Development / Monitoring / Review

| This e-safety policy was approved by the Governing Body on:                                                                                                                                                                                             | Oct 2015                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| The implementation of this e-safety policy will be monitored by the:                                                                                                                                                                                    | E-Safety<br>Group              |
| Monitoring will take place at regular intervals:                                                                                                                                                                                                        | Annually                       |
| The Governing Body will receive a report on the implementation of the e-safety policy generated by the monitoring group (which will include anonymous details of e-safety incidents) at regular intervals:                                              | Annually                       |
| The E-Safety Policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to e-safety or incidents that have taken place. The next anticipated review date will be: | Jan 2020                       |
| Should serious e-safety incidents take place, the following person should be informed:                                                                                                                                                                  | The<br>Safeguarding<br>Officer |

<sup>\*</sup> This policy is available on school intranet and website www.stvin.com

The school will monitor the impact of the policy using:

- Logs of reported incidents
- Monitoring logs of internet activity (including sites visited)
- Internal monitoring data for network activity
- Surveys / questionnaires of
  - students / pupils
  - parents / carers
  - staff

#### **Scope of the Policy**

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

The Education and Inspections Act 2006 empowers Headteachers / Principals to such extent as is reasonable, to regulate the behaviour of students / pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of cyber-bullying, or other e-safety incidents covered by this policy, which may take place outside of the school, but is linked to membership of the school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data (see appendix for template policy). In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

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

#### **Roles and Responsibilities**

#### Governors

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

- regular meetings with the E-Safety Officer
- regular monitoring of e-safety incident logs
- regular monitoring of filtering / change control logs
- reporting to relevant Governors / Board / committee / meeting

# **Principal and Senior Leaders:**

- The Principal has a duty of care for ensuring the safety (including e-safety) of members of the school community, though the day to day responsibility for e-safety will be delegated to the E-Safety Officer.
- The Principal and the Safeguarding Officer should be aware of the procedures to be followed in the event of a serious e-safety allegation being made against a member of staff. (see flow chart on dealing with e-safety incidents included in a later section "Responding to incidents of misuse"). We have access to (as part of the SWGfL BOOST kit), an 'Incident Response Tool' that includes the steps to follow (and forms to complete) for any staff facing an issue, disclosure or report.
- The Principal / Senior Leaders are responsible for ensuring that the E-Safety Officer and other relevant staff receive suitable training to enable them to carry out their esafety roles and to train other colleagues, as relevant. (SWGfL BOOST includes access to unlimited online webinar training.)
- The Principal / Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal e-safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive regular monitoring reports from the E-Safety Officer.

# **E-Safety Officer:**

- · leads the e-safety committee
- takes day to day responsibility for e-safety issues and has a leading role in establishing and reviewing the school e-safety policies / documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an e-safety incident taking place.
- · provides training and advice for staff
- liaises with the Local Authority / relevant body
- receives reports of e-safety incidents and creates a log of incidents to inform future e-safety developments, (Examples of suitable log sheets may be found later in this document. SWGfL BOOST includes access to Whisper, an anonymous reporting app that installs onto a school website and extends the schools ability to capture reports from staff, children and parents)
- meets regularly with the E-Safety Governor to discuss current issues, review incident logs and filtering / change control logs
- reports regularly to Senior Leadership Team

Incidents will be dealt with by the Safeguarding Officer, the E-Safety Office and the Principal.

#### **Network Manager: Co-ordinator for ICT / Computing is responsible for ensuring:**

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
- the filtering policy, is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person
- that they keep up to date with e-safety technical information in order to effectively carry out their e-safety role and to inform and update others as relevant
- that the use of the network / internet / Virtual Learning Environment / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Senior Leadership Team for investigation / action / sanction

 that monitoring software / systems are implemented and updated as agreed in school policies

Teaching and Support Staff are responsible for ensuring that:

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

## Child Protection / Safeguarding Designated Person / Officer

should be trained in e-safety issues and be aware of the potential for serious child protection / safeguarding issues to arise from:

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

#### Incidents are to be considered child protection issues, not technical issues.

#### **E-Safety Group**

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

Members of the E-safety Group will assist the E-Safety Officer (or other relevant person, as above) with:

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

#### The E-Safety Group Terms of Reference can be found in the appendices

#### Students / pupils:

- are responsible for using the school digital technology systems in accordance with the Student / Pupil Acceptable Use Policy
- have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking / use of images and on cyber-bullying.

 should understand the importance of adopting good e-safety practice when using digital technologies out of school and realise that the school's E-Safety Policy covers their actions out of school, if related to their membership of the school

#### Parents / Carers

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

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

# Education - students / pupils

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

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

- A planned e-safety curriculum should be provided as part of Computing lessons and should be regularly revisited
- Key e-safety messages should be reinforced as part of a planned programme of assemblies and tutorial / pastoral activities

- Students / pupils should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information.
- Students / pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Students / pupils should be helped to understand the need for the student / pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school
- Staff should act as good role models in their use of digital technologies the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that students /
  pupils should be guided to sites checked as suitable for their use and that
  processes are in place for dealing with any unsuitable material that is found in
  internet searches.
- Where students / pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may
  need to research topics (eg racism, drugs, discrimination) that would normally
  result in internet searches being blocked. In such a situation, staff can request
  that the ICT Coordinator can temporarily remove those sites from the filtered list
  for the period of study. Any request to do so, should be auditable, with clear
  reasons for the need.

#### **Education – parents / carers**

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

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

- Curriculum activities
- Letters, newsletters, web site

- Parents / Carers evenings / sessions
- High profile events / campaigns eg Safer Internet Day
- Reference to the relevant web sites / publications eg www.swgfl.org.uk
   www.saferinternet.org.uk/ http://www.childnet.com/parents-and-carers (see appendix for further links / resources)

#### **Education – The Wider Community**

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

- Providing family learning courses in use of new digital technologies, digital literacy and e-safety
- E-Safety messages targeted towards grandparents and other relatives as well as parents.
- The school website will provide e-safety information for the wider community
- Supporting community groups eg Early Years Settings, Childminders, youth / sports / voluntary groups to enhance their e-safety provision (possibly supporting the group in the use of Online Compass, an online safety self review tool www.onlinecompass.org.uk)

#### **Education & Training – Staff / Volunteers**

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

- A planned programme of formal e-safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the e-safety training needs of all staff will be carried out regularly. SWGfL BOOST includes unlimited online webinar training for all, or nominated, staff (http://www.swgfl.org.uk/Staying-Safe/E-Safety-BOOST/Boost-landing-page/Boost-Hub/Professional-Development) It is expected that some staff will identify e-safety as a training need within the performance management process.
- All new staff should receive e-safety training as part of their induction programme, ensuring that they fully understand the school e-safety policy and Acceptable Use Agreements. SWGfL BOOST includes an array of presentations and resources

- that can be presented to new staff (http://www.swgfl.org.uk/Staying-Safe/E-Safety-BOOST/Boost-landing-page/Boost-Hub/Resources)
- The E-Safety Officer will receive regular updates through attendance at external training events (eg from SWGfL / LA / other relevant organisations) and by reviewing guidance documents released by relevant organisations.
- This E-Safety policy and its updates will be presented to and discussed by staff in staff / team meetings / INSET days.
- The E-Safety Officer will provide advice / guidance / training to individuals as required. SWGfL BOOST includes an array of presentation resources that the e-Safety coordinator can access to deliver to staff (<a href="http://www.swgfl.org.uk/Staying-Safe/E-Safety-BOOST/Boost-landing-page/Boost-Hub/Resources">http://www.swgfl.org.uk/Staying-Safe/E-Safety-BOOST/Boost-landing-page/Boost-Hub/Resources</a>). It includes presenter notes to make it easy to confidently cascade to all staff

#### Training – Governors

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

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

#### Technical – infrastructure / equipment, filtering and monitoring

If the school has a managed ICT service provided by an outside contractor, it is the responsibility of the school to ensure that the managed service provider carries out all the e-safety measures that would otherwise be the responsibility of the school, as suggested below. It is also important that the managed service provider is fully aware of the school E-Safety Policy / Acceptable Use Agreements. The school should also check their Local Authority / other relevant body policies on these technical issues.

The school will be responsible for ensuring that the school infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people

named in the above sections will be effective in carrying out their e-safety responsibilities: A more detailed Technical Security Policy can be found in the appendix.

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school technical systems and devices.
- All users (at KS2 and above) will be provided with a username and secure
  password by the ICT Coordinator, who will keep an up to date record of users and
  their usernames. Users are responsible for the security of their username and
  password and will be required to change their password every year.
- The "administrator" password for the school ICT system, used by the Network Manager (or other person) must also be available to the Principal and kept in a secure place (eg school safe)
- The ICT Coordinator is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the filtering provider. Content lists are regularly updated and internet use is logged and regularly monitored. (the school will need to decide on the merits of external / internal provision of the filtering service see appendix). There is a clear process in place to deal with requests for filtering changes (see appendix for more details)
- The school has provided enhanced / differentiated user-level filtering (allowing different filtering levels for different ages / stages and different groups of users – staff / pupils / students etc)
- The ICT Coordinator regularly monitors and records the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement.
- An appropriate system is in place for users to report any actual / potential technical incident / security breach to the relevant person, as agreed).

- Appropriate security measures are in place to protect the servers, firewalls,
  routers, wireless systems, work stations, mobile devices etc from accidental or
  malicious attempts which might threaten the security of the school systems and
  data. These are tested regularly. The school infrastructure and individual
  workstations are protected by up to date virus software.
- An agreed policy is in place for the provision of temporary access of "guests" (eg trainee teachers, supply teachers, visitors) onto the school systems.

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## **Bring Your Own Device (BYOD)**

The educational opportunities offered by mobile technologies are being expanded as a wide range of devices, software and online services become available for teaching and learning, within and beyond the classroom. This has led to the exploration by schools of users bringing their own technologies in order to provide a greater freedom of choice and usability. However, there are a number of e-safety considerations for BYOD that need to be reviewed prior to implementing such a policy. Use of BYOD should not introduce vulnerabilities into existing secure environments. Considerations will need to include; levels of secure access, filtering, data protection, storage and transfer of data, mobile device management systems, training, support, acceptable use, auditing and monitoring. This list is not exhaustive and a BYOD policy should be in place and reference made within all relevant policies. (See appendix for a more detailed BYOD Policy)

- The school has a set of clear expectations and responsibilities for all users
- The school adheres to the Data Protection Act principles
- All users are provided with and accept the Acceptable Use Agreement
- All network systems are secure and access for users is differentiated
- Where possible these devices will be covered by the school's normal filtering systems, while being used on the premises
- All users will use their username and password and keep this safe
- Training is undertaken for all staff
- Students / Pupils receive training and guidance on the use of personal devices
- Regular audits and monitoring of usage will take place to ensure compliance
- Any device loss, theft, change of ownership of the device will be reported as in the BYOD policy

Any user leaving the school will follow the process outlined within the BYOD policy

# Use of digital and video images

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

- When using digital images, staff should inform and educate students / pupils about
  the risks associated with the taking, use, sharing, publication and distribution of
  images. In particular they should recognise the risks attached to publishing their
  own images on the internet eg on social networking sites.
- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other students / pupils in the digital / video images.
- Staff and volunteers are allowed to take digital / video images to support
  educational aims, but must follow school policies concerning the sharing,
  distribution and publication of those images. Those images should only be taken on
  school equipment, the personal equipment of staff should not be used for such
  purposes.
- Care should be taken when taking digital / video images that students / pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Students / pupils must not take, use, share, publish or distribute images of others without their permission

- Photographs published on the website, or elsewhere that include students / pupils
  will be selected carefully and will comply with good practice guidance on the use of
  such images.
- Students' / Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Written permission from parents or carers will be obtained before photographs of students / pupils are published on the school website.
- Student's / Pupil's work can only be published with the permission of the student / pupil and parents or carers.

#### **Data Protection**

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

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

#### A School Personal Data Statement is available in the appendices to this document

The school must ensure that:

- It will hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for.
- Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay.
- All personal data will be fairly obtained in accordance with the "Privacy Notice" and lawfully processed in accordance with the "Conditions for Processing". (see Privacy Notice section in the appendix)
- It has a Data Protection Policy (see appendix for policy)
- It is registered as a Data Controller for the purposes of the Data Protection Act (DPA)

- Responsible persons are appointed / identified Senior Information Risk Officer
   (SIRO) and Information Asset Owners (IAOs)
- Risk assessments are carried out
- It has clear and understood arrangements for the security, storage and transfer of personal data
- Data subjects have rights of access and there are clear procedures for this to be obtained
- There are clear and understood policies and routines for the deletion and disposal of data
- There is a policy for reporting, logging, managing and recovering from information risk incidents
- There are clear Data Protection clauses in all contracts where personal data may be passed to third parties
- There are clear policies about the use of cloud storage / cloud computing which ensure that such data storage meets the requirements laid down by the Information Commissioner's Office.

### Staff must ensure that they:

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

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

- the data must be encrypted and password protected
- the device must be password protected (many memory sticks / cards and other mobile devices cannot be password protected)
- the device must offer approved virus and malware checking software
- the data must be securely deleted from the device, in line with school policy once it
  has been transferred or its use is complete

#### **Communications**

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

|                                                                 |         | ff & o                 |                        | Students / P |         |                        | Pupi                    | ls          |
|-----------------------------------------------------------------|---------|------------------------|------------------------|--------------|---------|------------------------|-------------------------|-------------|
| Communication Technologies                                      | Allowed | lowed at certain times | wed for selected staff | Not allowed  | Allowed | lowed at certain times | 1 with staff permission | Not allowed |
| Mobile phones may be brought to school                          | X       |                        |                        |              |         | X                      | X                       |             |
| Use of mobile phones in lessons                                 | X       |                        |                        | X            |         |                        |                         |             |
| Use of mobile phones in social time                             | X       |                        |                        |              |         | X                      |                         |             |
| Taking photos on mobile phones / cameras                        | X       |                        |                        |              |         |                        | X                       |             |
| Use of other mobile devices eg tablets, gaming devices          | X       |                        |                        |              |         | X                      | X                       |             |
| Use of personal email addresses in school, or on school network | X       |                        |                        |              |         |                        | X                       |             |
| Use of school email for personal emails                         | X       |                        |                        |              |         | X                      | X                       |             |
| Use of messaging apps                                           |         | X                      |                        |              |         | X                      | X                       |             |
| Use of social media                                             |         | X                      |                        |              |         | X                      | X                       |             |
| Use of blogs                                                    |         | X                      |                        |              |         | X                      | X                       |             |

When using communication technologies the school considers the following as good practice:

- The official school email service may be regarded as safe and secure and is
  monitored. Users should be aware that email communications are monitored. Staff
  and students / pupils should therefore use only the school email service to
  communicate with others when in school, or on school systems (eg by remote
  access).
- Users must immediately report, to the E-Safety Coordinator or Safeguarding
   Officer, in accordance with the school policy, the receipt of any communication
   that makes them feel uncomfortable, is offensive, discriminatory, threatening or
   bullying in nature and must not respond to any such communication. (SWGfL
   BOOST includes an anonymous reporting app Whisper -

# http://www.swgfl.org.uk/Staying-Safe/E-Safety-BOOST/Boost-landing-page/Boost-Hub/SWGfL-Whisper)

- Any digital communication between staff and students / pupils or parents / carers (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 social media must not be used for these communications.
- Whole class / group email addresses may be used at KS1, while students / pupils at KS2 and above will be provided with individual school email addresses for educational use.
- Students / pupils should be taught about e-safety issues, such as the risks attached
  to the sharing of personal details. They should also be taught strategies to deal
  with inappropriate communications and be reminded of the need to communicate
  appropriately when using digital technologies.
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

#### **Social Media - Protecting Professional Identity**

- All schools, academies and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Schools/academies and local authorities could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, cyberbully, discriminate on the grounds of sex, race or disability or who defame a third party may render the school liable to the injured party. Reasonable steps to prevent predictable harm must be in place.
- The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to pupils, staff and the school through limiting access to personal information:
- Training to include: acceptable use; social media risks; checking of settings; data protection; reporting issues. SWGfL BOOST includes unlimited webinar training on this subject: (<a href="http://www.swgfl.org.uk/Staying-Safe/E-Safety-BOOST/Boost-landing-page/Boost-Hub/Professional-Development">http://www.swgfl.org.uk/Staying-Safe/E-Safety-BOOST/Boost-landing-page/Boost-Hub/Professional-Development</a>)
- Clear reporting guidance, including responsibilities, procedures and sanctions
- Risk assessment, including legal risk
- School staff should ensure that:

- No reference should be made in social media to students / pupils, parents / carers or school staff
- They do not engage in online discussion on personal matters relating to members of the school community
- Personal opinions should not be attributed to the school
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.
- The school's use of social media for professional purposes will be checked regularly by the senior risk officer and e-safety committee to ensure compliance with the Social Media, Data Protection, Communications, Digital Image and Video Policies. SWGfL BOOST includes SWGfL Alerts that highlight any reference to the school/academy in any online media (newspaper or social media) for example <a href="http://www.swgfl.org.uk/Staying-Safe/E-Safety-BOOST/Boost-landing-page/Boost-Hub/Alerts">http://www.swgfl.org.uk/Staying-Safe/E-Safety-BOOST/Boost-landing-page/Boost-Hub/Alerts</a>

# Unsuitable / inappropriate activities

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

| User Actions                                            |                                                                                                                                                                            | Acceptabl | Acceptabl | Acceptabl<br>e for | Unaccept | Unaccept<br>able and |
|---------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|--------------------|----------|----------------------|
| Users shall<br>not visit<br>Internet                    | Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978                          |           |           |                    |          | Х                    |
| sites,<br>make,<br>post,<br>download,                   | Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.                                                |           |           |                    |          | X                    |
| upload,<br>data<br>transfer,<br>communic<br>ate or pass | Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008 |           |           |                    |          | Х                    |
| on,<br>material,<br>remarks,                            | criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986                    |           |           |                    |          | X                    |
| proposals<br>or                                         | pornography                                                                                                                                                                |           |           |                    | Х        |                      |
| comments                                                | promotion of any kind of discrimination                                                                                                                                    |           |           |                    | Х        |                      |
| contain or relate to:                                   | threatening behaviour, including promotion of physical violence or mental harm                                                                                             |           |           |                    | X        |                      |
|                                                         | any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute                        |           |           |                    | X        |                      |
| Using school                                            | systems to run a private business                                                                                                                                          |           |           |                    | Х        |                      |
|                                                         | s, applications, websites or other mechanisms that tering or other safeguards employed by the school                                                                       |           |           |                    | Х        |                      |
| Infringing cop                                          | yright                                                                                                                                                                     |           |           |                    | Х        |                      |
|                                                         | publicising confidential or proprietary information (eg sonal information, databases, computer / network access sswords)                                                   |           |           |                    | X        |                      |
| Creating or pr                                          | opagating computer viruses or other harmful files                                                                                                                          |           |           |                    | Х        |                      |
| Unfair usage in their use of                            | (downloading / uploading large files that hinders others the internet)                                                                                                     |           |           |                    | Х        |                      |
| On-line gamir                                           | ng (educational)                                                                                                                                                           |           | X         |                    |          |                      |
| On-line gamir                                           | ng (non educational)                                                                                                                                                       |           | Х         |                    |          |                      |
| On-line gamb                                            | ling                                                                                                                                                                       |           |           |                    | Х        |                      |
| On-line shopp                                           | oing / commerce                                                                                                                                                            |           | X         | Х                  |          |                      |
| File sharing                                            |                                                                                                                                                                            |           | X         | X                  |          |                      |

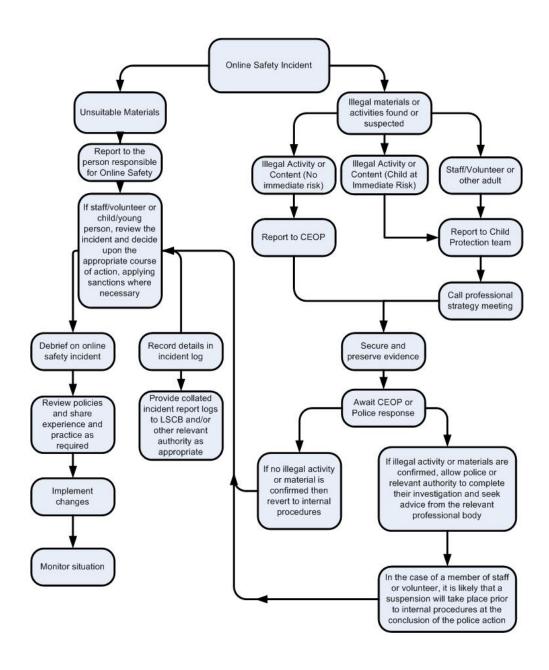
| Use of social media                  |   | Х | Х |  |
|--------------------------------------|---|---|---|--|
| Use of messaging apps                |   | Х | X |  |
| Use of video broadcasting eg Youtube | Х |   |   |  |

#### Responding to incidents of misuse

This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities (see "User Actions" above). SWGfL BOOST includes a comprehensive and interactive 'Incident Management Tool' that steps staff through how to respond, forms to complete and action to take when managing reported incidents (<a href="http://www.swgfl.org.uk/Staying-Safe/E-Safety-BOOST/Boost-landing-page/Boost-Hub/Incident-Response-Tool">http://www.swgfl.org.uk/Staying-Safe/E-Safety-BOOST/Boost-landing-page/Boost-Hub/Incident-Response-Tool</a>)

# **Illegal Incidents**

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



#### **Other Incidents**

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

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

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

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

#### **School Actions & Sanctions**

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

#### Students / Pupils

#### **Actions / Sanctions**

| Incidents:                                                                                                                                                   | Refer to class teacher / tutor | Department / Head of Year | Refer to Principal | Refer to Police | Refer to technical support staff for action re filtering / | Inform parents / carers | Removal of network / internet access rights | Warning | Further sanction eg<br>detention / exclusion |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|---------------------------|--------------------|-----------------|------------------------------------------------------------|-------------------------|---------------------------------------------|---------|----------------------------------------------|
| Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities). |                                | x                         | X                  | x               |                                                            |                         |                                             |         |                                              |
| Unauthorised use of non-educational sites during lessons                                                                                                     | Х                              |                           |                    |                 |                                                            |                         |                                             |         |                                              |
| Unauthorised use of mobile phone / digital camera / other mobile device                                                                                      | Х                              |                           |                    |                 |                                                            |                         |                                             | X       |                                              |
| Unauthorised use of social media / messaging apps / personal email                                                                                           | X                              |                           |                    |                 |                                                            |                         |                                             | X       |                                              |
| Unauthorised downloading or uploading of files                                                                                                               | X                              |                           |                    |                 |                                                            |                         |                                             | X       |                                              |
| Allowing others to access school network by sharing username and passwords                                                                                   | X                              |                           |                    |                 |                                                            |                         |                                             | X       |                                              |
| Attempting to access or accessing the school network, using another student's / pupil's account                                                              | X                              |                           |                    |                 |                                                            |                         |                                             | X       |                                              |
| Attempting to access or accessing the school network, using the account of a member of staff                                                                 | X                              |                           | X                  |                 | X                                                          |                         |                                             |         |                                              |
| Corrupting or destroying the data of other users                                                                                                             | X                              |                           | X                  |                 | Х                                                          |                         |                                             |         |                                              |
| Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature                                                          | X                              |                           | X                  |                 | X                                                          |                         |                                             |         |                                              |
| Continued infringements of the above, following previous warnings or sanctions                                                                               | X                              |                           | X                  |                 | X                                                          |                         |                                             |         | X                                            |
| Actions which could bring the school into disrepute or breach the integrity of the ethos of the school                                                       | X                              |                           | X                  |                 | X                                                          |                         |                                             |         |                                              |

| Using proxy sites or other means to subvert the school's / academy's filtering system                                   | X | X |   | X |  | X |
|-------------------------------------------------------------------------------------------------------------------------|---|---|---|---|--|---|
| Accidentally accessing offensive or pornographic material and failing to report the incident                            | X | X |   | X |  |   |
| Deliberately accessing or trying to access offensive or pornographic material                                           | Х | X | X | X |  | X |
| Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act | Х | X | X |   |  |   |

# Staff

# **Actions / Sanctions**

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