

File: Governor

Initials: **HKE/CD** Date: **10/2021**Pages: **94 (including appendices)**Review: **HKE/CD** Date: **10/2024**

Victoria Community School Online Safety Policy







Development / Monitoring / Review of this Policy

This Online Safety policy has been developed by the ICT Coordinator and required support from:

- Headteacher and Senior Leaders
- Staff including Teachers, Support Staff, Technical staff
- Governors
- Parents and Carers
- · Community users

Consultation with the whole school community will take place through a range of formal and informal meetings to discuss developments to the policy.

Schedule for Development / Monitoring / Review

This Online Safety policy was approved by the Governing Body	July 2021
on:	
The implementation of this Online Safety policy will be	ICT Coordinator
monitored by the:	
Monitoring will take place at regular intervals:	Termly basis or sooner if/when
	required
The Governing Body will receive a report on the implementation	Updates on a termly basis
of the Online Safety Policy generated by the ICT Coordinator	
(which will include anonymous details of online safety incidents)	
at regular intervals:	
The Online Safety Policy will be reviewed annually, or more	September 2022
regularly in the light of any significant new developments in the	
use of the technologies, new threats to online safety or incidents	
that have taken place. The next anticipated review date will be:	
Should serious online safety incidents take place, the following	Headteacher / Safeguarding
external persons / agencies should be informed:	officers / LA Safeguarding
	Officer, LADO, Police

The school will monitor the impact of the policy using:

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

Scope of the Policy

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

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

Victoria Community School will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents / carers of incidents of inappropriate Online Safety behaviour that take place out of school.

Roles and Responsibilities

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

Governors

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

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

Headteacher and Senior Leaders

The Headteacher has a duty of care for ensuring the safety (including online safety) of members
of the school community, though the day to day responsibility for online safety will be delegated
to the Online Safety Lead/ICT Coodrinator.

- The Headteacher and (at least) another member of the Senior Leadership Team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff. (see flow chart on dealing with online safety incidents included in a later section "Responding to incidents of misuse" and relevant Local Authority disciplinary procedures). Online Safety BOOST includes an 'Incident Response Tool' that outines the steps (and forms to complete) any staff facing an issue, disclosure or report, need to follow. More information is available at: https://boost.swgfl.org.uk/
- The Headteacher and Senior Leaders are responsible for ensuring that the Online Safety Lead/ ICT Coordinator and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant. Online Safety BOOST includes access to unlimited online webinar training – further details are at https://boost.swgfl.org.uk/
- The Headteacher and 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 online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive regular monitoring reports from the Online Safety Lead/ ICT coordinator.

Online Safety Officer Lead / ICT Coordinator

Helen Keyworth-Edwards will:

- lead on the Online Safety
- take day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies / documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provides training and advice for staff
- liaises with the Local Authority
- liaises with school technical staff
- receive reports of online safety incidents and create a log of incidents to inform future online safety developments – Future Cloud
- meets regularly with Online Safety Governor to discuss current issues, review incident logs and filtering / change control logs
- · attends relevant meeting
- reports regularly to Senior Leadership Team

Network Manager / Technical staff

Victoria Community School has a managed ICT service provided by an outside contractor – currently Entrust, it is the responsibility of the *Victoria Community School* to ensure that the managed service provider carries out all the online safety measures that would otherwise be the responsibility of the school technical staff. It is also important that the managed service provider (Entrust) is fully aware of the *schools* Online Safety Policy and procedures.

The Network Manager / Technical Staff / ICT Coordinator is responsible for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- that the *school* meets required online safety technical requirements and any *Local*Authority Online Safety Policy / Guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
- the filtering policy, is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person (see appendix "Technical Security Policy Template")
- that they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- that the use of the *network / internet / remote access / email* is regularly monitored in order that any misuse / attempted misuse can be reported to the *Headteacher / Senior Leader; Online Safety Lead* for investigation / action / sanction
- that monitoring software / systems, Future Clouds, are implemented and updated as agreed in school policies

Teaching and Support Staff

Are responsible for ensuring that:

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

Designated Safeguarding Lead

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

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

Online Safety Group made up of ICT Coordinator and Designated Safeguard Leads

The Online Safety Group provides a consultative group that has wide representation from the *school*, with responsibility for issues regarding online safety and the monitoring the Online Safety Policy including the impact of initiatives. Depending on the size or structure of the *school* this group may be part of the safeguarding group. The group will also be responsible for regular reporting to the *Governing Body*.

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

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

Students / Pupils:

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

Parents / Carers

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

- digital and video images taken at school events
- access to parents' sections of parent pay, website, on-line pupil records
- their children's personal devices in the school

Community Users

Community Users who access school systems / website as part of the wider *school* provision will be expected to sign a Community User AUA before being provided with access to school systems. (A Community Users Acceptable Use Agreement Template can be found in the appendices.)

Policy Statements

Education - Students / Pupils

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

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

- A planned online safety curriculum should be provided as part of Computing / PHSE / other lessons and should be regularly revisited DFE: Education for a Connected World Framework and Project Evolve Computing Scheme of Work which includes age specific advice about the online knowledge and skills that pupils should have the opportunity to develop at different stages of their lives, including how to navigate online safely. This was developed by the UK Council for Internet Safety
- Key online safety messages should be reinforced as part of a planned programme of assemblies
- Pupils should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information.
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet

- Pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. N.b. additional duties for schools under the Counter Terrorism and Securities Act 2015 which requires schools to ensure that children are safe from terrorist and extremist material on the internet.
- Pupils should be helped to understand the need for the Pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school.
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices
- In lessons where internet use is pre-planned, it is best practice that pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (eg racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff or 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 online safety risks and issues, yet they play an essential role in the education of their children and in the monitoring / regulation of the children's online behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

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

- Curriculum activities
- Letters, newsletters, website
- Parents / Carers evenings / sessions
- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant websites / publications e.g. <u>swgfl.org.uk</u> <u>www.saferinternet.org.uk/</u> <u>http://www.childnet.com/parents-and-carers</u> (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 online safety knowledge and experience. This may be offered through the following:

- Providing family learning courses in use of new digital technologies, digital literacy and online safety – ESOL Classes
- Online safety messages targeted towards grandparents and other relatives as well as parents.
- The school website will provide online safety information for the wider community

 Supporting community groups e.g. Early Years Settings to enhance their Online Safety provision (possibly supporting the group in the use of Online Compass, an online safety selfreview tool for groups such as these - www.onlinecompass.org.uk)

Education & Training – Staff / Volunteers

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

- A planned programme of formal online safety training will be made available to staff https://www.onlinesafetyalliance.org/ This will be updated yearly and reinforced alongside
 Safeguarding training and updates from KCSIE (2021). An audit of the online safety
 training needs of all staff will be carried out regularly.
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school ESafety Policy and Acceptable Use Agreements.
- It is expected that some staff will identify online safety as a training need within the performance management process.
- The Online Safety Lead will receive regular updates through attendance at external training events (eg from SWGfL / LA / other relevant organisations) and by reviewing guidance documents released by relevant organisations.
- This Online Safety Policy and its updates will be presented to and discussed by staff in staff / team meetings / INSET days.
- The Online Safety Lead will provide advice / guidance / training to individuals as required.

Training - Governors

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

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

Technical – infrastructure / equipment, filtering and monitoring

Victoria Community School has a managed ICT service provided by Entrust, it is the responsibility of the school to ensure that the managed service provider carries out all the online 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* Online Safety Policy / Acceptable Use

Agreements. The school should also check their Local Authority and 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 online safety responsibilities:

A more detailed Technical Security Template Policy can be found in the appendix.

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements (these may be outlined in Local Authority / other relevant body policy and guidance)
- 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 will be provided with a username and secure password by Helen Keyworth-Edwards or Adam Davies who will keep an up to date record of users and their usernames.
 Users are responsible for the security of their username and password.
- The "administrator" passwords for the school ICT systems, used by the Network Manager (or other person) must also be available to the *Headteacher/Business Manager* or other nominated senior leader and kept in a secure place
- Helen Keyworth-Edwards is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered
 by the broadband or filtering provider by actively employing the Internet Watch Foundation
 CAIC list. Content lists are regularly updated and internet use is logged and regularly
 monitored. There is a clear process in place to deal with requests for filtering changes (see
 appendix for more details)
- Internet filtering / monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet. N.b. additional duties for schools under the Counter Terrorism and Securities Act 2015 which requires schools to ensure that children are safe from terrorist and extremist material on the internet. (see appendix for information on "appropriate filtering").
- The school has provided enhanced / differentiated user-level filtering (allowing different filtering levels for different different groups of users staff / pupils etc)
- School technical staff regularly monitor and record the activity of users on the school technical systems – <u>Smoothwall Monitoring</u> - 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 – report to ICT Coordinator, Senior Leadership Team and/or Headteacher

- 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. They will have their own designated 'guest' login
- An agreed distance / remote learning policy is in place regarding the extent of personal use that
 users (staff pupils / community users) and their family members are allowed on school devices
 that may be used out of school. See Victoria Community School Pupil Remote Learning Policy
- An agreed policy is in place that allows staff to / forbids staff from downloading executable files and installing programmes on school devices.
- An agreed policy is in place regarding the use of removable media (eg memory sticks / CDs / DVDs) by users on school devices. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured in line with GDPR Regulations. (see School Personal Data Policy Template in the appendix for further detail)

Mobile Technologies (including BYOD/BYOT) Changes due to CIVID 19

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

Mobile technologies are an integral part of the school's Online Safety education programme.

All users should understand that the primary purpose of the use mobile / personal devices in a school context is educational.

A more detailed Mobile Technologies Template Policy can be found in the appendix. The school may however choose to include these aspects of their policy in a comprehensive Acceptable Use Agreement, rather than in a separate Mobile Technologies Policy. It is suggested that the school should in this overall policy document outline the main points from their agreed policy. A checklist of points to be considered in included below.

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

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School Devices	Personal Devices

	School owned for single user	School owned for multiple users	Authorised device ¹	Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	<mark>At</mark> present No	<mark>Yes</mark>	<mark>Yes</mark>
Full network access	Yes	Yes	Yes	<mark>No</mark>	No	<mark>No</mark>
Internet only	-	•	-	<mark>No</mark>	Yes	Yes
No network access	-	-	-	Yes	Yes	Yes

Aspects that the school may wish to consider and be included in their Online Safety Policy, Mobile Technologies Policy or Acceptable Use Agreements:

School owned / provided devices:

Victoria Community School is now in possession of 57 laptops supplied by the DFE during lockdown.

These devices will be allocated to children and staff who find themselves isolating or who need to work from home. These devices will be issued to children/ staff when needed to be used at home. (If the child does not have internet access at home, a 30GB data card will be allocated).

Children will be using the devices for remote learning, logging on to Class Dojo, Google Classroom and occasional access to wider internet sites for research purposes.

Staff using these devices at home will be able to access the internet, school's remote logon to the network, Class Dojo and Google Classroom.

Personal use of these devices is prohibited.

Smoothwall monitoring and Netsweeper filtering software is installed on all devices which will capture anything that does not conform to Victoria Community Schools Acceptable Use Policy (AUP) and will filter out inappropriate web searches.

Management of devices, technical support, install of Apps and changing settings will be completed by the ICT Technician.

Access to cloud services, such as shared drives and emails is allowed.

Data protection is in line with Victoria Community School policies.

Taking/storage/use of images on these devices is prohibited on the hard drive but can be saved to Victoria Community School network.

Once the school bubble re-opens/self-isolation completed or working from home has finished the mobile technology (i.e. laptop) must be returned to school with nothing saved to it. The search history, along with downloads will be checked and deleted; the laptop will be cleared and ready for the next user.

Liability of damage – when the mobile device is taken from the school ground by a child/parent or member of staff, a liability of damage for is filled out. This states it becomes their responsibility to look after the device; any loss or damage that occurs will be their responsibility and a costing will be attached to it.

Personal devices:

Staff and visitors are allowed to use their own personal devices in school but only connect to the internet.

Staff will not have the ability to link to the school network.

Personal devices must be password protected.

Storage of school related work (e.g. planning) must be password protected and encrypted. No school data should be stored on personal devices.

No technical support is available for personal devices.

Filtering of the internet connection to these devices, once logged on to the schools Wi-Fi internet, falls in line with the Smoothwall monitoring and Netsweeper filtering software.

Data protection is in line with Victoria Community School policies.

If a device is suspected of misuse and / or is displayed on the monitoring software, a member of the Leadership team at Victoria Community School has the right to take, examine and search users devices. Also refer to Behaviour Policy.

Taking / storage / use of images on personal devices is prohibited.

The liability for loss/damage or malfunction following access to the network lies with the owner and is not the schools responsibility.

- How visitors will be informed about school requirements
- How education about the safe and responsible use of mobile devices is included in the school
 Online Safety education programmes.

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Use of digital and video images

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

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

Data Protection

With effect from 25th May 2018, the data protection arrangements for the UK changed following the European Union General Data Protection Regulation (GDPR). As a result, schools are subject to greater scrutiny in their care and use of personal data. More detailed guidance is available in our school GDPR compliance policy.

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

The school must ensure that:

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

Staff must ensure that they:

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

Transfer data using encryption and secure password protected devices.

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

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

Communications

This is an area of rapidly developing technologies and uses. Schools will need to discuss and agree how they intend to implement and use these technologies eg at present Victoria Community school do not allow pupils to use mobile phones in lessons or bring them to school, while other schools recognise their educational potential and allow their use. Victoria Community School is a Mobile Phone Free Zone. School staff are required to lock away their own personal mobile phones in their lockers and may access them before school starts, at break and lunchtimes and after the school day, visitors are required to sign in and hand over their mobile phones into the office where they will be securely locked away until they leave, this will then be returned to them, alternatively they may wish to leave them in their car.

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

	Staff & other adults				Students / Pupils					
Communication Technologies	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed		
Mobile phones may be brought to the school		Х					х			
Use of mobile phones in lessons				Х				Х		
Use of mobile phones in social time	х							X		

Taking photos on mobile phones / cameras			Х		X
Use of other mobile devices e.g. tablets, gaming devices	Х				х
Use of personal email addresses in school, or on school network			Х		X
Use of school / academy email for personal emails			х		Х
Use of messaging apps			х		Х
Use of social media - Twitter		Х			Х
Use of social media – all others			Х		X
Use of blogs			Х		X

In addition to the above table:

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.
- Users must immediately report, to the nominated person in accordance with the policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and pupils or parents / carers (email, social media, chat, blogs, 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 pupils at KS2 and above will be provided with individual school email addresses for educational use when required.
- Pupils should be taught about online safety issues, such as the risks attached to the sharing of
 personal details. They should also be taught strategies to deal with inappropriate
 communications and be reminded of the need to communicate appropriately when using digital
 technologies.
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

With an increase in use of all types of social media for professional and personal purposes a policy that sets out clear guidance for staff to manage risk and behaviour online is essential. Core messages should include the protection of pupils, the school and the individual when publishing any material online. Expectations for teachers' professional conduct are set out in 'Teachers Standards 2012'. Ofsted's online safety inspection framework reviews how a school protects and educates staff and pupils in their use of technology, including the measures that would be expected to be in place to

intervene and support should a particular issue arise. Schools are increasingly using social media as a powerful learning tool and means of communication. It is important that this is carried out in a safe and responsible way.

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

- Ensuring that personal information is not published
- Training is provided including: acceptable use; social media risks; checking of settings; data protection; reporting issues. https://www.onlinesafetyalliance.org/cpd-2020/
- 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 pupils, parents / carers or school staff
- They do not engage in online discussion on personal matters relating to members of the school community
- Personal opinions should not be attributed to the school or local authority
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information, Privacy settings must be set to the highest possible setting e.g. Friends only.

When official school social media accounts are established there should be:

- A process for approval by senior leaders
- Clear processes for the administration and monitoring of these accounts involving at least two members of staff
- A code of behaviour for users of the accounts
- Systems for reporting and dealing with abuse and misuse
- Understanding of how incidents may be dealt with under school disciplinary procedures

Personal Use:

- Personal communications are those made via a personal social media accounts. In all cases,
 where a personal account is used which associates itself with the school or impacts on the school,
 it must be made clear that the member of staff is not communicating on behalf of the school with
 an appropriate disclaimer. Such personal communications are within the scope of this policy
- Personal communications which do not refer to or impact upon the school are outside the scope of this policy
- Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken
- The school permits reasonable and appropriate access to private social media sites on own devices during break times.

Monitoring of Public Social Media

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

The *school's* use of social media for professional purposes will be checked regularly by the ICT Coordinator to ensure compliance with the school policies.

Dealing with unsuitable / inappropriate activities

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

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

User Act	tions	Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
et sites, upload, iicate or	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					Х
sit Intern wnload, commur	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					Х
er, er	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the					х
Users to mak	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					х

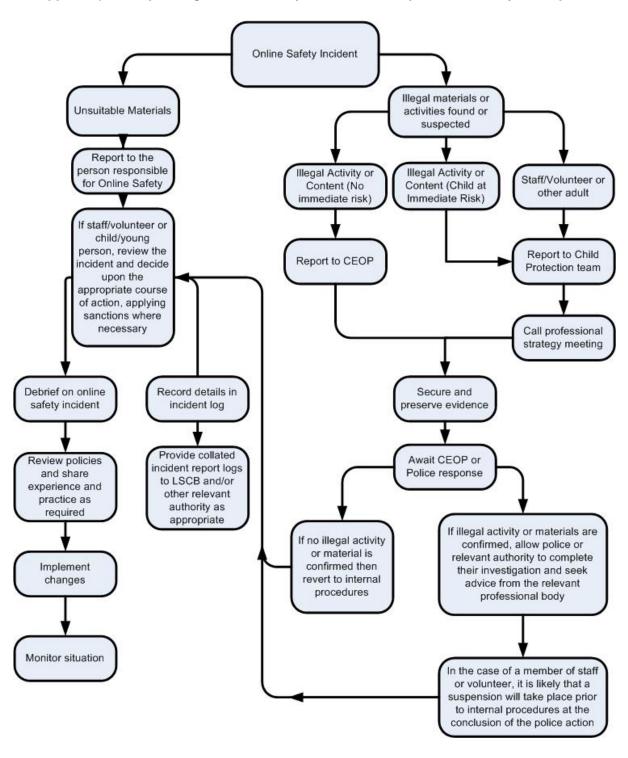
Pornography				Х	
Promotion of any kind of discrimination				Х	
threatening behaviour, including promotion of physical violence of mental harm	r			Х	
Promotion of extremism or terrorism				Х	
Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Using school systems to run a private business				Х	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school / academy				Х	
Infringing copyright				Х	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)				X	
Creating or propagating computer viruses or other harmful files					Χ
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)				Х	
On-line gaming (educational)		X			
On-line gaming (non-educational)				Χ	
On-line gambling				Х	
On-line shopping / commerce		Х			
File sharing – only acceptable on schools chosen platform	X				
Use of social media – Twitter for Educational purposes			X		
Use of social media other than Twitter				Х	
Use of messaging apps				Х	
Use of video broadcasting e.g. Youtube		X			

Responding to incidents of misuse

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

Illegal Incidents

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



Other Incidents

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

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

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

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

School Actions & Sanctions

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It

is intended that incidents of misuse will be dealt with through normal behaviour / disciplinary procedures as follows:

Actions / Sanctions

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

			Α	ctio	ns / San	ction	าร		
ceipt or transmission of material that infringes the byright of another person or infringes the Data btection Act		Х	Х	Х	х		Х		Х
liberately accessing or trying to access offensive or rnographic material		Х	Х		Х		Х		Х
cidentally accessing offensive or pornographic terial and failing to report the incident	Х	Х	Х		Х		Х		
ing proxy sites or other means to subvert the nool's filtering system		Х	Х		Х		Х	Х	Х
tions which could bring the school into disrepute or each the integrity of the ethos of the school			Х		Х		Х		Х
ntinued infringements of the above, following evious warnings or sanctions		Х	Х		Х	Х	Х	Х	Х
nding an email, text or message that is regarded as ensive, harassment or of a bullying nature		Х	Х				Х	Х	Х
		Х	Х				Х		Х

Staff Incidents	Refer to line managerr	Refer to Headteacher Principal	Refer to Local Authority / HR	Refer to Police	Refer to Technical Support Staff for action re filtering etc.	Warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		х	х	х			Х	X
Inappropriate personal use of the internet / social media / personal email		Х			Х	Х	Х	Х
Unauthorised downloading or uploading of files	Х	Х			Х			
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	Х	Х			Х	Х		
Careless use of personal data e.g. holding or transferring data in an insecure manner	Х	Х				Х	Х	Х

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

Appendix

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

SWGfL Online Safety Policy Templates

Acknowledgements

SWGfL would like to acknowledge a range of individuals and organisations whose policies, documents, advice and guidance have contributed to the development of this School Online Safety Policy Template and of the 360 degree safe Online Safety Self Review Tool:

- Members of the SWGfL Online Safety Group
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- Plymouth University Online Safety
- NEN / Regional Broadband Grids

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Student / Pupil Acceptable Use Agreement Template – for older pupils

School Policy

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

This Acceptable Use Agreement is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other digital technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could
 put the security of the systems and will have good access to digital technologies to enhance
 their learning and will, in return, expect the *pupils* to agree to be responsible users.

Acceptable Use Policy Agreement

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

For my own personal safety:

- I understand that Victoria Community School will monitor my use of the systems, devices and digital communications.
- I will keep my username and password safe and secure I will not share it, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will be aware of "stranger danger", when I am communicating on-line.
- I will not disclose or share personal information about myself or others when on-line (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc.)
- If I arrange to meet people off-line that I have communicated with on-line, I will do so in a public place and take an adult with me.
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it on-line.

I understand that everyone has equal rights to use technology as a resource and:

- I understand that Victoria Community School systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not use the *school* systems or devices for on-line gaming, on-line gambling, file sharing, or video broadcasting (eg YouTube), unless I have permission of a member of staff to do so.

I will act as I expect others to act toward me:

- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission.

I recognise that the school has a responsibility to maintain the security and integrity of the technology it offers me and to ensure the smooth running of the school:

- I will only use my own personal devices (USB devices etc) in school if I have permission. I understand that, if I do use my own devices in the *school*, I will follow the rules set out in this agreement, in the same way as if I was using school equipment.
- I understand the risks and will not try to upload, download or access any materials which are
 illegal or inappropriate or may cause harm or distress to others, nor will I try to use any
 programmes or software that might allow me to bypass the filtering / security systems in place
 to prevent access to such materials.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.

- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person / organisation who sent the email, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will not install or attempt to install or store programmes of any type on any school device, nor will I try to alter computer settings.

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

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

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

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

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

Pupil Acceptable Use Agreement Form

This form relates to the *pupil* Acceptable Use Agreement, to which it is attached.

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

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

- I use the school systems and devices (both in and out of school)
- I use my own devices in the *school* (when allowed) e.g. mobile phones, gaming devices, USB devices, cameras etc.
- I use my own equipment out of the school in a way that is related to me being a member of this school eg communicating with other members of the school, accessing school email, website etc.

Name of Pupil	:
Class:	
Child's Signatı	ıre:
Date:	
Parent / Carer	Countersignature:

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

This is how we stay safe when we use computers:

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

Signed (child):	
Signed (parent):	

Parent / Carer Acceptable Use Agreement Template

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

This Acceptable Use Policy is intended to ensure:

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

The school will try to ensure that *pupils* will have good access to digital technologies to enhance their learning and will, in return, expect the *pupils* to agree to be responsible users. A copy of the *Pupil* Acceptable Use Policy is attached to this permission form, so that parents / carers will be aware of the school expectations of the young people in their care.

Parents are requested to sign the permission form below to show their support of the school in this important aspect of the school's work.

Parent / Carers Name:
Pupil Name:
I understand that the school has discussed the Acceptable Use Agreement with my son / daughter and that they have received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet — both in and out of school.
I understand that the school will take every reasonable precaution, including monitoring and filtering systems, to ensure that young people will be safe when they use the internet and systems. I also understand that the school cannot ultimately be held responsible for the nature and content of materials accessed on the internet and using mobile technologies.
I understand that my son's / daughter's activity on the systems will be monitored and that the school will contact me if they have concerns about any possible breaches of the Acceptable Use Policy.
I will encourage my child to adopt safe use of the internet and digital technologies at home and will inform the school if I have concerns over my child's online safety.
This form will be printed.
School staff will have access to this form.
This form will be stored in your child's personal folder
This form will be stored for the time your child is in school
This form will be shredded and destroyed in line with the Data Protection Policy.
Signed:
Date:

Use of Digital / Video Images

Permission Form

Staff (and Volunteer) Acceptable Use Policy Agreement Template

School Policy

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

This Acceptable Use Policy is intended to ensure:

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

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

Acceptable Use Policy Agreement

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

For my professional and personal safety:

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

I will be professional in my communications and actions when using *Victoria Community School* ICT systems:

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

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

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

- I understand that data protection policy requires that any staff or pupil data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by school policy to disclose such information to an appropriate authority.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.

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

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

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

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

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

Staff / Volunteer Name:	
Signed:	
Date:	

Acceptable Use Agreement for Community Users

This Acceptable Use Agreement is intended to ensure:

- that community users of school digital technologies will be responsible users and stay safe while using these systems and devices
- that school systems, devices and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that users are protected from potential risk in their use of these systems and devices

Acceptable Use Agreement

I understand that I must use school systems and devices in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems, devices and other users. This agreement will also apply to any personal devices that I bring into the school:

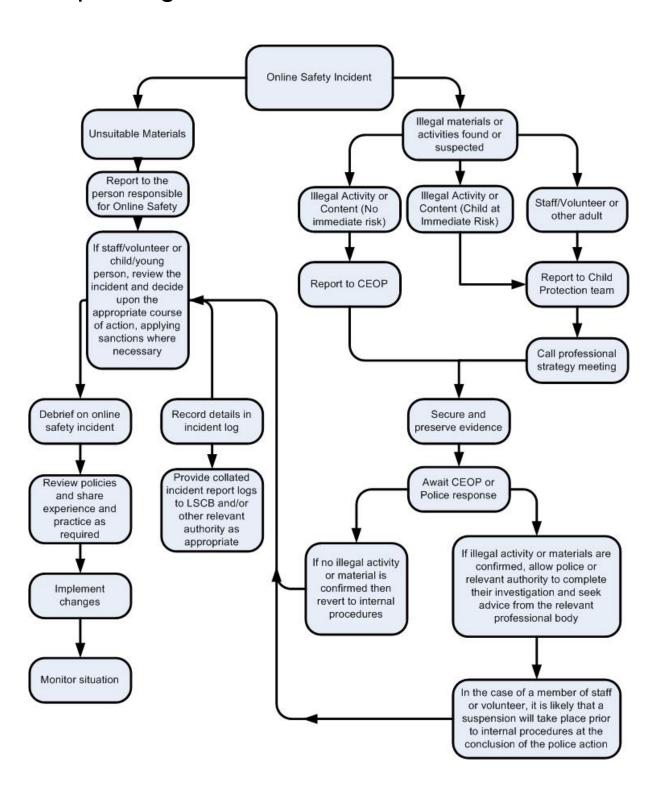
- I understand that my use of school systems and devices and digital communications will be monitored.
- I will not use a personal device that I have brought into school for any activity that would be inappropriate in a school setting.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering / security systems in place to prevent access to such materials.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.
- I will not access, copy, remove or otherwise alter any other user's files, without permission.
- I will ensure that if I take and / or publish images of others I will only do so with their permission.
 I will not use my personal equipment to record these images, without permission. If images are published it will not be possible to identify by name, or other personal information, those who are featured.
- I will not publish or share any information I have obtained whilst in the school on any personal
 website, social networking site or through any other means, unless I have permission from the
 school.
- I will not, without permission, make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a school device, nor will I try to alter computer settings, unless I have permission to do so.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.
- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).

• I understand that if I fail to comply with this Acceptable Use Agreement, the school has the right to remove my access to school systems / devices

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

Name:	Signed:
Date:	

Responding to incidents of misuse – flow chart



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

Group: Date: Reason for investigation:	
Details of first reviewing person Name: Position: Signature:	
Details of second reviewing pers Name: Position: Signature:	son
Name and location of computer	used for review (for web sites)
Web site(s) address / device	Reason for concern
Conclusion and Action proposed	d or taken





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





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





Victoria Community School Technical Security Policy (including filtering and passwords)

Introduction

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

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

Victoria Community School has a managed ICT service provided by an outside contractor - Entrust, it is the responsibility of the school to ensure that the managed service provider carries out all the online safety measures that might otherwise be carried out by the *school* itself. It is also important that the managed service provider is fully aware of the *school* Online Safety Policy / Acceptable Use Agreements). Victoria Community School should also check their Local Authority and other relevant body policies / guidance on these technical issues.

Responsibilities

The management of technical security will be the responsibility of Helen Keyworth-Edwards, working alongside Entrust: Adam Davies

Technical Security

Policy statements

The school will be responsible for ensuring that the school infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people receive guidance and training and will be effective in carrying out their responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- Appropriate security measures are in place to protect the servers, firewalls, switches, routers, wireless systems, work stations, mobile devices etc. from accidental or malicious attempts which might threaten the security of the school systems and data.





- Responsibilities for the management of technical security are clearly assigned to appropriate and well trained staff
- All users will have clearly defined access rights to school technical systems. Details of the access
 rights available to groups of users will be recorded by the Network Manager / Technical Staff (or other
 person) and will be reviewed, at least annually, by the ICT Coordinator
- Users will be made responsible for the security of their username and password must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security. (See Password section below).
- Helen Keyworth-Edwards is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Mobile device security and management procedures are in place
- School technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement – Future Cloud
- An appropriate system is in place for users to report any actual / potential technical incident to the ICT Coordinator / Network Manager / Technician
- An agreed policy is in place for the provision of temporary access of "guests" (e.g. trainee teachers, supply teachers, visitors) onto the school system Guest logins available at the office.
- An agreed policy is in place regarding the downloading of executable files and the installation of programmes on school devices by users
- An agreed policy is in place regarding the extent of personal use that users (staff /pupils/community users) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place regarding the use of removable media (eg memory sticks / CDs / DVDs) by
 users on school devices. (see School Personal Data Policy Template in the appendix for further detail)
- The school infrastructure and individual workstations are protected by up to date software to protect against malicious threats from viruses, worms, trojans etc
- Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured. (see School Personal Data Policy Template in the appendix for further detail)

Password Security

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

Policy Statements

- All users will have clearly defined access rights to school technical systems and devices. Details of the
 access rights available to groups of users will be recorded by the Network Manager/ICT Coordinator
 and will be reviewed, at least annually, by the ICT Coordinator.
- All school networks and systems will be protected by secure passwords that are regularly changed





- The "master / administrator" passwords for the school systems, used by the technical staff must
 also be available to the *Headteacher* or other nominated senior leader and kept in a secure place
 eg school safe. Consideration should also be given to using two factor authentication for such
 accounts. (A school / academy should never allow one user to have sole administrator access)
- All users (adults and young people) will have responsibility for the security of their username and
 password must not allow other users to access the systems using their log on details and must
 immediately report any suspicion or evidence that there has been a breach of security.
- Passwords for new users, and replacement passwords for existing users will be allocated by Helen Keyworth-Edwards or Adam Davies.
- Passwords for new users and replacement passwords for existing users will be issued by Helen Keyworth-Edwards and/or Adam Davies when requested
- Users will change their passwords at regular intervals as described in the staff and student / pupil sections below
- Where passwords are set / changed manually requests for password changes should be authenticated by Helen Keyworth-Edwards to ensure that the new password can only be passed to the genuine user.

Staff Passwords

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

Pupil Passwords

All children at Victoria Community School are allocated an individual username, at the start of the year the children will initially have the same password but are requested to change it to an individual one when they have logged on.

All users will be provided with a username and password by Helen Keyworth-Edwards who will keep an up to date record of users and their usernames.

- Users will be required to change their password when prompted (usually yearly)
- Pupils will be taught the importance of password security
- School password routines should model good password practice for users





• The complexity (i.e. minimum standards) will be set with regards to the cognitive ability of the children. Children in lower years may choose a password that they can spell, older years will start to create passwords with greater complexity.

Training / Awareness

It is essential that users should be made aware of the need for keeping passwords secure, and the risks attached to unauthorised access / data loss. This should apply to even the youngest of users, even if class log-ins are being used.

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

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

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

- in lessons each year when they first log on and during the Computing Curriculum
- · through the Acceptable Use Agreement

Audit / Monitoring / Reporting / Review

The responsible person Helen Keyworth-Edwards will ensure that full records (manual or automated) are kept of:

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

Filtering

Introduction

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

Helen Keyworth-Edwards is aware of the flexibility provided by the filtering services at a local level for schools and at a national level within the county. Where available, schools should use this flexibility to meet their learning needs and reduce some of the frustrations occasionally felt by users who wish to maximise the use of the new technologies.

Victoria Community School has considered carefully the issues raised and decided:





- They will use the provided filtering service and are able to change specific filtering to allow flexibility for sites to be added or removed from the filtering list for their organisation
- We will not remove filtering controls for some internet use (e.g. social networking sites) at certain times
 of the day or for certain users
- Overall the Headteacher has responsibility for such decisions, but for educational / curriculum content
 Helen Keyworth-Edwards can change, the checks and balances are put in place to do so when making
 an informed decision to allow/remove such filtering flexibility
- What other system and user monitoring systems will be used to supplement the filtering system and how these will be used e.g. IPads to be monitored by staff when class using them.

Responsibilities

The responsibility for the management of the school's filtering policy will be held by Helen Keyworth-Edwards. They will manage the school filtering, in line with this policy and will keep records / logs of changes and of breaches of the filtering systems.

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

- be logged in change control logs
- be reported to a second responsible person Mrs E Laughlin
- staff do not have access to the filtering system, they have to request a site become available to Helen Keyworth-Edwards of which she will check the content and will then report to Yvonne Fearn prior to changes being made
- Change logs can be viewed by anyone wishing to see the changes made

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

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

Policy Statements

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

- Victoria Community School maintains and supports the managed filtering service provided by the Internet Service Provider and Entrust along with managing its own filtering to allow or block sites.
- The school has provided differentiated user-level filtering through the use of the Netsweeper filtering programme. (allowing different filtering levels for different ages and different groups of users – staff / pupils etc.)





- In the event of the technical staff needing to switch off the filtering for any reason, or for any user, this must be logged and carried out by a process that is agreed by the Headteacher
- Mobile devices that access the school internet connection (whether school or personal devices) will be subject to the same filtering standards as other devices on the school systems
- Any filtering issues should be reported immediately to the filtering provider.
- Requests from staff for sites to be removed from the filtered list will be considered by Helen Keyworth-Edwards and Yvonne Fearn. If the request is agreed, this action will be recorded and logs of such actions shall be reviewed regularly by the Online Safety Group.

Education / Training / Awareness

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

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

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

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

Changes to the Filtering System

In this section the school should provide a detailed explanation of:

- Staff may request a site be allowed by forwarding the relevant details to Helen Keyworth-Edwards, so
 she is able to check content and seek further permission from Yvonne Fearn before making a decision
 to allow/deny. There should be strong educational reasons for changes that are agreed.
- Logs of changes are identifiable on the Netsweeper filtering site

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

Monitoring

Victoria Community School supplements their filtering systems with additional monitoring systems - Smoothwall

No filtering system can guarantee 100% protection against access to unsuitable sites. The school will therefore monitor the activities of users on the school network and on school equipment as indicated in the School Online Safety Policy and the Acceptable Use Agreement. *Monitoring takes place weekly, if not more often, to make sure all users of the system are adhering to the AUP.*

Audit / Reporting

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





- the second responsible person Mrs E Laughlin
- Online Safety Group
- Online Safety Governor / Governors committee
- External Filtering provider / Local Authority / Police on request

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

Further Guidance

Schools may wish to seek further guidance. The following is recommended:

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

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

In response UKSIC produced guidance on – information on "Appropriate Filtering"

NEN Technical guidance: http://www.nen.gov.uk/e-security-managing-and-maintaining-e-securitycyber-security-in-schools/

Somerset Guidance for schools – this checklist is particularly useful where a school / academy uses external providers for its technical support / security: https://360safe.org.uk/Files/Documents/Somerset-Questions-for-Technical-Support-v4.aspx





School Personal Data Advice and Guidance

Suggestions for use

This document is for advice and guidance purposes only. It is anticipated that schools will use this advice alongside their own data protection policy. This document is not intended to provide legal advice and the school is encouraged to seek their own legal counsel when considering their management of personal data. The template uses the terms pupils to refer to the children or young people at the institution.

School Personal Data Handling

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

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

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

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

Introduction

Schools and their employees must do everything within their power to ensure the safety and security of any material of a personal or sensitive nature, including personal data.

It is the responsibility of all members of the Victoria Community School community to take care when handling, using or transferring personal data that it cannot be accessed by anyone who does not:

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





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

Anyone who has access to personal data must know, understand and adhere to the relevant school policy which brings together the statutory requirements contained in relevant data protection legislation and relevant regulations and guidance (where relevant from the Local Authority / Parent Organisation).

Legislative Context

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

Are schools / academies in England and Wales required to comply?

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

Guidance for schools / academies is available on the <u>Information Commissioner's Office</u> website including information about the new regulations.

Freedom of Information Act

All schools / academies (including <u>Academies</u>, which were previously exempt) must have a Freedom of Information Policy which sets out how it will deal with FOI requests. Good advice would encourage the School / Academy to:

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





Model Publication Scheme

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

Personal Data

The school / academy and its employees will have access to a wide range of personal information and data. The data may be held in a digital format or on paper records. Personal data is defined as any combination of data items that identifies an individual and provides specific information about them, their families or circumstances. This will include:

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

Fee

The School / Academy should pay the relevant fee to the ICO.

Responsibilities

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

- regular and systematic monitoring of individuals on a large scale;
- [the processing of] special categories² of data on a large scale and data relating to criminal convictions and offences

The Data Protection Officer (DPO) can be internally or externally appointed.

They must have:

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

The data controller must:

• Not give the DPO instructions regarding the performance of tasks

² • 'Special categories of data' is the type of data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; genetic data, biometric data or data concerning health or sex life and sexual orientation





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

As a minimum a Data Protection Officer must:

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

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

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

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

- what information is held, for how long and for what purpose,
- · how information has been amended or added to over time, and
- who has access to the data and why.

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

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

Information to Parents / Carers – the Privacy Notice and Consent

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

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

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





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

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

This means that where a school / academy is relying on consent as the basis for processing personal data that consent has to be clear, meaning that pre-ticked boxes, opt-out or implied consent are no longer suitable. Pupils / students aged 13 or over (the age proposed in the Data Protection Bill, subject to Parliamentary approval) may be able to consent to their data being processed for the purposes of information society services. The GDPR does not specify an age of consent for general processing bur schools / academies should consider the capacity of pupils / students to freely give their informed consent.

Schools / academies should satisfy themselves that their consent forms are clear and written in plain language. Consent should also detail in a very clear and specific way why this is necessary, what will happen to the data, and, how and when it will be disposed of.

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

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

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

Parental permission for use of cloud hosted services

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

Data Protection Impact Assessments (DPIA)

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





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

The risk assessment will involve:

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

According to the ICO a DPIA should contain:

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

Or more simply and fully:

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

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

Special categories of personal data

The following list is a list of personal data listed in the GDPR as a 'special category'.

"revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation"

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

Use of Biometric Information

The Protection of Freedoms Act 2012, included measures that affect schools / academies that use biometric recognition systems, such as fingerprint identification and facial scanning:

 For all pupils in schools / academies under 18, they must obtain the written consent of a parent before they take and process their child's biometric data





- They must treat the data with appropriate care and must comply with data protection principles as set out in the Data Protection Act
- They must provide alternative means for accessing services where a parent or pupil has refused consent

New advice to schools / academies makes it clear that they are not able to use pupils' biometric data without parental consent. Schools / academies may wish to incorporate the parental permission procedures into revised consent processes.

Training & awareness

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

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

Secure storage of and access to data

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

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

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

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

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

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

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

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





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

The school should have clear policy and procedures for the use of "Cloud Based Storage Systems" (for example Dropbox, Microsoft 365, Google drive) and is aware that data held in remote and cloud storage is still required to be protected in line with the Data Protection Act. The school will ensure that it is satisfied with controls put in place by remote / cloud based data services providers to protect the data. The ICO produced <u>guidance about cloud storage</u> for organisations in 2012.

As a Data Controller, the school is responsible for the security of any data passed to a "third party". Data Protection clauses must be included in all contracts where personal data is likely to be passed to a third party.

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

Subject Access Requests

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

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

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

Secure transfer of data and access out of school

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

- Users may not remove or copy sensitive or restricted or protected personal data from the school / academy or authorised premises without permission and unless the media is encrypted and password protected and is transported securely for storage in a secure location
- Users must take particular care that computers or removable devices which contain personal data must not be accessed by other users (e.g. family members) when out of school
- When restricted or protected personal data is required by an authorised user from outside the
 organisation's premises (for example, by a member of staff to work from their home), they should
 preferably have secure remote access to the management information system or learning platform





- If secure remote access is not possible, users must only remove or copy personal or sensitive data from
 the organisation or authorised premises if the storage media, portable or mobile device is encrypted
 and is transported securely for storage in a secure location
- Users must protect all portable and mobile devices, including media, used to store and transmit personal information using approved encryption software
- Particular care should be taken if data is taken or transferred to another country, particularly outside Europe, and advice should be taken from the local authority (if relevant) in this event.

Disposal of data

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

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

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

Audit Logging / Reporting / Incident Handling

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

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

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

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

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

• a "responsible person" for each incident





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

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

Data Mapping

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

Privacy and Electronic Communications

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





School Policy: Electronic Devices - Searching & Deletion

The Education Act 2012, the basis of this policy, sets out what the law is presumed to be, based on prior legal and educational knowledge, and common sense. Rights and responsibilities regarding physical contact and personal data are still evolving rapidly. So too are social, entertainment and educational technologies and the skills necessary to use them safely and prudently. This is particularly so where those who are under 18 are involved.

No existing law or policy can fully insulate anyone from the risk involved in searching for, access to or deletion of the personal data of others. Anyone refraining from any such search, access or deletion when hindsight shows circumstances merit such actions may however be at significant risk and may put seriously at risk the wellbeing of children entrusted to their care. This template cannot therefore be relied on as justification for any act or lack of action by anyone – there is no substitute for the proper and well documented exercise of adequately informed professional judgement.

It is for each school's Headteacher and Governors to set, apply and monitor application of their own policies as guided by their head teacher, local authority and official guidance, especially if the school is local authority maintained. This template is intended as an aide to this. South West Grid for Learning Trust does not and cannot accept and does not have responsibility for any school's policy on this or any other matter.

Introduction

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

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

Items banned under the school rules are determined and publicised by the Headteacher (section 89 Education and Inspections Act 1996).

An item banned by the school rules may only be searched for under these new powers if it has been identified in the school rules as an item that can be searched for. It is therefore important that there is a school policy which sets out clearly and unambiguously the items which:

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

The act allows authorised persons to examine data on electronic devices if they think there is a good reason to do so. In determining a 'good reason' to examine or erase the data or files the authorised staff member must





reasonably suspect that the data or file on the device in question has been, or could be, used to cause harm, to disrupt teaching or could break the school rules.

Following an examination, if the person has decided to return the device to the owner, or to retain or dispose of it, they may erase any data or files, if they think there is a good reason to do so.

The *Head Teacher* must publicise the school behaviour policy, in writing, to staff, parents / carers and pupils at least once a year. (There should therefore be clear links between the search etc. policy and the behaviour policy).

http://www.education.gov.uk/schools/pupilsupport/behaviour/behaviourpolicies/f0076897/screening-searching-and-confiscation

Relevant legislation:

- Education Act 1996
- Education and Inspections Act 2006
- Education Act 2011 Part 2 (Discipline)
- The School Behaviour (Determination and Publicising of Measures in Academies) Regulations 2012
- Health and Safety at Work etc. Act 1974
- Obscene Publications Act 1959
- Children Act 1989
- Human Rights Act 1998
- Computer Misuse Act 1990

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

Responsibilities

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

This policy has been written by and will be reviewed by: Helen Keyworth-Edwards, Assistant Headteacher, ICT Coordinator, Network Manager

The *Headteacher* has authorised the following members of staff to carry out searches for and of electronic devices and the deletion of data / files on those devices:

Liz Laughlin, Deputy Headteacher, DSL

Helen Keyworth-Edwards, Assistant Headteacher, ICT Coordinator, Network Manager

Helen Coulthard, SLC Manager and DSL





The *Headteacher* may authorise other staff members in writing in advance of any search they may undertake, subject to appropriate training.

Training / Awareness

It is essential that all staff should be made aware of and should implement the school's policy.

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

- at induction
- at regular updating sessions on the school's online safety policy

Members of staff authorised by the Headteacher to carry out searches for and of electronic devices and to access and delete data / files from those devices should receive training that is specific and relevant to this role.

Specific training is required for those staff who may need to judge whether material that is accessed is inappropriate or illegal.

Policy Statements

Search:

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

Pupils are allowed to bring mobile phones or other personal electronic devices to school but they may not use them in school time. They are to be locked away in the school office at the beginning of the day and collected at the end of the school day.

If pupils breach these roles:

The sanctions for breaking these rules will be:

Mobiles devices will not be permitted in school, parents will be informed.

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

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

In carrying out the search:

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





'reasonable grounds' is a matter decided on by reference to the circumstances witnessed by, or reported to, someone who is authorised and who exercises properly informed professional judgment and has received appropriate training).

The authorised member of staff should take reasonable steps to check the ownership of the mobile phone / personal electronic device before carrying out a search. (The powers included in the Education Act do not extend to devices owned (or mislaid) by other parties e.g. a visiting parent or contractor, only to devices in the possession of pupils.)

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

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

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

Extent of the search:

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

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

'Possessions' means any goods over which the *pupil* has or appears to have control – this includes desks, lockers and bags. (schools will need to take account of their normal policies regarding religious garments / headwear and may wish to refer to it in this policy)

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

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

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

Electronic devices

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





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

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

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

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

The school should also consider their duty of care responsibility in relation to those staff who may access disturbing images or other inappropriate material whilst undertaking a search. Seeing such material can be most upsetting. There should be arrangements in place to support such staff – Counselling is available.

Further guidance on reporting the incident to the police and the preservation of evidence can be found in the SWGfL flow chart in the main School Template Policies document. Local authorities / LSCBs may also have further guidance, specific to their area.

Deletion of Data

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

If inappropriate material is found on the device, it is up to the authorised member of staff to decide whether they should delete that material, retain it as evidence (of a possible criminal offence or a breach of school discipline) or whether the material is of such seriousness that it requires the involvement of the police. (It is recommended that members of staff should know who to contact, within school, for further guidance – report to Headteacher).

A record should be kept of the reasons for the deletion of data / files. (DfE guidance states and other legal advice recommends that there is no legal reason to do this, best practice suggests that the school can refer to relevant documentation created at the time of any search or data deletion in the event of a pupil, parental or other interested party complaint or legal challenge. Records will also help the school to review online safety incidents, learn from what has happened and adapt and report on application of policies as necessary). Reports to be found in the Behaviour files in Headteachers office on both sites.





Care of Confiscated Devices

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

Disclaimer:

Victoria Community School takes no responsibility for the loss or damage of confiscated devices.

Audit / Monitoring / Reporting / Review

The responsible persons; Yvonne Fearn, Liz Laughlin and Helen Keyworth-Edwards will ensure that full records are kept of incidents involving the searching for and of mobile phones and electronic devices and the deletion of data / files. (a template log sheet can be found in the appendices to the School Online Safety Template Policies)

These records will be reviewed by Helen Keyworth-Edwards, Online Safety Governor at regular intervals throughout the school year and reported to full governors three times a year.

This policy will be reviewed by the head teacher and governors annually and in response to changes in guidance and evidence gained from the records.

The school is required is publish its Behaviour Policy to parents annually (including on its website) – the Behaviour Policy should be cross referenced with this policy on search and deletion. DfE guidance can be found at: https://www.gov.uk/government/publications/searching-screening-and-confiscation

Not a requirement at present - Mobile Technologies Policy Template (inc. BYOD/BYOT)

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

The absolute key to considering the use of mobile technologies is that the pupils, staff and wider school community understand that the primary purpose of having their personal device at school is educational and that this is irrespective of whether the device is school owned/provided or personally owned. The mobile technologies policy should sit alongside a range of polices including but not limited to the Safeguarding Policy, Bullying Policy, Acceptable Use Policy, policies around theft or malicious damage and the Behaviour Policy. Teaching about the safe and appropriate use of mobile technologies should be included in the online safety education programme.

Potential Benefits of Mobile Technologies

Research has highlighted the widespread uptake of mobile technologies amongst adults and children of all ages. Web-based tools and resources have changed the landscape of learning. Students now have at their





fingertips unlimited access to digital content, resources, experts, databases and communities of interest. By effectively maximizing the use of such resources, schools not only have the opportunity to deepen student learning, but they can also develop digital literacy, fluency and citizenship in students that will prepare them for the high tech world in which they will live, learn and work.

For further reading, please refer to the "NEN Technical Strategy Guidance Note 5 – Bring your own device" - http://www.nen.gov.uk/advice/bring-your-own-device-byod

Considerations

There are a number of issues and risks to consider when implementing mobile technologies, these include; security risks in allowing connections to your school network, filtering of personal devices, breakages and insurance, access to devices for all students, avoiding potential classroom distraction, network connection speeds, types of devices, charging facilities, total cost of ownership

Schools may consider implementing the use of mobile technologies as a means of reducing expenditure on school provided devices. However, it is important to remember that the increased network management costs and overheads involved in implementing this properly are likely to counterbalance or outweigh any savings.

The use of mobile technologies brings both real benefits and challenges for the whole school community – including teachers - and the only effective way for a school to implement these successfully is to involve the whole school community from the outset. Before the school embarks on this path, the risks and benefits must be clearly identified and shared with all stakeholders.

A range of mobile technology implementations is possible. School should consider the following statements and remove those that do not apply to their planned implementation approach.

- The school Acceptable Use Agreements for staff, pupils/students and parents/carers will give consideration to the use of mobile technologies
- The school allows: (the school should complete the table below to indicate which devices are allowed and define their access to school systems)

	School Devices			Personal Devices		
	School owned and allocated to a single user	School owned for use by multiple users	Authorised device ³	Pupil/Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	Yes / No ⁴	Yes / No ⁴	Yes / No ⁴
Full network access	Yes	Yes	Yes			

³ Authorised device – purchased by the pupil/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school

⁴ The school should add below any specific requirements about the use of personal devices in school, e.g. storing in a secure location, use during the school day, liability, taking images etc





Internet only			
No network			
access			

- The school has provided technical solutions for the safe use of mobile technology for school devices/personal devices:
 - All school devices are controlled though the use of Mobile Device Management software
 - Appropriate access control is applied to all mobile devices according to the requirements of the user (e.g Internet only access, network access allowed, shared folder network access)
 - The school has addressed broadband performance and capacity to ensure that core educational and administrative activities are not negatively affected by the increase in the number of connected devices
 - For all mobile technologies, filtering will be applied to the internet connection and attempts to bypass this are not permitted
 - Appropriate exit processes are implemented for devices no longer used at a school location or by an authorised user. These may include; revoking the link between MDM software and the device, removing proxy settings, ensuring no sensitive data is removed from the network, uninstalling school-licenced software etc.
 - All school devices are subject to routine monitoring
 - o Pro-active monitoring has been implemented to monitor activity
 - When personal devices are permitted:
 - All personal devices are restricted through the implementation of technical solutions that provide appropriate levels of network access
 - Personal devices are brought into the school entirely at the risk of the owner and the decision to bring the device in to the school lies with the user (and their parents/carers) as does the liability for any loss or damage resulting from the use of the device in school
 - The school accepts no responsibility or liability in respect of lost, stolen or damaged devices while at school or on activities organised or undertaken by the school (the school recommends insurance is purchased to cover that device whilst out of the home)
 - The school accepts no responsibility for any malfunction of a device due to changes made to the device while on the school network or whilst resolving any connectivity issues
 - The school recommends that the devices are made easily identifiable and have a protective case to help secure them as the devices are moved around the school. Pass-codes or PINs should be set on personal devices to aid security
 - The school is not responsible for the day to day maintenance or upkeep of the users personal device such as the charging of any device, the installation of software updates or the resolution of hardware issues
 - Users are expected to act responsibly, safely and respectfully in line with current Acceptable
 Use Agreements, in addition;
 - Devices may not be used in tests or exams
 - Visitors should be provided with information about how and when they are permitted to use mobile technology in line with local safeguarding arrangements
 - Users are responsible for keeping their device up to date through software, security and app updates. The device is virus protected and should not be capable of passing on infections to the network





- Users are responsible for charging their own devices and for protecting and looking after their devices while in school
- Personal devices should be charged before being brought to school as the charging of personal devices is not permitted during the school day
- o Devices must be in silent mode on the school site and on school buses
- School devices are provided to support learning. It is expected that pupils/students will bring devices to school as required.
- Confiscation and searching (England) the school has the right to take, examine and search any device that is suspected of unauthorised use, either technical or inappropriate.
- The changing of settings (exceptions include personal settings such as font size, brightness, etc...) that would stop the device working as it was originally set up and intended to work is not permitted
- The software / apps originally installed by the school must remain on the school owned device in usable condition and be easily accessible at all times. From time to time the school may add software applications for use in a particular lesson. Periodic checks of devices will be made to ensure that users have not removed required apps
- The school will ensure that school devices contain the necessary apps for school work. Apps added by the school will remain the property of the school and will not be accessible to students on authorised devices once they leave the school roll. Any apps bought by the user on their own account will remain theirs.
- Users should be mindful of the age limits for app purchases and use and should ensure they read the terms and conditions before use.
- Users must only photograph people with their permission. Users must only take pictures or videos that are required for a task or activity. All unnecessary images or videos will be deleted immediately
- Devices may be used in lessons in accordance with teacher direction
- Staff owned devices should not be used for personal purposes during teaching sessions, unless in exceptional circumstances
- o Printing from personal devices will not be possible

Insurance

Schools that have implemented an authorised device approach (1:1 deployment) may wish to consider how they will insure these devices and should include details of the claims process in this policy.





Social Media Policy

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

The school recognises the numerous benefits and opportunities which a social media presence offers. Staff, parents/carers and pupils are actively encouraged to find creative ways to use social media. However, there are some risks associated with social media use, especially around the issues of safeguarding, bullying and personal reputation. This policy aims to encourage the safe use of social media by *Victoria Community School*; its staff, parents, carers and children.

Scope

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

This policy:

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

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

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

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

Personal communications which do not refer to or impact upon the school are outside the scope of this policy.

Digital communications with pupils are also considered. Staff may use social media to communicate with learners via a school social media account for teaching and learning purposes but must consider whether this is appropriate and consider the potential implications.





Organisational control

Roles & Responsibilities

SLT

- Facilitating training and guidance on Social Media use.
- o Developing and implementing the Social Media policy
- Taking a lead role in investigating any reported incidents.
- Making an initial assessment when an incident is reported and involving appropriate staff and external agencies as required.
- Receive completed applications for Social Media accounts
- Approve account creation

Administrator / Moderator

- Create the account following SLT approval
- Store account details, including passwords securely
- o Be involved in monitoring and contributing to the account
- Control the process for managing an account after the lead staff member has left the organisation (closing or transferring)

Staff

- Know the contents of and ensure that any use of social media is carried out in line with this and other relevant policies
- Attending appropriate training
- Regularly monitoring, updating and managing content he/she has posted via school accounts
- o Adding an appropriate disclaimer to personal accounts when naming the school

Process for creating new accounts

The school community is encouraged to consider if a social media account will help them in their work, e.g. a history department Twitter account, or a "Friends of the school" Facebook page. Anyone wishing to create such an account must present a business case to the School Leadership Team which covers the following points:-

- The aim of the account
- The intended audience
- How the account will be promoted
- Who will run the account (at least two staff members should be named)
- Will the account be open or private/closed

Following consideration by the SLT an application will be approved or rejected. In all cases, the SLT must be satisfied that anyone running a social media account on behalf of the school has read and understood this policy and received appropriate training. This also applies to anyone who is not directly employed by the school, including volunteers or parents.

Monitoring

School accounts must be monitored regularly and frequently (preferably 7 days a week, including during holidays). Any comments, queries or complaints made through those accounts must be responded to within 24 hours (or on the next working day if received at a weekend) even if the response is only to acknowledge receipt.





Regular monitoring and intervention is essential in case a situation arises where bullying or any other inappropriate behaviour arises on a school social media account.

Behaviour

- The school requires that all users using social media adhere to the standard of behaviour as set out in this policy and other relevant policies.
- Digital communications by staff must be professional and respectful at all times and in accordance with this policy. Staff will not use social media to infringe on the rights and privacy of others or make ill-considered comments or judgments about staff. School social media accounts must not be used for personal gain. Staff must ensure that confidentiality is maintained on social media even after they leave the employment of the school.
- Users must declare who they are in social media posts or accounts. Anonymous posts are discouraged
 in relation to school activity.
- If a journalist makes contact about posts made using social media staff must follow the school media policy before responding.
- Unacceptable conduct, (e.g. defamatory, discriminatory, offensive, harassing content or a breach of
 data protection, confidentiality, copyright) will be considered extremely seriously by the school and will
 be reported as soon as possible to a relevant senior member of staff, and escalated where appropriate.
- The use of social media by staff while at work may be monitored, in line with school policies. The school
 permits reasonable and appropriate access to private social media sites. However, where excessive
 use is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken
- The school will take appropriate action in the event of breaches of the social media policy. Where conduct is found to be unacceptable, the school will deal with the matter internally. Where conduct is considered illegal, the school will report the matter to the police and other relevant external agencies, and may take action according to the disciplinary policy.

Legal considerations

- Users of social media should consider the copyright of the content they are sharing and, where necessary, should seek permission from the copyright holder before sharing.
- Users must ensure that their use of social media does not infringe upon relevant data protection laws, or breach confidentiality.

Handling abuse

- When acting on behalf of the school, handle offensive comments swiftly and with sensitivity.
- If a conversation turns and becomes offensive or unacceptable, school users should block, report or
 delete other users or their comments/posts and should inform the audience exactly why the action was
 taken
- If you feel that you or someone else is subject to abuse by colleagues through use of a social networking site, then this action must be reported using the agreed school protocols.

Tone

The tone of content published on social media should be appropriate to the audience, whilst retaining appropriate levels of professional standards. Key words to consider when composing messages are:

Engaging





- Conversational
- Informative
- Friendly (on certain platforms, e.g. Facebook/Twitter)

Use of images

School use of images can be assumed to be acceptable, providing the following guidelines are strictly adhered to

- Permission to use any photos or video recordings should be sought in line with the school's
 digital and video images policy. If anyone, for any reason, asks not to be filmed or photographed
 then their wishes should be respected.
- Under no circumstances should staff share or upload student pictures online
- Staff should exercise their professional judgement about whether an image is appropriate to share on school social media accounts. Students images must not be published.
- If a member of staff inadvertently takes a compromising picture which could be misconstrued or misused, they must delete it immediately.

Personal use

Staff

- Personal communications are those made via a personal social media accounts. In all cases, where a personal account is used which associates itself with the school or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.
- Personal communications which do not refer to or impact upon the school are outside the scope of this policy.
- Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken
- The school permits reasonable and appropriate access to private social media sites.

Pupil

- Staff are not permitted to follow or engage with current or prior pupils of the school on any personal social media network account.
- The school's education programme should enable the pupils to be safe and responsible users of social media.
- Pupils are encouraged to comment or post appropriately about the school. Any offensive or inappropriate comments will be resolved by the use of the school's behaviour policy

• Parents/Carers

- If parents/carers have access to a school learning platform where posting or commenting is enabled, parents/carers will be informed about acceptable use.
- The school has an active parent/carer education programme which supports the safe and positive use of social media. This includes information on the website.
- Parents/Carers are encouraged to comment or post appropriately about the school. In the event
 of any offensive or inappropriate comments being made, the school will ask the parent/carer to
 remove the post and invite them to discuss the issues in person. If necessary, refer parents to
 the school's complaints procedures.





Monitoring posts about the school

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

Appendix

Managing your personal use of Social Media:

- · "Nothing" on social media is truly private
- Social media can blur the lines between your professional and private life. Don't use the school logo and/or branding on personal accounts
- Check your settings regularly and test your privacy
- · Keep an eye on your digital footprint
- Keep your personal information private
- Regularly review your connections keep them to those you want to be connected to
- When posting online consider; Scale, Audience and Permanency of what you post
- If you want to criticise, do it politely.
- Take control of your images do you want to be tagged in an image? What would children or parents say about you if they could see your images?
- Know how to report a problem

Managing school social media accounts

The Do's

- Check with a senior leader before publishing content that may have controversial implications for the school
- Use a disclaimer when expressing personal views
- Make it clear who is posting content
- Use an appropriate and professional tone
- Be respectful to all parties
- Ensure you have permission to 'share' other peoples' materials and acknowledge the author
- Express opinions but do so in a balanced and measured manner
- Think before responding to comments and, when in doubt, get a second opinion
- Seek advice and report any mistakes using the school's reporting process
- Consider turning off tagging people in images where possible

The Don'ts

- Don't make comments, post content or link to materials that will bring the school into disrepute
- Don't publish confidential or commercially sensitive material
- Don't breach copyright, data protection or other relevant legislation
- Consider the appropriateness of content for any audience of school accounts, and don't link to, embed or add potentially inappropriate content





- Don't post derogatory, defamatory, offensive, harassing or discriminatory content
- Don't use social media to air internal grievances

Acknowledgements

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





School Policy – Online Safety Group Terms of Reference

1. Purpose

To provide a consultative group that has representation from Victoria Community School, with responsibility for issues regarding online safety and the monitoring the online safety policy including the impact of initiatives. Depending on the size or structure of the school this group may be part of the safeguarding group. The group will also be responsible for regular reporting to the Full Governing Body.

2. Membership

2.1. The online safety group will seek to include representation from Victoria Community School

The composition of the group should include

- SLT member/s
- Child Protection/Safeguarding officer
- · Teaching staff member
- Online safety coordinator
- Governor
- ICT Technical Support staff (where possible)
- Pupil representation for advice and feedback. Pupil voice is essential in the make-up of the online safety group, but pupils would only be expected to take part in committee meetings where deemed relevant – Smartbots from Year 6
- 2.2. Other people may be invited to attend the meetings at the request of the Chairperson on behalf of the committee to provide advice and assistance where necessary.
- 2.3. Committee members must declare a conflict of interest if any incidents being discussed directly involve themselves or members of their families.
- 2.4. Committee members must be aware that many issues discussed by this group could be of a sensitive or confidential nature
- 2.5. When individual members feel uncomfortable about what is being discussed they should be allowed to leave the meeting with steps being made by the other members to allow for these sensitivities

3. Chairperson

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

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





4. Duration of Meetings

Meetings shall be held $\frac{1}{2}$ termly for a period of 1 hour(s). A special or extraordinary meeting may be called when and if deemed necessary.

5. Functions

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

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

6. Amendments

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

The above Terms of Re	ference for Victoria Community School have been agreed
Signed by (SLT):	
Date:	
Date for review:	

Acknowledgement

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





Legislation

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

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

Computer Misuse Act 1990

This Act makes it an offence to:

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

Data Protection Act 1998

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

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

Freedom of Information Act 2000

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

Communications Act 2003

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





Malicious Communications Act 1988

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

Regulation of Investigatory Powers Act 2000

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

- · Establish the facts;
- · Ascertain compliance with regulatory or self-regulatory practices or procedures;
- · Demonstrate standards, which are or ought to be achieved by persons using the system;
- Investigate or detect unauthorised use of the communications system;
- · Prevent or detect crime or in the interests of national security;
- Ensure the effective operation of the system.
- Monitoring but not recording is also permissible in order to:
- Ascertain whether the communication is business or personal;
- · Protect or support help line staff.
- The school reserves the right to monitor its systems and communications in line with its rights under this
 act.

Trade Marks Act 1994

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

Copyright, Designs and Patents Act 1988

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

Telecommunications Act 1984

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

Criminal Justice & Public Order Act 1994

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

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





Racial and Religious Hatred Act 2006

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

Protection from Harrassment Act 1997

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

Protection of Children Act 1978

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

Sexual Offences Act 2003

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

Public Order Act 1986

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

Obscene Publications Act 1959 and 1964

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

Human Rights Act 1998

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

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





- · Prohibition of discrimination
- · The right to education

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

The Education and Inspections Act 2006

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

The Education and Inspections Act 2011

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

The Protection of Freedoms Act 2012

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

The School Information Regulations 2012

Requires schools to publish certain information on its website:

https://www.gov.uk/guidance/what-maintained-schools-must-publish-online

Serious Crime Act 2015

Introduced new offence of sexual communication with a child. Also created new offences and orders around gang crime (including CSE)





Links to other organisations or documents

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

UK Safer Internet Centre

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

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

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

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

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

CEOP

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

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

Others

LGfL - Online Safety Resources

Kent - Online Safety Resources page

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

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

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

Tools for Schools

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

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

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

Bullying / Online-bullying / Sexting / Sexual Harrassment

Enable – European Anti Bullying programme and resources (UK coordination / participation through SWGfL & Diana Awards) - http://enable.eun.org/

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

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

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

DfE - Cyberbullying guidance -

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

_Advice_for_Headteachers_and_School_Staff_121114.pdf

Childnet – Cyberbullying guidance and practical PSHE toolkit:

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

<u>Childnet – Project deSHAME – Online Sexual Harrassment</u>

<u>UKSIC – Sexting Resources</u>

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

Ditch the Label - Online Bullying Charity

<u>Diana Award – Anti-Bullying Campaign</u>





Social Networking

Digizen - Social Networking

UKSIC - Safety Features on Social Networks

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

Curriculum

SWGfL Digital Literacy & Citizenship curriculum

UKCCIS - Education for a connected world framework

Teach Today - www.teachtoday.eu/

Insafe - Education Resources

Mobile Devices / BYOD

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

NEN - Guidance Note - BYOD

Data Protection

360data - free questionnaire and data protection self review tool

ICO Guide for Organisations (general information about Data Protection)

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

DfE advice on Cloud software services and the Data Protection Act

ICO Guidance on Bring Your Own Device

ICO Guidance on Cloud Computing

ICO - Guidance we gave to schools - September 2012

IRMS - Records Management Toolkit for Schools

NHS - Caldicott Principles (information that must be released)

ICO Guidance on taking photos in schools

Dotkumo - Best practice guide to using photos

Professional Standards / Staff Training

DfE – Keeping Children Safe in Education

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

Childnet – School Pack for Online Safety Awareness

UK Safer Internet Centre Professionals Online Safety Helpline

Infrastructure / Technical Support

UKSIC – Appropriate Filtering and Monitoring

Somerset - Questions for Technical Support

NEN - Advice and Guidance Notes

Working with parents and carers

SWGfL Digital Literacy & Citizenship curriculum

Online Safety BOOST Presentations - parent's presentation





Vodafone Digital Parents Magazine
Childnet Webpages for Parents & Carers
Get Safe Online - resources for parents
Teach Today - resources for parents workshops / education
The Digital Universe of Your Children - animated videos for parents (Insafe)
Cerebra - Learning Disabilities, Autism and Internet Safety - a Parents' Guide
Insafe - A guide for parents - education and the new media

Research

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

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

Ofcom -Media Literacy Research





Glossary of Terms

AUP / AUA Acceptable Use Policy / Agreement – see templates earlier in this document

CEOP Child Exploitation and Online Protection Centre (part of UK Police, dedicated to protecting

children from sexual abuse, providers of the Think U Know programmes.

CPD Continuous Professional Development

FOSI Family Online Safety Institute

ICO Information Commissioners Office

ICT Information and Communications Technology

ICTMark Quality standard for schools provided by NAACE

INSET In Service Education and Training

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

ISP Internet Service Provider

ISPA Internet Service Providers' Association

IWF Internet Watch Foundation

LA Local Authority

LAN Local Area Network

MIS Management Information System

NEN National Education Network – works with the Regional Broadband Consortia (e.g. SWGfL) to

provide the safe broadband provision to schools across Britain.

Office of Communications (Independent communications sector regulator)

SWGfL South West Grid for Learning Trust - the Regional Broadband Consortium of SW Local

Authorities – is the provider of broadband and other services for schools and other organisations

in the SW

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

VLE Virtual Learning Environment (a software system designed to support teaching and learning in

an educational setting,

WAP Wireless Application Protocol





UKSIC

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