

# St. Paul's C of E Primary School



## Online Safety Policy

Approved by:	Head teacher	Carl Thornton
	Chair of Governors	Claire Emptage
Last reviewed on:	25 <sup>th</sup> January 2021	
Next review due by:	January 2024	

# Monitoring and Review of this Policy

This Online Safety policy has been developed by Graham Longdon (Overall Computing Co-ordinator), DSL Team and E-cadets and their parents with a view to include more persons to contribute to the policy throughout the year or at review.

## Schedule for Monitoring and Review

This Online Safety policy was approved by the Board of Directors / Governing Body / Governors Sub Committee on:	/
The implementation of this Online Safety policy will be monitored by the:	<i>Graham Longdon (Online Safety Coordinator) and the Senior Leadership Team.</i>
Monitoring will take place at regular intervals:	<i>At least annually.</i>
The Governing body will receive a report on the implementation of the Online Safety Policy generated (which will include anonymous details of online safety incidents) at regular intervals:	
The Online Safety Policy will be reviewed every three years, or more regularly in the light of any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	<i>January 2024</i>
Should serious online safety incidents take place, the following external persons / agencies should be informed:	<i>Warwickshire ICTDS for specific advice, Warwickshire Police or MASH dependant on the situation.</i>

The school will monitor the impact of the policy using:

- Logs of reported incidents via cpoms and green forms
- Monitoring logs of internet activity (including sites visited) / filtering provided by Warwickshire County Council
- Internal monitoring data for network activity
- Surveys / questionnaires from the following groups during the year:
  - students / pupils
  - parents / carers
  - staff

## Scope of the Policy

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

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

The school will deal with such incidents within this policy and associated behaviour and 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*. A member of the Governing Body has taken on the role of Online Safety Governor (Colin Dayman). The role of the Online Safety Governor will include:

- regular meetings with the Online Safety Co-ordinator / Officer
- attendance at Online Safety Group meetings
- regular monitoring of online safety incident logs
- regular monitoring of filtering / change control logs
- reporting to relevant Governors / Board / Committee / meeting

### Headteacher and Senior Leaders:

- The Headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety will be delegated to the Online Safety Co-ordinator.
- The Headteacher and Senior Leads are 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 Warwickshire ICTDS disciplinary procedures).
- The Headteacher and Senior Leaders are responsible for ensuring that the Online Safety Coordinator and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.
- The Headteacher 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 Co-ordinator.

### Online Safety Coordinator: Graham Longdon

- leads the Online Safety Group
- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies / 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 / relevant body
- liaises with school technical staff

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

## Technical Coordinator:

The Technical Co-ordinator 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 Warwickshire ICTDS 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.
- 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 and email is regularly monitored in order that any misuse or attempted misuse can be reported to the Headteacher and Online Safety Coordinator for investigation.
- that monitoring software / systems are implemented and updated as agreed in school policies.

## Teaching and Support Staff

Are responsible for ensuring that:

- they have an up to date awareness of 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.
- they report any suspected misuse or problem to the Headteacher or Online Safety Coordinator for investigation.
- all digital communications with pupils and 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 uphold copyright regulations, as well as understand concepts which could cause issues online (i.e. clickbait).
- they monitor the use of digital technologies, mobile devices, cameras etc. in lessons and other school activities (where allowed) and implement current policies with regard to these devices.
- in lessons where internet use is pre-planned, students / pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.

## 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
- cyber-bullying

## Online Safety Group:

The Online Safety Group provides a consultative group that has wide representation from the school community, including teachers, governors and parents, with responsibility for issues regarding online safety and the monitoring the Online Safety Policy including the impact of initiatives. The staffing element of the group will meet once a half term to review Online Safety with a separate meeting with children and parents with the Computing Coordinator at least once a term.

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

- the production, review and monitoring of the school Online Safety Policy
- mapping and reviewing the online safety curricular provision – ensuring relevance, breadth and progression
- monitoring network, internet and incident logs
- consulting stakeholders
- monitoring improvement actions identified through use of the 360 degree safe self-review tool

This will begin 2021/2022 Academic Year.

## 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 uphold copyright regulations, as well as understand concepts which could cause issues online (i.e. clickbait).
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so.
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking / use of images and on cyber-bullying.
- should understand the importance of adopting good 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 and Carers:

Parents and carers play a crucial role in ensuring that their children understand the need to use the internet and mobile devices in an appropriate way. The school will take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, social media and information about national or local online safety campaigns and 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 online parents' sections where appropriate

## Community Users:

Community Users who access school systems as part of the wider *school* provision will be expected to sign a Community User AUA before being provided with access to school systems.

## Policy Statements

### Education – Students:

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 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
- Key online safety messages may be reinforced through the use of assemblies and events , like the Safer Internet Day activities
- Pupils should be taught in all lessons to be critically aware of the materials and content they access on-line and be guided to validate the accuracy of information.
- Students / pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- Pupils should be helped to understand the need for the pupil Acceptable Use 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 or use child-friendly search engines like Kiddle.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (eg racism, drugs, and discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Coordinator or Business Manager can contact Warwickshire ICTDS to permanently or temporarily remove those sites from the filtered list. Any request to do so, should be auditable, with clear reasons for the need. However, Homophobic, Biphobic and Transphobic (HBT) language, both on school computers and those outside of school, will not be tolerated and the same sanctions apply online as they would in the school environment.

## **Education – Parents and 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 on-line behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

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

- Curriculum activities
- Letters, newsletters, the school website or social media pages.
- Parents / Carers evenings
- High profile events or campaigns e.g. Safer Internet Day
- Work completed by the eCadets

This will include references to relevant websites which can support their implementation of online safety at home.

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

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

- A planned programme of formal online safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly.
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school Online Safety 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 Coordinator will receive regular updates through attendance at external training events and by reviewing guidance documents released by relevant organisations.
- This Online Safety Policy and its updates will be presented to and discussed by staff in staff meetings or INSET days.
- The Online Safety Coordinator will provide advice, guidance and training to individuals as required.

## **Training – Governors**

Governors should take part in online safety training and awareness sessions, with particular importance for those who are members of any group involved in technology, online safety and 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.
- Participation in school training or information sessions for staff or parents (this may include attendance at assemblies / lessons).

## Technical – infrastructure / equipment, filtering and monitoring

St. Paul's has a managed ICT service provided by Warwickshire ICTDS, however, it is the responsibility of the school to ensure that Warwickshire ICTDS carries out all the online safety measures that would otherwise be the responsibility of the school.

The school will be responsible for ensuring that the school infrastructure and 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:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements.
- There will be regular reviews and audits of the safety and security of school technical systems.
- Servers, wireless systems and cabling must be securely located and physical access restricted.
- All users will have clearly defined access rights to school technical systems and devices.
- In school, Foundation and KS1 will log on using the specific Class#spp login assigned. From KS2 ( and KS1 and Foundation at Home), all users will be provided with a username and secure password by Graham Longdon or Chris Uttley who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password and will be required to change their password when asked.
- The “master or administrator” passwords for the school ICT system, used by the Technical Coordinator must also be available to the Headteacher and kept in a secure place (e.g. school safe).
- Chris Uttley and Leah Glenn are responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations.
- 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 ensures that children are safe from terrorist and extremist material when accessing the internet.

## Mobile Technologies (including BYOD/BYOT)

Mobile technology devices are school owned and have the capability of utilising the school's wireless network. The device then has access to the wider internet which may include the services such as email and data storage.

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

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

The school allows:

	School Devices			Personal Devices		
	School owned for single user	School owned for multiple users	Authorised device <sup>1</sup>	Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	N/A	No	Yes	<i>This is dependent on the reason the visitor is in.</i>
Full network access	Yes	Yes	N/A	No	This is dependent on the reason.	No
Internet	Yes	Yes	N/A	No	Yes	<i>This is dependent on the reason the visitor is in.</i>
No network access			N/A	Yes		

<sup>1</sup> 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.

## 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 which is given to parents/carers at the start of each academic year to review and update.
- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published or 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 or 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 or video images that pupils are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Pupils must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include pupils will be selected carefully and will comply with good practice guidance on the use of such images.
- Pupils' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Pupil's work can only be published with the permission of the pupil and parents or carers.

## Data Protection

Personal data will be recorded, processed, transferred and made available according to the General Data Protection Regulation 2018. The GDPR sets out seven key principles:

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

The school must ensure that:

- It will hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for.
- Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay.
- All personal data will be fairly obtained in accordance with the "Privacy Notice" and lawfully processed in accordance with the "Conditions for Processing".
- It has a Data Protection Policy
- It is registered as a Data Controller for the purposes of the Data Protection Act (DPA)
- Responsible persons are appointed and identified - Senior Information Risk Officer (SIRO) and Information Asset Owners (IAOs)
- Risk assessments are carried out
- It has clear and understood arrangements for the security, storage and transfer of personal data
- Data subjects have rights of access and there are clear procedures for this to be obtained
- There are clear and understood policies and routines for the deletion and disposal of data
- There is a policy for reporting, logging, managing and recovering from information risk incidents
- There are clear Data Protection clauses in all contracts where personal data may be passed to third parties
- There are clear policies about the use of cloud storage / cloud computing which ensure that such data transfer / storage meets the requirements laid down by the Information Commissioner's Office.

**Staff must ensure that they:**

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

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

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

## Communications

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

	Staff & other adults				Students / Pupils			
	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Staff: Mobile phones may be brought to the school	X							
Pupils: Mobile phones may be brought to the school, left at the school office and collected at the end of the day					X			
Use of mobile phones in lessons				X			X	
Use of mobile phones in social time		X					X	
Taking photos on mobile phones / cameras			X				X	
Use of other mobile devices e.g. tablets, gaming devices		X					X	
Use of personal email addresses in school, or on school network		X						X

Use of school email for personal emails	X		X		
Use of messaging apps		X			X
Use of social media		X			X
Use of blogs	X				X

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

- The official school email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and pupils should therefore use only the school email service to communicate with others when in school, or on school systems (e.g. by remote access).
- Users must immediately report, to the nominated person – in accordance with the school policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and pupils or parents / carers (email, social media, apps, chat, blogs etc) must be professional in tone and content and via approved formats, eg Class Dojo, Google Classroom. Personal email addresses, text messaging or social media must not be used for these communications.
- 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

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

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

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

School staff should ensure that:

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

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, including:*
  - *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

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 senior risk officer and Online Safety Group to ensure compliance with the school policies

## 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. cyber-bullying would be banned and could lead to criminal prosecution. There are however a range of activities which may, generally, be legal but would be inappropriate in 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 Actions	Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:					
Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
Criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
Pornography					X
Promotion of any kind of discrimination					X

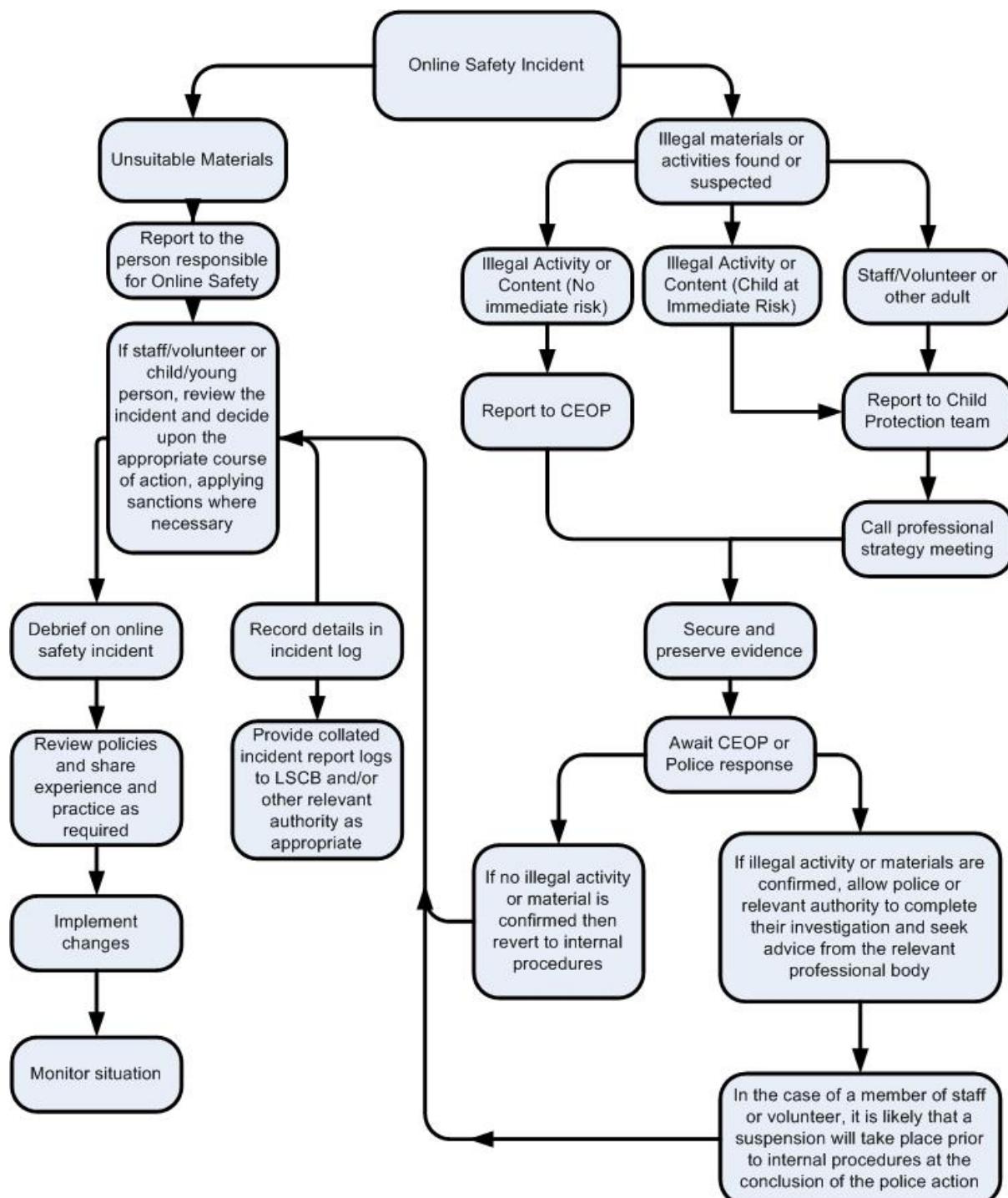
threatening behaviour, including promotion of physical violence or mental harm			X	
Promotion of extremism or terrorism			X	
Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute			X	
Using school systems to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

## Responding to incidents of misuse

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

# Illegal Incidents

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



## 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:
  - Internal response or discipline procedures
  - Involvement by Local Authority
  - Police involvement and/or action
- If content being reviewed includes images of Child abuse then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:
  - incidents of 'grooming' behaviour
  - the sending of obscene materials to a child
  - adult material which potentially breaches the Obscene Publications Act
  - criminally racist material
  - promotion of terrorism or extremism
  - other criminal conduct, activity or materials
  - Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.

It is important that all of the above steps are taken as they will provide an evidence trail for the 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:

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

Corrupting or destroying the data of other users	X	X						
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X	X	X				X	
Continued infringements of the above, following previous warnings or sanctions	X	X	X				X	X
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school	X	X	X				X	X
Using proxy sites or other means to subvert the school's filtering system	X	X	X				X	X
Accidentally accessing offensive or pornographic material and failing to report the incident	X	X	X		X		X	
Deliberately accessing or trying to access offensive or pornographic material	X	X	X		X		X	X
Receipt or transmission of material that infringes the copyright of another person or infringes GDPR.	X	X	X		X		X	X

## Staff Incidents

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