



# Christ The King Federation

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St Francis and St Joseph's Catholic Primary Schools  
Executive Headteacher: Mrs S. Ginzler-Maher

## DRAFT

### Online Safety Policy and Procedures (Including Acceptable User Policies)

#### ST. JOSEPH'S MISSION STATEMENT

*Through our loving God we follow in the footsteps of St. Joseph  
who helps us to be gentle, caring and hardworking.  
As we learn together, we love value and welcome everyone.*

#### ST. FRANCIS MISSION STATEMENT

*Jesus said, "love one another as I have loved you!"  
Our aim is to make St. Francis School a loving community, respecting every child and  
every adult, caring for God's world and helping each other to do our best as we grow  
together in Christ.*

Approved	
Version	
Review Date	

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

This Online Safety policy has been developed by a working group made up of:

- Senior Leaders
- Online Safety coordinator
- Staff - including Teachers, Support Staff, Technical Staff
- Governors
- Pupils
- Parents and Carers
- Community users

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

## **Schedule for Development / Monitoring / Review**

This Online Safety policy was approved by the Governing Body	
The implementation of this Online Safety policy will be monitored by the:	Online Safety Working group
Monitoring will take place at regular intervals:	Annually - Autumn Term
Governing Body will receive a report on the implementation of the Online Safety policy generated by the monitoring group (which will include anonymous details of Online Safety incidents) at regular intervals:	Annually - Autumn Term
The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to Online Safety or incidents that have taken place. The next anticipated review date will be:	Annually - Autumn Term 2022
Should serious Online Safety incidents take place, the following external persons / agencies should be informed:	Essex County Council, DUCL, Police, Computer Talk

The school will monitor the impact of the policy using:

- Logs of reported incidents
- Monitoring logs of internet activity
- Internal monitoring data for network activity
- Surveys and questionnaires of
  - pupils

- parents / carers
- staff

## **Acknowledgments**

This template was provided by the South West Grid for Learning Trust Limited and the UK Safer Internet Centre

## **Scope of the Policy**

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

The Education and Inspections Act 2006 empowers Headteachers to such extent as is reasonable, to regulate the behaviour of 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 the school.

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.

## **Policy Statement**

Safeguarding is a serious matter: within Christ The King Federation we use technology and the internet extensively across all areas of the curriculum. Online safeguarding is an area that is constantly evolving and as such this policy will be reviewed on an annual basis or in response to an online safety incident, whichever is sooner.

The primary purpose of this policy is twofold:

1. To ensure the requirement to empower the whole school communities with the knowledge to stay safe and risk free and that our statutory obligations are met.
2. To ensure risks are identified assessed and mitigated (where possible) in order to reduce any foreseeability of harm to the pupil or liability to the school.

This policy is available for anybody to read on the school's website; upon review all members of staff will sign as read and understand, and agree to follow both the online safety policy and the Staff Acceptable Use policy.

A copy of this policy and the pupil's acceptable use policy will be sent home with pupils at the beginning of each school year with a permission slip in their home school diary. Upon return of the signed permission slip and acceptance of the terms and conditions, pupils will be permitted access to school technology including the internet.

## **Roles and Responsibilities**

The following section outlines the Online Safety roles and responsibilities of individuals and groups within the school/Federation.

### **Governing Body**

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/Sub Committee receiving regular information about Online Safety incidents and monitoring reports. A member of the Governing Body (**David Mills**) has taken on the role of Online Safety Governor.

The role of the Online Safety Governor will include:

- Meet with the Online Safety Lead/Online Safety Group meetings as appropriate
- Reporting to relevant Governors/committee/meeting on online safety issues that arise
- Keep up to date with the emerging risks and threats through technology use<sup>[L]<sub>SEP</sub></sup>
- Receive regular updates from the head teacher in regards to training, identified risks and any incidents
- Regular monitoring of online safety incident logs

### **Head teacher 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.
- The Headteacher is responsible for ensuring that the Online Safety Lead 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.

### **Online Safety Lead:**

The day to day duty of online safety lead is devolved to Anita Howard and Natasha Mowbray

The Online Safety Leads will:

- Leads the Online Safety Group, attends relevant meetings, keeping notes as evidence.
- Takes day to day responsibility for online Safety issues and has a leading role in establishing and reviewing this policy regularly along with other related 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 and provides training and advice.
- Receives reports of Online Safety incidents and creates a log of incidents.
- Reports regularly to Headteacher/Senior Leadership Team to address online safety issues<sup>[L]<sub>SEP</sub></sup>

### **Network Manager / Technical staff (Delegated to Computertalk)**

The Network Manager / Technical Staff are 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/other relevant body Online Safety Policy/Guidance that may apply.
- That users may only access the networks and devices through a properly enforced password protection policy (see appendix 9 for password protocol).

- The filtering policy, as provided by ECC/DUCL, is applied and updated on a regular basis and that filtering levels are age appropriate to the user; **(see appendix 10 - Technical Security Policy)**
- That the use of the network/internet/remote access/digital technologies/email is regularly monitored in order that any misuse/attempted misuse can be reported to the Headteacher or Online Safety Lead for investigation/action/ sanction

## **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) **(See appendix 4)**
- They report any suspected misuse or problem to the Online Safety Coordinator/Headteacher/Senior Leader 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 and acceptable use policies
- They monitor the use of digital technologies, mobile devices, cameras etc, in lessons and other school activities 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
- Any online safety incident is to be reported to the online safety lead, and/or the head teacher and recorded <sup>(SEP)</sup> in an online safety incident log. <sup>(SEP)</sup>
- The reporting flowcharts contained within this online safety policy are to be understood. **(See appendix 6)** <sup>(SEP)</sup>

## **Child Protection/Safeguarding Designated Person/Officer:**

Should be trained in Online Safety issues and ensure online safety incidents are logged. The DSL should 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/Cyber-bullying
- Peer on peer abuse

## **Online Safety Group**

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

Members of the Online Safety Group will assist the Online Safety Lead with (where relevant):

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

- 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.

**(For Online Safety Group Terms of Reference see - Appendix 16)**

## **Pupils:**

- Are responsible for using the school digital technology systems in accordance with the Pupil Acceptable Use Agreement.
- 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.

**A pupil Users Acceptable Use Agreement can be found in the appendices - Appendix 1 (KS2), Appendix 2 (EYFS/KS1)**

## **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. As such, the school will offer the parents the skills and knowledge they need to ensure online safety of children outside the school environment through parent's evenings, school newsletters, regular promotion and links on our website, social media and information about national Safer Internet Day, local online safety campaigns and literature.

Parents must also understand the school needs to have rules in place to ensure that their child can be properly safeguarded. As such, parents will sign the pupil acceptable use policy to show support of the policies and procedures before any access can be granted to school ICT equipment or services. They will also sign a parent's AUP policy at the start of each school year.

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 the school website

**(A parent/carers Users Acceptable Use Agreement can be found in the appendices - appendix 3)**

## **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 can be found in the appendices - appendix 5)**

## **Policy Statements**

## **Education – pupils**

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

**In planning our online safety curriculum, we refer to:**

- **National Curriculum computing programmes of study**
- **DfE Teaching Online Safety in Schools**
- **Education for a Connected World Framework**
- **SWGfL Project Evolve – online safety curriculum programme and resources**
- **Relationships and Health Education in Primary Schools**

**Online Safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum in the following ways:**

- A broad Online Safety Curriculum is provided through Computing/PHSE/RHE.
- Key Online Safety messages will be reinforced as part of a planned programme of assemblies, workshops and class activities, including displays.
- Pupils should be taught (when age appropriate) in all lessons to be critically aware of the materials/content they access on-line.
- Pupils should be supported in building resilience to radicalisation and helping them to understand how they can influence and participate in decision-making.
- Pupils will be helped to understand the Pupil Acceptable Use Agreement and encouraged to adopt safe and responsible use both within and outside school
- In lessons where internet use is pre-planned, pupils will 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. Pupils will not be allowed to freely search the internet.

## **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 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, school website
- High profile events/campaigns eg Safer Internet Day, Anti-bullying events, External Workshops
- Reference to the relevant web sites and publications are available through links on the school website,  
e.g. [www.swgfl.org.uk](http://www.swgfl.org.uk) [www.saferinternet.org.uk/](http://www.saferinternet.org.uk/) <http://www.childnet.com/parents-and-carers>

## **Education – The Wider Community**

The school will provide opportunities for members of the community to gain from the school's Online Safety knowledge and experience. This may be offered through the following:



- 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
- [Sharing their online safety expertise/good practice](#)

## **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. All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).
- 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 schools Online Safety policy and Acceptable Use Agreements.
- This Online Safety policy and its updates will be presented to and discussed by staff in staff meetings/training days.

**(A Staff/Volunteers Users Acceptable Use Agreement can be found in the appendices – Appendix 4)**

## **Training – Governors**

Governors should take part in Online Safety training/awareness sessions. 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/information sessions for staff or parents

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

Christ the King Federation uses a range of devices including Ipads and Chrome books. 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.

**(A more detailed Technical Security Policy can be found in appendix 10)**

In order to safeguard the pupil and in order to prevent loss of personal data we employ the following:

- 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 – devolved to Computertalk
- 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 from Year 2 and above will be provided with a username and secure password by Mrs Chapman who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password. Year 1 and reception will have individual user names with no password. (See appendix 10)

- The "master/administrator" passwords for the school ICT system must also be available to the Headteacher or other nominated senior leader and kept in a locked secure place.
- Mrs Chapman 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 filtering/monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet
- The school has provided differentiated user-level filtering for staff/pupils using the protocols provided by ECC/DUCL.
- 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.
- Email Filtering: We use email filtering software that prevents any infected email to be sent from or received by the school. All staff are reminded that their emails are subject to Freedom of Information Requests, and as such the email service is to be used for professional work based emails only. Emails of a personal nature are not permitted. Similarly use of personal emails for work purposes are not permitted.
- Encryption: All school devices that hold personal data (as defined by the Data Protection Act 1998) are encrypted. No data is to leave school on an un-encrypted device; all devices that are kept on school property and which may contain personal data are to be encrypted. Any loss or theft of device such as laptop or USB drive is to be brought to the attention of the head teacher immediately. The head teacher will liaise with the online safety governor to ascertain whether a report needs to be made to the Information Commissioner's Office. <sup>[1]</sup><sub>SEP</sub>
- Passwords: All staff will be unable to access a device that can access personal or confidential data without a unique username and password.
- An appropriate system is in place for users to report any actual/potential technical incident/security breach to the relevant person, as agreed.
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data - devolved to Computertalk.
- An agreed policy is in place for the provision of temporary access of "guests" (eg trainee teachers, supply teachers, visitors) onto the school systems. **(Appendix 10)**
- 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. **(See Acceptable User Agreements - appendices 1-5)**
- Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured, including USBs, **(see School Personal Data Policy - appendix 11)**. It is recommended that small files are to be emailed securely.

## **Mobile Technologies – (including Bring Your Own Device (BYOD))**

Mobile technology devices may be school owned or personally owned and might include: smartphone, tablet, notebook/laptop or other technology that usually has the capability of accessing the school's wireless network. All users should understand that the primary purpose of the use mobile/personal devices in a school context is educational. The mobile technologies policy should be consistent with and inter-related to other relevant school policies including but not limited to the safeguarding policy, behaviour policy, anti-bullying policy, acceptable use policy, and policies around theft or malicious damage.

- The school acceptable use agreements for staff, pupils, parents and carers will give consideration to the use of mobile technologies. **(See appendix 14)**

- 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	Yes	No	Yes	Yes
Full network access	Yes	Yes	Yes			
Internet only					Yes	Yes
No network access						

## **Staff using work devices outside school**

All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- Ensuring the device is in school and connected to the school network for regular updates weekly, and at least monthly, so operating systems are kept up to.
- Keeping the device password-protected – strong passwords are at least 12 characters, with a combination of upper and lower-case letters, numbers and special characters.
- Ensuring their hard drive is encrypted – this means if the device is lost or stolen, no one can access the files stored on the hard drive by attaching it to a new device
- Making sure the device locks if left inactive for a period of time
- Not sharing the device among family or friends
- Staff members must not use the device in any way, which would violate the school's terms of acceptable use, as set out in **appendix 4**.
- Work devices must be used solely for work activities.
- If staff have any concerns over the security of their device, they must seek advice from Elizabeth Chapman - ICT manager

### **Personal devices:**

Staff use of personal mobile devices are to follow the rules in the acceptable use agreements and should be aware that the school has a set of clear expectations and responsibilities for all users:

- Restrictions will be in place on where, when and how they may be used in school
- Technical support is not available
- Filtering of the internet connection to these devices will apply
- The school adheres to the Data Protection Act principles
- The right to take, examine and search users devices in the case of misuse (England only) – also to be included in the Behaviour Policy.
- The taking and storing of images is not allowed.
- All users will use their username and password and keep this safe
- Regular audits and monitoring of usage will take place to ensure compliance
- Any device loss, theft, change of ownership of the device will be reported as in the BYOD policy
- Any user leaving the school will follow the process outlined within the BYOD policy

## **Use of digital and video images (in conjunction with the Camera and Image Policy)**

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 online bullying to take place. 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 eg on social networking sites.
  - Written permission from parents or carers will be obtained before photographs of pupils are published on the school website/newsletter or flyer.
  - 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/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. These images should only be taken on school equipment, the personal equipment of staff should not be used for such purposes. School Ipads are available for taking digital images.
  - Care should be taken when taking digital/video images that pupils are appropriately dressed
  - Photographs published on the school 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 newsletter, particularly in association with photographs.
  - Pupil's work can only be published with the permission of the pupil and parents or carers.
- (See Parents/Carers Acceptable Use Agreement - appendix 3)**

## **Data Protection (in conjunction with the School Personal Data Handling Policy)**

Personal data will be recorded, processed, transferred and made available according to the current data protection legislation, which states that personal data must be:

- Fairly and lawfully processed <sup>[L]</sup><sub>[SEP]</sub>
- Processed for limited purposes <sup>[L]</sup><sub>[SEP]</sub>
- Adequate, relevant and not excessive <sup>[L]</sup><sub>[SEP]</sub>
- Accurate <sup>[L]</sup><sub>[SEP]</sub>
- Kept no longer than is necessary <sup>[L]</sup><sub>[SEP]</sub>
- Processed in accordance with the data subject's rights <sup>[L]</sup><sub>[SEP]</sub>
- Secure <sup>[L]</sup><sub>[SEP]</sub>
- Only transferred to others with adequate protection and encryption

**The Schools Federation must ensure that:**

- It has a Data Protection Policy.
- It implements the data protection principles and is able to demonstrate that it does so through use of policies, notices and records.
- It has paid the appropriate fee Information Commissioner's Office (ICO) and included details of the Data Protection Officer (DPO).
- It has appointed an appropriate Data Protection Officer (DPO) who has a high level of understanding of data protection law and is free from any conflict of interest.
- It has an 'information asset register' in place and knows exactly what personal data it holds, where this data is held, why and which member of staff has responsibility for managing it
- The information asset register records the lawful basis for processing personal data (including, where relevant, how consent was obtained and refreshed). Where special category data is processed, an additional lawful basis will have also been recorded
- It will hold only 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. The school should develop and implement a 'retention policy' to ensure there are clear and understood policies and routines for the deletion and disposal of data to support this. personal data held must be accurate and up to date where this is necessary for the purpose it is processed for. Have systems in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- It provides staff, pupils, parents and volunteers with information about how the Federation looks after their data and what their rights are in a clear Privacy Notice (see Privacy Notice section in appendix 12)
- Procedures must be in place to deal with the individual rights of the data subject, e.g. one of the 8 data subject rights applicable is that of Subject Access which enables an individual to see to have a copy of the personal data held about them (subject to certain exceptions which may apply).
- Data Protection Impact Assessments (DPIA) are carried out where necessary. For example, to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier (this may also require ensuring that data processing clauses are included in the supply contract or as an addendum)
- It has undertaken appropriate due diligence and has required data processing clauses in contracts in place with any data processors where personal data is processed.
- It understands how to share data lawfully and safely with other relevant data controllers.
- It reports any relevant breaches to the Information Commissioner within 72hrs of becoming aware of the breach in accordance with UK data protection law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents.
- If a maintained school, it must have a Freedom of Information Policy which sets out how it will deal with FOI requests.
- All staff receive data protection training at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff.

**When personal data is stored on any mobile device or removable media the:**

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

**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
- Can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- Can help data subjects understand their rights and know how to handle a request whether verbal or written. Know who to pass it to in the school
- Where personal data is stored or transferred on mobile or other devices (including USBs) these must be encrypted and password protected.
- Will not transfer any Federation personal data to personal devices except as in line with school policy
- Access personal data sources and records 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

## **Communications**

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

	Staff and Other Adults				Pupils			
	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
<b>Communication Technologies</b>								
Mobile phones may be brought to school	X						X	
Use of mobile phones in lessons				X				X
Use of mobile phones in social time		X						X

Taking photos on personal 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 can be monitored.
- 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 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.
- 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 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, engage in online bullying, 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 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 schools Federation or local authority
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.

**(See Staff Acceptable User Agreement – appendix 4)**

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
- The school's use of social media for professional purposes will be checked regularly by the senior risk officer and online safety committee to ensure compliance with the Social Media, Data Protection, Communications, Digital Image and Video Policies <sup>[L]</sup><sub>[SEP]</sub>

○

**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
- Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken

**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

**(See Social Media Policy Guidance – appendix 15)**

## **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. 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 school or outside school when using school equipment or systems. The school policy restricts usage as follows:

## User Actions

		Acceptable	Acceptable at certain	Acceptable for nominated	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images -The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	criminally racist material in UK - to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	pornography				X	
	promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	Promotion of extremism or terrorism				X	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Activities that might be classed as cyber-crime under the Computer Misuse Act:						X
<ul style="list-style-type: none"> <li>Gaining unauthorised access to school networks, data and files, through the use of computers/devices</li> </ul>						
Creating or propagating computer viruses or other harmful files						
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)					X	
<ul style="list-style-type: none"> <li>Disable/Impair/Disrupt network functionality through the use of computers/devices</li> </ul>						
<ul style="list-style-type: none"> <li>Using penetration testing equipment (without relevant permission)</li> </ul>						

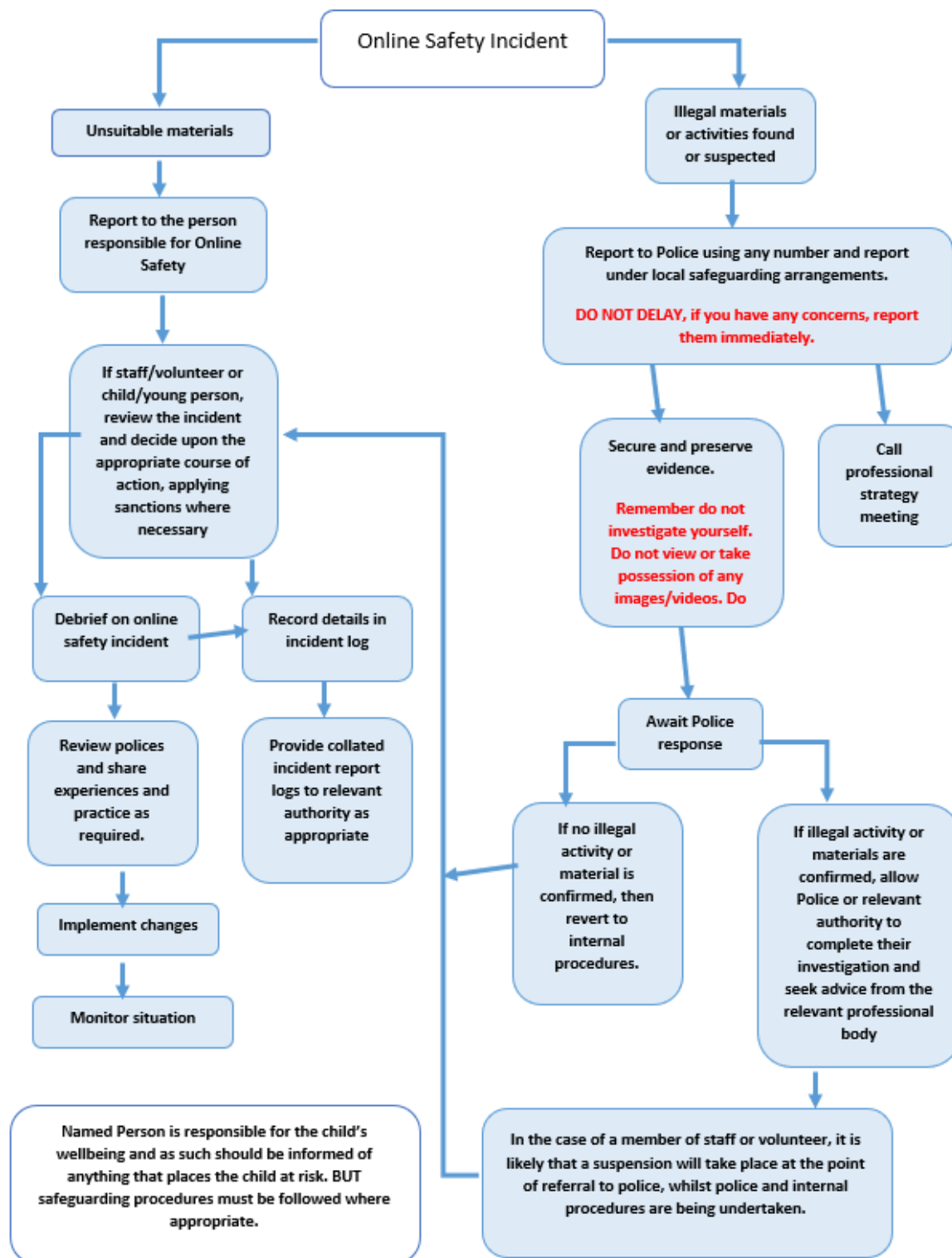
▪ Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school / academy				X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)				X	
Using school systems to run a private business				X	
Infringing copyright				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 eg 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/volunteer involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the url of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below)
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does then appropriate action will be required and could include the following:
  - Internal response or discipline procedures
  - Involvement by Local Authority/Federation or national/local organisation (as relevant).
  - Police involvement and/or action
- **If content being reviewed includes images of child abuse then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:**
  - incidents of 'grooming' behaviour
  - the sending of obscene materials to a child
  - adult material which potentially breaches the Obscene Publications Act
  - criminally racist material
  - promotion of terrorism or extremism
  - offences under the Computer Misuse Act (see User Actions chart above)
  - other criminal conduct, activity or materials
- **Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.**

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

## **School/Federation actions & sanctions**

It is more likely that the Federation 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:

Incidents:	Refer to class teacher	Refer to Senior Leader/Online Safety Cor.	Refer to Head Teacher	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 e.g. exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).	X	X	X	X	X	X	X	X	X
Unauthorised use of non-educational sites during lessons	X	X				X		X	
Unauthorised use of mobile phone / digital camera / other mobile device	X	X	X			X	X	X	
Unauthorised use of social media / messaging apps / personal email	X	X	X		X	X	X	X	
Unauthorised downloading or uploading of files	X	X	X		X	X	X	X	
Allowing others to access school network by sharing username and passwords	X	X	X		X	X		X	
Attempting to access or accessing the school network, using another pupil's account	X	X	X		X	X		X	
Attempting to access or accessing the school network, using the account of a member of staff	X	X	X		X	X		X	
Corrupting or destroying the data of other users	X	X	X		X	X		X	
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X	X	X		X	X		X	
Continued infringements of the above, following previous warnings or sanctions	X	X	X		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	X
Using proxy sites or other means to subvert the school's filtering system	X	X				X	X	X	X
Accidentally accessing offensive or pornographic material and failing to report the incident	X	X	X		X	X	X	X	
Deliberately accessing or trying to access offensive or pornographic material	X	X	X	X	X	X	X	X	X
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act	X	X	X		X	X	X	X	

## Actions / Sanctions

### Staff

Incidents:	Refer to Line Manager	Refer to Head Teacher	Refer to Local Authority / HR	Refer to Police	Refer to Technical Support Staff for action re filtering	Warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		X	X	X				
Inappropriate personal use of the internet / social media / personal email	X	X				X		
Unauthorised downloading or uploading of files	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	X					X		
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	X	X	
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	X	X				X	X	
Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with pupils	X	X				X	X	X
Actions which could compromise the staff member's professional standing	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
Using proxy sites or other means to subvert the school's filtering system	X	X			X	X	X	X
Accidentally accessing offensive or pornographic material and failing to report the incident	X	X			X	X		
Deliberately accessing or trying to access offensive or pornographic material	X	X		X	X	X	X	X

Breaching copyright or licensing regulations	X	X			X	X		
Continued infringements of the above, following previous warnings or sanctions		X					X	X

## **Appendices:**

Can be found on the following pages:

1	Pupil Acceptable Use Agreement (KS2)	26
2	Pupil Acceptable Use Agreement (EYFS/KS1)	29
3	Parents/Carers Acceptable Use Agreement	30
4	Staff and Volunteers Acceptable Use Agreement Policy	37
5	Community Users Acceptable Use Agreement	40
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7	Record of reviewing devices/internet sites (for internet misuse)	43
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9	School Training Needs Audit Log	45
10	School Technical Security Policy (including filtering and passwords)	46
11	School Personal Data Advice and Guidance	52
12	Privacy Notice	57
13	Federation Policy - Electronic Devices - Searching & Deletion	59
14	Mobile Technologies Policy (inc. BYOD/BYOT)	64
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# Pupil Acceptable Use Agreement – Key Stage 2 pupils

## Federation 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. Pupils should have an entitlement to safe internet access at all times.

**This Acceptable Use Agreement is intended to ensure:**

- that KS2 pupils 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 users at risk.

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.

## Acceptable Use Agreement

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

**For my own personal safety:**

- The school will monitor what I do on the schools systems, devices and digital communications.
- I will only use my own login and password, which I will keep secret. I will not share it, nor will I try to use any other person's username and password.
- I will ask permission of the class teacher before going on any website, unless my teacher has already approved it.
- I will be aware of "stranger danger", when I am communicating on-line.
- I will not give personal information about myself or others when on-line including: name, address, phone number, age, school details or give any other personal information that could be used to identify me, my family or my friends, unless a trusted adult has given permission.
- I will never arrange to meet someone I have only ever previously met on the Internet, unless my parent/carer has given me permission and I take a responsible adult with me
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me uncomfortable when I see it on-line.

**I will act as I expect others to act towards me:**

- I will not take or distribute images or videos of anyone without their permission.
- I will only edit or delete my own files and not look at or change other people's files without their permission.



- Any messages I send, or information I upload, will always be nice, polite and sensible. I will not use technology to upset, bully or treat someone as I would not want to be treated myself.

**Responsible Internet use:**

- I will not try to alter computer settings.
- I will immediately report any damage or faults involving equipment or software.
- I will not download and use information or copy and paste content which is copyright. My teacher will give me guidelines on how and when I should use information from the internet.

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

I understand that if I fail to comply with this Acceptable Use Policy Agreement, I will be subject to the following sanctions:

- A ban, temporary or permanent, on the use of the Internet at school.
- A letter informing parents of the nature and breach of rules.

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 Key Stage 2

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 ICT 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 equipment out of school in a way that is related to me being a member of this school eg communicating with other members of the school, accessing Google Classroom etc.

Name of Pupil

Class

Signed

Date

## Parent / Carer Countersignature

I know that my son / daughter has signed an Acceptable Use Agreement and has 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.

Name of Pupil

Name of Parent

Signed

Date

## Appendix 2

### Pupil Acceptable Use Agreement - for (EYFS/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 or 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 computers/tablets 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 or tablet.

Name of Child: .....

Signed (child):.....

Name of Parent: .....

.Signed (parent): .....

## Appendix 3 – Parent / Carer Acceptable Use Agreement

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. Children should have an entitlement to safe internet access at all times.

### **This Acceptable Use Policy is intended to ensure:**

- that pupils 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 their child/children 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 children 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.

### **Permission Form**

Parent / Carers Name: \_\_\_\_\_

Pupils Name: \_\_\_\_\_

As the parent / carer of the above pupils, I give permission for my son / daughter to have access to the internet and to ICT systems at school.

#### **(Key Stage 2)**

I know that my son / daughter has signed an Acceptable Use Agreement and has 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.

#### **(EYFS/Key Stage 1)**

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 ICT 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 ICT 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.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

## Use of Digital / Video Images

The use of digital / video images plays an important part in learning activities. Pupils and members of staff may use digital cameras to record evidence of activities in lessons and out of school. These images may then be used in presentations in subsequent lessons.

Images may also be used to celebrate success through their publication in newsletters, on the school website and occasionally in the public media, with parent/carer consent.

The school will comply with the Data Protection Act and request parents / carers permission before taking images of members of the school. We will also ensure that when images are published that the pupils can not be identified by the use of their names.

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 / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other pupils in the digital / video images.

Parents / carers are requested to sign the permission form below to allow the school to take and use images of their children and for the parents / carers to agree

## Digital / Video Images Permission Form

Parent / Carers Name

Pupil Name

As the parent / carer of the above pupil, I agree to the school taking and using digital / video images of my child / children. I understand that the images will only be used to support learning activities or in publicity that reasonably celebrates success and promotes the work of the school.

Yes / No

I agree that if I take digital or video images at, or of school events which include images of children, other than my own, I will abide by these guidelines in my use of these images.

Yes / No

Signed

Date

# Use of Cloud Systems Permission Form

Christ the King Federation purchases and uses Google Apps for Education for pupils and staff, the school will be required to seek parental permission to set up an account for pupils. This permission form describes the tools and pupil responsibilities for using these services.

The following services are available to each pupil and hosted by Google as part of the school's online presence in Google Apps for Education:

**Mail** - an individual email account for school use managed by the school

**Docs** - a word processing, spreadsheet, drawing, and presentation toolset that is very similar to Microsoft Office

**Sites** - an individual and collaborative website creation tool

Using these tools, pupils collaboratively create, edit and share files and websites for school related projects and communicate via email with other pupils and members of staff. These services are entirely online and available 24/7 from any Internet-connected computer. Examples of student use include showcasing class projects, building an electronic portfolio of school learning experiences, and working in small groups on presentations to share with others.

The school believes that use of the tools significantly adds to your child's educational experience.

As part of the Google terms and conditions we are required to seek your permission for your child to have a Google Apps for Education account:

Parent / Carers Name

Pupil Name

As the parent / carer of the above pupil, I agree to my child using the school Google Apps for Education.

Yes / No

Signed

Date

# Pupil Acceptable Use Agreement

On the following pages we have copied, for the information of parents and carers, the Pupil Acceptable Use Agreement.

It is suggested that a copy should be attached to the Parents/Carers AUP Agreement to provide information for parents and carers about the rules and behaviours that pupils have committed to by signing the form.

## Appendix 1 Pupil Acceptable Use Agreement - Key Stage 2

### Federation 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. Pupils should have an entitlement to safe internet access at all times.

**This Acceptable Use Agreement is intended to ensure:**

- that KS2 pupils 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 users at risk.

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.

### Acceptable Use Agreement

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

**For my own personal safety:**

- The school will monitor what I do on the schools systems, devices and digital communications.
- I will only use my own login and password, which I will keep secret. I will not share it, nor will I try to use any other person's username and password.
- I will ask permission of the class teacher before going on any website, unless my teacher has already approved it.
- I will be aware of "stranger danger", when I am communicating on-line.
- I will not give personal information about myself or others when on-line including: name, address, phone number, age, school details or give any other personal information that could be used to identify me, my family or my friends, unless a trusted adult has given permission.
- I will never arrange to meet someone I have only ever previously met on the Internet, unless my parent/carer has given me permission and I take a responsible adult with me
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me uncomfortable when I see it on-line.

**I will act as I expect others to act towards me:**

- I will not take or distribute images or videos of anyone without their permission.
- I will only edit or delete my own files and not look at or change other people's files without their permission.

- Any messages I send, or information I upload, will always be nice, polite and sensible. I will not use technology to upset, bully or treat someone as I would not want to be treated myself.

**Responsible Internet use:**

- I will not try to alter computer settings.
- I will immediately report any damage or faults involving equipment or software.
- I will not download and use information or copy and paste content which is copyright. My teacher will give me guidelines on how and when I should use information from the internet.

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

I understand that if I fail to comply with this Acceptable Use Policy Agreement, I will be subject to the following sanctions:

- A ban, temporary or permanent, on the use of the Internet at school.
- A letter informing parents of the nature and breach of rules.

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 Key Stage 2

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 ICT 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 equipment out of school in a way that is related to me being a member of this school eg communicating with other members of the school, accessing Google Classroom etc.

Name of Pupil

Class

Signed

Date

## Parent / Carer Countersignature

I know that my son / daughter has signed an Acceptable Use Agreement and has 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.

Name of Pupil

Name of Parent

Signed

Date

## Appendix 2 -Pupil Acceptable Use Agreement - (EYFS / 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 or 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 computers/tablets 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 or tablet.

Name of Child: .....

Signed (child):.....

Name of Parent: .....

Signed (parent): .....



## **Appendix 4 - Staff (and Volunteer) Acceptable Use Policy Agreement**

### **School Policy**

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

#### **This Acceptable Use Policy is intended to ensure:**

- that staff and volunteers will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school ICT systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that staff are protected from potential risk in their use of 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 other digital communications.
- I understand that the rules set out in this agreement also apply to use of these technologies (eg laptops, email, Google Classroom 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 school 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.
- I will only use social networking sites 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 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, which means not storing data locally but on the server.
- 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 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.
- 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/ LA Personal Data Policy (or other relevant policy). Where digital personal data is transferred outside the secure local network, including USB memory sticks, 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 ICT systems and equipment off the premises and my use of personal equipment on the premises or in situations related to my employment by the school.
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I could be subject to disciplinary action. This could include a warning, a suspension, referral to Governors 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 -

## Appendix 5

**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 harm in their use of these systems and devices

### **Acceptable Use Agreement**

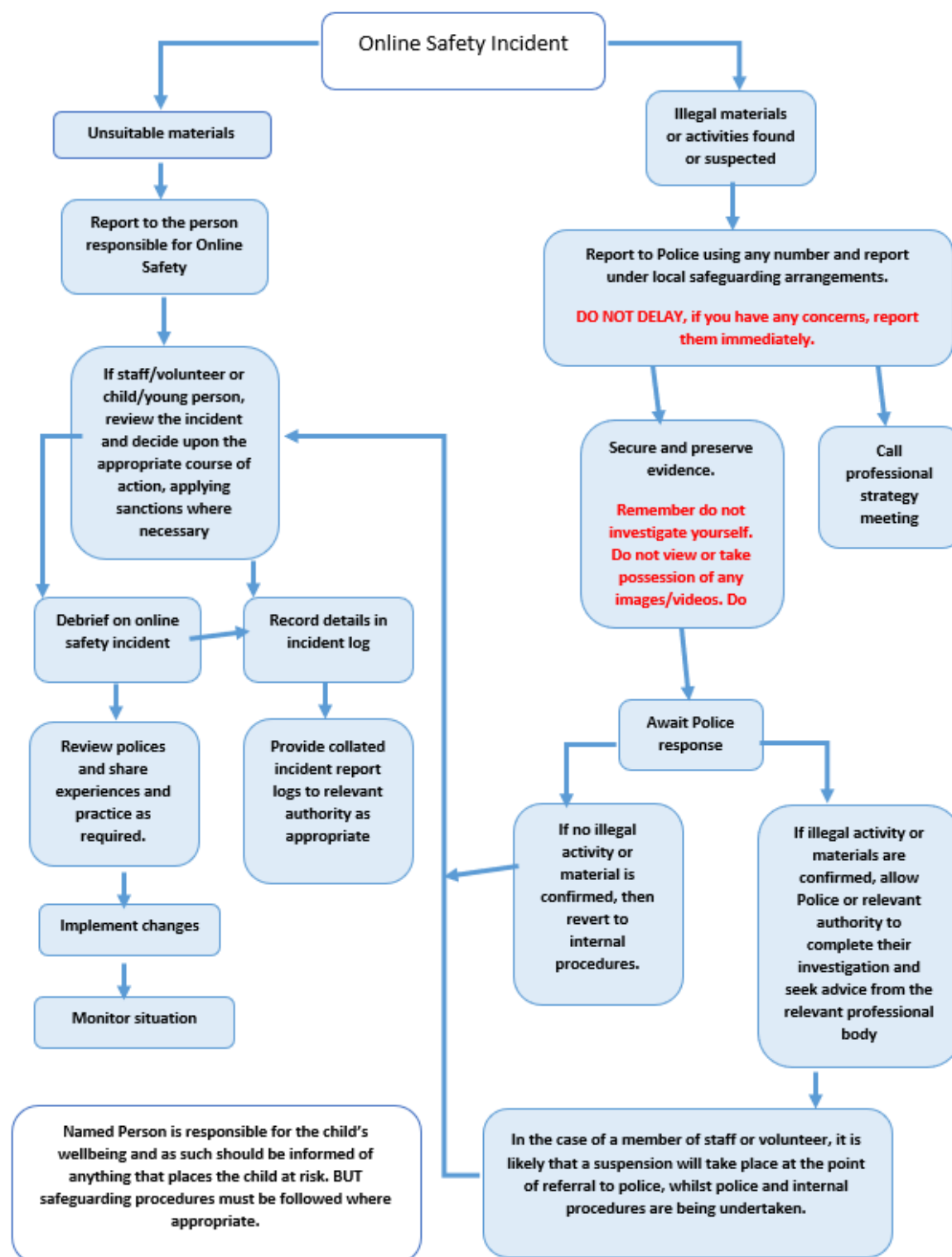
I understand that I must use school systems and devices in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems, devices and other users. This agreement will also apply to any personal devices that I bring into the school.

- 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, terrorist and extremist 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 immediately report any damage or faults involving equipment or software, however this may have happened.
- 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 ICT systems (both in and out of school) and my own devices (in school and when carrying out communications related to the school) within these guidelines.

Name: \_\_\_\_\_ Signed: \_\_\_\_\_ Date: \_\_\_\_\_

## Appendix 6 - Responding to incidents of misuse - flow chart



## Appendix 7

### 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 person

Name	
Position	
Signature	

#### Name and location of computer used for review (for web sites)

--

#### Web site(s) address / device

#### Reason for concern


#### Conclusion and Action proposed or taken


## **Appendix 8**

### **Online Safety - Incident Reporting Log**

Details of ALL Online Safety incidents are to be recorded by the Online Safety Coordinator. This incident log, will be monitored termly by the Head Teacher, Member of SLT or Chair of Governors. Any incidents involving Cyber-bullying may also need to be recorded elsewhere.

Date/time	Incident	Actions taken and reasons		Name and signature of staff member reporting/recording the incident.
		What?	By whom?	

## Appendix 9 - Training Needs Audit

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



# Appendix 10

## 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 the 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.

### Responsibilities

The management of technical security will be the responsibility of Computertalk (Technical Staff) and Mrs Chapman (IT Manager).

### 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 will 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 - [devolved to Computertalk](#).
- There will be regular reviews and audits of the safety and security of school technical systems by Computertalk.
- Servers, wireless systems and cabling must be securely located and physical access restricted - server room is to remain locked and key to be stored in the key safe.
- 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. Devolved to Computertalk and the Local Authority.

- 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.
- 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.
- The IT Manager 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.
- Remote management tools are used by staff to control workstations and view users activity
- An appropriate system is in place for users to report any actual / potential technical incident to the Online Safety Coordinator / IT Manager.. Forms are kept in the Office.
- An agreed policy is in place for the provision of temporary access of "guests" (eg trainee teachers, supply teachers, visitors) onto the school system.
- An agreed policy is in place (see AUA's) regarding the downloading of executable files and the installation of programmes on school devices by users
- An agreed policy is in place (see AUA's) regarding the extent of personal use that staff are allowed on school devices that may be used out of school.
- An agreed policy is in place (see AUA's) regarding the use of removable media (eg memory sticks / CDs / DVDs) by users on school devices.
- 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 must not be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

## 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 and email.

### Policy Statements:

**These statements apply to all users.**

- All school networks and systems will be protected by secure passwords
- All users 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 IT Manager and will be reviewed, at least annually, by the online safety group (or other group).
- All users (adults and pupils) 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 must not be shared with anyone.
- All users will be provided with a username and password by Mrs Chapman, who will keep an up to date record of users and their usernames.
- The 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. The school should never allow one user to have sole administrator access
- Users will change their passwords at regular intervals - as described in the staff and pupil sections below
- The level of password security required may vary for staff and pupil accounts and the sensitive nature of any data accessed through that account.
- Requests for password changes should be authenticated by the IT Manager, Mrs Chapman to ensure that the new password can only be passed to the genuine user.

### **Staff password requirements :**

- Passwords should be long. Good practice highlights that passwords over 12 characters in length are considerably more difficult to compromise than shorter passwords. Passwords generated by using a combination of unconnected words that are over 16 characters long are extremely difficult to crack. Password length trumps any other special requirements such as uppercase/lowercase letters, number and special characters. Passwords should be easy to remember, but difficult to guess or crack.
- 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
- Passwords must not include names or any other personal information about the user that might be known by others
- Passwords must be changed on first login to the system
- Passwords should not be set to expire as long as they comply with the above, but should be unique to each service the user logs into.

### **Pupil passwords**

- Records of learner usernames and passwords for foundation phase pupils can be kept in an electronic or paper-based form, but they must be securely kept when not required by the user.
- Password complexity in foundation phase should be reduced (for example 6-character maximum) and should not include special characters. Where external systems have different password requirements the use of random words or sentences should be encouraged.
- Password requirements for pupils at Key Stage 2 and above should increase as pupils progress through school.
- Users will be required to change their password if it is compromised.
- Pupils will be taught the importance of password security, this should include how passwords are compromised, and why these password rules are important..

## Notes for technical staff/teams

- Each administrator should have an individual administrator account, as well as their own user account with access levels set at an appropriate level. Consideration should also be given to using two factor authentication for such accounts.
- An administrator account password for the school systems should also be kept in a secure place e.g. school safe. This account and password should only be used to recover or revoke access. Other administrator accounts should not have the ability to delete this account.
- Any digitally stored administrator passwords should be hashed using a suitable algorithm for storing passwords (e.g. Bcrypt or Scrypt). Message Digest algorithms such as MD5, SHA1, SHA256 etc. should not be used.
- It is good practice that where passwords are used there is a user-controlled password reset process to enable independent, but secure re-entry to the system. This ensures that only the owner has knowledge of the password.
- Where user-controlled reset is not possible, passwords for new users, and replacement passwords for existing users will be allocated by Mrs Chapman (IT Manager).
- Good practice is that the password generated by this change process should be system generated and only known to the user. This password should be temporary and the user should be forced to change their password on first login. The generated passwords should also be long and random.
- Where automatically generated passwords are not possible, then a good password generator should be used by the IT Manager to provide the user with their initial password. There should be a process for the secure transmission of this password to limit knowledge to the password creator and the user. The password should be temporary and the user should be forced to change their password on the first login.
- Requests for password changes should be authenticated by Mrs Chapman to ensure that the new password can only be passed to the genuine user
- Suitable arrangements should be in place to provide visitors with appropriate access to systems which expires after use. (For example, your technical team may provide pre-created user/password combinations that can be allocated to visitors, recorded in a log, and deleted from the system after use.)
- In good practice, the account is "locked out" following six successive incorrect log-on attempts.
- Passwords shall not be displayed on screen, and shall be securely hashed when stored (use of one-way encryption).

## Training / Awareness

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
- through the Acceptable Use Agreement

## Audit / Monitoring / Reporting / Review

The responsible person, IT Technician/Online Safety Coordinator, will ensure that full records are kept of:

- User Ids and requests for password changes
- User log-ons
- 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 within this Federation.

- Differentiated filtering for different groups - 8080, 8081, 8082, 8084 - see ECC/DUCL list of filtered ports.

### Responsibilities

The responsibility for the management of the school's filtering policy will be held by [Essex County Council](#). 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.

All users have a responsibility to report immediately to the IT Manager or Online Safety Coordinator 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 ECC. Illegal content is filtered by 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.

- The school maintains and supports the managed filtering service provided by the Internet Service Provider
- The school has provided enhanced/differentiated user-level filtering through the use of ECC filtering programme.
- 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 or other nominated senior leader.
- 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 IT Technician/Online Safety Coordinator and escalated to the filtering provider.
- Requests from staff for sites to be removed from the filtered list will be considered by the IT Technician/Online Safety Coordinator. 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. 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**

No changes should be made to the filtering system without proper and valid requests being made to the IT Manager/Online Safety Coordinator and the IT Technical support (Computertalk).

- Any changes made are to be recorded in the appropriate log.

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 the IT Manager/Online Safety coordinator who will decide whether to make school level changes.

## **Monitoring**

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.

## **Audit / Reporting**

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

- HeadTeacher
- IT Manager
- 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.

# School Personal Data Handling Policy

## School Personal Data Handling Policy

With effect from 25th May 2018, the data protection arrangements for the UK changed following the implementation of the European Union General Data Protection Regulation (GDPR). This represented a significant shift in legislation and in conjunction with the Data Protection Act 2018 replaced the Data Protection Act 1998.

This document will place particular emphasis on data which is held or transferred digitally. The schools Data Protection Policy will have further detail.

## Introduction

Schools and their employees should do everything within their power to ensure the safety and security of any material of a personal or sensitive nature

It is the responsibility of all members of the 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, and/or
- 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 Commissioners Office - for the school and the individuals involved. 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 this policy, which brings together the legal requirements contained in relevant data protection legislation and relevant regulations and guidance (where relevant from the Local Authority).

## Policy Statements

The school 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".

## Personal Data

The school and individuals 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 community – including pupils, members of staff and parents / carers eg names, addresses, contact details, legal guardianship contact details, health records, disciplinary records
- Curricular / academic data eg class lists, pupil progress records, reports, references
- Professional records eg 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.

## Responsibilities

The school's Senior Information Risk Officer (SIRO) is **the Head Teacher**. This person will keep up to date with current legislation and guidance and will:

- determine and take responsibility for the school's information risk policy and risk assessment
- appoint the Information Asset Owners (IAOs) e.g. office staff

The IAOs 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 protected data and why.

Everyone in the school 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.

## Registration

The school is registered as a Data Controller on the Data Protection Register held by the Information Commissioner.

## Information to Parents / Carers – the “Privacy Notice”

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

## Secure Storage of and access to data

The school will ensure that ICT 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.

All users will use strong passwords as outlined in the school's password security policy. User passwords must never be shared.



Personal data may only be accessed on machines that are securely password protected. Any device that can be used to access 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 can only be stored on school equipment (this includes computers and portable storage media. Private equipment (ie owned by the users) must not be used for the storage of 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 - including memory sticks, if used
- 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.

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

The school has clear policy and procedures for the use of "Cloud Based Storage Systems" (for example Dropbox, Google Drive, Microsoft 365) 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.

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

All paper based Protected and Restricted (or higher) material must be held in lockable storage, whether on or off site.

The school recognises that under Section 7 of the DPA, <http://www.legislation.gov.uk/ukpga/1998/29/section/7> data subjects have a number of rights in connection with their personal data, the main one being the right of access. Procedures are 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. Under certain circumstances the data subject can also exercise rights in connection with the rectification; blocking; erasure and destruction of data.

## **Secure transfer of data and access out of school**

The school recognises that personal data may be accessed by users out of school, 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 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 (eg 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. (nb. to carry encrypted material is illegal in some countries)

## Disposal of data

The school will comply with the requirements for 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 for data.

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

It is good practice, as recommended in the "Data Handling Procedures in Government" document that the activities of data users, in respect of electronically held personal data, will be logged and these logs will be monitored by responsible individuals.

The audit logs will be kept to provide evidence of accidental or deliberate data security breaches - including loss of protected data or breaches of an acceptable use policy, for example.

The school has a policy for reporting, managing and recovering from information risk incidents, which establishes:

- a "responsible person" for each incident;
- a communications plan, including escalation procedures;
- and results in a plan of action for rapid resolution; and
- a plan of action of non-recurrence and further awareness raising.

All significant data protection incidents must be reported through the SIRO to the Information Commissioner's Office based upon the local incident handling policy and communication plan.

## Training & awareness

All staff will receive annual data handling awareness / data protection training and will be made aware of their responsibilities, as described in this policy through:

- Induction training for new staff
- Staff meetings / briefings / Inset

- Day to day support and guidance from Information Asset Owners

## Use of technologies and Protective Marking

The following provides a useful guide:

	The information	The technology	Notes on Protect Markings (Impact Level)
<b>School life and events</b>	School terms, holidays, training days, the curriculum, extra-curricular activities, events, displays of pupils work, lunchtime menus, extended services, parent consultation events	Common practice is to use publically accessible technology such as school websites or portal, emailed newsletters, subscription text services	Most of this information will fall into the NOT PROTECTIVELY MARKED (Impact Level 0) category.
<b>Learning and achievement</b>	Individual pupil academic, social and behavioural achievements, progress with learning, learning behaviour, how parents can support their child's learning, assessments, attainment, attendance, individual and personalised curriculum and educational needs.	Typically schools will make information available by parents logging on to a system that provides them with appropriately secure access, such as a Learning Platform or portal, or by communication to a personal device or email account belonging to the parent.	Most of this information will fall into the PROTECT (Impact Level 2) category. There may be pupils whose personal data requires a RESTRICTED marking (Impact Level 3) or higher. For example, the home address of a child at risk. In this case, the school may decide not to make this pupil record available in this way.
<b>Messages and alerts</b>	Attendance, behavioural, achievement, sickness, school closure, transport arrangements, and other information that it may be important to inform or contact a parent about as soon as possible. This may be particularly important when it is necessary to contact a parent concerning information that may be considered too sensitive to make available using other online means.	Email and text messaging are commonly used by schools to contact and keep parents informed. Where parents are frequently accessing information online then systems e.g. Learning Platforms or portals, might be used to alert parents to issues via "dashboards" of information, or be used to provide further detail and context.	Most of this information will fall into the PROTECT (Impact Level 1) category. However, since it is not practical to encrypt email or text messages to parents, schools should not send detailed personally identifiable information. General, anonymous alerts about schools closures or transport arrangements would fall into the NOT PROTECTIVELY MARKED (Impact Level 0) category.

## **Appendices: Additional issues / documents related to Personal Data Handling in Schools:**

### **Privacy and Electronic Communications**

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

### **Appendix 12 - Privacy Notice**

#### **PRIVACY NOTICE TEMPLATE**

**for**

*Pupils in Schools, Alternative Provision and Pupil Referral Units*

*and Children in Early Years Settings*

#### **Privacy Notice - Data Protection Act**

We, Christ the King Federation, are a data controller for the purposes of the Data Protection Act. We collect information from you and may receive information about you from your previous school and the Learning Records Service. We hold this personal data and use it to:

- Support your teaching and learning;
- Monitor and report on your progress;
- Provide appropriate pastoral care, and
- Assess how well your school is doing.

This information includes your contact details, national curriculum assessment results, attendance information and personal characteristics such as your ethnic group, any special educational needs and relevant medical information.

*We will not give information about you to anyone outside the school without your consent unless the law and our rules allow us to.*

We are required by law to pass some information about you to the Local Authority and the Department for Education (DfE)

If you want to see a copy of the information about you that we hold and/or share, please contact the **School Administrator**.

If you require more information about how the Local Authority (LA) and/or DfE store and use your information, then please go to the following websites:

[Insert LA website link] and

<http://www.education.gov.uk/researchandstatistics/datatdatam/b00212337/datause>

If you are unable to access these websites we can send you a copy of this information. Please contact the LA or DfE as follows:

[insert details and link to appropriate contact at the LA]

Public Communications Unit, Department for Education  
Sanctuary Buildings, Great Smith Street, London  
SW1P 3BT

Website: [www.education.gov.uk](http://www.education.gov.uk)

email: <http://www.education.gov.uk/help/contactus>

Telephone: 0370 000 2288

# School Policy: Electronic Devices - Searching & Deletion

## 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* will publicise the school behaviour policy, in writing, to staff, parents/carers and pupils at least once a year. Clear links should be evident between the search etc. policy and the behaviour policy.

## 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

## 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: **Online Safety committee**

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:

- Headteacher
- Senior Leadership Team
- Online Safety Coordinator

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

## Training / Awareness

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 not allowed to bring mobile phones or other personal electronic devices to school or use them in the school unless authorised by the Headteacher.

If pupils breach these rules:

*The sanctions for breaking these rules can be found in the pupils user agreement*

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.

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 authorised member of staff should take care that, where possible, searches should not take place in public places eg 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.

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 good reason to do so. 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.

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

## **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.

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.

*A record should be kept of the reasons for the deletion of data / files.*

## **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.

## **Audit / Monitoring / Reporting / Review**

The responsible person (Online Safety Coordinator) 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 using the schools reporting incidents log.

These records will be reviewed by ... (Online Safety Officer / Online Safety Committee / Online Safety Governor) at termly intervals.

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.

## Appendix 14 - Mobile Technologies Policy including BYOD

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 and allocated to a single user	School owned for use by multiple users	Authorised device <sup>2</sup>	Pupil owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	No <sup>3</sup>	Yes	Yes
Full network access	Yes	Yes	Yes			
Internet only					Yes	Yes
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 through 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/academy location or by an authorised user.

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 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:

- 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 the school
- 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.
- The school will ensure that 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 pupils on authorised devices once they leave the school roll.
- 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
- Staff owned devices should not be used for personal purposes during teaching sessions, unless in exceptional circumstances
- Printing from personal devices will not be possible

# School Bring Your Own Devices (BYOD) Acceptable User Agreement

## Bring Your Own Devices Policy Agreement

I understand that I have been allowed to use my own device on the Schools network and will have access to the schools systems as appropriate.

I further understand that I am bound by the schools policies regarding:

- Acceptable use
- Personal Data handling
- Electronic Devices - Search and Deletion
- Technical Security Policy

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

Staff/Volunteer

Name:

Signed:

Date:

## Appendix 15

### Social Media Policy

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 the 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, 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.

#### Organisational control

##### Roles & Responsibilities

- **SLT**
  - Facilitating training and guidance on Social Media use.

- 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
  - 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/academy accounts
  - Adding an appropriate disclaimer to personal accounts when naming the school/academy

### 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. Year group Twitter account, or a "Friends of the school" Facebook page. Anyone wishing to create such an account must present a business case to the 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/academy 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)

### 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 pupil pictures online other than via school owned social media accounts**
- Staff should exercise their professional judgement about whether an image is appropriate to share on school social media accounts. Pupils should be appropriately dressed, not be subject to ridicule and must not be on any school list of children whose 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.
- **Pupil/Students**
  - **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.**
  - 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/academy 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/academy 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/academy 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 ([wellchuffedcomms.com](http://wellchuffedcomms.com)) and Chelmsford College for allowing the use of their policies in the creation of this policy.

# Appendix 16

## School Policy - Online Safety Committee Terms of Reference

### 1. PURPOSE

To provide a consultative group that has wide representation from the school community, with responsibility for issues regarding Online Safety and the monitoring the Online Safety policy including the impact of initiatives.

### 2. MEMBERSHIP

2.1 The Online Safety committee will seek to include representation from all stakeholders.

The composition of the group should include:

- SLT member/s
- Child Protection/Safeguarding officer
- Teaching staff member
- Support staff member
- Online Safety coordinator
- Governor
- Parent / Carer
- ICT Technical Support staff (where possible)
- Community users (where appropriate)
- *Pupil representation - essential to the group*

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 twice a year for a period of 1 - 2 hours. A special or extraordinary meeting may be called when and if deemed necessary.

#### **5. FUNCTIONS**

These are to assist the Online Safety Co-ordinator (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.
- 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 [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 Reference for Christ the King Federation have been agreed.

Signed by (SLT):

Date:

Date for review:

## Appendix 17

### Legislation

Schools/academies 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 online 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.

School/academies may wish to view the National Crime Agency website which includes information about ["Cyber crime - preventing young people from getting involved"](#). Each region in England (& Wales) has a Regional Organised Crime Unit (ROCU) Cyber-Prevent team that works with schools to encourage young people to make positive use of their cyber skills. There is a useful [summary of the Act on the NCA site](#).

#### 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.

#### The Data Protection Act 2018:

**Updates the 1998 Act, incorporates the General Data Protection Regulations (GDPR) and aims to:**

- Facilitate the secure transfer of information within the European Union.
- Prevent people or organisations from holding and using inaccurate information on individuals. This applies to information regarding both private lives or business.

- Give the public confidence about how businesses can use their personal information.
- Provide data subjects with the legal right to check the information businesses hold about them. They can also request for the data controller to destroy it.
- Give data subjects greater control over how data controllers handle their data.
- Place emphasis on accountability. This requires businesses to have processes in place that demonstrate how they're securely handling data.
- Require firms to keep people's personal data safe and secure. Data controllers must ensure that it is not misused.
- Require the data user or holder to register with the Information Commissioner.

**All data subjects have the right to:**

- Receive clear information about what you will use their data for.
- Access their own personal information.
- Request for their data to be revised if out of date or erased. These are known as the right to rectification and the right to erasure
- Request information about the reasoning behind any automated decisions, such as if computer software denies them access to a loan.
- Prevent or query about the automated processing of their personal data.

### 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 Harassment Act 1997

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

### 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 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)

### Criminal Justice and Courts Act 2015

Revenge porn - as it is now commonly known - involves the distribution of private and personal explicit images or video footage of an individual without their consent, with the intention of causing them embarrassment and distress. Often revenge porn is used maliciously to shame ex-partners. Revenge porn was made a specific offence in the Criminal Justice and Courts Act 2015. The Act specifies that if you are accused of revenge porn and found guilty of the criminal offence, you could be prosecuted and face a sentence of up to two years in prison.

For further guidance or support please contact the [Revenge Porn Helpline](#)

## Appendix 18

### Links to other organisations or documents

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

#### 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>

Revenge Porn Helpline - <https://revengepornhelpline.org.uk/>

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

Report Harmful Content - <https://reportharmfulcontent.com/>

#### 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 Internet Safety (UKCIS) - <https://www.gov.uk/government/organisations/uk-council-for-internet-safety>

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](http://www.360data.org.uk)

SWGfL Test filtering - <http://testfiltering.com/>

UKCIS Digital Resilience Framework - <https://www.gov.uk/government/publications/digital-resilience-framework>

#### Bullying/Online-bullying/Sexting/Sexual Harassment

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

SELMA - Hacking Hate - <https://selma.swgfl.co.uk>

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](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>

[Childnet - Project deSHAME - Online Sexual Harrassment](#)

[UKSIC - Sexting Resources](#)

[Anti-Bullying Network - <http://www.antibullying.net/cyberbullying1.htm>](#)

[Ditch the Label - Online Bullying Charity](#)

[Diana Award - Anti-Bullying Campaign](#)

## 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 Evolve - <https://projectevolve.co.uk>](#)

[UKCCIS - Education for a connected world framework](#)

[Teach Today - \[www.teachtoday.eu/\]\(http://www.teachtoday.eu/\)](#)

[Insafe - Education Resources](#)

## Data Protection

[360data - free questionnaire and data protection self review tool](#)

[ICO Guides for Education \(wide range of sector specific guides\)](#)

[DfE advice on Cloud software services and the Data Protection Act](#)

[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](#)

[SWGfL Safety & Security Resources](#)

[Somerset - Questions for Technical Support](#)

[NCA - Guide to the Computer Misuse Act](#)

[NEN - Advice and Guidance Notes](#)

## Working with parents and carers

[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](#)

[Internet Matters](#)

## Prevent

[Prevent Duty Guidance](#)

[Prevent for schools - teaching resources](#)

[NCA - Cyber Prevent](#)

Childnet - [Trust Me](#)

Research

[Ofcom -Media Literacy Research](#)

Further links can be found at the end of the UKCIS [Education for a Connected World Framework](#)

## Appendix 18

### Glossary of Terms

<b>AUP/AUA</b>	Acceptable Use Policy/Agreement - see templates earlier in this document
<b>CEOP</b>	Child Exploitation and Online Protection Centre (part of National Crime Agency, UK Police, dedicated to protecting children from sexual abuse, providers of the Think U Know programmes.
<b>CPD</b>	Continuous Professional Development
<b>FOSI</b>	Family Online Safety Institute
<b>ICO</b>	Information Commissioners Office
<b>ICT</b>	Information and Communications Technology
<b>INSET</b>	In Service Education and Training
<b>IP address</b>	The label that identifies each computer to other computers using the IP (internet protocol)
<b>ISP</b>	Internet Service Provider
<b>ISPA</b>	Internet Service Providers' Association
<b>IWF</b>	Internet Watch Foundation
<b>LA</b>	Local Authority
<b>LAN</b>	Local Area Network
<b>MAT</b>	Multi Academy Trust
<b>MIS</b>	Management Information System
<b>NEN</b>	National Education Network - works with the Regional Broadband Consortia (e.g. SWGfL) to provide the safe broadband provision to schools across Britain.
<b>Ofcom</b>	Office of Communications (Independent communications sector regulator)

<b>SWGfL</b>	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
<b>TUK</b>	Think U Know - educational online safety programmes for schools, young people and parents.
<b>UKSIC</b>	UK Safer Internet Centre - EU funded centre. Main partners are SWGfL, Childnet and Internet Watch Foundation.
<b>UKCIS</b>	UK Council for Internet Safety
<b>VLE</b>	Virtual Learning Environment (a software system designed to support teaching and learning in an educational setting,
<b>WAP</b>	Wireless Application Protocol

A more comprehensive glossary can be found at the end of the UKCIS [Education for a Connected World Framework](#)