Be kind, work hard and never give up.

Online Safety and Acceptable Use Policy

Policy Reviewed and Adopted::	Autumn Term 2024
Date of Next Review:	Autumn Term 2025
Responsible Officer:	Headteacher

Introduction

This policy applies to all members of the school community (including staff, learners, volunteers, parents and carers, visitors, community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site, where allowed.

It is best practice that the school reviews their Online Safety Policy at least annually and, if necessary, more frequently in response to any significant new technological developments.

The DfE Keeping Children Safe in Education statutory guidance requires Local Authorities, Multi Academy Trusts, and schools in England to ensure learners are safe from harm:

"It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to ***online safety*** *empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate"*

"Local Advisory Boards and proprietors should ensure ***online safety*** *is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies and procedures. This will include considering how* ***online safety*** *is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement"*

The DfE Keeping Children Safe in Education guidance also recommends:

Reviewing online safety *… Technology, and risks and harms related to it, evolve, and change rapidly. Schools and colleges should consider carrying out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. A free online safety self-review tool for schools can be found via the* 360 safe self-review tool.

Schools in England are subject to an increased level of scrutiny of their online safety practices by Ofsted Inspectors during inspections, while the Counter Terrorism and Securities Act 2015 requires schools to ensure that children and young people are safe from terrorist and extremist material on the internet.

This Online Safety Policy outlines the commitment of Pentland Primary School to safeguard members of our school community online in accordance with statutory guidance and best practice. Schools should be aware of the legislative framework under which this Online Safety Policy template and guidance has been produced as outlined in the attached 'Legislation' Appendix.

This Online Safety Policy applies to all members of the school community (including staff, learners, volunteers, parents and carers, visitors, community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

Pentland Primary 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 development, monitoring and review

This Online Safety Policy has been developed by Senior Leaders and Pupil Parliament made up of:

- Headteacher
- Pupil Parliament member
- Teacher
- Teaching Assistant
- Member of the Local Advisory Board
- Parent/carer

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

Schedule for development, monitoring and review

This Online Safety Policy was approved by One Excellence Directors on:	AutumnTerm 2024
The implementation of this Online Safety Policy will be monitored by:	Local Advisory Board CEO Computing Leads
Monitoring will take place at regular intervals:	Local Advisory Board and CEO – once a year Computing Leads - termly
The Local Advisory Board 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:	Once a term
The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new technological developments, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	Autumn term
Should serious online safety incidents take place, the following external persons/agencies should be informed:	ONE IT Stockton Local Authority Veritau Police

Process for monitoring the impact of the Online Safety Policy

The school will monitor the impact of the policy using:

- logs of reported incidents
- monitoring logs of internet activity (including sites visited)
- internal monitoring data for network activity
- surveys/questionnaires of:
    - learners
    - parents and carers
    - staff.

Policy and Leadership

Responsibilities

To ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviours, learning from each other and from good practice elsewhere, reporting inappropriate online behaviours, concerns, and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals[1] and groups within the school.

Headteacher and senior leaders

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding, though the day-to-day responsibility for online safety may be delegated to the Online Safety Lead.
- The headteacher and (at least) another member of the senior leadership team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff[2].
- The headteacher/senior leaders are responsible for ensuring that the Online Safety Lead, technical staff, and other relevant staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.
- The headteacher/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.
- The headteacher/senior leaders will receive regular monitoring reports from the Online Safety Lead.

Local Advisory Board (LAB) Members

The DfE guidance "Keeping Children Safe in Education" states:

"Local Advisory Boards and proprietors should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare …. this includes … online safety"

LAB Members are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy e.g. by asking the questions posed in the UKCIS document "Online Safety in Schools and Colleges – questions from the Local Advisory Board"

This review will be carried out by One Excellence Directors whose members will receive regular information about online safety incidents and monitoring reports. A member of the Local Advisory Board will take on the role of Online Safety Governor to include:

- **regular meetings with the Online Safety Lead**
- **regularly receiving (collated and anonymised) reports of online safety incidents**
- **checking that provision outlined in the Online Safety Policy (e.g. online safety education provision and staff training is taking place as intended)**
- **reporting to LAB meetings / Directors**
- membership of the school Online Safety Group
- termly review of the filtering change control logs and the monitoring of filtering logs

[1] In a small school some of the roles described may be combined, though it is important to ensure that there is sufficient 'separation of responsibility' should this be the case.

[2] See flow chart on dealing with online safety incidents in 'Responding to incidents of misuse' and relevant local authority/MAT/ HR/other relevant body disciplinary procedures.

The Local Advisory Board will also support the school in encouraging parents/carers and the wider community to become engaged in online safety activities.

Online Safety Lead

The Online Safety Lead will:

- lead the Online Safety Group
- work closely on a day-to-day basis with the Designated Safeguarding Lead (DSL), where these roles are not combined
- take day-to-day responsibility for online safety issues, being aware of the potential for serious child protection concerns
- have a leading role in establishing and reviewing the school online safety policies/documents
- promote an awareness of and commitment to online safety education / awareness raising across the school and beyond
- liaise with curriculum leaders to ensure that the online safety curriculum is planned, mapped, embedded and evaluated
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents
- receive reports of online safety incidents[3] and create a log of incidents to inform future online safety developments
- provide (or identify sources of) training and advice for staff/LAB Members/parents/carers/learners
- liaise with (school/local authority/MAT/external provider) technical staff, pastoral staff and support staff (as relevant)
- meet regularly with the online safety governor to discuss current issues, review (anonymised) incidents and if possible, filtering and monitoring logs
- attend relevant Local Advisory Board meetings/groups
- report regularly to headteacher/senior leadership team.
- liaises with the local authority/MAT/relevant body.

Designated Safeguarding Lead (DSL)

The DfE guidance "Keeping Children Safe in Education" states:

*"The designated safeguarding lead should take lead responsibility for safeguarding and child protection (**including online safety**). This should be explicit in the role holder's job description." … Training should provide designated safeguarding leads with a good understanding of their own role, … so they … are able to understand the unique risks associated with **online safety** and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college."*

The Designated Safeguarding Lead should be trained in online safety issues and be aware of the potential for serious safeguarding issues to arise from:

- sharing of personal data [4]
- access to illegal/inappropriate materials
- inappropriate online contact with adults/strangers
- potential or actual incidents of grooming
- online bullying.

[3] The school will need to decide how these incidents will be dealt with and whether the investigation/action will be the responsibility of the online safety lead or another member of staff, e.g. headteacher / senior leader / Designated Safeguarding Lead / class teacher / head of year, etc.

[4] See 'Personal data policy' in the Appendix.

Curriculum Leads

Curriculum Leads will work with the Online Safety Lead to develop a planned and coordinated online safety education programme

This will be provided through:

- a discrete programme
- PRSHE
- A mapped cross-curricular programme
- assemblies and pastoral programmes
- through relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week.

Teaching and support staff

School staff are responsible for ensuring that:

- they have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices
- they understand that online safety is a core part of safeguarding
- they have read, understood, and signed the staff acceptable use agreement (AUA)
- they immediately report any suspected misuse or problem to Mrs S. Robinson for investigation/action, in line with the school safeguarding procedures
- all digital communications with learners and parents/carers should be on a professional level and only carried out using official school systems
- online safety issues are embedded in all aspects of the curriculum and other activities
- ensure learners understand and follow the Online Safety Policy and acceptable use agreements, have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they supervise and monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other school activities (where allowed) and implement current policies regarding these devices
- in lessons where internet use is pre-planned learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- where lessons take place using live-streaming or video-conferencing, staff must have full regard to national safeguarding guidance and local safeguarding policies and should take note of the guidance contained in the SWGfL Safe Remote Learning Resource
- have a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc
- they model safe, responsible, and professional online behaviours in their own use of technology, including out of school and in their use of social media.

Network manager/technical staff

One IT is responsible for ensuring that:

- they are aware of and follow the school Online Safety Policy and Technical Security Policy to carry out their work effectively in line with school policy
- the school technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets (as a minimum) the required online safety technical requirements as identified by the MAT
- there is clear, safe, and managed control of user access to networks and devices
- they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- the use of technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported to Mrs S. Robinson for investigation and action
- the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person (see appendix 'Technical Security Policy template' for good practice).
- monitoring software/systems are implemented and regularly updated as agreed in school policies

Learners

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement and Online Safety Policy
- should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school, if related to their membership of the school.

Parents and carers

The school will take every opportunity to help parents and carers understand these issues through:

- publishing the school Online Safety Policy on the school website
- providing them with a copy of the learners' acceptable use agreement
- publish information about appropriate use of social media relating to posts concerning the school
- seeking their permissions concerning digital images, cloud services etc (see parent/carer AUA in the appendix)
- parents'/carers' evenings, newsletters, website, social media and information about national/local online safety campaigns and literature.

Parents and carers will be encouraged to support the school in:

- reinforcing the online safety messages provided to learners in school

Community users

Community users who access school systems/website/learning platform as part of the wider school provision will be expected to sign a community user AUA before being provided with access to school systems.

The school encourages the engagement of agencies/members of the community who can provide valuable contributions to the online safety provision and actively seeks to share its knowledge and good practice with other schools and the community.

Online Safety Group

The Online Safety Group provides a consultative group that has wide representation from the school community, with responsibility for issues regarding online safety and monitoring the Online Safety Policy including the impact of initiatives. The group will also be responsible for regular reporting to senior leaders and the Local Advisory Board.

- Headteacher
- Pupil Parliament member
- Teacher
- Teaching Assistant
- Member of the Local Advisory Board
- Parent / carer

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

- the production/review/monitoring of the school Online Safety Policy/documents
- the production/review/monitoring of the school filtering policy and requests for filtering changes
- mapping and reviewing the online safety education provision – ensuring relevance, breadth and progression and coverage
- reviewing network/filtering/monitoring/incident logs, where possible
- encouraging the contribution of learners to staff awareness, emerging trends and the school online safety provision
- consulting stakeholders – including staff/parents/carers about the online safety provision
- monitoring improvement actions identified through use of the 360-degree safe self-review tool.

An Online Safety Group terms of reference template can be found in the appendices.

Professional Standards

There is an expectation that required professional standards will be applied to online safety as in other aspects of school life i.e., policies and protocols are in place for the use of online communication technology between the staff and other members of the school and wider community, using officially sanctioned school mechanisms.

Policy

Online Safety Policy

The DfE guidance "Keeping Children Safe in Education" states:

"Online safety and the school or college's approach to it should be reflected in the child protection policy"

The school Online Safety Policy:

- sets expectations for the safe and responsible use of digital technologies for learning, administration, and communication
- allocates responsibilities for the delivery of the policy
- is regularly reviewed in a collaborative manner, taking account of online safety incidents and changes/trends in technology and related behaviours
- establishes guidance for staff in how they should use digital technologies responsibly, protecting themselves and the school and how they should use this understanding to help safeguard learners in the digital world
- describes how the school will help prepare learners to be safe and responsible users of online technologies
- establishes clear procedures to identify, report, respond to and record the misuse of digital technologies and online safety incidents, including external support mechanisms
- is supplemented by a series of related acceptable use agreements
- is made available to staff at induction and through normal communication channels e.g. Every
- is published on the school website.

Acceptable use

The school has defined what it regards as acceptable/unacceptable use and this is shown in the tables below.
Acceptable use agreements. An Acceptable Use Agreement is a document that outlines a school's expectations on the responsible use of technology by its users.

The Online Safety Policy and acceptable use agreements define acceptable use at the school. The acceptable use agreements will be communicated/re-enforced through:

- staff induction and handbook
- digital signage
- posters/notices around where technology is used
- communication with parents/carers
- school website
- PRSHE curriculum
- Subject monitoring

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not access online content (including apps, games, sites) to make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	**Any illegal activity for example:** • Child sexual abuse imagery* • Child sexual abuse/exploitation/grooming • Terrorism • Encouraging or assisting suicide • Offences relating to sexual images i.e., revenge and extreme pornography • Incitement to and threats of violence • Hate crime • Public order offences - harassment and stalking • Drug-related offences • Weapons / firearms offences • Fraud and financial crime including money laundering School will refer to guidance about dealing with self-generated images/sexting – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges					**X**
Users shall not undertake activities that might be classed as cyber-crime under the Computer Misuse Act (1990)	• Using another individual's username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised) • Gaining unauthorised access to school networks, data and files, through the use of computers/devices • Creating or propagating computer viruses or other harmful files • Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords) • Disable/Impair/Disrupt network functionality through the use of computers/devices • Using penetration testing equipment (without relevant permission) Schools will decide whether these should be dealt with internally or by the police. Serious or repeat offences should be reported to the police. Under the Cyber-Prevent agenda the National Crime Agency has a remit to prevent learners becoming involved in cyber-crime and harness their activity in positive ways – further information here					**X**
Users shall not undertake activities that are not illegal but are classed as unacceptable in school policies:	Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs)			X	X	
	Promotion of any kind of discrimination				X	
	Using school systems to run a private business				X	
	Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school				X	
	Infringing copyright				X	
	Unfair usage (downloading/uploading large files that hinders others in their use of the internet)			X	X	
	Any other information which may be offensive to others or breaches the integrity of the ethos of the school or brings the school into disrepute				X	

Consideration should be given for the following activities when undertaken for non-educational purposes:	Staff and other adults				Learners			
	Not allowed	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission /awareness
Online gaming	X				X			
Online shopping/commerce	X				X			
File sharing		X						X
Personal social media during break / dinner time		X			X			
School social media		X						X
Messaging/chat	X				X			
Entertainment streaming e.g. Netflix, Disney+			X		X			
Use of video broadcasting, e.g. YouTube, Twitch, TikTok	X				X			
Use of YouTube for teaching		X			X			
Mobile phones may be brought to school			X				X	
Use of mobile phones for learning at school	X				X			
Use of mobile phones in social time at school		X			X			
Use of smart watches in school			X		X			
Taking photos on mobile phones/cameras	X				X			
Using school i-pods		X						X
Use of other personal devices, e.g. tablets, gaming devices	X				X			
Use of personal e-mail in school, or on school network/wi-fi	X				X			
Use of school e-mail for personal e-mails	X				X			

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

- when communicating in a professional capacity, staff should ensure that the technologies they use are officially sanctioned by the school
- any digital communication between staff and learners or parents/carers (e-mail, social media, learning platform, etc.) must be professional in tone and content. Personal e-mail addresses, text messaging or social media must not be used for these communications.
- staff should be expected to follow good practice when using personal social media regarding their own professional reputation and that of the school and its community
- users should immediately report to a 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
- relevant policies and permissions should be followed when posting information online e.g., school website and social media. Only school e-mail addresses should be used to identify members of staff and learners.

Reporting and responding

The 2021 Ofsted "Review of Sexual Abuse in Schools and Colleges" highlighted the need for schools to understand that reporting systems do not always respond to the needs of learners. While the report looks specifically at harmful sexual behaviours, schools may wish to address these issues more generally in reviewing their reporting systems. The Ofsted review suggested:

"School and college leaders should create a culture where sexual harassment and online sexual abuse are not tolerated, and where they identify issues and intervene early to better protect children and young people. ..In order to do this, they should assume that sexual harassment and online sexual abuse are happening in their setting, even when there are no specific reports, and put in place a whole-school approach to address them. This should include:

- *routine record-keeping and analysis of sexual harassment and sexual violence, including online, to identify patterns and intervene early to prevent abuse"*

The school will take all reasonable precautions to ensure online safety for all school users but recognises that incidents may occur inside and outside of the school (with impact on the school) which will need intervention. The school will ensure:

- there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the school safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies.
- all members of the school community will be made aware of the need to report online safety issues/incidents
- reports will be dealt with as soon as is practically possible once they are received
- the Designated Safeguarding Lead, Online Safety Lead and other responsible staff have appropriate skills and training to deal with online safety risks.
- if there is any suspicion that the incident involves any illegal activity or the potential for serious harm (see flowchart and user actions chart in the appendix), the incident must be escalated through the agreed school safeguarding procedures.
- any concern about staff misuse will be reported to the Headteacher, unless the concern involves the Headteacher, in which case the complaint is referred to the Chair of the Local Advisory Board.

where there is no suspected illegal activity, devices may be checked using the following procedures:

- one or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- conduct the procedure using a designated device that will not be used by learners and, if necessary, can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). Use the same device for the duration of the procedure.

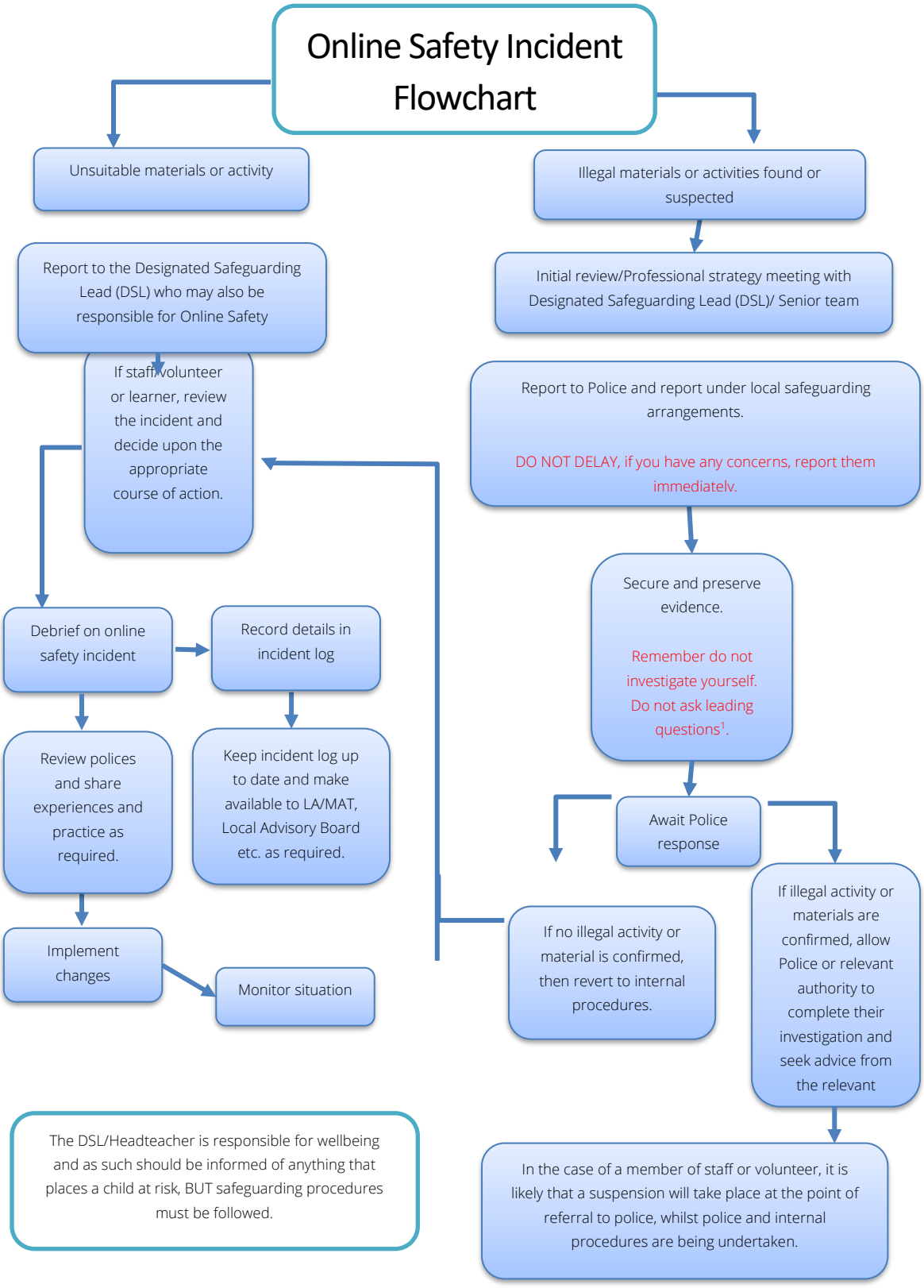
- ensure that the relevant staff have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- record the URL of any site containing the alleged misuse and describe the nature of the content 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
- 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 / MAT (as relevant)
    - police involvement and/or action

- it is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively
- there are support strategies in place e.g., peer support for those reporting or affected by an online safety incident
- incidents should be logged on CPOMs.
- relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority; police; Professionals Online Safety Helpline; Reporting Harmful Content; CEOP.
- those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions, as relevant.

- learning from the incident (or pattern of incidents) will be provided, as relevant and anonymously, to:
    - the Online Safety Group for consideration of updates to policies or education programmes and to review how effectively the report was dealt with
    - staff, through regular briefings
    - learners, through assemblies/lessons
    - parents/carers, through newsletters, school social media, website
    - LAB Members, through regular safeguarding updates

The school will make the flowchart below available to staff to support the decision-making process for dealing with online safety incidents.

Online Safety Incident Flowchart



School actions

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

Responding to Learner Actions

Incidents	Refer to class teacher/tutor	Refer to Online Safety Lead / Computing Lead	Refer to Headteacher	Refer to Police/Social Work	Refer to One IT technical support for advice/action	Inform parents/carers	Remove device/ network/internet access rights	Issue a warning	Further sanction, in line with behaviour policy
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on User Actions on unsuitable/inappropriate activities).		X	X	X					
Attempting to access or accessing the school network, using another user's account (staff or learner) or allowing others to access school network by sharing username and passwords	X	X	X			X			
Corrupting or destroying the data of other users.	X	X	X			X			X
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature	X	X	X	X		X			X
Unauthorised downloading or uploading of files or use of file sharing.	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
Deliberately accessing or trying to access offensive or pornographic material.	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
Unauthorised use of digital devices (including taking images)	X	X	X	X	X	X			X
Unauthorised use of online services	X	X	X		X	X			X
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.	X	X	X		X	X			X
Continued infringements of the above, following previous warnings or sanctions.	X	X	X	X	X	X			X

Responding to Staff Actions

Incidents	Refer to Headteacher	Refer to local CEO/MAT/HR	Refer to Police	Refer to Technical Support Staff for action re filtering, etc.	Issue a 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				
Deliberate actions to breach data protection or network security rules.	X	X	X				
Deliberately accessing or trying to access offensive or pornographic material	X	X	X			X	X
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	X	X	X				X
Using proxy sites or other means to subvert the school's filtering system.	XXX	X		X	X		
Unauthorised downloading or uploading of files or file sharing	X	X			X		
Breaching copyright or licensing regulations.	X	X	X	X			
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account.	X	X		X	X		X
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature	X	X	X		X		X
Using personal e-mail/social networking/messaging to carry out digital communications with learners and parents/carers	X	X			X		X
Inappropriate personal use of the digital technologies e.g. social media / personal e-mail	X	X			X		X
Careless use of personal data, e.g. displaying, holding or transferring data in an insecure manner	X	X			X		X
Actions which could compromise the staff member's professional standing	X	X			X		X
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.	X	X			X		X
Failing to report incidents whether caused by deliberate or accidental actions	X	X			X		
Continued infringements of the above, following previous warnings or sanctions.	X	X			X	X	X

Online Safety Education Programme

While regulation and technical solutions are particularly important, their use must be balanced by educating learners to take a responsible approach. The education of learners in online safety is therefore an essential part of the school's online safety provision. Learners need the help and support of the school to recognise and avoid online safety risks and develop their resilience.

The 2021 Ofsted "Review of Sexual Abuse in Schools and Colleges" highlighted the need for:
"a carefully sequenced RSHE curriculum, based on the Department for Education's (DfE's) statutory guidance, that specifically includes sexual harassment and sexual violence, including online. This should include time for open discussion of topics that children and young people tell us they find particularly difficult, such as consent and the sending of 'nudes'.."

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

- A planned online safety curriculum for all year groups matched against a nationally agreed framework
- Lessons are matched to need; are age-related and build on prior learning
- Lessons are context-relevant with agreed objectives leading to clear and evidenced outcomes
- Learner need and progress are addressed through effective planning and assessment
- Digital competency is planned and effectively threaded through the appropriate digital pillars in other curriculum areas e.g. PRSHE, Literacy etc
- it incorporates/makes use of relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week
- the programme will be accessible to learners at different ages and abilities such as those with additional learning needs or those with English as an additional language.
- learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school
- staff should act as good role models in their use of digital technologies the internet and mobile devices
- in lessons where internet use is pre-planned, it is best practice that learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- where learners are allowed to freely search the internet, staff should be vigilant in supervising the learners and monitoring the content of the websites the young people visit
- it is accepted that from time to time, for good educational reasons, students may need to research topics, (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff should be able to request the temporary removal of those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need
- the online safety education programme should be relevant and up to date to ensure the quality of learning and outcomes.

Contribution of Learners

The school acknowledges, learns from, and uses the skills and knowledge of learners in the use of digital technologies. We recognise the potential for this to shape the online safety strategy for the school community and how this contributes positively to the personal development of young people. Their contribution is recognised through:

- mechanisms to canvass learner feedback and opinion.
- appointment of Pupil Parliament
- the Online Safety Group has learner representation
- learners contribute to the online safety education programme e.g. peer education, digital leaders leading lessons for younger learners, online safety campaigns
- learners designing/updating acceptable use agreements
- contributing to online safety events with the wider school community e.g. parents' evenings, family learning programmes etc.

Staff/volunteers

The DfE guidance "Keeping Children Safe in Education" states:

"All staff should receive appropriate safeguarding and child protection training (**including online safety**) at induction. The training should be **regularly updated**. In addition, all staff should receive safeguarding and child protection (**including online safety**) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively."

"Local Advisory Boards and proprietors should ensure... that safeguarding training for staff, **including online safety** training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning.**"**

All staff will 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 and data protection training will be made available to all staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly.
- the training will be an integral part of the school's annual safeguarding and data protection training for all staff
- all new staff will receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements. It includes explicit reference to classroom management, professional conduct, online reputation and the need to model positive online behaviours
- the Online Safety Lead and Designated Safeguarding Lead (or other nominated person) will receive regular updates through attendance at external training events, and by reviewing guidance documents released by relevant organisations
- this Online Safety Policy and its updates will be presented to and discussed by staff in staff/team meetings/INSET days
- the Online Safety Lead (or other nominated person) will provide advice/guidance/training to individuals as required.

LAB Members

LAB Members should take part in online safety training/awareness sessions, with particular importance for those who are members of any sub-committee/group involved in technology/online safety/health and safety/safeguarding. This may be offered in several ways such as:

- attendance at training provided by One Excellence or other relevant organisation
- participation in school training / information sessions for staff or parents (this may include attendance at assemblies/lessons).

A higher level of training will be made available to (at least) the Online Safety Governor.

Families

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

- regular communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes
- regular opportunities for engagement with parents/carers on online safety issues through awareness workshops / parent/carer evenings etc
- the learners – who are encouraged to pass on to parents the online safety messages they have learned in lessons and by learners leading sessions at parent/carer evenings.
- letters, newsletters, website, learning platform,
- high profile events / campaigns e.g. Safer Internet Day
- reference to the relevant web sites/publications, e.g. SWGfL; www.saferinternet.org.uk/; www.childnet.com/parents-and-carers (see Appendix for further links/resources).
- Sharing good practice with other schools

Adults and Agencies

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

- online safety messages targeted towards families and relatives.
- providing family learning courses in use of digital technologies and online safety
- the school will provide online safety information via their website and social media for the wider community
- supporting community groups, e.g. early years settings, childminders, youth/sports/voluntary groups to enhance their online safety provision

Technology

The school is 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. The school should ensure that all staff are made aware of policies and procedures in place on a regular basis and explain that everyone is responsible for online safety and data protection.

Filtering

- the school filtering policies are agreed by senior leaders and technical staff and are regularly reviewed and updated in response to changes in technology and patterns of online safety incidents/behaviours
- the school manages access to content across its systems for all users. The filtering provided meets the standards defined in the UK Safer Internet Centre Appropriate filtering.
- access to online content and services is managed for all users
- illegal content (e.g., child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list and the police assessed list of unlawful terrorist content, produced on behalf of the Home Office. Content lists are regularly updated
- there are established and effective routes for users to report inappropriate content
- there is a clear process in place to deal with requests for filtering changes (see Appendix).
- the school has provided enhanced/differentiated user-level filtering (allowing different filtering levels for different abilities/ages/stages and different groups of users: staff/learners, etc.)
- younger learners will use child friendly/age-appropriate search engines e.g. SWGfL Swiggle
- filtering logs are regularly reviewed and alert the school to breaches of the filtering policy, which are then acted upon.
- access to content through non-browser services (e.g. apps and other mobile technologies) is managed in ways that are consistent with school policy and practice.

If necessary, the school will seek advice from, and report issues to, the SWGfL Report Harmful Content site.

Monitoring

The DfE guidance "Keeping Children Safe in Education" states:

"It is essential that Local Advisory Boards and proprietors ensure that appropriate filters and monitoring systems are in place ...Local Advisory Boards and proprietors should be doing all that they reasonably can to limit children's exposure to the … risks from the school's or college's IT system. As part of this process, Local Advisory Boards and proprietors should ensure their school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. "

The school has monitoring systems in place to protect the school, systems and users:

- The school monitors all network use across all its devices and services.
- An appropriate monitoring strategy for all users has been agreed and users are aware that the network is monitored. There is a staff lead responsible for managing the monitoring strategy and processes.
- There are effective protocols in place to report abuse/misuse. There is a clear process for prioritising response to alerts that require rapid safeguarding intervention. Management of serious safeguarding alerts is consistent with safeguarding policy and practice
- Technical monitoring systems are up to date and managed and logs/alerts are regularly reviewed and acted upon.

The school follows the UK Safer Internet Centre Appropriate Monitoring guidance and protects users and school systems through the use of the appropriate blend of strategies strategy informed by the school's risk assessment. These may include:

- physical monitoring (adult supervision in the classroom)
- internet use is logged, regularly monitored and reviewed
- filtering logs are regularly analysed and breaches are reported to senior leaders
- pro-active alerts inform the school of breaches to the filtering policy, allowing effective intervention.
- where possible, school technical staff regularly monitor and record the activity of users on the school technical systems
- use of a third-party assisted monitoring service to review monitoring logs and report issues to school monitoring lead(s)

Technical Security

The school technical systems will be managed in ways that ensure that the school meets recommended technical requirements:

- there will be regular reviews and audits of the safety and security of school technical systems
- servers, wireless systems and cabling are securely located and physical access restricted
- there are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud, (this is good practice in helping to prevent loss of data from ransomware attacks)
- 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 Network Manager (or other person) and will be reviewed, at least annually, by the Online Safety Group
- all users (adults and learners) have responsibility for the security of their username and password and must not allow other users to access the systems using their log on details. Users must immediately report any suspicion or evidence that there has been a breach of security
- all school networks and system will be protected by secure passwords. Passwords must not be shared with anyone. All users will be provided with a username and password by One IT who will keep an up-to-date record of users and their usernames (see section on password generation in 'Technical security policy template' in the Appendix)
- the master account passwords for the school systems are kept in a secure place
- passwords should be long. See this Password and Management Security Guide from SWGfL for details.
- records of learner usernames and passwords for learners in Key Stage 1 or younger can be kept in an electronic or paper-based form, but they must be securely kept when not required by the user. Password complexity for younger learners may 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 learners at Key Stage 2 and above should increase as learners progress through school
- Mrs S. Robinson, in consultation with One IT, is responsible for ensuring that all software purchased by and used by the school is adequately licenced and that the latest software updates (patches) are applied.
- 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 and devices from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up-to-date endpoint (anti-virus) software.
- an agreed policy is in place for the provision of temporary access of 'guests', (e.g., trainee teachers, supply teachers, visitors) onto the school systems
- an agreed policy is in place regarding the extent of personal use that users (staff / learners / community users) and their family members are allowed on school devices that may be used out of school
- an agreed policy is in place that allows staff to/forbids staff from downloading executable files and installing programmes on school devices
- an agreed policy is in place regarding the use of removable media (e.g., memory sticks/CDs/DVDs) by users on school devices.
- systems are in place that prevent the unauthorised sharing of personal data unless safely encrypted or otherwise secured. (See school personal data policy template in the appendix for further detail)

Mobile technologies

The DfE guidance "Keeping Children Safe in Education" states:

"The school or college should have a clear policy on the use of mobile and smart technology. Amongst other things this will reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. Schools and colleges should

carefully consider how this is managed on their premises and reflect this in their mobile and smart technology policy and their child protection policy.

The school acceptable use agreements for staff, learners, parents, and carers outline the expectations around the use of mobile technologies.

The school allows:

	School devices			Personal devices		
	School owned for individual use	School owned for multiple users	Authorised device[5]	Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	No	No	No
Full network access	Yes	Yes	Yes	No	No	No
Internet only	Yes	Yes	Yes	No	No	No
No network access	Yes	Yes	Yes	No	No	No

Social media

With widespread use of social media for professional and personal purposes a policy that sets out clear guidance for staff to manage risk and behaviour online is essential. Core messages should include the protection of learners, the school and the individual when publishing any material online.

All members of One Excellence Multi Academy Trust community will be encouraged to engage in social media in a positive, safe and responsible manner at all times. Information about safe and responsible use of social media will be communicated clearly and regularly to all members of One Excellence Multi Academy Trust community.

Expectations for teachers' professional conduct are set out in the DfE Teachers Standards but all adults working with children and young people must understand that the nature and responsibilities of their work place them in a position of trust and that their conduct should reflect this.

Expectations regarding safe and responsible use of social media will apply to all members of One Excellence Multi Academy Trust community and exist in order to safeguard both the school/setting and the wider community, on and offline. Examples of social media may include blogs, wikis, social networking sites, forums, bulletin boards, multi-player online gaming, apps, video/photo sharing sites, chatrooms, instant messenger and many others.

All members of One Excellence Multi Academy Trust community are advised not to publish specific and detailed private thoughts, concerns, pictures or messages on any social media services, especially content that may be considered threatening, hurtful or defamatory to others.

The SLT will control pupil and staff access to social media and social networking sites whilst on site and when using school provided devices and systems. Social media should not be used during this time.

Any concerns regarding the online conduct of any member of One Excellence Multi Academy Trust community on social media sites should be reported to the leadership team and will be managed in accordance with policies such as anti-bullying, allegations against staff, behaviour and safeguarding/child protection.

Any breaches of school/setting policy may result in criminal, disciplinary or civil action being taken and this will depend upon the age of those involved and the circumstances of the wrong committed. Action taken will be

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

accordance with relevant policies, such as anti-bullying, allegations against staff, behaviour and safeguarding/child protection.

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

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to learners through:

- ensuring that personal information is not published
- education/training being provided including acceptable use, age restrictions, social media risks, digital and video images policy, checking of settings, data protection and reporting issues
- clear reporting guidance, including responsibilities, procedures and sanctions
- risk assessment, including legal risk
- guidance for learners, parents/carers

School staff should ensure that:

- no reference should be made in social media to learners, parents/carers or school staff
- they do not engage in online discussion on personal matters relating to members of the school community
- personal opinions should not be attributed to the school
- security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information
- they act as positive role models in their use of social media

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

- a process for approval by senior leaders
- clear processes for the administration, moderation, and monitoring of these accounts – involving at least two members of staff
- a code of behaviour for users of the accounts
- systems for reporting and dealing with abuse and misuse
- understanding of how incidents may be dealt with under school disciplinary procedures.
- Official use of social media sites by the school/setting will only take place with clear educational or community engagement objectives with specific intended outcomes e.g. increasing parental engagement.
- Official use of social media sites as communication tools will be risk assessed and formally approved by the SLT.
- Official school/setting social media channels will be set up as distinct and dedicated social media site or account for educational or engagement purposes.
- Staff will use school/setting provided email addresses to register for and manage any official approved social media channels.
- Members of staff running official social media channels will sign a specific Acceptable Use Agreement (AUA) to ensure they are aware of the required behaviours and expectations of use and to ensure that sites are used safely, responsibly and in accordance with local and national guidance and legislation.
- All communication on official social media platforms will be clear, transparent and open to scrutiny.
- Any online publication on official social media sites will comply with legal requirements including the Data Protection Act 1998, right to privacy conferred by the Human Rights Act 1998, or similar duty to protect private information and will not breach any common law duty of confidentiality, copyright etc.
- Official social media use will be in line with existing policies including anti-bullying and child protection.
- Images or videos of children will only be shared on official social media sites/channels in accordance with the image use policy.
- Information about safe and responsible use of social media channels will be communicated clearly and regularly to all members of the community.

- Official social media sites, blogs or wikis will be suitably protected (e.g. password protected) and where possible/appropriate, run and/or linked to from the school/setting website and take place with written approval from the Leadership Team.
- Leadership staff must be aware of account information and relevant details for social media channels in case of emergency, such as staff absence.
- Parents/Carers and pupils will be informed of any official social media use, along with expectations for safe use and l action taken to safeguard the community.
- Public communications on behalf of the school/setting will, where possible, be read and agreed by at least one other colleague.
- Official social media channels will link back to the school/setting website and/or Acceptable Use Policy to demonstrate that the account is official.
- The school/setting will ensure that any official social media use does not exclude members of the community who are unable or unwilling to use social media channels.

Personal use

- personal communications are those made via 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
- The use of social networking applications during working hours for personal use is not permitted.
- The safe and responsible use of social networking, social media and personal publishing sites will be discussed with all members of staff as part of staff induction and will be revisited and communicated via regular staff training opportunities.
- Safe and professional behaviour will be outlined for all members of staff (including volunteers) as part of the school/setting Acceptable Use Agreement.
- All members of staff are advised not to communicate with or add as 'friends' any current or past children/pupils or current or past pupils' family members via any personal social media sites, applications or profiles. Any pre-existing relationships or exceptions that may compromise this will be discussed with SLT.
- If ongoing contact with pupils is required once they have left the school roll, then members of staff will be expected to use existing alumni networks or use official school provided communication tools.
- All communication between staff and members of the school community on school business will take place via official approved communication channels e.g. schools main e-mail or school telephone
- Staff will not use personal social media accounts to make contact with pupils or parents, nor should any contact be accepted, except in circumstance whereby prior approval has been given by the SLT.
- Any communication from pupils/parents received on personal social media accounts will be reported to the SLT.
- Information and content that staff members have access to as part of their employment, including photos and personal information about pupils and their family members, colleagues etc. will not be shared or discussed on personal social media sites.
- All members of staff are strongly advised to safeguard themselves and their privacy when using social media sites. This will include being aware of location sharing services, setting the privacy levels of their personal sites as strictly as they can, opting out of public listings on social networking sites, logging out of accounts after use and keeping passwords safe and confidential.
- All members of staff are encouraged to carefully consider the information, including text and images, they share and post online and to ensure that their social media use is compatible with their professional role and is in accordance with schools policies and the wider professional and legal framework.
- Members of staff will be encouraged to manage and control the content they share and post online. Advice will be provided to staff via staff training and by sharing appropriate guidance and resources on a regular basis.
- Members of staff will notify the Leadership/Management Team immediately if they consider that any content shared or posted via any information and communications technology, including emails or social networking sites conflicts with their role in the school/setting.

- Members of staff are encouraged not to identify themselves as employees of One Excellence Multi Academy Trust on their personal social networking accounts. This is to prevent information on these sites from being linked with the school/setting and also to safeguard the privacy of staff members and the wider community.
- Members of staff will ensure that they do not represent their personal views as that of the school/setting on social media.
- School/setting email addresses will not be used for setting up personal social media accounts.
- Members of staff who follow/like the school/settings social media channels will be advised to use dedicated professionals accounts, where possible, to avoid blurring professional boundaries.
- Inappropriate or excessive use of social media during school/work hours or whilst using school/setting devices may result in disciplinary or legal action and/or removal of Internet facilities.
- 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, the school may 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
- when parents/carers express concerns about the school on social media we will urge them to make direct contact with the school, in private, to resolve the matter. Where this cannot be resolved, parents/carers should be informed of the school complaints procedure.

School use of social media for professional purposes will be checked regularly by a senior leader and the Online Safety Lead to ensure compliance with the social media, data protection, communications, digital image and video policies. In the event of any social media issues that the school is unable to resolve support may be sought from the Professionals Online Safety Helpline.

Digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and learners instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and learners 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. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees.

The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- the school may use live-streaming or video-conferencing services in line with national and local safeguarding guidance / policies.
- when using digital images, staff will inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images.
- staff/volunteers must be aware of those learners whose images must not be taken/published. Those images should only be taken on school devices. The personal devices of staff should not be used for such purposes
- in accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other learners 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, storage, distribution and publication of those images
- care should be taken when sharing digital/video images that learners are appropriately dressed
- learners must not take, use, share, publish or distribute images of others without their permission

- photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with Online Safety Policy
- learners' full names will not be used anywhere on a website or blog, particularly in association with photographs
- written permission from parents or carers will be obtained before photographs of learners are taken for use in school or published on the school website/social media. Permission is not required for images taken solely for internal purposes
- parents/carers will be informed of the purposes for the use of images, how they will be stored and for how long – in line with the school data protection policy
- images will be securely stored in line with the school retention policy

Online Publishing

The school communicates with parents/carers and the wider community and promotes the school through:

- Public-facing website
- Social media
- Online newsletters

The school website is managed/hosted by One IT. The school ensures that online safety policy has been followed in the use of online publishing e.g., use of digital and video images, copyright, identification of young people, publication of school calendars and personal information – ensuring that there is least risk to members of the school community, through such publications.

Where learner work, images or videos are published, their identities are protected, and full names are not published.

The website includes an online reporting process for parents and the wider community to register issues and concerns to complement the internal reporting process

Website

- The school will ensure that information posted on the school website meets the requirements as identified by the Department for Education (DfE).
- The contact details on the website will be the school/setting address, email and telephone number. Staff or pupils' personal information will not be published.
- The SLT will take overall editorial responsibility for online content published and will ensure that information is accurate and appropriate.
- The website will comply with the school's guidelines for publications including accessibility respect for intellectual property rights, privacy policies and copyright.
- Email addresses will be published carefully online, to avoid being harvested for spam (e.g. by replacing '@' with 'AT'.)
- Pupils work will be published with their permission or that of their parents/carers.
- The administrator account for the school website will be safeguarded with an appropriately strong password.
- The school will post information about safeguarding, including online safety, on the school website for members of the community.

Learners email

- Pupils may only use school/setting provided email accounts for educational purposes
- Access to school /setting email systems will always take place in accordance to data protection legislation and in line with other appropriate school/setting policies e.g. confidentiality.
- Members of the community must immediately tell a designated member of staff if they receive offensive communication and this will be recorded in the school safeguarding files/records.
- Whole -class or group email addresses may be used for communication outside of the school.

Official video conferencing and webcam use for educational purposes

- The school acknowledges that videoconferencing is a challenging activity with a wide range of learning benefits. Preparation and evaluation are essential to the whole activity.
- All videoconferencing equipment will be switched off when not in use and where appropriate, not set to auto answer.
- External IP addresses will not be made available to other sites.
- Videoconferencing contact details will not be posted publically.
- Video conferencing equipment will be kept securely and, if necessary, locked away when not in use.
- School videoconferencing equipment will not be taken off school premises without permission.
- Staff will ensure that external videoconference opportunities and/or tools are suitably risk assessed and will ensure that accounts and systems used to access events are appropriately safe and secure.

Users

- Pupils will ask permission from a teacher before making or answering a videoconference call or message.
- Videoconferencing will be supervised by an adult.
- Parents and carers consent will be obtained prior to children taking part in videoconferencing activities.
- Video conferencing will take place via official and approved communication channels following a robust risk assessment.
- Only key administrators will be given access to videoconferencing administration areas or remote control pages.
- Unique log on and password details for the educational videoconferencing services will only be issued to members of staff and kept secure.

Content

- When recording a videoconference lesson, written permission will be given by all sites and participants. The reason for the recording must be given and the recording of videoconference should be clear to all parties at the start of the conference. Recorded material will be stored securely.
- If third party materials are to be included, the school will check that recording is acceptable to avoid infringing the third party intellectual property rights.
- The school will establish dialogue with other conference participants before taking part in a videoconference. If it is a non-school site, the school will check that they are delivering material that is appropriate for the class.

Management of school learning platforms/portals/gateways

- SLT and staff will regularly monitor the usage of the Learning Platform (LP) in all areas, in particular message and communication tools and publishing facilities.
- Pupils/staff will be advised about acceptable conduct and use when using the LP.
- Only members of the current pupil, parent/carers and staff community will have access to the LP.
- All users will be mindful of copyright issues and will only upload appropriate content onto the LP.
- When staff, pupils' etc. leave the school their account or rights to specific school areas will be disabled or transferred to their new establishment.

Any concerns about content on the LP will be recorded and dealt with in the following ways:

1. The user will be asked to remove any material deemed to be inappropriate or offensive.
2. The material will be removed by the site administrator if the user does not comply.
3. Access to the LP for the user may be suspended.
4. The user will need to discuss the issues with a member of leadership before reinstatement.
5. A pupil's parent/carer may be informed.

A visitor may be invited onto the LP by a member of the leadership. In this instance there may be an agreed focus or a limited time slot. Pupils may require editorial approval from a member of staff. This may be given to the pupil to fulfil a specific aim and may have a limited time frame.

Visitors use of personal devices and mobile phones

Parents/carers and visitors must use mobile phones and personal devices in accordance with the school/settings acceptable use policy.

Use of mobile phones or personal devices by visitors and parents/carers to take photos or videos must take place in accordance with the school image use policy.

The school will ensure appropriate signage and information is displayed and provided to inform visitors of expectations of use.

Staff will be expected to challenge concerns when safe and appropriate and will always inform the Designated Safeguarding Lead of any breaches of use by visitors.

Data Protection

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

The school:

- has a Data Protection Policy.
- implements the data protection principles and can demonstrate that it does so
- has paid the appropriate fee to the Information Commissioner's Office (ICO)
- has appointed an appropriate Data Protection Officer (DPO) who has effective understanding of data protection law and is free from any conflict of interest. The school may also wish to appoint a Data Manager and Systems Controllers to support the DPO
- has a 'Record of Processing Activities' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- the Record of Processing Activities lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis is listed
- has an 'information asset register' in place and knows exactly **what personal data is held,** where, why and which member of staff has responsibility for managing it
- information asset register lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis will have also been listed
- will hold the minimum personal data necessary to enable it to perform its function and will not hold it for longer than necessary for the purposes it was collected for. The school 'retention schedule" supports this
- data held is accurate and up to date and is held only for the purpose it was held for. Systems are in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- provides staff, parents, volunteers, teenagers, and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice (see Privacy Notice section in the appendix)
- has procedures in place to deal with the individual rights of the data subject, e.g. one of the dozen rights applicable is that of Subject Access which enables an individual to see/have a copy of the personal data held about them
- carries out Data Protection Impact Assessments (DPIA) where necessary e.g. to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier
- has undertaken appropriate due diligence and has data protection compliant contracts in place with any data processors
- understands how to share data lawfully and safely with other relevant data controllers.
- has clear and understood policies and routines for the deletion and disposal of data

- reports any relevant breaches to the Information Commissioner within 72hrs of becoming aware of the breach as required by 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
- has a Freedom of Information Policy which sets out how it will deal with FOI requests
- provides data protection training for all staff 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 will be encrypted, and password protected.
- device will be password protected.
- device will be protected by up-to-date endpoint (anti-virus) software
- data will 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 and know who to pass it to in the school
- only use encrypted data storage for personal data
- will not transfer any school personal data to personal devices.
- use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data
- transfer data using encryption, a secure email account (where appropriate), and secure password protected devices.

Outcomes

The impact of the Online Safety Policy and practice is regularly evaluated through the review/audit of online safety incident logs; behaviour/bullying reports; surveys of staff, learners; parents/carers and is reported to relevant groups:

- there is balanced professional debate about the evidence taken from the reviews/audits and the impact of preventative work e.g., online safety education, awareness, and training
- there are well-established routes to regularly report patterns of online safety incidents and outcomes to school leadership and LAB Members
- parents/carers are informed of patterns of online safety incidents as part of the school's online safety awareness raising
- online safety (and related) policies and procedures are regularly updated in response to the evidence gathered from these reviews/audits/professional debate
- the evidence of impact is shared with other schools, agencies and LAs to help ensure the development of a consistent and effective local online safety strategy.

Learner Acceptable Use Agreement for EYFS and KS1

This is how we stay safe when we use computers:

- I will ask a teacher or suitable adult if I want to use the computers/tablets
- I will only use activities that a teacher or suitable adult has told or allowed me to use
- I will take care of 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/tablet

Signed	

Learner Acceptable Use Agreement for KS2

Introduction

Digital technologies have become integral to the lives of children and young people, both within and outside schools. These technologies are powerful tools, which open-up new opportunities for everyone. They can stimulate discussion, encourage creativity and stimulate awareness of context to promote effective learning. Learners should have an entitlement to safe access to these digital technologies.

This acceptable use agreement is intended:

- to ensure that learners will have good access to devices and online content, be responsible users and stay safe while using digital technologies for educational, personal and recreational use
- to help learners understand good online behaviours that they can use in school, but also outside school
- to protect school devices and networks from accidental or deliberate misuse that could put the security of the systems and users at risk.

Acceptable Use Agreement

When I use devices I must behave responsibly to help keep me and other users safe online and to look after the devices. For my own personal safety:

- I understand that what I do online will be supervised and monitored and that I may not be allowed to use devices in school unless I follow these rules and use them responsibly
- I will only visit internet sites that adults have told me are safe to visit
- I will keep my username and password safe and secure and not share it with anyone else
- I will be aware of "stranger danger" when I am online
- I will not share personal information about myself or others when online
- If I arrange to meet people off-line that I have communicated with online, I will do so in a public place and take a trusted adult with me
- I will immediately tell an adult if I see anything that makes me feel uncomfortable when I see it online.

I will look after the devices I use, so that the school and everyone there can be safe:

- I will handle all the devices carefully and only use them if I have permission.
- I will not try to alter the settings on any devices or try to install any software or programmes.
- I will tell an adult if a device is damaged or if anything else goes wrong.
- I will only use the devices to do things that I am allowed to do.

I will think about how my behaviour online might affect other people:

- When online, I will act as I expect others to act toward me.
- I will not copy anyone else's work or files without their permission.
- I will be polite and responsible when I communicate with others and I appreciate that others may have different opinions to me.
- I will not take or share images of anyone without their permission.

I know that there are other rules that I need to follow:

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

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

- I know that I am expected to follow these rules in school and that I should behave in the same way when out of school as well.
- I understand that if I do not follow these rules, I may be subject to a consequence. This could include missing break time, parents/carers contacted and in the event of illegal activities involvement of the police.

Learner Acceptable Use Agreement Form

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

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

- I use the school systems and devices (both in and out of school)
- I am out of school and involved in any online behaviour that might affect the school or other members of the school.

Name of Learner	
Year Group	
Signed	
Date	

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

This acceptable use policy is intended to ensure:

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

The school will try to ensure that learners have good access to digital technologies to enhance their learning and will, in return, expect the learners to agree to be responsible users. A copy of the learner acceptable use agreement is attached to this permission form, so that parents/carers will be aware of the school expectations of the young people in their care. If you wish to discuss this any further or do not agree with the Acceptable Use Agreement, please contact the school.

As the parent/carer of the above learners, I give permission for my son/daughter to have access to the digital technologies at school.

EYFS and KS1

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.

KS2

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.

I understand that the school will take every reasonable precaution, including monitoring and filtering systems, to ensure that young people will be safe when they use the internet and systems. I also understand that the school cannot ultimately be held responsible for the nature and content of materials accessed on the internet and using mobile technologies.

I understand that my son's/daughter's activity on the systems will be monitored and that the school will contact me if they have concerns about any possible breaches of the acceptable use agreement.

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.

Use of Digital/Video Images

The use of digital/video images plays an important part in learning activities. Learners 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. Where an image is publicly shared by any means, only your child's **delete as relevant** first name/initials will be used.

The school will comply with the Data Protection Act and request parent's/carer's permission before taking images of members of the school. We will also ensure that when images are published that the young people cannot 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 in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other learners 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.

Once parents/carers have signed they form, we will use and store the form in the following manner:

- This form will be printed for parents to sign.
- Once signed, this will be stored on Arbor on your child's file.
- The staff in school will have access to this information
- The form will be stored in line with regulations for the correct period of time
- We will shred the form once it is stored on Arbor

Any pictures taken will be uses and store the form in the following manner:

- The images will be stored on school devices and then uploaded to One Drive
- The images may be published on Twitter, Facebook, the schools website, local press, etc
- The staff will have access to the images
- The images will be stored in line with regulations for the correct period of time

Name of parent	
Name of child	
Signed	
Date	

Staff (and Volunteer) Acceptable Use Policy Agreement

Introduction

As part of **One Excellence Multi Academy Trust's** programme to comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA), it has a suite of Information Governance policies.

The Acceptable Use Agreement governs the use of the School's corporate network that individuals use on a daily basis in order to carry out business functions.

This policy should be read in conjunction with the other policies in the School's Information Governance policy framework.

Scope

All policies in **One Excellence Multi Academy Trust's** Information Governance policy framework apply to all School employees, any authorised agents working on behalf of the School, including temporary or agency employees, and third party contractors. Individuals who are found to knowingly or recklessly infringe these policies may face disciplinary action.

The policies apply to information in all forms including, but not limited to:

- Hard copy or documents printed or written on paper,
- Information or data stored electronically, including scanned images,
- Communications sent by post/courier or using electronic means such as email, fax or electronic file transfer,
- Information or data stored on or transferred to removable media such as tape, CD, DVD, USB storage device or memory card,
- Information stored on portable computing devices including mobile phones, tablets, cameras and laptops,
- Speech, voice recordings and verbal communications, including voicemail,
- Published web content, for example intranet and internet,
- Photographs and other digital images.

This acceptable use policy is intended to ensure:

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

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

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 learners receive opportunities to gain from the use of digital technology. I will, where possible, educate the young people in my care in the safe use of digital technology and embed online safety in my work with young people.

For my professional and personal safety:

- I understand that the school will monitor my use of the school digital technology and communications systems.
- I understand that the rules set out in this agreement also apply to use of these technologies (e.g. laptops, email, VLE 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 should not use it for personal reasons.
- 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 not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.

Computers

The School provides laptops to employees to assist with performance of their duties.

The staff understand that any hardware and software's provided by my school for staff use can only be used by members of staff and can only be used for school related work.

The personal use of school ICT systems and connectivity is only permitted with the consent of the CEO.

To prevent unauthorised access to systems of personal data, I will not leave any information system unattended without first logging out or locking my login as appropriate.

I will respect system security and I will not disclose any password or security information. I will use a 'strong password.

I will not attempt to install any purchased or downloaded software, including browser toolbars, or hardware without permission from the system manager. I will not try to alter computer settings, unless this is allowed in school policies.

I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, terrorist or 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 not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.

I will ensure that any personal data of pupils, staff or parents / carers is kept in accordance with the Data Protection Act 1988. This means that all personal data will be obtained and processed fairly and lawfully, only kept for specific purposes, held no longer than necessary and will be kept private and secure with appropriate security measure in place, whether used in the workplace, hosted online (only within countries or sites with suitable data protections controls) or accessed remotely. Ay personal data which is being removed from the school site (such as via email or on memory sticks or CD's) will be encrypted with either an encrypted USB / HDD and Office 365 cloud based system.

I will not access, copy, remove or otherwise alter any other user's files, without their express permission.

If I choose to use a portable device to collect my work email I will ensure that the device is locked by a pin code or password and will be wiped when I dispose of the device.

I will only transport, hold, disclose or share personal information about myself or others, as outlined in the School Personal Data Policy (or other relevant policy). Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper based documents containing personal data must be held in lockable storage.

I understand that data protection policy requires that any staff or learner 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 not transfer sensitive personal information from my school email account unless the information is encrypted.

I will not keep professional documents which contain school related personal information (including images, files, videos etc.) on any personally owned devices (such as laptops, digital cameras, mobile phones).

Digital images or videos of pupils will only be taken from the school premises using encrypted devices or school cloud based programmes.

I will not use unapproved cloud storage systems (Dropbox, iCloud etc.) for storing personal data of staff or pupils.

I will not store any personal information on the school computer system that is unrelated to school activities, such as personal photographs, files or financial information.

I will ensure that my data is regularly backed up, in accordance with relevant school policies.

I will respect copyright and intellectual property rights.

Email

The School provides email accounts to employees to assist with performance of their duties.

I will not use personal email addresses on the school's ICT systems.

Personal Use

Whilst email accounts should primarily be used for business functions, incidental and occasional use of the email account in a personal capacity may be permitted so long as:

- Personal messages do not tarnish the reputation of the School,
- Employees understand that emails sent to and from corporate accounts are the property of the School,
- Employees understand that School management may have access to their email account and any personal messages contained within,
- Employees understand that the Emails sent to/from their email account may have to be disclosed under Freedom of Information and/or Data Protection legislation,
- Employees understand that the School reserves the right to cleanse email accounts at regular intervals which could result in personal emails being erased from the corporate network,
- Use of corporate email accounts for personal use does not infringe on business functions.

Inappropriate Use

The School does not permit individuals to send, forward, or solicit emails that in any way may be interpreted as insulting, disruptive, or offensive by any other individual or entity. Examples of prohibited material include, but are not necessarily limited to:

- Sexually explicit messages, images, cartoons, jokes or movie files,
- Unwelcome propositions,
- Profanity, obscenity, slander, or libel,
- Ethnic, religious, or racial slurs,
- Political beliefs or commentary,
- Any messages that could be construed as harassment or disparagement of others based on their sex, gender, racial or ethnic origin, sexual orientation, age, disability, religious or philosophical beliefs, or political beliefs.

Email Security

Users will take care to use their email accounts in accordance with the School's information security policy. In particular users will:

- 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)
- Use secure email transmission methods when sending personal data,
- Not sign up to marketing material that could jeopardise the School's IT network,
- Not send excessively large email attachments without authorisation from School management and the School's IT provider.

Group Email Accounts

Individuals may also be permitted access to send and receive emails from group and/or generic email accounts. These group email accounts must not be used in a personal capacity and users must ensure that they sign each email with their name so that emails can be traced to individuals. Improper use of group email accounts could lead to suspension of an individual's email rights. The CEO will have overall responsibility for allowing access to group email accounts but this responsibility may be devolved to other individuals.

The School may monitor and review all email traffic that comes to and from individual and group email accounts.

Internet Use

The School provides internet access to employees to assist with performance of their duties.

I will not engage in any on-line activity that may compromise my professional responsibilities.

Personal Use

Whilst the internet should primarily be used for business functions, incidental and occasional use of the internet in a personal capacity may be permitted so long as:

- Usage does not tarnish the reputation of the School,
- Employees understand that School management may have access to their internet browsers and browsing history contained within,
- Employees understand that the School reserves the right to suspend internet access at any time,
- Use of the internet for personal use does not infringe on business functions.

Inappropriate Use

The School does not permit individuals use the internet in a way that may be interpreted as insulting, disruptive, or offensive by any other individual or entity. Examples of prohibited material include, but are not necessarily limited to:

- Sexually explicit or pornographic images, cartoons, jokes or movie files,
- Images, cartoons, jokes or movie files containing ethnic, religious, or racial slurs,
- Any content that could be construed as harassment or disparagement of others based on their sex, gender, racial or ethnic origin, sexual orientation, age, disability, religious or philosophical beliefs, or political beliefs.

Individuals are also not permitted to use the internet in a way which could affect usage for others. This means not streaming or downloading media files and not using the internet for playing online games.

Other Business Use

Users are not permitted to use the internet to carry out their own business or business of others. This includes, but not necessarily limited to, work for political organisations, not-for-profit organisations, and private enterprises. This restriction may be lifted on a case by case basis at the discretion of School management.

Internet Security

Users will take care to use the internet in accordance with the School's information security policy. In particular users will not click on links on un-trusted or unverified WebPages.

I will not attempt to bypass any filtering and / or security systems put in place by the school. If I suspect a computer or system has been damaged or affected by a virus or other malware or if I have lost any school related documents of files, then I will report this to IT provider as soon as possible.

If I have any queries or questions regarding safe and professional practise online either in school or off site, then I will raise them with the Senior Leadership Team.

I understand that my use of the information systems internet and email may be monitored and recorded to ensure policy compliance.

I will report all incidents of concern regarding children's online safety to the Designated Safeguarding Lead(s) and / or the Computing Lead as soon as possible. I will report any accidental access, receipt of inappropriate materials, filtering breaches or unsuitable websites to the Computing Lead and Designated Safeguarding Lead(s).

The school may exercise its right to monitor the use of information systems including internet access and the interception of emails in order to monitor compliance with the Acceptable Use Policy and the School's Data Security Policy. Where it believes unauthorised and / or inappropriate use of the service's information system or unacceptable or inappropriate behaviour may be taking place, the school will invoke its disciplinary procedure. If the school suspects that the system may be being used for criminal purposes or for storing unlawful text, imagery or sound, the matter will be brought to the attention of the relevant law enforcement organisation.

Images

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, unless I have permission to do so. Where these images are published (e.g. on the school website/VLE) it will not be possible to identify by name, or other personal information, those who are featured.

Social Media Use

The School recognises and embraces the benefits and opportunities that social media can contribute to an organisation. The School also recognises that the use of social media is a data protection risk due to its open nature and capacity to broadcast to a large amount of people in a short amount of time.

My use of ICT and information systems will always be compatible with my professional role, whether using school or personal systems. This includes the use of email, text, social media, social networking, gaming, webs publications and any other devices or websites. My use of ICT will not interfere with my work duties and will be in accordance with the school AUA and the Law.

I will only use social networking sites in school in accordance with the school's policies.

Corporate Accounts

The School has a number of social media accounts across multiple platforms. Nominated employees will have access to these accounts and are permitted to post general information about the School. Authorised employees will be given the usernames and passwords to these accounts which must not be disclosed to any other individual within or external to the organisation. The CEO will have overall responsibility for allowing access to social media accounts.

Corporate Social Media Accounts must not be used for the dissemination of personal data either in an open forum or by direct message. This would be a contravention of the School's information governance policies and data protection legislation.

Corporate Social Media Accounts must not be used in a way which could:

- Tarnish the reputation of the School,
- Be construed as harassment or disparagement of others based on their sex, gender, racial or ethnic origin, sexual orientation, age, disability, religious or philosophical beliefs, or political beliefs.
- Be construed as sexually explicit,
- Be construed as political beliefs or commentary.

Personal Accounts

The School understands that many employees will use or have access to Personal Social Media Accounts. Employees must not use these accounts:

- During working hours,
- Using corporate equipment,
- To conduct corporate business,
- To contact or approach clients, customers, or partners of the School.

I will not communicate with pupils or ex-pupils using social media without the express permission of the CEO.

My electronic communications with pupils, parents / carers and other professionals will only take place via work approved communication channels e.g. via a school provided email address or telephone number. Any pre-existing relationships which may compromise this will be discussed with the Senior Leadership Team and/or CEO, if necessary. This would include any relatives of current pupils that are my 'friends' on a social media site.

I will not create, transmit, display, publish or forward any material that is likely to harass, cause offence, inconvenience or needless anxiety to any other person, or anything which could bring my professional role, the school, or the County council into disrepute. This would include any comment made, even in the belief that it is private on social media.

Telephone Use

Inappropriate Use

The School does not permit individuals to use the telephone in a way that may be interpreted as insulting, disruptive, or offensive by any other individual or entity.

Other Business Use

Users are not permitted to use the telephone to carry out their own business or business of others. This includes, but not necessarily limited to, work for political organisations, not-for-profit organisations, and private enterprises. This restriction may be lifted on a case by case basis at the discretion of School management.

Mobile Phones

Staff mobile phones will be stored in lockers/classroom cupboards during the school day and may only be used at break times with the exception of caretaker, who is authorised to have their phone on their person throughout the day.

Staff mobile phones will never be used for any reason when children are present.

Personal mobile phones or devices will not be used during teaching periods unless permission has been given by a member of the SLT in emergency circumstances.

Cameras on personal phones or tablets will not be used to take pictures of children in any circumstances and will only use work-provided equipment for this purpose.

In the unlikely event of needing to contact a parent use the school phone.

Members of staff are not permitted to use their own personal phones or devices for contacting children, young people and their families within or outside of the setting in a professional capacity. Any pre-existing relationships which could compromise this will be discussed with SLT.

Members of staff will ensure that any use of personal phones and devices will always take place in accordance with the law e.g. data protection as well as relevant school policy and procedures e.g. confidentiality, data security, Acceptable Use etc.

Staff will not use any personal devices directly with children and will only use work-provided equipment during lessons/educational activities.

Staff will ensure that any content bought on site via mobile phones and personal devices are compatible with their professional role and expectations.

If a member of staff breaches the school/setting policy then disciplinary action will be taken.

If a member of staff is thought to have illegal content saved or stored on a mobile phone or personal device or have committed a criminal offence then the police will be contacted.

Any allegations against members of staff involving personal use of mobile phone or devices will be responded to following the school/settings allegations management policy.

Communication

I will be professional in my communications and actions when using school systems:

- 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 only communicate with learners and parents/carers using official school systems. Any such communication will be professional in tone and manner.

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

- I understand that this acceptable use agreement applies not only to my work and use of school's digital technology equipment in school, but also applies to my use of school systems and equipment off the premises and my use of personal equipment on the premises or in situations related to my employment by the school
- I understand that if I fail to comply with this acceptable use agreement, I could be subject to disciplinary action. This could include a warning, a suspension, referral to LAB Members/Trustees 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) within these guidelines.

Staff / Volunteer Name	
Signed	
Date	

Acceptable Use Agreement for Community Users

This acceptable use agreement is intended to ensure:

- that community users of school digital technologies will be responsible users and stay safe while using these systems and devices
- that school systems, devices and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that users are protected from potential 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 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 not install or attempt to install programmes of any type on a school device, nor will I try to alter computer settings, unless I have permission to do so.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will immediately report any damage or faults involving equipment or software, whatever the cause.
- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).
- I understand that if I fail to comply with this acceptable use agreement, the school has the right to remove my access to school systems/devices

I have read and understand the above and agree to use the school 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	

Online Safety Group Terms of Reference – School Policy

Purpose

To provide a consultative group that has wide representation from the Pentland Primary School community, with responsibility for issues regarding online safety and the monitoring the online safety policy including the impact of initiatives. The group will also report termly to the Local Advisory Board.

Membership

The online safety group will seek to include representation from all stakeholders.

The composition of the group should include

- Headteacher
- Pupil Parliament member
- Teacher
- Teaching Assistant
- Member of the Local Advisory Board
- Parent / carer

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.

Committee members must declare a conflict of interest if any incidents being discussed directly involve themselves or members of their families.

Committee members must be aware that many issues discussed by this group could be of a sensitive or confidential nature

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

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

Duration of Meetings

Meetings shall be held termly for a period of approximately 2 hours. A special or extraordinary meeting may be called when and if deemed necessary.

Functions

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

- To keep up to date with new developments in the area of online safety
- To (at least) annually review and develop the online safety policy in line with new technologies and incidents
- To monitor the delivery and impact of the online safety policy

- To monitor the log of reported online safety incidents (anonymous) to inform future areas of teaching/learning/training.
- To co-ordinate consultation with the whole schools community to ensure stakeholders are up to date with information, training and/or developments in the area of online safety. This could be carried out through reviewing training records
- Staff meetings
- Local Advisory Board meetings
- Surveys/questionnaires for learners, parents/carers and staff
- Parents evenings
- Website/VLE/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 schools
- To monitor filtering/change control logs (e.g. requests for blocking/uN.B.locking sites).
- To monitor the safe use of data across the schools
- To monitor incidents involving cyberbullying for staff and learners

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 Pentland Primary School have been agreed

Signed by SLT	
Date	
Date for review	

School Online Safety Policy– Harmful Sexual Behaviour

Legislative background and context

Key Documents:

- Department for Education: Keeping Children Safe in Education
- Department for Education: Sexual violence and sexual harassment between children in schools and colleges
- Everyone's Invited
- Department for Education: Sharing Nudes and Semi-Nudes: Advice for Education Settings working with Young People
- Ofsted: Review of sexual abuse in schools and colleges
- Department for Education: Teaching Online Safety in Schools
- Department for Education: Working together to safeguard children
- Report Harmful Content: Laws about harmful behaviours

In March 2021 it was discovered that the Everyone's Invited website was holding "testimonials" about incidents that occurred in over 3000 schools in the UK. This highlighted a wide range of abuse scenarios involving children abusing other children. As a result, the Education Secretary requested a rapid review into sexual abuse in schools and colleges in England. Ofsted published their findings in June 2021. This led to a series of recommendations for schools, multi-agency partners and government.

Ofsted's School Inspection Handbook states that:
"leaders ensure that their school's culture addresses harmful sexual behaviour. ***Inspectors will expect schools to assume that sexual harassment, online sexual abuse and sexual violence are happening in the community, and potentially in the school, even when there are no specific reports, and put in place a whole-school approach to address them."***

"Schools should have appropriate and well-communicated school-wide policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) are unacceptable."

Ofsted will:

- Request that college leaders supply records and analysis of sexual harassment and sexual violence, including online, to inspectors. The Independent Schools Inspectorate will also specifically request schools to provide the same records upon notification of inspection, in addition to its current practice.
- Speak with groups of pupils, where this helps them to better understand a school or college's approach to tackling sexual harassment and violence, including online.
- Feed this part of the inspection into a judgement of safeguarding and leadership and management. If a school's processes are not adequate, Ofsted is likely to judge both their safeguarding practices and leadership and management as inadequate.

Your behaviour and safeguarding/child protection policies will likely be checked to see whether they set out clear and effective procedures to prevent and respond to incidents. It will be expected that you have a zero-tolerance approach to all harmful sexual behaviour.

This document has been created as a template for school leaders to assist them in creating their own Harmful Sexual Behaviour Policy.

Within this template, sections which include information or guidance are shown in BLUE. It is anticipated that schools/academies would remove these sections from their completed policy document, though this will be a decision for the group that produces the policy.

Online

Schools and colleges should recognise that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across social media platforms that leads to repeat victimisation. Online concerns can be especially complicated and support is available from a range of organisations – see the links section. For this reason, schools should ensure they have a robust, up-to-date and comprehensive online safety policy which links to other relevant safeguarding policies.

Policy for Harmful Sexual Behaviour

Statement of intent

Our school has a zero-tolerance approach to any harmful sexual behaviour involving children and acknowledge that it could be occurring at Pentland Primary School and in our school community. The school is proactive in its approach to assessing prevalence, responding to incidents and challenging and changing behaviour. This policy applies to all LAB Members, staff and learners.

Schools and colleges have a statutory duty to safeguarding the children in their setting. We work together to foster an environment that creates healthy relationships for children and young people.

Our whole-school approach encourages healthy relationships and works to prevent harmful sexual behaviour. We provide high quality education within the curriculum to reduce the likelihood of the situations occurring.

We recognise that HSB is harmful to both the child/children affected by the behaviours and the child/children who displayed the behaviour and provide ongoing support for all involved.

Our approach is to treat everything as safeguarding incident in the first instance - we distinguish between behaviours that are exploratory and part of healthy age and ability appropriate development and those that may be harmful.
As a school we provide regular opportunities for school staff to understand what harmful sexual behaviours might look like and what they should do in the event of a report.

Related policies

This policy should be read in conjunction with:

- Child protection and safeguarding policy
- Whistleblowing
- Behaviour policy
- Anti-bullying policy
- Online safety
- Acceptable Use Agreements
- *Curriculum Policies*

Definitions

As stated in the Sexual Offences Act 2003, the term Harmful Sexual Behaviour (HSB) covers a wide range of behaviours, often these may be considered problematic, abusive, or violent and may also be developmentally inappropriate. HSB can occur online, offline or in a blend of both environments. The term HSB is widely acknowledged in child protection and should be treated in this context.

Whilst peer on peer harassment has become a widely recognised term, this is already moving towards child on child in recognition that age and development is a factor in making decisions about behaviour. A significant age difference between the children involved in an incident may lead to a decision about the behaviour being harmful or not. For example, this could be an older child's behaviour towards a pre-pubescent child, or a younger child's behaviour towards an older child with learning difficulties. It is important that Designated Safeguarding Leads (DSL) know what is and is not HSB. DSLs should be involved in planning the curriculum for HSB, planning preventative actions and

ensuring a whole-schools culture that condones HSB, alongside all other forms of abuse and harassment. This template policy provides a basis for an effective approach to managing sexual violence and harassment.

What is sexual violence?

The following are sexual offences under the Sexual Offences Act 2003:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is sexual harassment?

Keeping Children Safe in Education Guidance 2022 and the Sexual Violence and sexual harassment between children in schools and colleges state:

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence.
    - sharing of unwanted explicit content
    - upskirting (this is a criminal offence)
    - sexualised online bullying
    - unwanted sexual comments and messages, including, on social media
    - sexual exploitation; coercion and threats.

It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Responsibilities

Leaders and DSLs

Our leaders and DSLs have ultimate responsibility in dealing with all incidents of harmful sexual behaviour, including online. It is the expectation that all incidents of harmful sexual behaviour/sexual violence and harassment are reported in line with school safeguarding and child protection procedures.

We ensure that our designated safeguarding lead/s (DSL) and their deputies are confident in school safeguarding processes and when it is necessary to escalate. Our DSLs know what local and national specialist support is available to support all children involved in harmful sexual behaviour and are confident as to how to access this support when required.

Designated safeguarding lead/s and their deputies have an in-depth working knowledge of key documentation, particularly KCSIE 2022 and Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE 2021). We ensure that they receive appropriate specialist training, commensurate with their role and that ongoing training is provided for all school staff.

It is the role of school leaders and designated safeguarding leads to ensure that all staff and LAB Members receive training specific to harmful sexual behaviour, and that it is included as part of induction.

Staff

It is the responsibility of all staff to have read and understood this policy and associated policies. All staff must report any incidents or suspected incidents of harmful sexual behaviour to DSLs in line with school policy and ensure they are informed of the outcome. All staff will challenge any harmful sexual language or inappropriate behaviour. Staff have a duty to ensure that the school environment is one which is safe and which supports learners to understand safe and healthy relationships and appropriate behaviour through delivery of our curriculum.

LAB Members

We ensure that our trust board/Local Advisory Board have a good understanding of what harmful sexual behaviour is, when it can pose a risk to children and how to keep children safe. Our trustees/LAB Members receive regular training and updates, both in terms of what sexualised behaviour is, but also how to effectively support establishments and their stakeholders whilst holding provision to account.

As part of the headteacher's report, our trust board/Local Advisory Board has the opportunity to monitor and evaluate the approach to harmful sexual behaviour to ensure it is adequate and effective. This includes evaluation of the curriculum, pupil voice activity and evaluation of parent/carer engagement. Trustees/LAB Members ensure that risks relating to these issues are identified, that a number of reporting routes are available, and that risks are effectively mitigated.

Learners

All learners have the right to learn in a safe, healthy and respectful school environment. Our learners benefit from a broad and balanced curriculum and are taught about healthy relationships and know how and when to report and that a range of different reporting routes is available to them. Our learners are encouraged to report any harmful sexual behaviour, even if they are not directly involved. All learners will be believed if they make a disclosure and will be treated sensitively - whilst we cannot guarantee confidentiality, their thoughts and wishes will be taken into account when supporting them.

Parents/carers

We work hard to engage parents and carers by:

- Sessions in school
- sharing newsletters

- sharing information online e.g., website, social media
- providing curriculum information

Our parents and carers are made aware of how and when to report any concerns to the school, that all incidents will be handled with care and sensitivity, and that it may sometimes be necessary to involve other agencies.

Vulnerable groups

We recognise that, nationally, vulnerable learners are three times more likely to be at risk from Harmful Sexual Behaviour. These include:

- A child with additional needs and disabilities.
- A child living with domestic abuse.
- A child who is at risk of/suffering significant harm.
- A child who is at risk of/or has been exploited or at risk of exploited (CRE, CSE),
- A care experienced child.
- A child who goes missing or is missing education.
- Children who identify as, or are perceived as, LGBTQI+ and/or any of the other protected characteristics

Children displaying HSB have often experienced their own abuse and trauma. We ensure that any vulnerable learner is offered appropriate support, both within and outside school, sometimes via specialist agencies.

Reporting

Our systems are well promoted, easily understood and easily accessible for children and young people to confidently report abuse, knowing their concerns will be treated seriously. All reports will be dealt with swiftly and sensitively and outcomes shared where appropriate. We also respond to anonymous reports, or reports made by third parties. This can be done via:

- online reporting tool,
- links to national or local organisations

Responding to an incident or disclosure

In this policy we recognise the importance of distinguishing between healthy, problematic and sexually harmful behaviour (HSB)

Our response is always based on sound safeguarding principles and follows school safeguarding processes. It is calm, considered and appropriate and puts the learner at the centre of all decisions made.

The school will always adopt a multi-agency approach and seek external support and guidance, in line with school policy, if deemed necessary. This may include MASH, Early Help, CAMHS, Police etc

Risk assessment

The school may deem it necessary to complete a harmful sexual behaviour risk assessment as part of the response to any reported incidents. The purpose of the risk assessment is the protect and support all those involved by identifying potential risk, both in and out of school (e.g., including public transport, after school clubs etc) and by clearly describing the strategies put in place to mitigate such risk.

The risk assessment will be completed following a meeting with all professionals working with the learner, as well as parents or carers. Where appropriate, the learners involved will also be asked to contribute.

The risk assessment will be shared will all staff who work with the learner, as well as parents and carers. It will be dynamic and will respond to any changes in behaviour and will be regularly evaluated to assess impact.

Education

Our school's educational approach seeks to develop knowledge and understanding of healthy, problematic and sexually harmful behaviours, and empowers young people to make healthy, informed decisions. Our school's approach is delivered predominantly through PSHE and RSE and additional opportunities are provided through:

- Cross curricular programmes
- Computing
- Assemblies
- Discrete lessons
- Visits from outside agencies

Our approach is given the time it deserves and is authentic i.e., based on current issues nationally, locally and within our setting. It is shaped and evaluated by learners and other members of the school community to ensure that it is dynamic, evolving and based on need. We do this by:

- Surveys
- Focus groups
- Parental engagement
- Staff consultation
- Staff training

Training

It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of HSB. This could form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding.

- Brook traffic light tool
- NSPCC training
- Clennell Training
- Whole staff training

A clear training strategy which supports staff to respond effectively to different types of harassment and sexual misconduct incidents. This should involve an assessment of the training needs of all staff. This strategy should be reviewed and evaluated on a regular basis to ensure it is fit for purpose.
Training should be made available on an ongoing basis for all staff and students to raise awareness of harassment and sexual misconduct with the purpose of preventing incidents and encouraging reporting where they do occur.

Links

Child Exploitation and Online Protection command: CEOP is a law enforcement agency which aims to keep children and young people safe from sexual exploitation and abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors

The NSPCC provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk. The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies)

Support from specialist sexual violence sector organisations such as Rape Crisis or The Survivors Trust

The Anti-Bullying Alliance has developed guidance for schools about Sexual and sexist bullying.

The UK Safer Internet Centre provides an online safety helpline for professionals at 0344 381 4772 and helpline@saferinternet.org.uk. The helpline provides expert advice and support for school and college staff with regard to online safety issues

Internet Watch Foundation: If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF)

Childline/IWF Report Remove is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online

UKCIS Sharing nudes and semi-nudes advice: Advice for education settings working with children and young people on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery).

Thinkuknow from NCA-CEOP provides support for the children's workforce, parents and carers on staying safe online

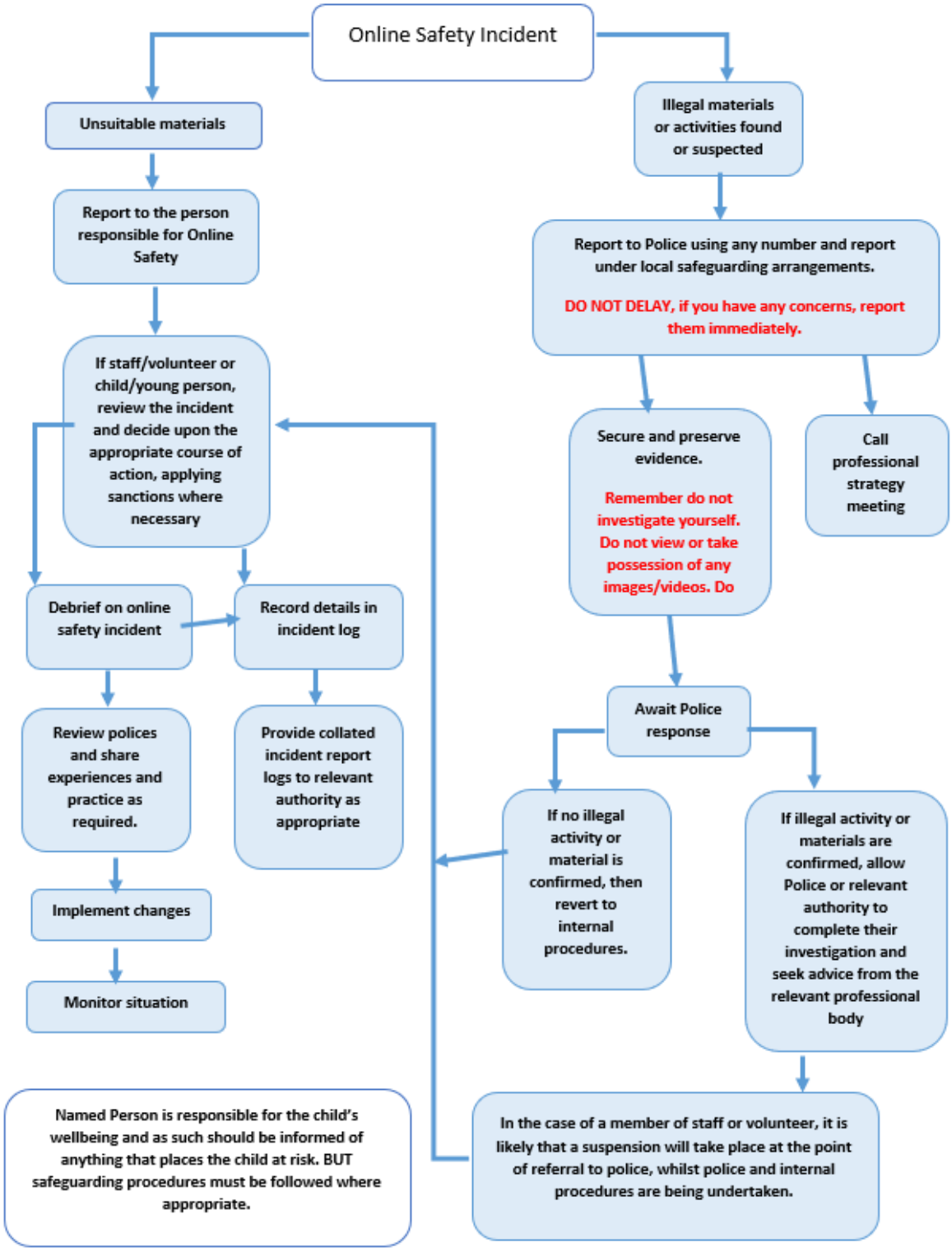
Lucy Faithful Foundation

Marie Collins Foundation

NSPCC National Clinical and Assessment Service (NCATS)

Project deSHAME from Childnet provides useful research, advice and resources regarding online sexual harassment.

Responding to incidents of misuse – flow chart



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

Group	
Date	
Reason for Investigation	

Name of first reviewing person	
Position	
Signature	
Name of second reviewing person	
Position	
Signature	

Name and location of computer used for review (for websites)

Website(s) address / device	**Reason for concern**

Conclusion and Action proposed or taken

Reporting Log						
Date	Time	Incident	What action was taken?	By whom?	Incident Report by	Signature

School Online Safety Policy: Electronic Devices - Searching Screening and Confiscation

Introduction

The changing face of information technologies and ever-increasing learner use of these technologies has meant that the Education Acts were updated to keep pace. Part 2 of the Education Act 2011 (Discipline) introduced changes to the powers afforded to schools by statute to search learners 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 screen, confiscate and search for items 'banned under the school rules' and the power to 'delete data' stored on confiscated 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 relates to an offence and/or may 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 Headteacher must publicise the school behaviour policy, in writing, to staff, parents/carers and learners at least once a year. (There should therefore be clear links between the search etc. policy and the behaviour policy).

DfE advice on these sections of the Education Act 2011 can be found in the document: "Screening, searching and confiscation – Advice for schools" (**updated July 2022**)

It is recommended that Headteachers (and, at the least, one other senior leader) should be familiar with this guidance.
The DfE Guidance – "Behaviour in Schools" was updated in July 2022 and refers to behaviour online:

"The way in which pupils relate to one another online can have a significant impact on the culture at school. Negative interactions online can damage the school's culture and can lead to school feeling like an unsafe place. Behaviour issues online can be very difficult to manage given issues of anonymity, and online incidents occur both on and off the school premises. Schools should be clear that even though the online space differs in many ways, the same standards of behaviour are expected online as apply offline, and that everyone should be treated with kindness, respect and dignity.

Inappropriate online behaviour including bullying, the use of inappropriate language, the soliciting and sharing of nude or semi-nude images and videos and sexual harassment should be addressed in accordance with the same principles as offline behaviour, including following the child protection policy and speaking to the designated safeguarding lead (or deputy) when an incident raises a safeguarding concern.

Many online behaviour incidents amongst young people occur outside the school day and off the school premises. Parents are responsible for this behaviour. However, often incidents that occur online will affect the school culture. Schools should have the confidence to sanction pupils when their behaviour online poses a threat or causes harm to another pupil, and/or could have repercussions for the orderly running of the school, when the pupil is identifiable as a member of the school or if the behaviour could adversely affect the reputation of the school.

A new Keeping Children Safe in Education guidance document is in force from September 2022. Schools should be aware of new guidance concerning Harmful Sexual Behaviour (see policy template in these appendices):

"Following any report of child-on-child sexual violence or sexual harassment offline or online, schools should follow the general safeguarding principles set out in Keeping children safe in education (KCSIE) - especially Part 5. The designated safeguarding lead (or deputy) is the most appropriate person to advise on the school's initial response. Each incident should be considered on a case-by-case basis.

Schools should be clear in every aspect of their culture that sexual violence and sexual harassment are never acceptable, will not be tolerated and that pupils whose behaviour falls below expectations will be sanctioned. Schools should make clear to all staff the importance of challenging all inappropriate language and behaviour between pupils. Schools should refer to the Respectful School Communities toolkit for advice on creating a culture in which sexual harassment of all kinds is treated as unacceptable."

Relevant legislation:

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

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

Responsibilities

The Headteacher is responsible for ensuring that the school policies reflect the requirements contained within the relevant legislation. The formulation of these policies may be delegated to other individuals or groups. The policies will normally be taken to LAB Members 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 annually.

The Headteacher has authorised the following staff members to carry out searches for and of electronic devices and the deletion of data/files on those devices: Mrs S. Robinson (Headteacher) and Mrs C. Fryett (Assistant Headteacher)

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, confiscation 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

Screening
DfE "Screening, searching and confiscation – Advice for schools" allows schools to use screening:

"Screening can help provide reassurance to pupils, staff and parents that the school is taking measures to create a calm, safe and supportive environment.

Schools' statutory power to make rules on pupil behaviour and their duties as employers in relation to the safety of staff, pupils and visitors enables them to impose a requirement that pupils undergo screening.

Screening is the use of a walk-through or hand-held metal detector (arch or wand) to scan all pupils for weapons before they enter the school premises..

If a headteacher decides to introduce a screening arrangement, they should inform pupils and parents in advance to explain what the screening will involve and why it will be introduced."

The school should add here details of any screening arrangements that are in place:

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.

At Pentland, if children bring mobile phones in they get put into a locked cupboard in their classroom for the day and handed back out at home time. This is the teacher's responsibility.

The sanctions for breaking these rules will be confiscation of the electronic device and phone call home to parents

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 learner's consent for any item
- Searching without consent - Authorised staff may only search without the learner'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 learner 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 e.g. an occupied classroom, which might be considered as exploiting the learner being searched.

The authorised member of staff carrying out the search must be the same gender as the *learner* 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 *learner* being searched.

There is a limited exception to this rule: Authorised staff can carry out a search of a learner 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 learner 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 learner has or appears to have control.

A learner's possessions can only be searched in the presence of the learner 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

The DfE guidance – Searching, Screening and Confiscation received significant updates in July 2022 and now states:

- Electronic devices, including mobile phones, can contain files or data which relate to an offence, or which may cause harm to another person. This includes, but is not limited to, indecent images of children, pornography, abusive messages, images or videos, or evidence relating to suspected criminal behaviour.
- As with all prohibited items, staff should first consider the appropriate safeguarding response if they find images, data or files on an electronic device that they reasonably suspect are likely to put a person at risk
- Staff may examine any data or files on an electronic device they have confiscated as a result of a search .. if there is good reason to do so (defined earlier in the guidance as)
    - poses a risk to staff or pupils;
    - is prohibited, or identified in the school rules for which a search can be made or
    - is evidence in relation to an offence.

- If the member of staff conducting the search suspects they may find an indecent image of a child (sometimes known as nude or semi-nude images), the member of staff should never intentionally view the image, and must never copy, print, share, store or save such images. When an incident might involve an indecent image of a child and/or video, the member of staff should confiscate the device, avoid looking at the device and refer the incident to the designated safeguarding lead (or deputy) as the most appropriate person to advise on the school's response. Handling such reports or concerns can be especially complicated and schools should follow the principles as set out in Keeping children safe in education. The UK Council for Internet Safety also provides the following guidance to support school staff and designated safeguarding leads: Sharing nudes and semi-nudes: advice for education settings working with children and young people.
- If a member of staff finds any image, data or file that they suspect might constitute a specified offence, then they must be delivered to the police as soon as is reasonably practicable.
- In exceptional circumstances members of staff may dispose of the image or data if there is a good reason to do so. In determining a 'good reason' to examine or erase the data or files, the member of staff must have regard to the following guidance issued by the Secretary of State
    - In determining whether there is a 'good reason' to examine the data or files, the member of staff should reasonably suspect that the data or file on the device has been, or could be used, to cause harm, undermine the safe environment of the school and disrupt teaching, or be used to commit an offence.
    - In determining whether there is a 'good reason' to erase any data or files from the device, the member of staff should consider whether the material found may constitute evidence relating to a suspected offence. In those instances, the data or files should not be deleted, and the device must be handed to the police as soon as it is reasonably practicable. If the data or files are not suspected to be evidence in relation to an offence, a member of staff may delete the data or files if the continued existence of the data or file is likely to continue to cause harm to any person and the pupil and/or the parent refuses to delete the data or files themselves

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 Mrs S. Robinson will ensure that full records are kept of incidents involving the searching for and of electronic devices and the deletion of data/files.

These records will be reviewed by the Online Safety Officer, the Online Safety Committee, Local Advisory Boards and Directors at regular intervals (termly).

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

Mobile Technologies Policy

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

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

The school allows:

	School / Devices			Personal Devices		
	School owned and allocated to a single user	School owned for use by multiple users	Authorised device[6]	Learner owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	Yes[7]	Yes[7]	Yes[7]
Full network access	Yes	Yes	Yes	No	No	No
Internet only	Yes	Yes	Yes	No	No	Yes
No network access	No	No	No	No	No	No

The school has provided technical solutions for the safe use of mobile technology for school devices/personal devices:

- 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
- All school devices are subject to routine monitoring
- Pro-active monitoring has been implemented to monitor activity

When personal devices are permitted:

- All personal devices are restricted through the implementation of technical solutions that provide appropriate levels of network access
- Personal devices are brought into the school entirely at the risk of the owner and the decision to bring the device in to the school lies with the user (and their parents/carers) as does the liability for any loss or damage resulting from the use of the device in school

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

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

- The school accepts no responsibility or liability in respect of lost, stolen or damaged devices while at school or on activities organised or undertaken by the school (the school recommends insurance is purchased to cover that device whilst out of the home)
- The school accepts no responsibility for any malfunction of a device due to changes made to the device while on the school network or whilst resolving any connectivity issues
- The school recommends that the devices are made easily identifiable and have a protective case to help secure them as the devices are moved around the school. Pass-codes or PINs should be set on personal devices to aid security
- The school is not responsible for the day to day maintenance or upkeep of the users personal device such as the charging of any device, the installation of software updates or the resolution of hardware issues
- Users are expected to act responsibly, safely and respectfully in line with current acceptable use agreements, in addition;
- 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
- Personal devices should be charged before being brought to the school as the charging of personal devices is not permitted during the school day
- Devices must be in silent mode on the school site and on school buses
- School devices are provided to support learning. It is expected that learners will bring devices to the school as required.
- Confiscation and searching (England) - the school has the right to take, examine and search any device that is suspected of unauthorised use, either technical or inappropriate.
- The changing of settings (exceptions include personal settings such as font size, brightness, etc…) that would stop the device working as it was originally set up and intended to work is not permitted
- The software/apps originally installed by the school must remain on the school owned device in usable condition and be easily accessible at all times. From time to time the school may add software applications for use in a particular lesson. Periodic checks of devices will be made to ensure that users have not removed required apps
- The school will ensure that 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 learners on authorised devices once they leave the school roll. Any apps bought by the user on their own account will remain theirs.
- Users should be mindful of the age limits for app purchases and use and should ensure they read the terms and conditions before use.
- Users must only photograph people with their permission. Users must only take pictures or videos that are required for a task or activity. All unnecessary images or videos will be deleted immediately
- Devices may be used in lessons in accordance with teacher direction
- Staff owned devices should not be used for personal purposes during teaching sessions, unless in exceptional circumstances
- Printing from personal devices will not be possible

Social Media Policy

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

The school recognises the numerous benefits and opportunities which a social media presence offers. Staff, parents/carers and learners 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 learners 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.
Digital communications with learners are also considered.

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

Process for creating new accounts

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

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

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

Monitoring

School accounts must be monitored regularly and frequently (preferably 7 days a week, including during holidays). Any comments, queries or complaints made through those accounts must be responded to within 24 hours (or on the next working day if received at a weekend) even if the response is only to acknowledge receipt. Regular monitoring and intervention is essential in case a situation arises where bullying or any other inappropriate behaviour arises on a school social media account.

Behaviour

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

Legal considerations

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

Handling abuse

- When acting on behalf of the school, respond to harmful and / or 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 online communications, 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 online content are:

- Engaging
- Conversational
- Informative
- Professional

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 learner pictures online other than via official school channels.
- Staff should exercise their professional judgement about whether an image is appropriate to share on school social media accounts. Learners 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 online accounts. In all cases, where a personal account is used which associates itself with the school or impacts on the school, it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.
- Personal communications which do not refer to or impact upon the school are outside the scope of this policy.
- Where excessive or inappropriate personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken

Learners

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

Parents/Carers

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

Monitoring posts about the school

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

Appendix

Managing your personal use of Social Media:

- "Nothing" on social media is truly private

- Social media can blur the lines between your professional and private life. Don't use the school logo and/or branding on personal accounts
- Check your settings regularly and test your privacy
- Keep an eye on your digital footprint
- Keep your personal information private
- Regularly review your connections – keep them to those you want to be connected to
- When posting online consider; Scale, Audience and Permanency of what you post
- If you want to criticise, do it politely.
- Take control of your images – do you want to be tagged in an image? What would children or parents say about you if they could see your images?
- Know how to report a problem

Managing school social media accounts

The Do's

- Check with a senior leader before publishing content that may have controversial implications for the school
- Use 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
- Ensure the account is set up securely and the account can be transferred to another approved staff member in the event of the account holder leaving the school.

The Don'ts

- Don't make comments, post content or link to materials that will bring the school into disrepute
- Don't publish confidential or commercially sensitive material
- Don't breach copyright, data protection or other relevant legislation
- Don't link to, embed or add potentially inappropriate content. Consider the appropriateness of content for any audience of school accounts.
- Don't post derogatory, defamatory, offensive, harassing or discriminatory content
- Don't use social media to air internal grievances

Legislation

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

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

A useful summary of relevant legislation can be found at: Report Harmful Content: Laws about harmful behaviours

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.

Schools 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 (UK 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 learners 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.

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

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:

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/
Harmful Sexual Support Service
CEOP - http://ceop.police.uk/
ThinkUKnow - https://www.thinkuknow.co.uk/
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

Tools for Schools / other organisations
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
SWGfL Test filtering - http://testfiltering.com/
UKCIS Digital Resilience Framework - https://www.gov.uk/government/publications/digital-resilience-framework
SWGfL 360 Groups – online safety self review tool for organisations working with children
SWGfL 360 Early Years - online safety self review tool for early years organisations
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

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

Department for Education: Teaching Online Safety in Schools
Teach Today – www.teachtoday.eu/
Insafe - Education Resources

Data Protection
360data - free questionnaire and data protection self review tool
ICO Guides for Organisations
IRMS - Records Management Toolkit for Schools
ICO Guidance on taking photos in schools

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/Cyber-security
UKSIC – Appropriate Filtering and Monitoring
SWGfL Safety & Security Resources
Somerset - Questions for Technical Support
SWGfL - Cyber Security in Schools.
NCA – Guide to the Computer Misuse Act
NEN – Advice and Guidance Notes

Working with parents and carers
SWGfL – Online Safety Guidance for Parents & Carers
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
Childnet – Trust Me

Research
Ofcom –Media Literacy Research
Ofsted: Review of sexual abuse in schools and colleges

Further links can be found at the end of the UKCIS Education for a Connected World Framework

Glossary of Terms

AUP/AUA	Acceptable Use Policy/Agreement – see templates earlier in this document
CEOP	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.
CPD	Continuous Professional Development
FOSI	Family Online Safety Institute
ICO	Information Commissioners Office
ICT	Information and Communications Technology
INSET	In Service Education and Training
IP address	The label that identifies each computer to other computers using the IP (internet protocol)
ISP	Internet Service Provider
ISPA	Internet Service Providers' Association
IWF	Internet Watch Foundation
LA	Local Authority
LAN	Local Area Network
MAT	Multi Academy Trust
MIS	Management Information System
NEN	National Education Network – works with the Regional Broadband Consortia (e.g. SWGfL) to provide the safe broadband provision to schools across Britain.
Ofcom	Office of Communications (Independent communications sector regulator)
SWGfL	South West Grid for Learning Trust – the Regional Broadband Consortium of SW Local Authorities – is the provider of broadband and other services for schools and other organisations in the SW
TUK	Think U Know – educational online safety programmes for schools, young people and parents.
UKSIC	UK Safer Internet Centre – EU funded centre. Main partners are SWGfL, Childnet and Internet Watch Foundation.
UKCIS	UK Council for Internet Safety
VLE	Virtual Learning Environment (a software system designed to support teaching and learning in an educational setting,
WAP	Wireless Application Protocol

A more comprehensive glossary can be found at the end of the UKCIS Education for a Connected World Framework