Online Safety Policy

Galleywood Infant School

Policy written: March 2022

Agreed by staff and governors: May 2022

Review: May 2023

Contents

Development/Monitoring/Review of this Policy

This online safety policy has been developed by members of the school made up of:

- Headteacher and senior leaders
- Staff – including teachers, support staff, technical staff
- Governors
- Parents and carers
- Community users

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

Schedule for Development/Monitoring/Review

This online safety policy was approved by Governing Body on	*11th May 2022*
The implementation of this online safety policy will be monitored by the:	*Headteacher, Senior Leadership Team, Online Safety Governor*
Monitoring will take place at regular intervals:	*At least annually*
The Governing Body will receive a report on the implementation of the online safety policy and will include anonymous details of online safety incidents at regular intervals:	*Termly at FGB*
The online safety policy will be reviewed annually, or more regularly in the light of significant developments in the use of technologies, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	*May 2023*
Should serious online safety incidents take place, the following external persons/agencies should be informed:	*LA Safeguarding Officer, LADO, Police*

The school will monitor the impact of the policy using:

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

Scope of the Policy

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

The Education and Inspections Act 2006 empowers Headteachers to such extent as is reasonable, to regulate the behaviour of pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of online-bullying or other

online safety incidents covered by this policy, which may take place outside of the school, but is linked to membership of the school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data. In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

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

Policy Statement

For clarity, the online safety policy uses the following terms unless otherwise stated:

Users – refers to staff, governing body, school volunteers, students and any other person working in or on behalf of the school, including contractors.
Parents and Carers - any adult with a legal responsibility for the child/ young person outside the school. E.g. parent, guardian, carer.
School – any school business or activity conducted on or off the school site, e.g. visits, conferences school trips etc.
Wider school community – students, all staff, governing body, parents, clubs.

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

The primary purpose of this policy is twofold:

1. To ensure the requirement to empower the whole school community with the knowledge to stay safe and risk free is met.
2. To ensure risks are identified, assessed, and mitigated (where possible) in order to reduce any foreseeability of harm to the student or liability to the school.

This policy is available for anybody to read on the school's website; upon review all members of staff will sign as read and understand and agree to follow both the online safety policy and the Staff Acceptable Use policy. A copy of this policy and the student's acceptable use policy will be sent home as part of our admissions pack. Upon return of the signed permission slip and acceptance of the terms and conditions, students will be permitted access to school technology including the internet.

Roles and Responsibilities

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

Governing Body

The governing body is accountable for ensuring that out school has effective policies and procedures in place: as such they will:

- Review this policy at least annually and in response to any online safety incident to ensure that the policy is up to date, covers all aspects of technology use within the school, to ensure online safety incidents were appropriately dealt with and ensure the policy was effective in managing these incidents.
- Appoint one governor Nazia Hussein who has overall responsibility for the governance of online safety at the school who will:
    - Keep up to date with the emerging risks and threats through technology use
    - Receive regular updates from the head teacher in regards to training, identified risks and any incidents.
    - Meet with the Online Safety Lead
    - With Online Safety Lead, report to governors on online safety issues that arise

Head teacher and Senior Leaders

Reporting to the governing body, the head teacher has overall responsibility for online safety within our school. The day-to-day management of this will be delegated to a member of staff, the online safety lead, as indicated below.

The Head teacher will ensure that:

- Online safety training throughout the school is planned and up to date and appropriate to the recipient, e.g., students, all staff, SLT and governing body, parents.
- The designated online safety lead has had appropriate CPD in order to undertake the day-to-day duties.
- The Headteacher and Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and support to those colleagues who take on important monitoring roles.
- All online safety incidents are dealt with promptly and appropriately. The Headteacher and (at least) another member of the Senior Leadership Team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff. (See flow chart on dealing with online safety incidents later in this policy)
- The Senior Leadership Team will receive regular monitoring reports from the Online safety Co-ordinator / Officer.

Online Safety Lead

The day-to-day duty of online safety officer is devolved to: Rachel Foster

The online safety officer will:

- Take day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies/documents
- Provide training and advice for staff and ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- Liaise with the Local Authority, IT technical support and other agencies as required.
- Ensure any technical online safety measures in school (e.g., internet filtering software, behaviour management software) are fit for purpose through liaison with the LA and ICT technical support.

- Retain responsibility for the online safety incident log, ensure staff know what to report and ensure the appropriate audit trail as well as a log of incidents to inform future online safety developments. SEE APPENDIX A (Online Safety Incident Log)
- Meets regularly with Online Safety Governor to discuss current issues, review incident logs and filtering/change control logs
- Make herself aware of any reporting function with technical online safety measures, i.e., internet filtering reporting function, liaise with the Head teacher and responsible governor to decide on what reports may be appropriate for viewing.
- As part of Senior Leadership Team and in partnership with them decides on the investigation/ action and sanctions process for any online safety incidents.
- Engage with parents and the school community on online safety matters at school and/or home.
- Keep up to date with the latest risks to children whilst using technology; familiarise him/ herself with the latest research and available resources for school and home use.

Network Manager/Technical staff

Those with technical responsibilities are responsible for ensuring:

- That the school's technical infrastructure is secure and is not open to misuse or malicious attack; this will include at a minimum:
    - Anti-virus is fit for purpose, up to date and applied to all capable devices.
    - Windows updates are regularly monitored, and devices updated as appropriate.
    - Any online safety technical solutions such as internet filtering are operating correctly.
    - Filtering levels are applied appropriately and according to the age of the user; those categories of use are discussed and agreed with the online safety officer and the Head teacher.
    - Passwords may not be applied to shared pupil areas. Passwords for staff will be a minimum of 8 characters.
    - The IT system administrator password is to be changed at regular intervals.
    - Machines are encrypted and memory sticks containing pupil information are encrypted.
- That the school meets required online safety technical requirements and any Local Authority/ other relevant body online safety policy/guidance that may apply.
- That users may only access the networks and devices through a properly enforced password protection policy
- The filtering policy is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person (see appendix "Technical Security Policy Template" for good practice)
- That they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- That the use of the networks/internet/digital technologies is regularly monitored in order that any misuse/attempted misuse can be reported to the Headteacher and Senior Leaders; Online Safety Lead for investigation/action/sanction
- That monitoring software/systems are implemented and updated as agreed in school policies

Teaching and Support Staff

Are responsible for ensuring that:

- They have an up-to-date awareness of online safety matters and of the current school online safety policy and practices
- They have read, understood, signed, and abide by the staff acceptable use policy (AUP)
- They report any suspected misuse or problem to the Headteacher/Online Safety Lead/Senior Leaders for investigation/action/sanction and is recorded in the online safety incident log.
- All digital communications with pupils/parents/carers should be on a professional level and only carried out using official school systems
- Online safety issues are embedded in all aspects of the curriculum and other activities and implement current policies with regard to the use of digital technologies, mobile devices, cameras etc in lessons.
- Pupils understand and follow the Online Safety Policy and acceptable use policies
- They monitor the use of digital technologies, mobile devices, cameras, etc. in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- In lessons where internet use is pre-planned pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches

Senior Designated Person for Safeguarding

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

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

Online Safety Group

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

Members of the Online Safety Group (or other relevant group) will assist the Online Safety Lead (or other relevant person, as above) with:

- The production/review/monitoring of the school online safety policy/documents.
- Mapping and reviewing the online safety/digital literacy curricular provision – ensuring relevance, breadth and progression
- Monitoring network/internet/filtering/incident logs
- Consulting stakeholders – including parents/carers and the students/pupils about the online safety provision
- Monitoring improvement actions identified through use of the 360-degree safe self-review tool

Pupils:

- Are responsible for using the school digital technology systems in accordance with the pupil acceptable use agreement

- Need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- Will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking/use of images and on online-bullying.
- Should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's online safety policy covers their actions out of school, if related to their membership of the school

Parents/carers

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

- digital and video images taken at school events
- access to parents' sections of the website/Learning Platform and on-line pupil records

Community Users

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

Policy Statements

Education – All Pupils

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

In planning our online safety curriculum, we refer to the following documents:

- DfE Teaching Online Safety in Schools
- Education for a Connected Word Framework
- SWGfL Project Evolve – online safety curriculum programme and resources
- NCCE Teach Computing curriculum
- SCARF curriculum for PSHE education

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

- A planned online safety curriculum should be provided as part of Computing/PHSE/other lessons and should be regularly revisited

- Key online safety messages should be reinforced as part of a planned programme of assemblies and classroom activities
- Pupils should be taught in all lessons to be critically aware of the materials/content they access on-line and be guided to validate the accuracy of information.
- Pupils should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Pupils should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- Pupils should be helped to understand the need for the student/pupil acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school.
- Staff should act as good role models in their use of digital technologies, the internet, and mobile devices
- In lessons where internet use is pre-planned, it is best practice that pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Pupils will not be allowed to freely search the internet.
- 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 can request that the our IT Support can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

Education – Parents/carers

Many parents and carers have only a limited understanding of online safety risks and issues, yet they play an essential role in the education of their children and in the monitoring/regulation of the children's online behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.
The school will therefore seek to provide information and awareness to parents and carers through:

- Curriculum activities
- Letters, newsletters, web site, Tapestry
- Parents/carers sessions
- High profile events/campaigns e.g., Safer Internet Day
- Reference to the relevant web sites/publications e.g., www.saferinternet.org.uk/, http://www.childnet.com/parents-and-carers

Education – The Wider Community

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

- Providing family learning courses in use of new digital technologies, digital literacy and online safety
- Online safety messages targeted towards grandparents and other relatives as well as parents.
- The school website will provide online safety information for the wider community
- Sharing their online safety expertise/good practice with other local schools

- Supporting community groups e.g. Early Years Settings, Childminders, youth/sports/voluntary groups to enhance their online safety provision through online safety self-review tools such as www.onlinecompass.org.uk

Education & Training – Staff/Volunteers

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

- A planned programme of formal online safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly.
- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school/academy online safety policy and acceptable use agreements.
- It is expected that some staff will identify online safety as a training need within the performance management process.
- The Online Safety Lead will receive regular updates through attendance at external training events including termly computing update, 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 and/or training sessions.
- The Online Safety Lead will provide advice/guidance/training to individuals as required.

Training – Governors

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

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

Technical – infrastructure/equipment, filtering and monitoring

Galleywood Infant School uses a range of devices including Ipads, Cameras, PCs and Laptops. The school will be responsible for ensuring that the school network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their online safety responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems, and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school/academy technical systems and devices.
- Group and class log-ons are used for children in the school as they are age appropriate, but the school is aware of the risks associated with not being able to identify any individual who may have infringed

the rules set out in the policy and the AUP. To address this, pupils should always be supervised, and members of staff should never use a class log on for their own network / internet access.

- The administrator passwords for the school systems, used by the Network Manager (or other person) must also be available to the Headteacher or other nominated senior leader and kept in a secure place (e.g. school safe)
- The network provider is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all users. We use an educational filtered system that prevents unauthorised access to illegal websites. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored. There is a clear process in place to deal with requests for filtering changes
- Internet filtering/monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet.
- The school has provided enhanced/differentiated user-level filtering allowing different filtering levels for different ages/stages and different groups of users – staff/pupils/students etc
- Senior Leaders and our technical support company (IThelpdirect) the regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement. Senior Leaders and the technical support company (IThelpdirect) monitor attempts to access blocked sites and act accordingly.
- Any online safety incident is to be brought to the immediate attention of the head teacher and online safety officer. The online safety officer will assist you in taking the appropriate action to deal with the incident and fill out an incident log e.g., any threatening or inappropriate pop-ups/pages will be reported to the online safety officer, and this will be addressed.
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, workstations, mobile devices, etc. from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual devices are protected by up to date virus software.
- Guests such as trainee teachers, supply teachers or visitors will be given a school email address if appropriate, or a 'guest' login to use the school systems. They will have signed an acceptable use policy before using the school IT systems.
- An agreed policy is in place through the signing of a staff AUP regarding the extent of personal use that users and their family members are allowed on school devices that may be used out of school.
- All school devices that hold personal data (as defined by the Data Protection Act 1998) are encrypted. No data is to leave school on an un-encrypted device; all devices that are kept on school property and which may contain personal data are to be encrypted. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured Any loss or theft of device such as laptop or USB drive is to be brought to the attention of the head teacher immediately. The head teacher will liaise with the online safety governor to ascertain whether a report needs to be made to the Information Commissioner's Office.

Mobile Technologies (including BYOD/BYOT)

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

All users should understand that the primary purpose of the use mobile/personal devices in a school context is educational. The mobile technologies policy should be consistent with and inter-related to other relevant school polices including but not limited to the safeguarding policy, behaviour policy, bullying policy, acceptable use policy, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school's online safety education programme.

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

	School Devices			Personal Devices		
	School owned for single user	School owned for multiple users	Authorised device[1]	Student owned	Staff owned	Visitor owned
Allowed in school	*Yes*	*Yes*	*No*	*No*	*Yes*	*Yes*
Full network access	*Yes*	*Yes*			*No*	*No*
Internet only						*Yes*
No network access						

Aspects that the school may wish to consider and be included in their online safety policy, mobile technologies policy or acceptable use agreements:

School owned/provided devices:

- *Who they will be allocated to*
- *Where, when and how their use is allowed – times/places/in school/out of school*
- *If personal use is allowed*
- *Levels of access to networks/internet (as above)*
- *Management of devices/installation of apps/changing of settings/monitoring*
- *Network/broadband capacity*

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

- *Technical support*
- *Filtering of devices*
- *Access to cloud services*
- *Data Protection*
- *Taking/storage/use of images*
- *Exit processes – what happens to devices/software/apps/stored data if user leaves the school*
- *Liability for damage*
- *Staff training*

Personal devices:

- Which users are allowed to use personal mobile devices in school (staff/pupils/students/visitors)
- Restrictions on where, when and how they may be used in school
- Storage
- Whether staff will be allowed to use personal devices for school business
- Levels of access to networks/internet (as above)
- Network/broadband capacity
- Technical support (this may be a clear statement that no technical support is available)
- Filtering of the internet connection to these devices
- Data Protection
- The right to take, examine and search users devices in the case of misuse (England only) – N.B. this must also be included in the Behaviour Policy.
- Taking/storage/use of images
- Liability for loss/damage or malfunction following access to the network (likely to be a disclaimer about school responsibility).
- Identification/labelling of personal devices
- How visitors will be informed about school requirements
- How education about the safe and responsible use of mobile devices is included in the school online safety education programmes.

Safe Use

Internet: Use of the internet in school is a privilege, not a right. Internet use will be granted: to staff upon signing this online safety and the staff acceptable use policy; pupils (or their parents) upon signing and returning their acceptance of the acceptable use policy.

Email: All staff are reminded that their emails are subject to Freedom of Information Requests, and as such the email service is to be used for professional work-based emails only. Emails of a personal nature are not permitted. Similarly use of personal emails for work purposes are not permitted.

Incidents: Any online safety incident is to be brought to the immediate attention of the head teacher and online safety officer. The online safety officer will assist you in taking the appropriate action to deal with the

incident and fill out an incident log e.g. any threatening or inappropriate pop-ups/pages will be reported to the online safety officer and this will be addressed.

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and students/pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and students/pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for 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:

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

Data Protection

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

- Fairly and lawfully processed
- Processed for limited purposes

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

The school will ensure that:

- It has a Data Protection Policy.
- It implements the data protection principles and is able to demonstrate that it does so through use of policies, notices and records.
- It has paid the appropriate fee Information Commissioner's Office (ICO) and included details of the Data Protection Officer (DPO).
- It has appointed an appropriate Data Protection Officer (DPO) who has a high level of understanding of data protection law and is free from any conflict of interest.
- It has an 'information asset register' in place and knows exactly what personal data it holds, where this data is held, why and which member of staff has responsibility for managing it
- The information asset register records the lawful basis for processing personal data (including, where relevant, how consent was obtained and refreshed). Where special category data is processed, an additional lawful basis will have also been recorded
- It will hold only the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for. The school should develop and implement a 'retention policy" to ensure there are clear and understood policies and routines for the deletion and disposal of data to support this. Personal data held must be accurate and up to date where this is necessary for the purpose it is processed for. Have systems in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- It provides staff, parents, volunteers and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice
- Procedures must be in place to deal with the individual rights of the data subject, e.g. One of the 8 data subject rights applicable is that of Subject Access which enables an individual to see to have a copy of the personal data held about them (subject to certain exceptions which may apply).
- Data Protection Impact Assessments (DPIA) are carried out where necessary. For example, to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier (this may also require ensuring that data processing clauses are included in the supply contract or as an addendum)
- IT system security is ensured and regularly checked. Patches and other security essential updates are applied promptly to protect the personal data on the systems. Administrative systems are securely ring fenced from systems accessible in the classroom/to learners
- It has undertaken appropriate due diligence and has required data processing clauses in contracts in place with any data processors where personal data is processed.
- It understands how to share data lawfully and safely with other relevant data controllers.
- It reports any relevant breaches to the information commissioner within 72hrs of becoming aware of the breach in accordance with uk data protection law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents.

- If a maintained school/academy, it must have a freedom of information policy which sets out how it will deal with FOI requests.
- all staff receive data protection training at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff.

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

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

Staff must ensure that they:

- At all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse
- Can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- Can help data subjects understands their rights and know how to handle a request whether verbal or written. Know who to pass it to in the school
- Where personal data is stored or transferred on mobile or other devices (including usbs) these must be encrypted and password protected.
- Will not transfer any school personal data to personal devices except as in line with school policy
- Access personal data sources and records only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data

Communications

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

- The official school email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored.
- Users must immediately report to the nominated person – in accordance with the school policy, the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and pupils or parents/carers (email, social media, chat, blogs, VLE etc) must be professional in tone and content. These communications may only take place on official (monitored) school systems. Personal email addresses, text messaging or social media must not be used for these communications.
- Pupils should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

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

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

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

School staff should ensure that:

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

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

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

Personal Use:

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

Monitoring of Public Social Media:

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

The school's use of social media for professional purposes will be checked regularly by the senior risk officer and Online Safety Group to ensure compliance with the school policies.

Dealing with unsuitable/inappropriate activities

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

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

User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978 and with reference to guidance about dealing with self-generated images/sexting – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X

contain or relate to:	Criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	Pornography				X	
	Promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	Promotion of extremism or terrorism				X	
	Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Activities that might be classed as cyber-crime under the Computer Misuse Act: • 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)						X
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school/academy					X	
Revealing or publicising confidential or proprietary information (e.g. financial/personal information, databases, computer/network access codes and passwords)					X	
Unfair usage (downloading/uploading large files that hinders others in their use of the internet)					X	
Using school systems to run a private business					X	
Infringing copyright					X	
On-line gaming (educational)	X					
On-line gaming (non-educational)		X				
On-line gambling				X		
On-line shopping/commerce	X					

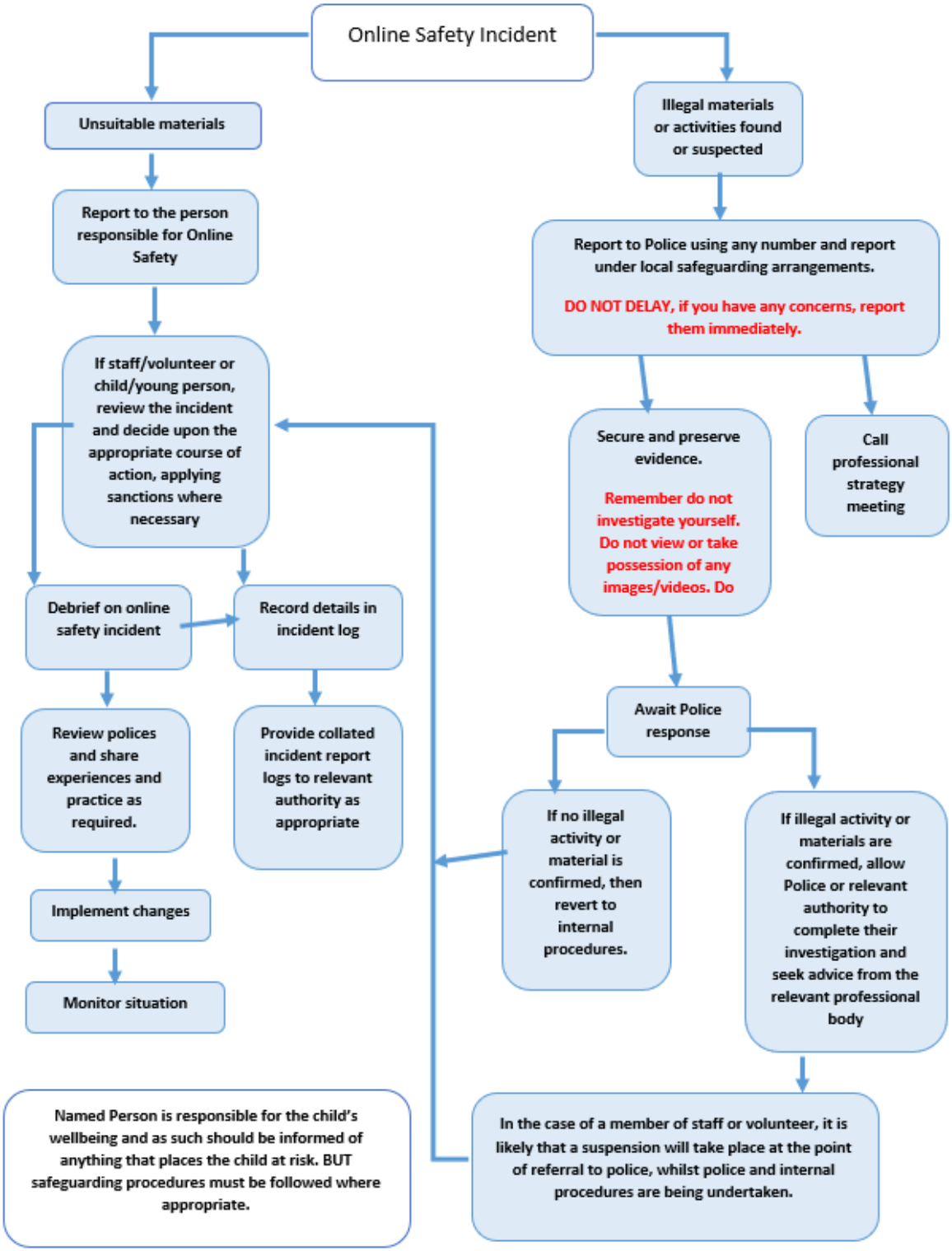
File sharing	X				
Use of social media		X			
Use of messaging apps		X			
Use of video broadcasting e.g. Youtube		X			

Responding to incidents of misuse

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

Illegal Incidents

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


Online Safety Incident
Unsuitable materials
Report to the person responsible for Online Safety
If staff/volunteer or child/young person, review the incident and decide upon the appropriate course of action, applying sanctions where necessary
Debrief on online safety incident
Record details in incident log
Review polices and share experiences and practice as required.
Provide collated incident report logs to relevant authority as appropriate
Implement changes
Monitor situation
Named Person is responsible for the child's wellbeing and as such should be informed of anything that places the child at risk. BUT safeguarding procedures must be followed where appropriate.
Illegal materials or activities found or suspected
Report to Police using any number and report under local safeguarding arrangements.
DO NOT DELAY, if you have any concerns, report them immediately.
Secure and preserve evidence.
Remember do not investigate yourself. Do not view or take possession of any images/videos. Do
Call professional strategy meeting
Await Police response
If no illegal activity or material is confirmed, then revert to internal procedures.
If illegal activity or materials are confirmed, allow Police or relevant authority to complete their investigation and seek advice from the relevant professional body
In the case of a member of staff or volunteer, it is likely that a suspension will take place at the point of referral to police, whilst police and internal procedures are being undertaken.

Other Incidents

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

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

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

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

School/academy actions & sanctions

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

that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with in conjunction with the school's behaviour and/or disciplinary policy.

APPENDIX A – Online safety Incident Log

APPENDIX B – Staff Acceptable Use Policy

APPENDIX C – Pupil Acceptable Use Policy

Appendix D - Parent Carer Acceptable Use Policy

Appendix A Online Safety Incident Log

Reporting Log

Group: .....

Date	Time	Incident	Action Taken		Incident Reported By	Signature
			What?	By Whom?		

Appendix B

Staff (and Volunteer) Acceptable Use Policy Agreement

School Policy

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

This acceptable use policy is intended to ensure:

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

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

Acceptable Use Policy Agreement

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

For my professional and personal safety:

- I understand that Galleywood Infant 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 that I will only use the systems for personal or recreational use within the policies and rules set down by the school.
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- I will immediately report any illegal, inappropriate, or harmful material or incident, I become aware of, to the appropriate person.

I will be professional in my communications and actions when using Galleywood Infant School systems:

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner, I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and/or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital/video images. I will not use my personal equipment to record these images 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.
- I will only use social networking sites in school in accordance with the school's policies.
- I will only communicate with pupils and parents/carers using official school systems. Any such communication will be professional in tone and manner. *There maybe times when staff use personal devices for communication with parents and carers. This should be recorded, and the appropriate person (Headteacher/online Safety Officer) notified*
- I will not engage in any on-line activity that may compromise my professional responsibilities.

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

- When I use my mobile devices in school, I will follow the rules set out in this agreement, in the same way as if I was using school equipment. I will also follow any additional rules set by the school about such use. I will ensure that any such devices are protected by up-to-date anti-virus software and are free from viruses.
- I will not use personal email addresses on the school/academy ICT systems.
- I will not open any hyperlinks in emails or any attachments to emails, unless the source is known and trusted, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will ensure that my data is regularly backed up, in accordance with relevant school/academy 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 not install or attempt to install programmes of any type on a machine, or store programmes on a computer, nor will I try to alter computer settings, unless this is allowed in school/academy policies.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in the School Personal Data Policy (or other relevant policy). Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper based documents containing personal data must be held in lockable storage.
- I understand that data protection policy requires that any staff or student/pupil data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by school policy to disclose such information to an appropriate authority.

- I will immediately report any damage or faults involving equipment or software; however this may have happened.

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

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

I understand that I am responsible for my actions in and out of Galleywood Infant School:

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

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

Staff/Volunteer Name: .....

Signed: .....

Date: .....

Appendix C

Pupil Acceptable Use Policy Agreement

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 (child): .....

Signed (parent): .....

Appendix D
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 new opportunities for everyone. They can stimulate discussion, promote creativity, and stimulate awareness of context to promote effective learning. Young people should always have an entitlement to safe internet access.

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/academy 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 regarding their on-line behaviour.

The school will try to ensure that *students/pupils* will have good access to digital technologies to enhance their learning and will, in return, expect the *students/pupils* to agree to be responsible users. A copy of the s*tudent/pupil* 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.

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

Permission Form

Parent/Carers Name: .....

Student/Pupil Name: .....

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

I understand that the school has discussed the acceptable use agreement with my son/daughter and that they have received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet – both in and out of school.

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

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

Signed: .....

Date: .....

Use of Digital/Video Images

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

Images may also be used to celebrate success through their publication in newsletters, on the school website and occasionally in the public media. Where an image is publicly shared by any means, only your child's initials will be used.

The school will comply with the Data Protection Act and request parent's/carers 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 using 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 pupils in the digital/video images.

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

Digital/Video Images Permission Form

Parent/Carers Name:..... Pupil Name:.....

As the parent/carer of the above student/pupil, I agree to the school taking digital/video images of my child/children.	Yes/No
I agree to these images being used:	
• to support learning activities.	Yes/No
• in publicity that reasonably celebrates success and promotes the work of the school.	Yes/No
Insert statements here that explicitly detail where images are published by the school/academy	Yes/No
I agree that if I take digital or video images at, or of school events which include images of children, other than my own, I will abide by these guidelines in my use of these images.	Yes/No

Signed: .....

Date: .....