Llwydcoed Primary School

Online Safety Policy

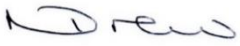
June 2024

Growing, Striving,

Achieving and Believing

Contents

Natalie Drew (Head Teacher)



Signed Chair of Governors:

Rhian Grundy

Date: June 2024

Review: June 2025

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/college.

Development/Monitoring/Review of this Policy

This online safety policy has been developed by a working committee made up of:

- *Headteacher/senior leaders*
- *Online safety officer*
- *Staff*
- *Governors*
- *Parents and carers*

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

Schedule for Development/Monitoring/Review

This online safety policy was approved by the *Governing body/governors subcommittee on:*	*02/07/24*
The implementation of this online safety policy will be monitored by the:	*Online Safety Co-ordinator*
Monitoring will take place at regular intervals:	*At least once a year*
The *Governing Body/governors subcommittee* 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:	*At least once a year*
The online safety policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	*Summer Term 2025*
Should serious online safety incidents take place, the following external persons/agencies should be informed:	*LA ICT manager, LA safeguarding officer, police*

The school will monitor the impact of the policy using:

- *Logs of reported incidents*
- *Monitoring logs of internet activity (including sites visited)*
- *Surveys/questionnaires of*
    - *Learners*
    - parents and carers
    - *staff*

Roles and Responsibilities

The following section outlines the online safety roles and responsibilities of individuals[1] and groups within the school:

Governors:

Governors are responsible for the approval of the online safety policy and for reviewing the effectiveness of the policy. This will be carried out by the G*overning Body/governor's sub-committee* receiving regular information about online safety incidents and monitoring reports. A member of the Governing Body should take on the role of online safety governor[i] to include:

- regular meetings with the online safety co-ordinator
- regular monitoring of online safety incident logs
- regular monitoring of filtering change control logs (where possible)
- reporting to relevant governors/sub-committee/meeting

Headteacher and senior leaders:

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety may be delegated to the online safety co-ordinator.
- 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[ii]
- The headteacher/senior leaders are responsible for ensuring that the online safety co-ordinator and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.
- The headteacher/senior leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.
- The headteacher/senior leaders will receive regular monitoring reports from the online safety co-ordinator.

Online safety co-ordinator/officer: Mrs Michelle Lloyd

The online safety co-ordinator

- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies and documents.
- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provides (or identifies sources of) training and advice for staff
- liaises with the local authority/relevant body
- liaises with (school) technical staff
- receives reports of online safety incidents[2] and creates a log of incidents to inform future online safety developments.
- meets regularly with online safety governor to discuss current issues, review incident logs and if possible, filtering change control logs
- attends relevant meeting/sub-committee of governors
- reports regularly to headteacher/senior leadership team

Network manager/technical staff:

The network manager/technical staff (or managed service provider) is responsible for ensuring:

- that the *school* technical infrastructure is secure and is not open to misuse or malicious attack
- that the school meets (as a minimum) the required online safety technical requirements as identified by the local authority or other relevant body and also the online safety policy/guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
- that they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- that the use of the *network/internet/learning platform/Hwb/remote access/email* is regularly monitored in order that any misuse/attempted misuse can be reported to the *headteacher/senior leader; online safety co-ordinator/officer* for investigation/action/sanction
- *that (if present) monitoring software/systems are implemented and updated as agreed in school policies*
- *that the filtering policy, is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person*

Teaching and Support Staff

Are responsible for ensuring that:

- they have an up to date awareness of online safety matters and of the current school online safety policy and practices
- they have read, understood and signed the staff acceptable use agreement (AUA)
- they report any suspected misuse or problem to the h*eadteacher/senior leader; online safety co-ordinator* for investigation/action
- all digital communications with learners/parents and 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
- Learners understand and follow the online safety and acceptable use agreements
- learners have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor the use of digital technologies, mobile devices, cameras etc., in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- in lessons where internet use is pre-planned 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*

Designated senior person

The designated senior person should be trained in online safety issues and be aware of the potential for serious safeguarding issues to arise from:

- sharing of personal data[3]
- access to illegal/inappropriate materials
- inappropriate online contact with adults/strangers
- potential or actual incidents of grooming
- cyber-bullying

Online safety group

The online safety group[4] 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. Depending on the size or structure of the school this group may be part of the safeguarding group. The group will also be responsible for regular reporting to the Governing Body.

Members of the online safety group will assist the online safety co-ordinator with:

- the production/review/monitoring of the school online safety policy/documents.
- *the production/review/monitoring of the school filtering policy.*
- mapping and reviewing the online safety curricular provision – ensuring relevance, breadth and progression
- monitoring network/internet/incident logs where possible
- consulting stakeholders – including parents/carers and the learners about the online safety provision
- monitoring improvement actions identified through use of the 360 degree safe Cymru self review tool

Learners in FPh:

- use the school digital technology systems in accordance with the learner acceptable use agreement with support from an adult
- use appropriate websites to research and find free pictures not to plagiarise.
- will tell an adult if the technology is not being used appropriately or if something pops up on a screen.
- will only take photos of their work on a designated device for the purpose of learning.
- will not take a photo of other children without permission.
- will understand that they should follow these rules at school and at home.

Learners in KS2:

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement, which they read and sign at the start of each academic year.
- have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations.
- understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so.
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking/use of images and on cyber-bullying.
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school online safety policy covers their actions out of school, if related to their membership of the school

Parents and carers

Parents and carers play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way. The school will take every

opportunity to help parents understand these issues through *parents' evenings, newsletters, letters, website, Hwb, learning platform 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/college events
- access to parents' sections of the website, Hwb, learning platform and online learner records
- their children's personal devices in the school (where this is allowed)

Community Users

Community users who access school systems/website/Hwb/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.

Policy Statements

Education – learners

Whilst regulation and technical solutions are very 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 online safety provision. Learners need the help and support of the school to recognise and avoid online safety risks and build their resilience.

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

- A planned online safety curriculum across a range of subjects, (e.g. ICT/PSE/ /DCF) and topic areas and should be regularly revisited.
- Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial/pastoral activities.
- Learners should be taught in all lessons to be critically aware of the materials/content they access online and be guided to validate the accuracy of information.
- Our younger learners will be guided to suitable sources to use online to ensure they access only suitable content approved by an adult.
- Learners should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet.
- Younger learners will only be able to use pre-approved material which follow copyright rules.
- Learners 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.
- Through Cross Cutting Themes, younger learners understand that school is a safe environment where everyone follows the rules and they should check with an adult if they think someone is not.

- 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 monitoring the content of the websites the young people visit. Children use a learner password to access the internet to ensure that inappropriate content is inaccessible.
- 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 technical staff (or other nominated person) 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 and carers

Many parents and carers have only a limited understanding of online safety risks and issues, yet they play an essential role in the education of their children and in the monitoring/regulation of the children's 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, learning platform, Hwb*
- *Parents and carers evenings/sessions*
- *High profile events/campaigns, e.g. Safer Internet Day*
- *Reference to the relevant web sites/publications,*

The school will provide opportunities for local community members to gain from the school 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 learning platform, Hwb, website will provide online safety information for the wider community
- Supporting community groups, e.g. early years settings, childminders, youth/sports/voluntary groups to enhance their online
- Education and 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. It is expected that some staff will identify online safety as a training need within the performance management process.

- All new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements.
- The online safety co-ordinator will receive regular updates through attendance at external training events, (e.g. from Consortium/SWGfL/LA/other relevant organisations) and by reviewing guidance documents released by relevant organisations.
- This online safety policy and its updates will be presented to and discussed by staff in staff/team meetings/INSET days.
- The online safety co-ordinator will provide advice/guidance/training to individuals as required.

Training – governors

Governors should take part in online safety training/awareness sessions, with particular importance for those who are members of any sub-committee/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
- Technical – infrastructure/equipment, filtering and monitoring

If the school has a managed ICT service provided by an outside contractor, it is the responsibility of the school to ensure that the managed service provider carries out all the online safety measures that would otherwise be the responsibility of the school, as suggested below. It is also important that the managed service provider is fully aware of the school online safety policy/acceptable use agreements. The school should also check their local authority/other relevant body policies on these technical issues if the service is not provided by the authority.

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

- Schools technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school technical systems and devices.
- The "master/administrator" passwords for the school digital 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.
- The Head teacher is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored. There is a clear process in place to deal with requests for filtering changes.

- Internet filtering should ensure that children are safe from terrorist and extremist material when accessing the internet.
- Where possible, school technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement.
- An appropriate system is in place for users to report any actual/potential technical incident/security breach to the relevant person, as agreed.
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices, etc., from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.
- 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 (eg memory sticks/CDs/DVDs) by users on school devices. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

Mobile technologies

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 learning platform and other cloud based services such as email and data storage.

All users should understand that the primary purpose of the use of 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 those for safeguarding, behaviour, anti-bullying, acceptable use, 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 online safety education programme.

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

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

Use of 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 and carers and learners need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for cyberbullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- When using digital images, staff should inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet, eg., on social networking sites.
- 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, distribution and publication of those images..
- Care should be taken when taking digital/video images that learners are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- 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 good practice guidance on the use of such images.
- 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 published on the school/college
- Learners' work can only be published with the permission of the learner 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 must ensure that:

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

Staff must ensure that they:

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

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

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

Communications

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

Communication Technologies

	Staff & other adults			Learners				
	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Mobile phones may be brought to school/college	■			■				
Use of mobile phones in lessons		■		■				
Use of mobile phones in social time	■			■				
Taking photos on mobile phones/cameras		■		■				
Use of other mobile devices eg tablets, gaming devices	■			■				
Use of personal email addresses in school/college, or on school/college network		■		■				
Use of school/college email for personal emails		■		■				
Use of messaging apps	■			■				
Use of social media	■			■				
Use of blogs	■						■	

The school may also wish to add some of the following policy statements about the use of communications technologies, in place of, or in addition to the above table:

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

- The official school email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. Staff and learners should therefore use only the school email service to communicate with others when in school, or on school systems, (e.g. by remote access).
- Users must immediately report to the nominated person – in accordance with the school policy - the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication.
- Any digital communication between staff and learners or parents/carers (email, chat, learning platform, etc.) must be professional in tone and content. Personal email addresses, text messaging must not be used for these communications.
- Whole class/group email addresses may be used at KS1, while learners at KS2 and above will be provided with individual school email addresses for educational use.
- Learners 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.

Social media

All schools and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Schools and local authorities could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, cyberbully, discriminate on the grounds of sex, race or disability or who defame a third party may render the school or local authority liable to the injured party. Reasonable steps to prevent predictable harm must be in place. All staff working at any educational establishment are expected to demonstrate a professional approach and respect for learners and their families and for colleagues and the learning setting.

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to 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 learners, parents and carers or school staff
- They do not engage in online discussion on personal matters relating to members of the school community
- Personal opinions should not be attributed to the school or local authority
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.

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

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

Personal Use:

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

School 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 social media, data protection, communications, digital image and video policies.

Unsuitable/inappropriate activities

Some internet activity, e.g. accessing child abuse images or distributing racist material is illegal and would obviously be banned from school and all other technical systems. Other activities, e.g. online 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 out of, school when using school equipment or systems. The school policy restricts usage as follows:

User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated	Unacceptable	Unacceptable and illegal
Users shall not visit internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children, contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character), contrary to the Criminal Justice and Immigration Act 2008					X
	criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	Pornography				X	
	promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	Promotion of extremism or terrorism				X	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school/college or brings the school/college into disrepute				X	
Using school/college 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/college					X	
Infringing copyright					X	

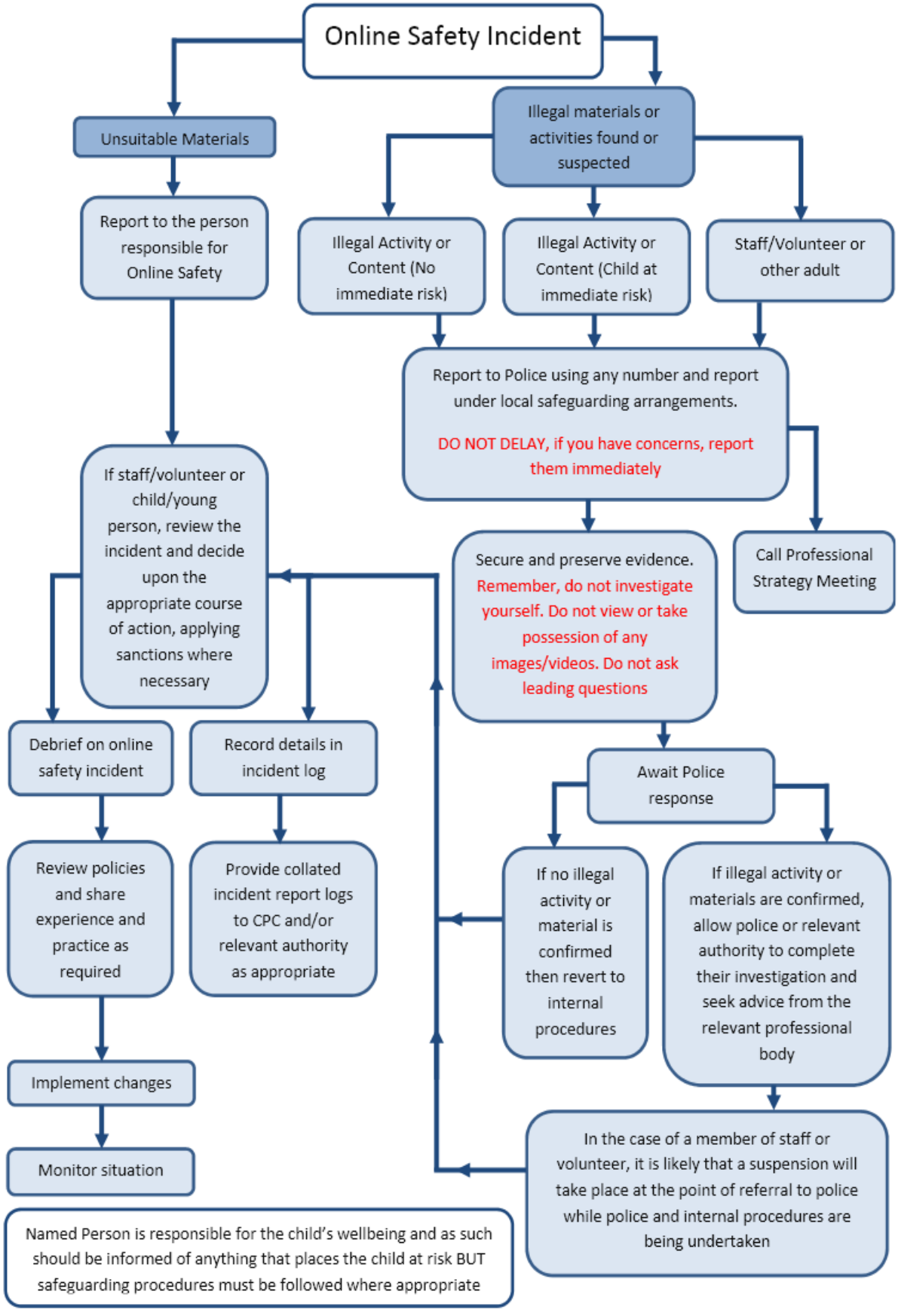
Revealing or publicising confidential or proprietary information, (e.g. financial/personal information, databases, computer/network access codes and passwords)				X	
Creating or propagating computer viruses or other harmful files				X	
Unfair usage (downloading/uploading large files that hinders others in their use of the internet)				X	
Online gaming (educational)	X				
Online gaming (non educational)		X			
Online gambling				X	
Online shopping/commerce		X			
File sharing		X			
Use of social media		X			
Use of messaging apps		X			
Use of video broadcasting, e.g. YouTube		X			

Responding to incidents of misuse

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

Illegal Incidents

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



Other Incidents

It is hoped that all members of the school community will be responsible users of digital technologies, who understand and follow school policy. However, there may be times when

infringements of the policy could take place, through careless, irresponsible or, very rarely, through deliberate misuse.

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

- Have more than one senior member of staff/volunteer involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by learners 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 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
  - 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/college 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.

Learner Actions

Incidents	Refer to class teacher/tutor	Refer to Head of Department/Head of Year/other	Refer to Headteacher/Principal	Refer to Police	Refer to technical support staff for action re filtering/security etc.	Inform parents/carers	Removal of network/internet access rights	Warning	Further sanction eg. detention/exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable/inappropriate activities).		X	X	X					
Unauthorised use of non-educational sites during lessons		X	X						
Unauthorised use of mobile phone/digital camera/other mobile device		X	X						
Unauthorised use of social media/messaging apps/personal email		X	X						
Unauthorised downloading or uploading of files		X	X						
Allowing others to access school/college network by sharing username and passwords		X	X						
Attempting to access or accessing the school/college network, using another learners' account		X	X						
Attempting to access or accessing the school/college network, using the account of a member of staff		X	X						
Corrupting or destroying the data of other users		X	X						
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature		X	X						
Continued infringements of the above, following previous warnings or sanctions		X	X			X	X		
Actions which could bring the school/college into disrepute or breach the integrity of the ethos of the school/college		X	X			X			
Using proxy sites or other means to subvert the school/college's filtering system		X	X	X		X	X		
Accidentally accessing offensive or pornographic material and failing to report the incident		X	X			X	X		
Deliberately accessing or trying to access offensive or pornographic material		X	X			X	X		
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act		X	X	X		X	X		

Staff Actions

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

C5 Summary of Legislation

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

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

Computer Misuse Act 1990

This Act makes it an offence to:

- erase or amend data or programs without authority;
- obtain unauthorised access to a computer;
- "eavesdrop" on a computer;
- make unauthorised use of computer time or facilities;
- maliciously corrupt or erase data or programs;
- deny access to authorised users.

Data Protection Act 1998

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

- fairly and lawfully processed.
- processed for limited purposes.
- adequate, relevant and not excessive.
- accurate.
- not kept longer than necessary.
- processed in accordance with the data subject's rights.
- secure.
- not transferred to other countries without adequate protection.

Freedom of Information Act 2000

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

Communications Act 2003

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

Malicious Communications Act 1988

It is an offence to send an indecent, grossly offensive, or threatening letter, electronic communication or other article to another person. It is also an offence to send information which is false and known or believed to be false by the sender.

Regulation of Investigatory Powers Act 2000

It is an offence for any person to intentionally and without lawful authority intercept any communication. Where the system controller has given express consent 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

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).

Criminal Justice & Public Order Act 1994/Public Order Act 1986

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/Public Order Act 1986

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

Protection from Harrassment Act 1997

A person must not pursue a course of conduct, which amounts to harassment of another, and which he knows or ought to know amounts to harassment of the other. A person whose course of conduct causes another to fear, on at least two occasions, that violence

will be used against him is guilty of an offence if he knows or ought to know that his course of conduct will cause the other so to fear on each of those occasions.

Protection of Children Act 1978

It is an offence to take, permit to be taken, make, possess, show, distribute or advertise indecent images of children in the United Kingdom. A child for these purposes is a anyone under the age of 18.. An image of a child also covers pseudo-photographs (digitally collated or otherwise). A person convicted of such an offence is liable to imprisonment for a term of not more than 10 years, or to a fine or to both.

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.

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/college 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
- the right not to be subjected to inhuman or degrading treatment or punishment

The school/college is obliged to respect these rights and freedoms, but should balance them against those rights, duties and obligations, which arise from other relevant legislation.

The Protection of Freedoms Act 2012

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

C6 Office 365 – further information

Where is the data stored?

Data for UK Schools/colleges is all hosted within the EU. The primary Microsoft data centre we host the service in is located in Dublin and the fail-over is to Amsterdam.

How often is the data backed up?

The idea of "back up" is very different with Office365 than with traditional locally hosted services. We use a network of globally redundant data centres and replicate data on multiple servers across the two data centres. Any one time we keep 3 copies of schools/colleges data across the two data-centres mentioned (Dublin & Amsterdam).

Does the email service provider have a clear process for recovering data?

Yes. Users themselves can recover data for 30 days after deleting an item. Administrators then have a further 30 days once the item is deleted from the deleted-items folder. There are also additional paid-for archiving services available with Office365, but with a 25GB inbox per person the pressure on users to archive email is not as great compared to existing email systems.

How does the email provider protect your privacy?

3 key things: No advertising, no "mingling" of Office 365 data with our consumer services (such as Hotmail) and full data-portability, in case you ever want to leave the service.

Who owns the data that you store on the email platform?

Schools/colleges own the data. Microsoft does not. You own your data, and retain all rights, title and interest in the data you store with Office 365. You can download a copy of all of your data at any time and for any reason, without any assistance from Microsoft.

Who has access to the data?

By default no one has access to customer data within the Office 365 service. Microsoft employees who have completed appropriate background checks and have justified need can raise an escalation for time-limited access to Customer data. Access is regularly audited, logged and verified through the ISO 27001 Certification.

As detailed in a recent accreditation submission to the UK Government, any organisation that specify "UK" as their country during tenant creation will be provisioned and data stored within the EU datacenters (Dublin and Amsterdam).

Microsoft has been granted accreditation up to and including the UK government's "Impact Level 2" (IL2) assurance for Office 365. As of February 2013 Microsoft are the only major international public cloud service provider to have achieved this level of accreditation and, indeed, it is the highest level of accreditation possible with services hosted outside of the UK (but inside of the EEA).

Schools/colleges may wish to consider the extent to which applicable laws in the US – which apply to services operated by companies registered in the US, e.g. Microsoft and Google – affect the suitability of these services. For example the US Patriot Act provides a legal means through which law enforcement agencies can access data held within these services without necessarily needing the consent or even the knowledge of the customer. Whilst SWGfL doesn't intend to put anyone off getting value from these beneficial services we feel it's only right to share what we know about them.

Is personal information shared with anyone else?

No personal information is shared.

Does the email provider share email addresses with third party advertisers? Or serve users with ads?

No. There is no advertising in Office365.

What steps does the email provider take to ensure that your information is secure?

Microsoft uses 5 layers of security - data, application, host, network and physical. You can read about this in a lot more detail here.

Office365 is certified for ISO 27001, one of the best security benchmarks available across the world. Office 365 was the first major business productivity public cloud service to have implemented the rigorous set of physical, logical, process and management controls defined by ISO 27001.

EU Model Clauses. In addition to EU Safe Harbor, Office 365 is the first major business productivity public cloud service provider to sign the standard contractual clauses created by the European Union ("EU Model Clauses") with all customers. EU Model Clauses address international transfer of data.

Data Processing Agreement. Microsoft offers a comprehensive standard Data Processing Agreement (DPA) to all customers. DPA addresses privacy, security and handling of customer data. Our standard Data Processing Agreement enables customers to comply with their local regulations. Visit here to get a signed copy of the DPA.

How reliable is the email service?

There is a 99.9% uptime commitment with financially-backed SLA for any paid-for services in Office365 (though most schools/colleges will be using 'free' services and therefore will not receive the financially backed SLA).

What level of support is offered as part of the service?

Microsoft offer schools/colleges direct telephone support 24/7 for IT administrators and there is also a large range of online help services, which you can read about here. Our recommendation is that schools/colleges use a Microsoft partner or support organisation with industry specific expertise in cloud services for schools/colleges.

Additional Resources

There is a wealth of information about Office365 in the Office365 Trust Centre. You can also read articles about Office365, get deployment resources and contact Microsoft Cloud experts direct on their

C7 Links to other organisations or documents

These may help those who are developing or reviewing an online safety policy.

UK Safer Internet Centre

- Safer Internet Centre
- South West Grid for Learning

- Childnet
- Professionals Online Safety Helpline
- Internet Watch Foundation

CEOP

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

Others

- INSAFE - http://www.saferinternet.org/ww/en/pub/insafe/index.htm
- UK Council for Child Internet Safety (UKCCIS) - www.education.gov.uk/ukccis
- Netsmartz - http://www.netsmartz.org/index.aspx

Cyberbullying

- Scottish Anti-Bullying Service, Respectme - http://www.respectme.org.uk/
- Scottish Government - Better relationships, better learning, better behaviour
- Welsh Government – Respecting Others
- Anti-Bullying Network - http://www.antibullying.net/cyberbullying1.htm
- Cyberbullying.org - http://www.cyberbullying.org/
- Enable – EU funded anti-bullying project - http://enable.eun.org/

Sexting

- UKCCIS - Sexting in schools and colleges: responding to incidents and safeguarding young people (to be added to both language versions)
- UKSIC – Responding to and managing sexting incidents

Social Networking

- Digizen – Social Networking
- SWGfL - Facebook - Managing risk for staff and volunteers working with children and young people
- Connectsafely Parents Guide to Facebook
- Facebook Guide for Educators

Curriculum

- SWGfL Online Safety Resource (accessed through Hwb)
- Alberta, Canada - digital citizenship policy development guide.pdf
- Teach Today – www.teachtoday.eu/
- Insafe - Education Resources

Mobile Devices/BYOD

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

NEN - Guidance Note - BYOD

Data Protection

- Information Commissioners Office:
  - Your rights to your information – Resources for Schools - ICO
  - ICO pages for young people
  - Guide to Data Protection Act - Information Commissioners Office
  - Guide to the Freedom of Information Act - Information Commissioners Office
  - ICO - Guidance we gave to schools/colleges - September 2012 (England)
  - ICO Guidance on Bring Your Own Device
  - ICO Guidance on Cloud Computing

- Information Commissioners Office good practice note on taking photos in schools/colleges
- ICO Guidance Data Protection Practical Guide to IT Security
- ICO – Think Privacy Toolkit
- ICO – Personal Information Online – Code of Practice
- ICO – Access Aware Toolkit
- ICO Subject Access Code of Practice
- ICO – Guidance on Data Security Breach Management

- SWGfL - Guidance for Schools/colleges on Cloud Hosted Services
- NEN - Guidance Note - Protecting School/college Data

Professional Standards/Staff Training

- Kent - Safer Practice with Technology
- Childnet/TDA - Social Networking - a guide for trainee teachers & NQTs
- Childnet/TDA - Teachers and Technology - a checklist for trainee teachers & NQTs
- UK Safer Internet Centre Professionals Online safety Helpline

Infrastructure/Technical Support

- Somerset - Questions for Technical Support
- NEN - Guidance Note - esecurity

Working with parents and carers

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

Research

- EU Kids on Line Report - "Risks and Safety on the Internet" - January 2011
- Futurelab - "Digital participation - its not chalk and talk any more!"

C8 Glossary of terms

AUA	Acceptable use agreement – see templates earlier in this document
CEOP	Child Exploitation and Online Protection Centre (part of UK Police, dedicated to protecting children from sexual abuse, providers of the Think U Know programmes.
CPD	Continuous Professional Development
FOSI	Family Online safety Institute
EA	Education Authority
ICO	Information Commissioners Office
ICT	Information and Communications Technology
ICTMark	Quality standard for schools/colleges provided by NAACE
INSET	In Service Education and Training
IP address	The label that identifies each computer to other computers using the IP (internet protocol)
ISP	Internet Service Provider
ISPA	Internet Service Providers' Association
IWF	Internet Watch Foundation
LA	Local Authority
LAN	Local Area Network
MIS	Management Information System
NEN	National Education Network – works with the Regional Broadband Consortia (e.g. SWGfL) to provide the safe broadband provision to schools/colleges 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/colleges and other organisations in the SW
TUK	Think U Know – educational Online safety programmes for schools/colleges, young people and parents.
VLE	Virtual Learning Environment (a software system designed to support teaching and learning in an educational setting.
WAP	Wireless Application Protocol