



Online Safety Policy

Date	Reason for issue	Approved: Governors & Staff	Review Date
April 2018	Revision of policy as a result of merger: Jan 2018		

Development, Monitoring & Review of this Policy

This Online Safety policy has been developed by the IT lead in conjunction with the Principal and Heads of School

This policy is based on the SWGfL Template Online Safety Policy found at (<http://swgfl.org.uk/productservices/esafety/resources/online-safety-policy-templates>).

This was a recommendation from Derby City Council ICT team. Consultation with the whole school will take place through a range of formal and informal meetings. The final policy has also been circulated to all staff and is available on the school's network and website. The school will monitor the impact of the policy using Logs of reported incidents, surveys, questionnaires of pupils /parents / carers / staff

Schedule for Development, Monitoring & Review

This Online Safety policy was approved by Governing Body	Awaiting approval
The implementation of this Online Safety policy will be monitored by the	Principal, IT lead & SLT
Monitoring will take place at regular intervals	Annually
The Governing Body will receive a report on the implementation of the Online Safety Policy generated by the monitoring group (which will include anonymous details of online safety incidents) at regular intervals:	Annually
The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	Annually
Should serious online safety incidents take place, the following external persons / agencies should be informed	LA ICT Manager, LADO Local Authority Safeguarding Officer, Police

Scope of the Policy

This policy applies to all members of the Brackensdale Primary School (including staff, governors, students /pupils, volunteers, parents / carers, visitors, community users) who have access to and are users of school. IT systems, both in and out of the school. The Education and Inspections Act 2006 empowers Head Teachers to such extent as is reasonable, to regulate the behaviour of pupils when they are off the school site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of cyber-bullying or other Online Safety incidents covered by this policy, which may take place outside of the school, but is linked to membership of the school. The 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.

Roles and Responsibilities

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

Link Governor: Iain Bater

Principal: David Hall

Safeguarding Leads: Ben Radbourne & Sian Mills

Online Safety Co-ordinator: Ben Radbourne & Sian Mills

Senior Leadership Team: David Hall, Ben Radbourne, Sian Mills, Kim Cooper, Alison Lumley & Helen Wallace

IT Lead: Leanne Dilkes (KS1) & TBC (KS2)

Network Manager:

Governors:

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the Governors receiving regular information about online safety incidents and monitoring reports.

Head teacher and Senior Leaders:

- The Principal has a duty of care for ensuring the safety (including online safety) of members of the school community.
- The Principal and 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.
- The Principal/ Heads of School are responsible for ensuring that staff receive suitable training to enable them to carry out their online safety roles.

Online Safety Co-ordinator:

- Along with the IT Lead the Online Safety Co-ordinator (Mr Ben Radbourne) takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies/ documents
- Liaises with the computing co-ordinator to ensure the teaching and implementation of e-safety is embedded throughout the school.
- Ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- Provides training and advice for staff
- Liaises with the Local Authority & other key relevant body
- Liaises with school technical staff

- Receives reports of online safety incidents and creates a log of incidents to inform future online safety developments
- Reports regularly to Senior Leadership Team & Governing body

Network Manager: (Overseen by the School Business Manager)

The Network Manager is responsible for ensuring:

- that the school's technical infrastructure is secure and is not open to misuse or malicious attack
- that the school meets required online safety technical requirements and any Local Authority guidance that may apply.
- that users may only access the networks and devices through school's enforced password protection policy.
- the filtering policy is applied and updated on a regular basis.
- 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 / remote access / email is regularly monitored in order that any misuse can be reported to the Online Safety Co-ordinator for investigation. (A weekly internet use report will be conducted)
- that monitoring software and systems are implemented and updated as agreed in school policies (see Technical Security Policy – Appendix 1)

Teaching and Support Staff

Are responsible for ensuring that:

- they have an up to date awareness of online safety matters and of the current school Online Safety Policy and practices
- they have read, understood and signed the Staff Acceptable Use Policy (Appendix 2)
- they report any suspected misuse or problem to the Online Safety Co-ordinator for investigation.
- all digital communications with pupils / parents / carers should be on a professional level and only carried out using official school systems or those approved by the Online Safety Co-ordinator.
- online safety issues are embedded in all aspects of the curriculum and other activities
- pupils understand and follow the Online Safety Policy and acceptable use policies
- pupils have a good understanding of research skills and the need to 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 pupils should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches

Designated Safeguarding Leads

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

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

IT Leads

The IT Leads will assist the Online Safety Co-ordinator with:

- the production, review and monitoring of the school Online Safety Policy and documents.
- mapping and reviewing the online safety curricular provision – ensuring relevance, breadth and progression • monitoring network / internet / incident logs
- consulting stakeholders – including parents / carers and the pupils about the online safety provision • 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
- are taught research skills and the need to avoid plagiarism and uphold copyright regulations
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking / use of images and on cyber-bullying.
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's Online Safety Policy covers their actions out of school, if related to their membership of the school

Parents / 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 inviting them to annual e-safety meetings, newsletters / letters, the school's website and distributing relevant 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
- their children's personal devices in the school (where this is allowed)

Parents / Carers are asked to countersign the pupil's Acceptable Use Agreement Form*.

Parents / Carers are asked to also sign a parent's Acceptable Use Agreement* to allow their child to have access to the internet and to ICT systems at school.

Community Users (Volunteers / students / after-school provision etc...)

The Online Safety Co-ordinator will decide the level of access to the school's technology systems each community user will be provided with. This will be facilitated by the Network manager. All community users must sign a Community User Acceptable Use Agreement* before being provided with access to school systems.

* Refer to Appendix 2 for all Acceptable Use policies and agreement forms.

Policy Statements

Education –Pupils

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

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

- A planned online safety curriculum should be provided as part of Computing (At Brackensdale the South West Grid for Learning (SWGfL) Digital literacy scheme is used), PHSE curriculum (specifically within the RSE scheme of work) and also other curriculum areas.
- E-safety should be taught throughout the year and regularly revisited.
- Key online safety messages should be reinforced as part of a planned programme of assemblies and 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 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.
- Where pupils are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics (eg racism, drugs, and discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other relevant designated 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 / Carers

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

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

- Curriculum activities
- Letters, newsletters, web site
- Parents e-safety evenings
- High profile events / campaigns e.g. Safer Internet Day
- Reference to the relevant web sites / publications e.g. www.swgfl.org.uk
www.saferinternet.org.uk/

<http://www.childnet.com/parents-and-carers>

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 Online Safety Policy and Acceptable Use Agreements.
- The Online Safety Co-ordinator and Computing Co-ordinator will receive regular updates through attendance at external training events (eg from 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 meetings.
- The Online Safety Co-ordinator or Computing Co-ordinator will provide advice / guidance / training to individuals as required.

Training –Governors

Governors should take part in online safety training sessions, with particular importance for those who are members of any subcommittee involving 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, attending assemblies, being present during e-safety lessons.
- Engaging with any literature or recommended guidelines provided national bodies relating to e-safety.

Technical – infrastructure / equipment, filtering and monitoring

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:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to school technical systems and devices.
- All users, including pupils at KS2, will be provided with a username and secure password by the network manager (L.E.A.D. IT Services) who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password. Pupils at KS1 or below will use a class log-on and the school are aware of the associated risks this may present and monitor accordingly.
- The administrator passwords for the school ICT system, used by the Network Manager must also be available to the Principal and kept in a secure place. This password must not be distributed to staff or pupils.
- The School Business Manager (Debbie Cockeram) 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.
- The school has provided differentiated user-level filtering (allowing different filtering levels for different groups of users – staff / pupils / visitors etc)
- 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.
- Staff and other adult users to report any actual or potential technical incident or security breach to the Network Manager who will decide if further action is required.
- Any pupils to report any actual or potential technical incident or security breach to their class teacher who will then decide if further action is required.
- Appropriate security measures are in place (managed by the Network manager) 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. The school infrastructure and individual workstations are protected by up to date virus software.
- An agreed policy is in place (outlined in supply/ student teacher information pack) for the provision of temporary access of “guests” (eg trainee teachers, supply teachers, visitors) onto the school systems. An Acceptable Use agreement will be signed before access is allowed. (Appendix 2)

- An agreed policy is in place regarding the extent of personal use that users (staff / pupils / community users) and their family members are allowed on school devices that may be used out of school.
- 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.
- (see School Personal Data Policy Template for further detail – Appendix 3)

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents / carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for cyberbullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm:

- When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet e.g. on social networking sites.
- Written permission from parents or carers will be obtained before photographs of pupils are published on the school website / social media / local press (see Digital / Video Images Permission Form – Appendix 2)
- Parents / carers are not permitted to take photographs or videos in any circumstances relating to school and school events.
- 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 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.

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 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". (see School Personal Data Policy Template – Appendix 3)
- It has a Data Protection Policy
- It is registered as a Data Controller for the purposes of the Data Protection Act (DPA)
- Protection of data is provided through Cyberreason.com Ransomfree software and protects school's systems from a Ransomware attack.

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 a, memory stick or any other removable media:

- the data must be encrypted and password protected
- the device must be provided by the school – personal storage is not allowed.
- 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:

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 school systems or those approved by the Online Safety Co-ordinator. Personal email addresses, text messaging or social media must not be used for these communications.
- Pupils should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.
- Personal information should not be posted on the school website and only official email addresses should be used to identify members of staff.

Social Media - Protecting Professional Identity

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

- Ensuring that personal information is not published
- Training is provided including: acceptable use; social media risks; checking of settings; data protection; reporting issues.
- Clear reporting guidance, including responsibilities, procedures and sanctions
- Risk assessment, including legal risk School staff should ensure that:
 - No reference should be made in social media to pupils, parents / carers or school staff
 - They do not engage in online discussion on personal matters relating to members of the school community
 - Personal opinions should not be attributed to the 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 and an understanding of how incidents may be dealt with under school disciplinary procedures.

Personal Use:

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

See Social Media Policy for further details – Appendix 4

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:

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 -**Unacceptable & illegal**

Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003-**Unacceptable & Illegal**

Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008 **Unacceptable & Illegal**

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 **Unacceptable & Illegal**

Threatening behaviour, including promotion of physical violence or mental harm – **Unacceptable**

Promotion of extremism or terrorism **Unacceptable**

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 **Unacceptable**

Using school systems to run a private business **Unacceptable**

Using school systems to run a private business **Unacceptable**

Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school. X Infringing copyright **Unacceptable**

Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords) **Unacceptable**

Creating or propagating computer viruses or other harmful files **Unacceptable**

Unfair usage (downloading / uploading large files that hinders others in their use of the internet **Unacceptable**

On-line gaming (educational) **Acceptable at certain times**

On-line gaming (non-educational) **Unacceptable**

On-line gambling **Unacceptable**

On-line shopping (For school purposes only) **Acceptable at certain times**

File sharing (For school purposes only) **Acceptable at certain times**

Use of social media (See above Social Media section) **Acceptable at certain times**

Use of messaging apps **Acceptable at certain times**

Use of video broadcasting e.g. Youtube (For school purposes only & with filtered restricted access **Acceptable at certain times**

Other Incidents

It is hoped that all members of the school community will be responsible users of digital technologies, who understand and follow school policy. However, there may be times when infringements of the policy could take place, through careless or irresponsible or, very rarely, through deliberate misuse. In the event of suspicion, all steps in the procedure (see Appendix flow chart: Responding to incident & Misuse) 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 o 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 o promotion of terrorism or extremism and other criminal conduct, activity or materials.
- Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.

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

School Actions & Sanctions –see attachments



Appendices & Attachments



Appendix 1

Technical Security Policy (Including filtering and passwords)

Introduction

Effective technical security depends not only on technical measures, but also on appropriate policies and procedures and on good user education and training. The school will be responsible for ensuring that the school infrastructure / network is as safe and secure as is reasonably possible and that:

- users can only access data to which they have right of access
- no user should be able to access another's files (other than that allowed for monitoring purposes within the school's policies).
- access to personal data is securely controlled in line with the school's personal data policy
- logs are maintained of access by users and of their actions while users of the system
- there is effective guidance and training for users
- there are regular reviews and audits of the safety and security of school computer systems
- there is oversight from senior leaders and these have impact on policy and practice.

Technical Security Policy statements

The school will be responsible for ensuring that the school infrastructure / network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. The management of technical security will be the responsibility of the Network Manager. This role has been assigned to an outside agency – L.E.A.D. IT Services. This will be overseen by the School Business Manager. It will also need to ensure that the relevant people receive guidance and training and will be effective in carrying out their responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- 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
- Responsibilities for the management of technical security are clearly assigned to appropriate and well trained staff
- All users will have clearly defined access rights to school technical systems.

- Users will be made responsible for the security of their username and password must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.
- The School Business Manager is responsible for ensuring that software licence logs are accurate and up to date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Mobile device security and management procedures are in place
- School technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement. • An appropriate system is in place for users to report any actual / potential technical incident to the Online Safety Coordinator or Network manager.
- An agreed policy is in place for the provision of temporary access of “guests” (e.g. Trainee teachers, supply teachers, visitors) onto the school system. Temporary users will need to have read, understood and signed the Staff Acceptable Use Policy before being allowed access to school’s systems.
- An agreed policy is in place regarding the downloading of executable files and the installation of programmes on school devices by users
- An agreed policy is in place regarding the extent of personal use that users (staff / pupils / community users) and their family members are allowed on school devices that may be used out of school. Appendix 1 20
- An agreed policy is in place regarding the use of removable media (eg memory sticks / cds / dvds) by users on school devices.

The school infrastructure and individual workstations are protected by up to date software to protect against malicious threats from viruses, worms, trojans etc

- Appropriate security measures are in place to protect the servers, firewalls, switches, routers, wireless systems, work stations, mobile devices etc. From accidental or malicious attempts which might threaten the security of the school systems and data.
- Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured

Password Security

A safe and secure username / password system is essential if the above is to be established and will apply to all school technical systems, including networks, devices, email and Virtual Learning Environment (VLE).

Policy Statements • All users will have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the Network Manager and will be reviewed, at least annually, by the Online Safety co-ordinator.

- All school networks and systems will be protected by secure passwords.

- The “master / administrator” passwords for the school systems, used by the technical staff must also be available to the Principal and kept in a secure place eg school safe.
- All users (adults and young people) will have responsibility for the security of their username and password must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.
- Passwords for new users, and replacement passwords for existing users will be allocated by the Network manager.

Staff Passwords

- All staff users will be provided with a username and password by the network manager who will keep an up to date record of users and their usernames.
- Temporary passwords e.g. Used with new user accounts or when users have forgotten their passwords, shall be enforced to change immediately upon the next account log-on
- Passwords shall not be displayed on screen, and shall be securely hashed
- Passwords should be different for different accounts, to ensure that other systems are not put at risk if one is compromised and should be different for systems used inside and outside of school.

Pupil Passwords

- All users (at KS2 and above) will be provided with a username and secure password by the network manager (L.E.A.D IT Services) who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password. Pupils at KS1 or below will use a class log-on and the school are aware of the associated risks this may present and monitor accordingly.
- Pupils will be taught the importance of password security
- The complexity (i.e. minimum standards) will be set with regards to the cognitive ability of the children. In KS1 a word using uppercase letters is to be used. In KS2 a mixture of uppercase and numbers is to be used.

Training / Awareness Members of staff will be made aware of the school’s password policy:

- at induction
- through the school’s online safety policy and password security policy
- through the Acceptable Use Agreement

Pupils / students will be made aware of the school’s password policy:

- in lessons throughout each academic year. This will be delivered using an online safety curriculum as part of Computing. At Brackensdale Primary School the South West Grid for Learning (SWGfL) Digital literacy scheme is used. In addition to computing e-safety will also be delivered through the PHSE curriculum (specifically within the SRE scheme of work) and also other curriculum areas.
- through the Acceptable Use Agreement

Audit / Monitoring / Reporting / Review

The Network Manager will ensure that they regularly monitor staff and pupil logins to ensure they are up to-date and valid. They will also regularly monitor and address any security incidents related to this policy.

Filtering

Introduction

The filtering of internet content provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context. The filtering system cannot, however, provide a 100% guarantee that it will do so, because the content on the web changes dynamically and new technologies are constantly being developed. It is important, therefore, to understand that filtering is only one element in a larger strategy for online safety and acceptable use. It is important that the school has a filtering policy to manage the associated risks and to provide preventative measures which are relevant to the situation in this school.

Responsibilities

The responsibility for the management of the school's filtering policy will be held by the Network Manager. They will manage the school filtering, in line with this policy and will keep records / logs of changes and of breaches of the filtering systems. To ensure that there is a system of checks and balances and to protect those responsible, changes to the school filtering service must:

- be logged in change control logs
- be reported to a second responsible person (School Business Manager)

All users have a responsibility to report immediately to the school's Network Manager any infringements of the school's filtering policy of which they become aware or any sites that are accessed, which they believe should have been filtered. Users must not attempt to use any programmes or software that might allow them to bypass the filtering / security systems in place to prevent access to such materials.

Policy Statements

Internet access is filtered for all users. L.E.A.D IT are responsible for this. Differentiated internet access is available for staff and customised filtering changes are managed by the school. Illegal content is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list and other illegal content lists. A weekly monitoring check of internet use will be carried out by L.E.A.D IT. The monitoring process alerts the school to breaches of the filtering policy, which are then acted upon. There is a clear route for reporting and managing changes to the filtering system. Where personal mobile devices are allowed internet access through the school network, filtering will be applied that is consistent with school practice.

- The school has provided filtering through the Smooth Wall filtering programme. (Allowing for different filtering levels for different groups of users – staff/pupils)
- In the event of the technical staff needing to switch off the filtering for any reason this must be logged and agreed by the Principal.
- Mobile devices that access the school internet connection will be subject to the same filtering standards as other devices on the school systems.

- Any filtering issues should be reported immediately to Link IT.
- Requests from the staff for sites to be removed from the filtered list must first be approved by the Principal and then considered by the Network manager.

Education / Training / Awareness

Pupils will be made aware of the importance of filtering systems through the online safety education programme. They will also be warned of the consequences of attempting to subvert the filtering system. Staff users will be made aware of the filtering systems through:

- the Acceptable Use Agreement
- induction training
- staff meetings, briefings, Inset.

Parents will be informed of the school's filtering policy through the Acceptable Use Agreement and through online safety awareness sessions / newsletter etc.

Monitoring

No filtering system can guarantee 100% protection against access to unsuitable sites. The school will therefore monitor the activities of users on the school network and on school equipment as indicated in the School Online Safety Policy and the Acceptable Use Agreement.

Audit / Reporting

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

- the Principal
- Online Safety Co-ordinator
- Online Safety Governor
- External Filtering provider / Local Authority / Police on request

The filtering policy will be reviewed in the response to the evidence provided by the audit logs of the suitability of the current provision.

Further Guidance Schools in England (and Wales) are required "to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering" ([Revised Prevent Duty Guidance: for England and Wales, 2015](#)).

Furthermore the Department for Education published proposed changes to 'Keeping Children Safe in Education' for consultation in December 2015. Amongst [the proposed changes](#), schools will be obligated to "ensure appropriate filters and appropriate monitoring systems are in place. Children should not be able to access harmful or inappropriate material from the school or colleges IT system" however, schools will need to "be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding."

In response UKSIC produced guidance on – information on "[Appropriate Filtering](#)"

NEN Technical guidance: <http://www.nen.gov.uk/e-security-managing-and-maintaining-e-securitycyber-security-in-schools/>

Somerset Guidance for schools – this checklist is particularly useful where a school / academy uses external providers for its technical support / security:

<https://360safe.org.uk/Files/Documents/Somerset-Questions-for-Technical-Support-v4.aspx>



Appendix 2

Pupil Acceptable Use Agreement Policy

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies are powerful tools, which open up new opportunities for everyone. These technologies can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This Acceptable Use Agreement is intended to ensure:

- that young people will be responsible users and stay safe while using the internet and other digital technologies for educational, personal and recreational use.
- that school systems and users are protected from accidental or deliberate misuse that could put the security of the systems and will have good access to digital technologies to enhance their learning and will, in return, expect the pupils to agree to be responsible users.



Appendix 2

Pupil Acceptable Use Policy Agreement (KS2)

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.

For my own personal safety:

- I understand that the school will monitor my use of the systems, devices and digital communications.
- I will keep my username and password safe and secure – I will not share it, 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 be aware of "stranger danger", when I am communicating on-line.
- I will not disclose or share personal information about myself or others when on-line (this could include names, addresses, email addresses, telephone numbers, age, gender, educational details, financial details etc)
- If I arrange to meet people off-line that I have communicated with on-line, I will do so in a public place and take an adult with me.
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it on-line.

I understand that everyone has equal rights to use technology as a resource and:

- I understand that the school systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- 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 use the school systems or devices for on-line gaming, on-line gambling, internet shopping. I will only engage in file sharing, or video broadcasting (eg YouTube) if I have permission from a member of staff to do so.

I will act as I expect others to act toward me:

- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission.

- I will not communicate using email, text, messaging or photos/images that will be regarded as offensive, harassing, excluding or of a bullying nature to those who see or received the communication.

I recognise that the school has a responsibility to maintain the security and integrity of the technology it offers me and to ensure the smooth running of the school:

- I will only use my own personal devices (mobile phones / USB devices etc) in school if I have permission. I understand that, if I do use my own devices in the school, I will follow the rules set out in this agreement, in the same way as if I was using school equipment.
- I understand the risks and will not try to upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I try to use any programmes or software that might allow me to bypass the filtering / security systems in place to prevent access to such materials.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.
- I will not open any hyperlinks in emails or any attachments to emails, unless I know and trust the person / organisation who sent the email, 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 not install or attempt to install or store programmes of any type on any school device, nor will I try to alter computer settings.
- I will not use any social media sites in school time.

When using the internet for research or recreation, I recognise that:

- I should 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 try to download copies (including music and videos)
- When I am using the internet to find information, I should take care to check that the information that I access is accurate, as I understand that the work of others may not be truthful and may be a deliberate attempt to mislead me.

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

- I understand that the school also has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of school and where they involve my membership of the school community (examples would be cyberbullying, use of images or personal information).
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I will be subject to disciplinary action. This may include a warning, the loss of a golden time, loss of access to the school network / internet, detentions, suspensions, contact with parents and in the event of illegal activities involvement of the police.

Please complete the sections on the next page to show that you have read, understood and agree to the rules included in the Acceptable Use Agreement. If you do not sign and return this agreement, access will not be granted to school systems and devices.



Appendix 2

Pupil Acceptable Use Agreement Form (KS2)

This form relates to the pupil Acceptable Use Agreement, to which it is attached.

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

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

- I use the school systems and devices (both in and out of school)
- I use my own devices in the school (when allowed) e.g. mobile phones, gaming devices USB devices, cameras etc.
- I use my own equipment out of the school in a way that is related to me being a member of this school e.g. communicating with other members of the school, accessing school email, website etc.

Name of Pupil:

Year Group:

Pupil Signature:

Date:

Parent / Carer Countersignature:



Appendix 2

Pupil Acceptable Use Agreement (Foundation Stage & Key Stage 1)

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 the computer and other equipment
- I will ask for help from a teacher or suitable adult if I am not sure what to do or if I think I have done something wrong
- I will tell a teacher or suitable adult if I see something that upsets me on the screen
- I know that if I break the rules I might not be allowed to use a computer or tablet.

Name of Pupil:

Year Group:

Pupil Signature:

Date:

Parent / Carer Countersignature:



Appendix 2

Parent / Carer Acceptable Use Agreement

Digital technologies have become integral to the lives of children and young people, both within schools and outside school. These technologies provide powerful tools, which open up new opportunities for everyone. They can stimulate discussion, promote creativity and stimulate awareness of context to promote effective learning. Young people should have an entitlement to safe internet access at all times.

This Acceptable Use Policy is intended to ensure:

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

The school will try to ensure that pupils will have good access to digital technologies to enhance their learning and will, in return, expect the pupils to agree to be responsible users. A copy of the Pupil Acceptable Use Policy is attached to this permission form, so that parents / carers will be aware of the school expectations of the 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.

Parent / Carers Name:

Pupil Name:

As the parent / carer of the above pupil, I give permission for my child 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 child 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 child'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 Policy.

I will encourage my child to adopt safe use of the internet and digital technologies at home and will inform the school if I have concerns over my child's online safety.

I am aware that my child's usage of social media/ internet outside of school where deemed inappropriate is covered by this agreement and the school has the right to take action if required.

Signed:

Date:



Appendix 2

Staff (and Volunteer) Acceptable Use Policy Agreement

School Policy

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

All users should have an entitlement to safe access to the internet and digital technologies at all times.

This Acceptable Use Policy is intended to ensure:

- that staff and volunteers will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- that school 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 pupils receive opportunities to gain from the use of digital technology. I will, where possible, educate the young people in my care in the safe use of digital technology and embed online safety in my work with young people.

For my professional and personal safety:

- I understand that the school will monitor my use of the school digital technology and 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 school ICT systems:

- I will not access, copy, remove or otherwise alter any other user's files, without their express permission.
- I will communicate with others in a professional manner, I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and / or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital / video images. I will not use my personal equipment to record these images. Where these images are published (eg on the school website /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 students / pupils and parents / carers in accordance with the school's policy. Any such communication will be professional in tone and manner.
- I will not engage in any on-line activity that may compromise my professional responsibilities.

The school and the local authority have the responsibility to provide safe and secure access to technologies and ensure the smooth running of the school / academy:

- When I use my mobile devices (laptops / tablets / mobile phones / USB devices etc) in school, I will follow the rules set out in this agreement, in the same way as if I was using school equipment. I will also follow any additional rules set by the school about such use. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses.
- I will not use personal email addresses on the school ICT systems.
- I will not open any hyperlinks in emails or any attachments to emails, unless the source is known and trusted, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will ensure that my data is regularly backed up, in accordance with relevant school policies.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering / security systems in place to prevent access to such materials.
- I will not 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 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 policy. Where digital personal data is transferred outside the secure local network, it must be encrypted.
- I understand that data protection policy requires that any staff or pupil data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by school policy to disclose such information to an appropriate authority.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.

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

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

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

- I understand that this Acceptable Use Policy applies not only to my work and use of school digital technology equipment in school, but also applies to my use of school systems and equipment off the premises and my use of personal equipment on the premises or in situations related to my employment by the school.
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I could be subject to disciplinary action. This could include a warning, a suspension, referral to Governors 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:

Copyright of these Template Policies is held by SWGfL. Schools / Academies and other educational institutions are permitted free use of the Template Policies for the purposes of policy writing, review and development. Any person or organisation wishing to use the document for other purposes should seek consent from SWGfL (esafety@swgfl.org.uk) and acknowledge its use. Every effort has been made to ensure that the information included in this document is accurate, as at the date of publication in April 2016. However, SWGfL cannot guarantee its accuracy, nor can it accept liability in respect of the use of the material.

© South West Grid for Learning Trust Ltd 2016



Appendix 2

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.

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

Parents / carers are not permitted to take photographs or videos in any circumstances relating to school and school events.

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

Digital / Video Images Permission Form

Parent / Carers Name:

Pupil Name:

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

Yes / No

As the parent / carer of the above pupil, I agree to the school taking and using digital /video images of my child / children. I hereby give permission for these images to be used in publicity that reasonably celebrates success and promotes the work of the school.

Yes / No

Signed:

Date:



Appendix 3

Personal Data Handling Policy

Introduction

Schools and their employees should do everything within their power to ensure the safety and security of any material of a personal or sensitive nature. It is the responsibility of all members of the school community to take care when handling, using or transferring personal data that it cannot be accessed by anyone who does not:

- have permission to access that data, and/or
- need to have access to that data.

Data breaches can have serious effects on individuals and / or institutions concerned, can bring the school into disrepute and may well result in disciplinary action, criminal prosecution and fines imposed by the Information Commissioners Office - for the school and the individuals involved. Particularly, all transfer of data is subject to risk of loss or contamination.

Anyone who has access to personal data must know, understand and adhere to this policy, which brings together the legal requirements contained in relevant data protection legislation and relevant regulations and guidance (where relevant from the Local Authority).

Policy Statements

The school will hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for.

Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay.

All personal data will be fairly obtained in accordance with the "Privacy Notice" and lawfully processed in accordance with the "Conditions for Processing".

Personal Data

The school and individuals will have access to a wide range of personal information and data. The data may be held in a digital format or on paper records. Personal data is defined as any combination of data items that identifies an individual and provides specific information about them, their families or circumstances.

This will include:

- Personal information about members of the school community – including pupils., members of staff and parents / carers e.g. names, addresses, contact details, legal guardianship contact details, health records, disciplinary records

- Curricular / academic data e.g. class lists, pupil / student progress records, reports, references
- Professional records e.g. employment history, taxation and national insurance records, appraisal records and references
- Any other information that might be disclosed by parents / carers or by other agencies working with families or staff members.

Responsibilities

The school's Online safety coordinator will keep up to date with current legislation and guidance and will:

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

They will manage and address risks to the information and will understand:

- what information is held, for how long and for what purpose,
- how information has been amended or added to over time, and
- who has access to protected data and why.

Everyone in the school has the responsibility of handling protected or sensitive data in a safe and secure manner.

Governors are required to comply fully with this policy in the event that they have access to personal data, when engaged in their role as a Governor.

Registration

The school is registered as a Data Controller on the Data Protection Register held by the Information Commissioner. (each school is responsible for their own registration):

http://www.ico.gov.uk/what_we_cover/register_of_data_controllers.aspx

Information to Parents / Carers – the “Privacy Notice”

In order to comply with the fair processing requirements of the DPA, the school will inform parents / carers of all pupils of the data they collect, process and hold on the pupils, the purposes for which the data is held and the third parties (eg LA, DfE, etc) to whom it may be passed. This privacy notice will be passed to parents/ carers through various methods including: the Prospectus, newsletters, specific letters / communication).

Parents / carers of young people who are new to the school will be provided with the privacy notice through a welcome pack.

Training & awareness

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

- Induction training for new staff
- Staff meetings / briefings / Inset
- Day to day support and guidance from Information Asset Owners

Risk Assessments

Information risk assessments will be carried out by Information Asset Owners to establish the security measures already in place and whether they are the most appropriate and cost effective.

The risk assessment will involve:

- Recognising the risks that are present;
- Judging the level of the risks (both the likelihood and consequences); and
- Prioritising the risks.

Secure Storage of and access to data

The school will ensure that systems are set up so that the existence of protected files is hidden from unauthorised users and that users will be assigned a clearance that will determine which files are accessible to them. Access to protected data will be controlled according to the role of the user. Members of staff will not, as a matter of course, be granted access to the whole management information system.

All users will use strong passwords. User passwords must never be shared. (Technical Security Policy for further details)

Personal data may only be accessed on machines that are securely password protected. Any device that can be used to access data must be locked if left (even for very short periods) and set to auto lock if not used for five minutes.

All storage media must be stored in an appropriately secure and safe environment that avoids physical risk, loss or electronic degradation.

Personal data can only be stored on school equipment (this includes computers and portable storage media (where allowed)). Private equipment (i.e. owned by the users) must not be used for the storage of personal data.

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

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

The school has clear policy and procedures for the automatic backing up, accessing and restoring all data held on school systems, including off-site backups. This is managed by the nominated Network Manager –LinkIT. The school does not use any “Cloud Based Storage Systems” for data storage. It is aware that data held in remote and cloud storage is still required to be protected in line with the Data Protection Act. The school will ensure that it is satisfied with controls put in place by remote / cloud based data services providers to protect the data if they wish to use these systems at a later date.

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

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

The school recognises that under Section 7 of the DPA,

<http://www.legislation.gov.uk/ukpga/1998/29/section/7> data subjects have a number of rights in connection with their personal data, the main one being the right of access. Procedures are in place (see Freedom Of Information Policy) to deal with Subject Access Requests i.e. a written request to see all or a part of the personal data held by the data controller in connection with the data subject. Data subjects have the right to know: if the data controller holds personal data about them; a description of that data; the purpose for which the data is processed; the sources of that data; to whom the data may be disclosed; and a copy of all the personal data that is held about them. Under certain circumstances the data subject can also exercise rights in connection with the rectification; blocking; erasure and destruction of data.

Secure transfer of data and access out of school

The school recognises that personal data may be accessed by users out of school, or transferred to the LA or other agencies. In these circumstances:

- Users may not remove or copy sensitive or restricted or protected personal data from the school or authorised premises without permission and unless the media is encrypted and password protected and is transported securely for storage in a secure location.
- Users must take particular care that computers or removable devices which contain personal data must not be accessed by other users (eg family members) when out of school
- When restricted or protected personal data is required by an authorised user from outside the organisation’s premises (for example, by a member of staff to work from their home), they should preferably have secure remote access to the management information system or learning platform;
- If secure remote access is not possible, users must only remove or copy personal or sensitive data from the organisation or authorised premises if the storage media, portable or mobile device is encrypted and is transported securely for storage in a secure location;
- Users must protect all portable and mobile devices, including media, used to store and transmit personal information using approved encryption software; and
- Particular care should be taken if data is taken or transferred to another country, particularly outside Europe, and advice should be taken from the local authority (if relevant) in this event.

Disposal of data

The school will comply with the requirements for the safe destruction of personal data when it is no longer required.

The disposal of personal data, in either paper or electronic form, must be conducted in a way that makes reconstruction highly unlikely. Electronic files must be securely overwritten, in accordance with government guidance, and other media must be shredded, incinerated or otherwise disintegrated for data.

In some cases a Destruction Log should be kept of all data that is disposed of. The log should include the document ID, classification, date of destruction, method and authorisation.

Audit Logging / Reporting / Incident Handling

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

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

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

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

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



Privacy Notice

Privacy Notice - Data Protection Act 1998

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

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

This information includes your contact details, national curriculum assessment results, attendance information and personal characteristics such as your ethnic group, any special educational needs and relevant medical information. If you are enrolling for post 14 qualifications we will be provided with your unique learner number (ULN) by the Learning Records Service and may also obtain from them details of any learning or qualifications you have undertaken.

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

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

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

Business Manager - Mrs Cockeram.

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

<http://www.derby.gov.uk/council-and-democracy/open-data-and-freedom-of-information/dataprotection-act/> and

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

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

Information Governance - Data Protection

Derby City Council

Council House

Corporation Street

Derby

DE1 2FS

Email: data.protection@derby.gov.uk

Telephone: 01332 6407637

Public Communications Unit, Department for Education

Sanctuary Buildings

Great Smith Street

London

SW1P 3BT

Website: www.education.gov.uk

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

Telephone: 0370 000 2288



Appendix 4

Social Media Policy

Social media (e.g. Facebook, Twitter, LinkedIn) is a broad term for any kind of online platform which enables people to directly interact with each other. However some games, for example Minecraft or World of Warcraft and video sharing platforms such as You Tube have social media elements to them. In addition the school's website also allows communication that falls into the remit of this policy.

The school recognises the numerous benefits and opportunities which a social media presence offers.

However, there are some risks associated with social media use, especially around the issues of safeguarding, bullying and personal reputation. This policy aims to encourage the safe use of social media by the school, its staff, parents, carers and children.

Scope

This policy is subject to the school's Codes of Conduct and Acceptable Use Agreements.

This policy:

- Applies to all staff and to all online communications which directly or indirectly, represent the school.
- Applies to such online communications posted at any time and from anywhere.
- Encourages the safe and responsible use of social media through training and education

The school respects privacy and understands that staff and pupils (even though not always meet the minimum age requirement) may use social media forums in their private lives. However, personal communications likely to have a negative impact on professional standards and/or the school's reputation are within the scope of this policy.

Professional communications are those made through official channels, posted on a school account or using the school name. All professional communications are within the scope of this policy.

Personal communications are those made via a personal social media accounts. In all cases, where a personal account is used which associates itself with 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.

Digital communications with parents and pupils are also considered. Staff may use social media to communicate with learners via a school social media account for teaching and learning purposes but must consider whether this is appropriate and consider the potential implications.

Organisational control

Roles & Responsibilities

SLT

- Facilitating training and guidance on Social Media use.
- Developing and implementing the Social Media policy
- Taking a lead role in investigating any reported incidents.
- Making an initial assessment when an incident is reported and involving appropriate staff and external agencies as required.
- Approve account creation

Administrator (School Business Manager & Head teacher)

- Create the account following SLT approval
- Store account details, including passwords securely
- Be involved in monitoring and contributing to the account
- Control the process for managing an account after the lead staff member has left the organisation (closing or transferring)

Staff

- Know the contents of and ensure that any use of social media is carried out in line with this and other relevant policies
- Attending appropriate training
- Regularly monitoring, updating and managing content he/she has posted via school accounts
- Adding an appropriate disclaimer to personal accounts when naming the school
- Following school guidelines for responsible use of Social Media (See Below)

Process for creating new accounts

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

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

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

Monitoring

School accounts must be monitored regularly and frequently (preferably 7 days a week, including during holidays). Any comments, queries or complaints made through those accounts must be responded to within

24 hours (or on the next working day if received at a weekend) even if the response is only to acknowledge receipt. Regular monitoring and intervention is essential in case a situation arises where bullying or any other inappropriate behaviour arises on a school social media account.

Behaviour

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

Legal considerations

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

Handling abuse

- When acting on behalf of the school, handle offensive comments swiftly and with sensitivity.
- If a conversation turns and becomes offensive or unacceptable, school users should block, report or delete other users or their comments/posts and should inform the audience exactly why the action was taken
- If you feel that you or someone else is subject to abuse by colleagues through use of a social networking site, then this action must be reported using the agreed school protocols.

Tone

The tone of content published on social media should be appropriate to the audience, whilst retaining appropriate levels of professional standards. Key words to consider when composing messages are:

- Engaging
- Conversational
- Informative
- Friendly (on certain platforms, e.g. Facebook)

Use of images

School use of images can be assumed to be acceptable, providing the following guidelines are strictly adhered to.

- Permission to use any photos or video recordings should be sought in line with the school's digital and video images policy. If anyone, for any reason, asks not to be filmed or photographed then their wishes should be respected.
- Under no circumstances should staff share or upload student pictures online other than via school owned social media accounts
- Staff should exercise their professional judgement about whether an image is appropriate to share on school social media accounts. Students should be appropriately dressed, not be subject to ridicule and must not be on any school list of children whose images must not be published.
- If a member of staff inadvertently takes a compromising picture which could be misconstrued or misused, they must delete it immediately.

Personal use

Staff

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

Pupil/Students

- Staff are not permitted to follow or engage with current pupils/students of the school on any personal social media network account unless they have a personal link to the family which extends out of school. (Family member etc..)
- The school's education programme should enable the pupils/students to be safe and responsible users of social media.

Parents/Carers

- If parents/carers have access to a school learning platform where posting or commenting is enabled, parents/carers will be informed about acceptable use.
- The school has an active parent/carer education programme which supports the safe and positive use of social media. This includes information on the website.

- Parents/Carers are encouraged to comment or post appropriately about the school. In the event of any offensive or inappropriate comments being made, the school will ask the parent/carer to remove the post and invite them to discuss the issues in person. If necessary, refer parents to the school's complaints procedures.
- Staff are permitted to follow or engage with current parents of the school on any personal social media account. However, if the link is only as staff/parent they must adhere to the professionalism listed within this policy. If their relationship goes beyond school employment (Family member, friend, colleague etc...) then their online communication should remain personal and not infringe of school matters.

Monitoring posts about the school

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



Responsible use of Social Media

Managing your personal use of Social Media:

- “Nothing” on social media is truly private
- Social media can blur the lines between your professional and private life. Don’t use the school logo and/or branding on personal accounts
- Check your settings regularly and test your privacy
- Keep an eye on your digital footprint
- Keep your personal information private
- Regularly review your connections – keep them to those you want to be connected to
- When posting online consider; Scale, Audience and Permanency of what you post
- If you want to criticise, do it politely.
- Take control of your images – do you want to be tagged in an image? What would children or parents say about you if they could see your images?
- Know how to report a problem

Managing school social media accounts

The Do’s

- Check with a senior leader before publishing content that may have controversial implications for the school
- Use a disclaimer when expressing personal views
- Make it clear who is posting content
- Use an appropriate and professional tone
- Be respectful to all parties
- Ensure you have permission to ‘share’ other peoples’ materials and acknowledge the author
- Express opinions but do so in a balanced and measured manner
- Think before responding to comments and, when in doubt, get a second opinion
- Seek advice and report any mistakes using the school’s reporting process
- Consider turning off tagging people in images where possible

The Don’ts

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