

# ***Our Lady and St Patrick's RC Primary School***



## **Online Safety Policy**

*Living, loving and learning together in God's way*

## Development of this Policy

This online safety policy has been developed by the:

*Headteacher: Cathy Blatchford*

*Governor for Safeguarding: Larry Coulter*

*Designated Senior Lead for Safeguarding including online safety (DSL): Rachel O'Sullivan (DDSL) Cathay Blatchford*

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

## Schedule for Monitoring and Review

This online safety policy was approved by the <i>Governors on:</i>	
The implementation of this online safety policy will be monitored by the:	<i>Head teacher, Senior Designated Officer for Safeguarding, ICT Co-ordinator and the Governor with responsibility for Safeguarding</i>
Monitoring will take place at regular intervals:	<i>Once a year</i>
The <i>Governing Body</i> will receive a report on the implementation of the online safety policy generated by the ICT Co-ordinator (which will include anonymous details of online safety incidents) at regular intervals:	<i>Once a year</i>
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:	Autumn 2026
Should serious online safety incidents take place, the following external persons / agencies should be informed:	Police and Local Authority

The school will monitor the impact of the policy using:

- *Logs of reported incidents*
- *Staff and pupil conferencing*

## Scope of the Policy

This policy applies to all members of the *school community* (including staff, students, volunteers, parents / carers, and visitors) who have access to and are users of school ICT systems, both in and out of the *school*. The Education and Inspections Act 2006 empowers 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 (see appendix for policy). 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 outlines the online safety roles and responsibilities of individuals and groups within the *school*:

### Governors:

*Governors* are responsible for the approval of the online safety Policy and for reviewing the effectiveness of the policy. This will be carried out by the *Governors* receiving regular information about online safety incidents and monitoring reports. The role of online safety Governor is incorporated into the wider role of Safeguarding Governor at Our Lady and St Patrick's. The role of the online safety *Governor* will include:

- *regular meetings with the Designated Senior Officer*
- *reporting to relevant Governors*

### Head teacher:

- The Head teacher has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety will be delegated to the *DSL and the IT Co-ordinator*.
- The Head teacher and Assistant Head Teachers should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff. (*see flow chart on dealing with online safety incidents "Responding to incidents of misuse" and relevant Local Authority HR disciplinary procedures*).
- The Head teacher is responsible for ensuring that the DSL and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.
- The Head teacher will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive regular monitoring reports from the DSL.

### DSL:

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

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

- 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
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments
- meets regularly with the Safeguarding *Governor* to discuss current issues
- attends relevant governor & SLT meetings

## IT Coordinator (currently overseen by SLT and DSLs)

The *Coordinator for IT* is responsible for ensuring:

- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies
- liaises with school technical staff
- reports regularly to Senior Leadership Team
- 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 a properly enforced password protection policy, in which passwords are regularly changed
- the filtering policy is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person
- that the use of the network, internet, remote access and email is regularly monitored in order that any misuse or attempted misuse can be reported to the DSL for investigation
- that monitoring software and systems are implemented and updated as agreed by the Head Teacher

## 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
- they report any suspected misuse or problem to the DSL for investigation
- all digital communications with students / parents / carers should be on a professional level and only carried out using official school systems
- online safety issues are embedded in all aspects of the curriculum and other activities
- students understand and follow the online safety and acceptable use policies
- students 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, students 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

## Students:

- are responsible for using the *school* digital technology systems in accordance with the Student Acceptable Use Policy
- have a good understanding of 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 and Carers play a crucial role in ensuring that their children understand the need to use the internet / mobile devices in an appropriate way. The *school* will take every opportunity to help parents understand these issues through parents' evenings, newsletters, letters, website and information about national and local online safety campaigns. 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 and on-line student / pupil records
- their own conduct regarding the school, its staff and other pupils when using social media
- their children's personal devices in the school (where this is allowed)

## Policy Statements

### Education – students

Whilst regulation and technical solutions are very important, their use must be balanced by educating *students* to take a responsible approach. The education of *students* 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 / PHSE / other lessons and should be regularly revisited
- Key online safety messages should be reinforced as part of a planned programme of assemblies and pastoral activities
- Students should be taught in all lessons to be critically aware of the content they access on-line and be guided to validate the accuracy of information.
- Students should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet
- Students 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 students are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites and should be present in the room.

### 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 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,
- High profile events e.g. Safer Internet Day

- Reference to the relevant web sites and publications

## Education – The Wider Community

The school will provide opportunities for members of the community to gain from the school's online safety knowledge and experience. This will be offered via the school's website and includes information handouts to develop awareness of online safety.

## Education & Training – Staff / Volunteers

It is essential that all staff receive online safety training and understand their responsibilities, as outlined in this policy. 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. From time to time the DSL may arrange additional training or refresher sessions for staff.

## Training – Governors

Governors should take part in online safety awareness sessions.

## 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 as outlined by the Local Authority.
- There will be regular reviews and audits of the safety and security of school academy 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 from Key Stage 2 and above will be provided with a username and secure password by the IT technician who will keep an up to date record of users and their usernames. Users are responsible for the security of their username and password.
- The “administrator” passwords for the school ICT system, used by the Network Manager must also be available to the Headteacher or other nominated senior leader and kept in a secure place (e.g. school safe).
- 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
- Internet access is filtered for all users.
- School technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the Acceptable Use Agreement.
- An appropriate system is in place for users to report any actual / potential technical incident / security breach to the DSO.
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc. from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.
- An agreed policy is in place for the provision of temporary access of “guests” (eg trainee teachers, supply teachers, visitors) onto the school systems.

## Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and students 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 students 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.
- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published or made publicly available on social networking sites, nor should parents / carers comment on any activities involving other *students* in the digital / video images.
- Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those images should only be taken on school equipment; the personal equipment of staff should not be used for such purposes. Staff **should not** use their mobile phones to take images.
- Care should be taken when taking digital / video images that students are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Students must not take, use, share, publish or distribute images of others without their permission.
- Photographs published on the website, or elsewhere that include students 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.
- Written permission from parents or carers will be obtained before photographs of students are published on the school website.
- Pupil's work can be published on the school website providing the pupil has given their permission.

## Data Protection

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

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

The school must ensure that:

- It will hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for.
- Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay.
- All personal data will be fairly obtained in accordance with the "Privacy Notice" and lawfully processed in accordance with the "Conditions for Processing".
- It has a Data Protection Policy.
- It is registered as a Data Controller for the purposes of the Data Protection Act (DPA).



- There are clear policies about the use of cloud storage / cloud computing which ensure that such data storage meets the requirements laid down by the Information Commissioner's Office.

Staff must ensure that they:

- At all times take care to ensure the safekeeping 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.
- Do not store data on removable devices regardless of whether or not the data has been encrypted.
- Do not share their log-on User names and passwords with others and that these are stored in a place that is inaccessible to pupils, parents and other staff members.

## Communications

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

Communication Technologies	Staff and Other Adults				Pupils			
	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Mobile phones may be brought to school	/						/	
Use of mobile phones in lessons				/				/
Use of mobile phones in social time	/							/
Taking photos on mobile phones/cameras				/			/	
Use of other mobile devices e.g. tablets, gaming devices			/					/
Use of personal email addresses in school				/				/
Use of school email for personal emails	/							/
Use of messaging apps	/							/
Use of social media	/							/
Use of blogs	/					/		

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

- The official *school* email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored.
- Users must immediately report, to the Head teacher – 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.
- Email communications between staff or parents / carers must be professional in tone and content. These communications should only take place on official (monitored) school systems. Personal email addresses, text messaging or social media must not be used for these communications.
- Whole class / group email addresses may be used in school.
- Students 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

Expectations for teachers' professional conduct are set out in 'Teachers Standards 2012'. While, Ofsted's e-safety framework 2012, reviews how a school protects and educates staff and pupils in their use of technology, including what measures would be expected to be in place to intervene and support should a particular issue arise.

All schools, academies and local authorities have a duty of care to provide a safe learning environment for pupils and staff. Schools/academies 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 liable to the injured party. Reasonable steps to prevent predictable harm must be in place.

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

- Training to include: 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 the school: its activity, 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, Trust or local authority
- Security and Privacy settings on personal social media profiles are regularly checked to minimise the risk of losing of personal information.

The school's use of social media for professional purposes will be checked regularly by the senior risk officer and online safety committee to ensure compliance with the Social Media, Data Protection, Communications, Digital Image and Video Policies.

## Unsuitable / inappropriate activities

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

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

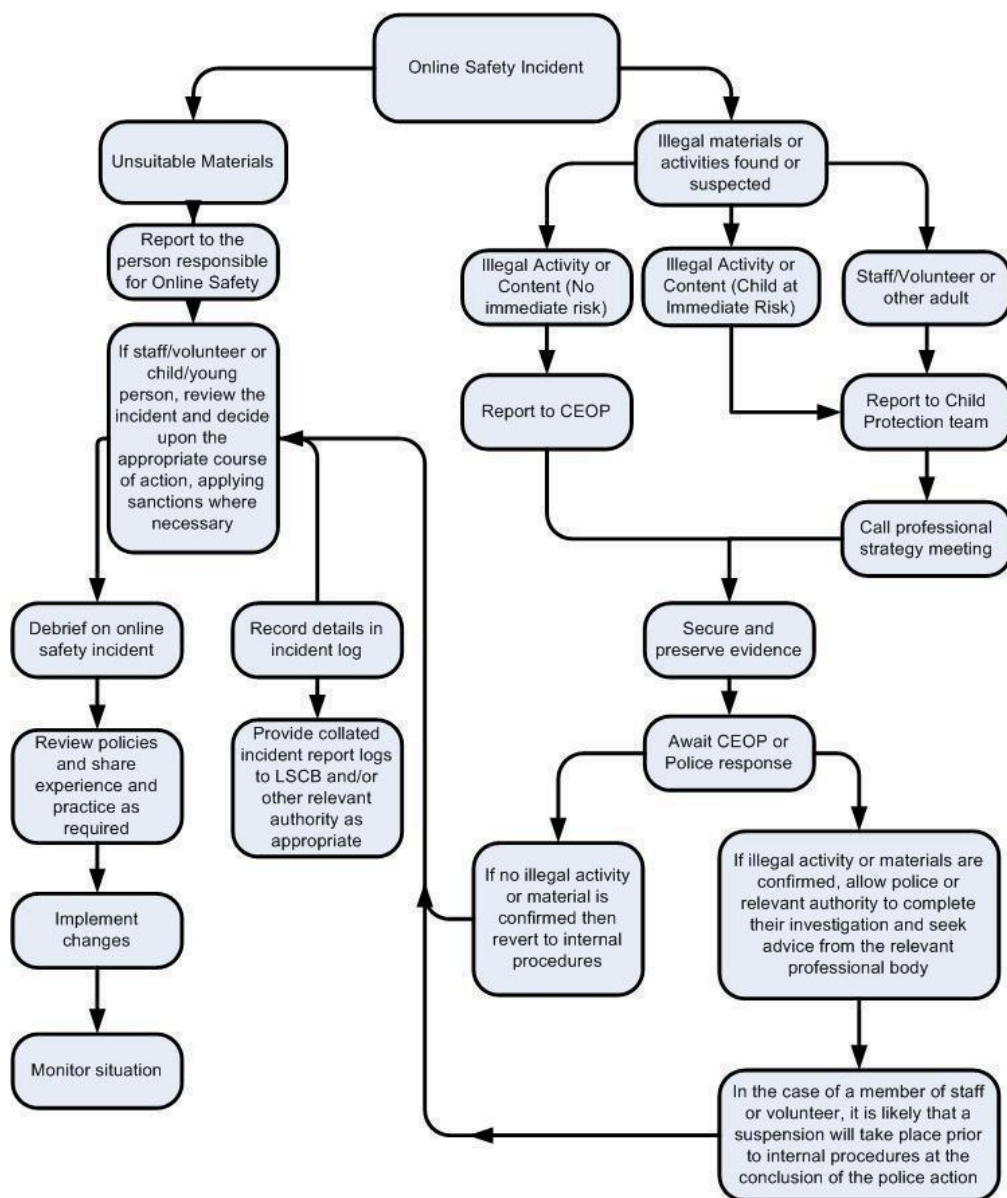
User Actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit Internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	pornography				X	
	promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Using school systems to run a private business					X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school					X	
Infringing copyright					X	
Revealing or publicising confidential or proprietary information (eg financial / personal information, databases, computer / network access codes and passwords)					X	
Creating or propagating computer viruses or other harmful files					X	
Unfair usage (downloading / uploading large files that hinders others in their use of the internet)					X	
On-line gaming (educational)			X			
On-line gaming (non educational)					X	
On-line gambling					X	
On-line shopping / commerce			X			
Use of social media					X	
Use of messaging apps					X	
Use of video broadcasting eg Youtube					X	

## Responding to incidents of misuse

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

### Illegal Incidents

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



## Other Incidents

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

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

- Have more than one senior member of staff involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by young people and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.

- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).

- Record the url of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below)

- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:

- Internal response or discipline procedures
- Involvement by Local Authority 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
- other criminal conduct, activity or materials

- **Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.**

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

## School Actions & Sanctions

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

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

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



## Appendices

Can be found on the following pages:

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# Pupil Acceptable Use Agreement – for KS2 children

## This Acceptable Use Policy 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 users at risk.

## Acceptable Use Policy Agreement

I understand that I must use school ICT systems in a responsible way, to ensure that there is no risk to my safety or to the safety of other users. In return the school will try to ensure that pupils have good access to digital technologies to enhance my learning.

### For my own personal safety:

- I understand that the *teachers can check on everything I do* using school ICT systems.
- I will keep my username and password safe and secure. I will not try to use any other person's username and password.
- I will be aware of "stranger danger" and will not tell people my name, address, telephone number, age, or any other details about me when I am on-line.
- I will never arrange to meet someone I have met on-line without taking my parent or carer.
- I will immediately tell an adult if I see anything that upsets or worries me on-line.

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

- I understand that the *school* devices are for educational use and that I will not use them for personal use unless I have permission.
- I will not make downloads or uploads without permission from a teacher.
- I will not use the *school* systems or devices for on-line gaming, on-line gambling, internet shopping, or video broadcasting (eg YouTube).

### 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 change any other user's files, without their knowledge and permission.
- I will be polite and responsible when I communicate with others.
- I will not take or distribute pictures of anyone without their permission.

### I will help the school to provide me with good access to digital technologies:

- I will always follow instructions when I am using school devices.
- 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 who sent the email.
- I will not install programmes of any type on any school device.
- I will not try to alter computer settings.
- I will not use social media sites in school e.g. Facebook or Instagram.

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

- I should never pretend that someone else's work is my own.
- I will not make unlawful copies.
- Not everything on the Internet is true or accurate.

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

- I understand that the *school* 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 both in and out of school and where they involve my membership of the school community (examples would be cyber-bullying, 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: loss of access to the school network / internet, detention, fixed term exclusion, contact with parents and in the event of illegal activities involvement of the police.

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

## Pupil Acceptable Use Agreement Form 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 ICT systems.

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

- I use the *school* systems and devices (both in and out of school)
- I use my own 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* eg communicating with other members of the school, accessing school email, website etc.

Name of Student / Pupil

Group / Class

Signed

Date

## Pupil Acceptable Use Policy Agreement (Foundation / KS1)

### This is how we stay safe when we use computers:

I will ask a teacher or suitable adult if I want to use the computers

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.

*Signed (child):*.....

Signed (parent): .....

## 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.

### Permission Form

Parent / Carers

Pupil

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.

#### Either: (KS2 and above)

*I know that my son / daughter has signed an Acceptable Use Agreement and has received, or will receive, online safety education to help them understand the importance of safe use of technology and the internet – both in and out of school.*

#### Or: (KS1/Foundation)

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

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

I understand that my child's activity on the ICT systems will be monitored and that the school will contact me if they have concerns about any possible breaches of the Acceptable Use Policy.

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

Signed

Date

## Use of Digital / Video Images

The use of digital / video images plays an important part in learning activities. Students 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 will not be identified by the use of their names.

In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other *students* in the digital / video images.

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

## Digital / Video Images Permission Form

Parent / Carers Name

Pupil Name

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

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

Signed

Date

## Use of Cloud Systems Permission Form

The school uses Google Apps for Education for pupils and staff. This permission form describes the tools and pupil responsibilities for using these services.

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

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

**Calendar** - an individual calendar providing the ability to organize schedules, daily activities, and assignments

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

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

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

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

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

Parent / Carers Name

Pupil Name

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

Signed

Date

## Staff (and Volunteer) Acceptable Use Policy Agreement



## School Policy

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

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

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

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

## Acceptable Use Policy Agreement

I understand that I must use school ICT systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the ICT systems and other users. I recognise the value of the use of ICT for enhancing learning and will ensure that students receive opportunities to gain from the use of ICT. I will, where possible, educate the young people in my care in the safe use of ICT 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 ICT systems, email and other digital communications.
- I understand that the rules set out in this agreement also apply to use of school ICT systems (eg 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 ICT systems are primarily intended for educational use and that I will only use the systems for personal or recreational acceptable use as per the Online Safety Policy.
- 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 Senior Designated Officer for Safeguarding.

### **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 permission.
- I will communicate with others in a professional manner, I will not use aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will ensure that when I take and / or publish images of others I will do so with their permission and in accordance with the school's policy on the use of digital / video images. I will not use my personal equipment to record these images, unless I have permission to do so. Where these images are published (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 communicate with pupils and parents / carers using official school systems. Any such communication will be professional in tone and manner.
- I will not engage in any on-line activity that may compromise my professional responsibilities.

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

- When I use my mobile devices in school, I will follow the rules set out in this agreement, in the same way as if I was using *school* equipment. I will also follow any additional rules set by the *school* about such

use. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses.

- I will not use personal email addresses on the school ICT systems.
- I will not open any hyperlinks in emails or any attachments to emails, unless the source is known and trusted, or if I have any concerns about the validity of the email (due to the risk of the attachment containing viruses or other harmful programmes)
- I will ensure that my data is regularly backed up, in accordance with relevant school policies.
- 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 I have agreement from the ICT Co-ordinator.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in the School / LA Personal Data Policy (or other relevant policy).
- 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 ICT equipment in school, but also applies to my use of school ICT systems and equipment off the premises and my use of personal equipment on the premises or in situations related to my employment by the school
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I could be subject to disciplinary action. This could include a warning, a suspension, referral to Governors and / or the Local Authority and in the event of illegal activities the involvement of the police.

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

Staff / Volunteer Name

Signed

Date

# Acceptable Use Agreement for Community Users

## This Acceptable Use Agreement is intended to ensure:

- that community users of school digital technologies will be responsible users and stay safe while using these systems and devices
- that school systems, devices and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- that users are protected from potential risk in their use of these systems and devices

## Acceptable Use Agreement

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

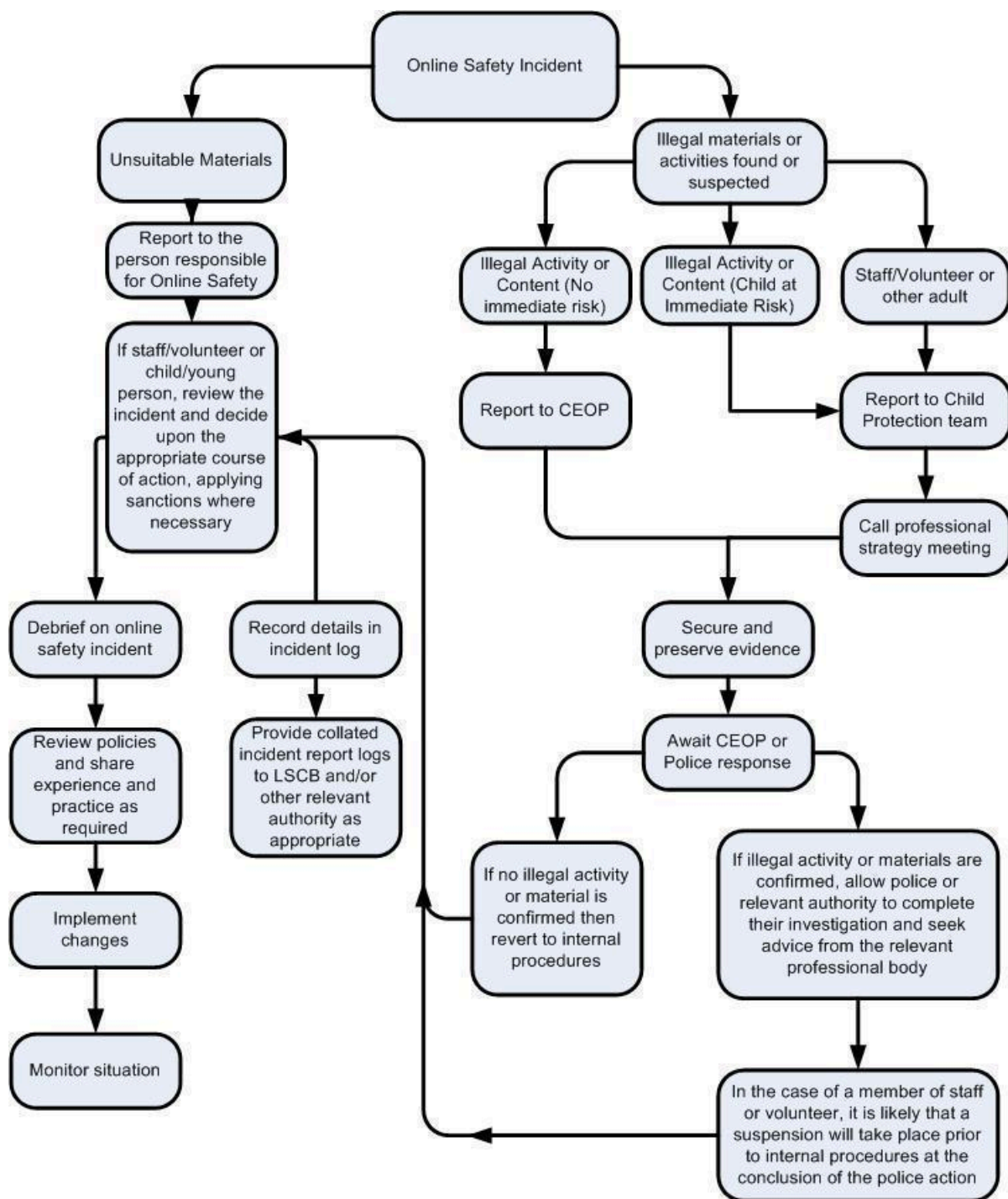
- I understand that my use of school) systems and devices and digital communications will be monitored
- I will not use a personal device that I have brought into school for any activity that would be inappropriate in a school setting.
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering / security systems in place to prevent access to such materials.
- I will immediately report any illegal, inappropriate or harmful material or incident, I become aware of, to the appropriate person.
- I will not access, copy, remove or otherwise alter any other user's files, without permission.
- I will ensure that if I take and / or publish images of others I will only do so with their permission. I will not use my personal equipment to record these images, without permission. If images are published it will not be possible to identify by name, or other personal information, those who are featured.
- I will not publish or share any information I have obtained whilst in the school on any personal website, social networking site or through any other means, unless I have permission from the school.
- I will not, without permission, make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a school device, nor will I try to alter computer settings, unless I have permission to do so.
- I will not disable or cause any damage to school equipment, or the equipment belonging to others.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.
- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos).
- I understand that if I fail to comply with this Acceptable Use Agreement, the school has the right to remove my access to school systems / devices

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

Name

Signature  Date

## Responding to incidents of misuse – flow chart



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

Group	
Date	
Reason for investigation	

#### Details of first reviewing person

Name	
Position	
Signature	

#### Details of second reviewing person

Name	
Position	
Signature	

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

--

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

#### Reason for concern


#### Conclusion and Action proposed or taken


Template Reporting Log

Reporting Log Group ..... ..... ..... ..... ..	Signature								
	Incident Reported by								
	Action taken	By whom?							
		What?							
	Incident								
	Time								
	Date								

Training Needs Audit

Training Needs Audit Log Group  ..... ..... ..... Date ..... .....	Review date								
	Cost								
	To be met by:								
	Identified training need								
	Relevant training in last 12 months								
	Position								
	Name								



## School Technical Security Policy (including filtering and passwords)

### Suggestions for use

#### Introduction

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

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

#### Responsibilities

The management of technical security will be the responsibility of the ICT Co-ordinator.

### Technical Security

#### Policy statements

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

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school academy technical systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- 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.
- 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

- A temporary log in has been provided for supply teachers to access the school system. Student teachers *must* be provided with their own log in and password so that their acceptable use can be monitored.

## 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 ICT Co-ordinator and will be reviewed, at least annually, by the Senior Designated Officer for Safeguarding.
- All school networks and systems will be protected by secure passwords that are regularly changed.
- The “master / administrator” passwords for the school systems, used by the technical staff must also be available to the Headteacher / Principal or other nominated senior leader and kept in a secure place eg school safe.
- Passwords for new users, and replacement passwords for existing users will be allocated via the School Business Manager.
- 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.

### Staff passwords:

- All staff users will be provided with a username and password by the School Business Manager who will keep an up to date record of users and their usernames.
- must not include proper names or any other personal information about the user that might be known by others
- the account should be “locked out” following six successive incorrect log-on attempts
- 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 (use of one-way encryption)
- 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
- 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 password by the ICT Co-ordinator who will keep an up to date record of users and their usernames.
- Pupils will be taught the importance of password security
- The complexity (ie minimum standards) will be set with regards to the cognitive ability of the children.

### Training / Awareness

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

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

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

- in lessons
- through the Acceptable Use Agreement

## Audit / Monitoring / Reporting / Review

The ICT Co-ordinator will ensure that full records are kept of User Ids and requests for password changes and 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 school's filtering policy will be held by the Senior Designated Officer for Safeguarding. The ICT Co-ordinator 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 (SDO)

All users have a responsibility to report immediately to the SDO, any infringements of the school's filtering policy of which they become aware or any sites that are accessed, which they believe should have been filtered.

Users must not attempt to use any programmes or software that might allow them to bypass the filtering / security systems in place to prevent access to such materials.

### Policy Statements

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

### 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. *Monitoring will take place half termly.*

## School Personal Data Handling Policy

Recent publicity about data breaches suffered by organisations and individuals has made the area of personal data protection compliance a current and high profile issue for schools and other organisations. It is important that the school has a clear and well understood personal data handling policy in order to avoid or at least minimise the risk of personal data breaches. A breach may arise from a theft, a deliberate attack on your systems, the unauthorised use of personal data by a member of staff, accidental loss, or equipment failure. In addition:

- No school or individual would want to be the cause of any data breach, particularly as the impact of data loss on individuals can be severe and cause extreme embarrassment, put individuals at risk and affect personal, professional or organisational reputation.
- Schools are “data rich” and the introduction of electronic storage and transmission of data has created additional potential for the loss of data
- The school will want to avoid the criticism and negative publicity that could be generated by any personal data breach.
- The school is subject to a wide range of legislation related to data protection and data use, with significant penalties for failure to observe the relevant legislation.

## 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 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 Senior Information Risk Officer (SIRO) is the Senior Designated Officer for Safeguarding. This person will keep up to date with current legislation and guidance and will:

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

The school will identify Information Asset Owners (IAOs) *for the various types of* data being held (eg pupil information / staff information / assessment data etc.). The IAOs will manage and address risks to the information and will understand:

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

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

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

## Registration

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

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

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

Risk assessments are an ongoing process and should result in the completion of an Information Risk Actions Form (example below):

Risk ID	Information Asset affected	Information Asset Owner	Protective Marking (Impact Level)	Likelihood	Overall risk level (low, medium, high)	Action(s) to minimise risk

## Impact Levels and protective marking

Following incidents involving loss of data, the Government recommends that the Protective Marking Scheme should be used to indicate the sensitivity of data. The Protective Marking Scheme is mapped to Impact Levels as follows:

Government Protective Marking Scheme label	Impact Level (IL)	Applies to schools?
NOT PROTECTIVELY MARKED	0	Will apply in schools
PROTECT	1 or 2	
RESTRICTED	3	
CONFIDENTIAL	4	Will not apply in schools
HIGHLY CONFIDENTIAL	5	
TOP SECRET	6	

Most pupils or staff personal data that is used within educational institutions will come under the PROTECT classification. However some, eg the home address of a child (or vulnerable adult) at risk will be marked as RESTRICT.

The school will ensure that all school staff, independent contractors working for it, and delivery partners, comply with restrictions applying to the access to, handling and storage of data classified as Protect, Restricted or higher. Unmarked material is considered 'unclassified'. The term 'UNCLASSIFIED' or 'NON 'or 'NOT PROTECTIVELY MARKED' may be used to indicate positively that a protective marking is not needed. All documents (manual or digital) that contain protected or restricted data will be labelled clearly with the Impact Level shown in the header and the Release and Destruction classification in the footer.

Users must be aware that when data is aggregated the subsequent impact level may be higher than the individual impact levels of the original data. Combining more and more individual data elements together in a report or data view increases the impact of a breach. A breach that puts pupils at serious risk of harm will have a higher impact than a risk that puts them at low risk of harm. Long-term significant damage to anyone's reputation has a higher impact than damage that might cause short-term embarrassment. Release and destruction markings should be shown in the footer eg. "Securely delete or shred this information when you have finished using it".

## Secure Storage of and access to data

The school will ensure that ICT systems are set up so that the existence of protected files is hidden from unauthorised users and that users will be assigned a clearance that will determine which files are accessible

to them. Access to protected data will be controlled according to the role of the user. Members of staff will not, as a matter of course, be granted access to the whole management information system.

All users will use strong passwords which must be changed regularly. User passwords must never be shared.

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

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

Personal data can only be stored on school equipment (this includes computers and portable storage media. Private equipment (ie owned by the users) must not be used for the storage of personal data. Personal data storage is not permitted on any removable devices e.g. USB stick.

The *school* has clear policy and procedures for the automatic backing up, accessing and restoring all data held on school systems, including off-site backup. The *school* has clear policy and procedures for the use of "Cloud Based Storage Systems" (for example dropbox, google apps and google docs) and is aware that data held in remote and cloud storage is still required to be protected in line with the Data Protection Act. The school will ensure that it is satisfied with controls put in place by remote / cloud based data services providers to protect the data.

As a Data Controller, the *school* is responsible for the security of any data passed to a "third party". Data Protection clauses will be included in all contracts where data is likely to be passed to a third party. All paper based Protected and Restricted (or higher) material must be held in lockable storage, whether on or off site.

The *school* recognises that under Section 7 of the DPA, [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 Data Protection 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.
- Users must take particular care that computers 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.



*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.*

## School Policy Electronic Devices - Searching & Deletion

### Introduction

The changing face of information technologies and ever increasing pupil use of these technologies has meant that the Education Acts have had to change in an attempt to keep pace. Within Part 2 of the Education Act 2011 (Discipline) there have been changes to the powers afforded to schools by statute to search pupils in order to maintain discipline and ensure safety. Schools are required to ensure they have updated policies which take these changes into account. No such policy can on its own guarantee that the school will not face legal challenge, but having a robust policy which takes account of the Act and applying it in practice will however help to provide the school with justification for what it does.

The particular changes we deal with here are the added power to search for items 'banned under the school rules' and the power to 'delete data' stored on seized electronic devices.

Items banned under the school rules are determined and publicised by the Headteacher (section 89 Education and Inspections Act 1996).

An item banned by the school rules may only be searched for under these new powers if it has been identified in the school rules as an item that can be searched for. It is therefore important that there is a school policy which sets out clearly and unambiguously the items which:

- are banned under the school rules; and
- are banned AND can be searched for by authorised school staff

The act allows authorised persons to examine data on electronic devices if they think there is a good reason to do so. In determining a 'good reason' to examine or erase the data or files the authorised staff member must reasonably suspect that the data or file on the device in question has been, or could be, used to cause harm, to disrupt teaching or could break the school rules.

Following an examination, if the person has decided to return the device to the owner, or to retain or dispose of it, they may erase any data or files, if they think there is a good reason to do so.

### Responsibilities:

The Headteacher has authorised all members of the Senior Leadership Team to carry out searches for, and of electronic devices, and to delete any data or files on those devices that meet the criteria above.

### Search:

Pupils are allowed to bring MP3 players and mobile phones to school and use them only within the rules laid down by the school as detailed in the Online Safety Policy.

Authorised staff (defined in the responsibilities section above) have the right to search for such electronic devices where they reasonably suspect that the data or file on the device in question has been, or could be, used to cause harm, to disrupt teaching or break the school rules.

- Searching with consent - Authorised staff may search with the pupil's consent for any item.
- Searching without consent - Authorised staff may only search without the pupil's consent for anything which is either 'prohibited' (as defined in Section 550AA of the Education Act 1996) or appears in the school rules as an item which is banned and may be searched for.

#### Extent of the search:

**The person conducting the search may not require the *student/ pupil* to remove any clothing other than outer clothing.**

Outer clothing means clothing that is not worn next to the skin or immediately over a garment that is being worn as underwear (outer clothing includes hats; shoes; boots; coat; blazer; jacket; gloves and scarves). 'Possessions' means any goods over which the *pupil* has or appears to have control – this includes desks, lockers and bags.

The power to search without consent enables a personal search, involving removal of outer clothing and searching of pockets; but not an intimate search going further than that, which only a person with more extensive powers (e.g. a police officer) can do.

There is a limited exception to this rule: Authorised staff can carry out a search of a pupil of the opposite gender including without a witness present, but only where you reasonably believe that there is a risk that serious harm will be caused to a person if you do not conduct the search immediately and where it is not reasonably practicable to summon another member of staff.

Use of Force – force cannot be used to search without consent for items banned under the school rules regardless of whether the rules say an item can be searched for.

## Electronic devices

An authorised member of staff finding an electronic device may access and examine any data or files on the device if they think there is a good reason to do so.

The examination of the data / files on the device should go only as far as is reasonably necessary to establish the facts of the incident. Any further intrusive examination of personal data may leave the school open to legal challenge.

If inappropriate material is found on the device it is up to the authorised member of staff to decide whether they should delete that material, retain it as evidence (of a criminal offence or a breach of school discipline) or whether the material is of such seriousness that it requires the involvement of the police. Examples of illegal activity would include:

- child sexual abuse images (including images of one child held by another child)
- adult material which potentially breaches the Obscene Publications Act
- criminally racist material
- other criminal conduct, activity or materials

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

## Care of Confiscated Devices

School staff are reminded of the need to ensure the safe keeping of confiscated devices, to avoid the risk of compensation claims for damage / loss of such devices

## Audit / Monitoring / Reporting / Review

The responsible person (the SDO) will ensure that full records are kept of incidents involving the searching for and of mobile phones and electronic devices and the deletion of data / files.