The Maynard School, Exeter

Sep 2023

6.24 Maynard School e-Safety Policy

Independent Day School for Girls

This policy contains the Acceptable Computer Use Agreement (staff), Acceptable Computer Use Policy for Students and, Mobile Phones and Other Electronic Devices Policy,

-See also the Maynard IT Security Access Policy and Data Protection Policy
-See also The Maynard School AUP documents
-See also The Maynard School Child Protection and Safeguarding Policy
-See also KCSIE Part One and Annex A

This policy is based on the SWGFL template policy

Contents

Introduction

SWGfL / UK Safer Internet Centre

The South West Grid for Learning Trust is an educational trust that has an international reputation in supporting schools with online safety.

SWGfL, along with partners Childnet and IWF, launched the UK Safer Internet Centre (UKSIC) in January 2011 as part of the European Commission's Safer Internet Programme. The Safer Internet Centre is, for example, responsible for the organisation of Safer Internet Day each February. More information about UKSIC services and resources can be found on the website: www.saferinternet.org.uk. SWGfL is a founding member of UKCCIS (UK Council for Child Internet Safety) and has spoken at conferences across Europe, America and Africa. More information about its wide-ranging online safety services for schools can be found on the SWGfL website – swgfl.org.uk

360 degree safe Online Safety Self Review Tool

360 degree safe is an online, interactive Self Review Tool which allows the Maynard School to review their online safety policy and practice.

Online Safety BOOST and BOOST+ – Schools Online Safety Toolkit

Online Safety BOOST and BOOST+ packages bring you extra empowerment and support to deal with your online safety challenges, official or otherwise. It comprises a toolkit of apps, services, tools and resources that all go to save time, equip your school to be more sensitive to, and better manage, online safety situations and issues and is used within the Maynard School

Development / Monitoring / Review of this Policy

This Online Safety policy has been developed by the Maynard School ICT steering group

- Head teacher / SLT
- Designated safeguarding lead (DSL)
- Online Safety Officer / Coordinator
- Staff – including Teachers, Support Staff, Technical staff
- Governors
- Students/Parents

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

Schedule for Development / Monitoring / Review

This Online Safety policy was approved by the Board of Directors / Governing Body / Governors Sub Committee on:	July 2018
The implementation of this Online Safety policy will be monitored by the:	*ICT Steering Group*
Monitoring will take place at regular intervals:	*Termly*
The Governing Body / Governors Sub Committee 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:	*June 2024*
Should serious online safety incidents take place, the following external persons / agencies should be informed:	*LA Safeguarding Officer, Governors, LADO, Police*

The school will monitor the impact of the policy using:

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

- students
- parents / carers
- staff

Scope of the Policy

This policy applies to all members of the *Maynard School* community (including staff, students, volunteers, parents / carers, visitors, governors) who have access to and are users of the Maynard School digital technology 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 students when they are off the *Maynard School* site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of online-bullying or other Online Safety incidents covered by this policy, which may take place outside of the *school*, but is linked to membership of the school. The 2011 Education Act increased these powers with regard to the searching for and of electronic devices and the deletion of data (see appendix for template policy). In the case of both acts, action can only be taken over issues covered by the published Behaviour Policy.

The *Maynard 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 / Board of Directors

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. A member of the *Governing Body* has taken on the role of *Online Safety Governor*. The role of the Online Safety *Governor* will include:

- regular meetings with the Online Safety Co-ordinator / Officer
- attendance at Online Safety Group meetings
- regular monitoring of online safety incident logs
- regular monitoring of filtering / change control logs
- reporting to relevant Governors

Headteacher and Senior Leaders

- 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 Online Safety Officer.
- The Headteacher and (at least) another member of the Senior Leadership Team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff. (See flow chart on dealing with online safety incidents – included in a later section – "Responding to incidents of misuse" and relevant school disciplinary procedures).
- The Headteacher and SLT are responsible for ensuring that the Online Safety Officer and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant.
- The Headteacher / Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles.
- The Senior Leadership Team will receive regular monitoring reports from the Online Safety Officer

Designated Safety Lead (ML)

Keeping Children Safe in Education states that:

> *"The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description." They (the DSL) "are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college"*
>
> *They (the DSL) "can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online"*

While the responsibility for online safety is held by the DSL and cannot be delegated, the school may choose to appoint an Online Safety Lead or other relevant persons to work in support of the DSL in carrying out these responsibilities. It is recommended that the school reviews the sections below for the DSL and OSL and allocate roles depending on the structure it has chosen

The DSL will:

- hold the lead responsibility for online safety, within their safeguarding role.
- Receive relevant and regularly updated training in online safety to enable them to understand the risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online
- meet regularly with the online safety governor to discuss current issues, review (anonymised) incidents and filtering and monitoring logs and ensuring that annual (at least) filtering and monitoring checks are carried out
- attend relevant governing body meetings/groups
- report regularly to headteacher/senior leadership team
- be responsible for receiving reports of online safety incidents and handling them, and deciding whether to make a referral by liaising with relevant agencies, ensuring that all incidents are recorded.
- liaise with staff and IT providers on matters of safety and safeguarding and welfare (including online and digital safety)

Online Safety Lead (JF)

The Online Safety Lead will:

- Lead the Online Safety Group
- work closely on a day-to-day basis with the Designated Safeguarding Lead (DSL), (where these roles are not combined)
- receive reports of online safety issues, being aware of the potential for serious child protection concerns and ensure that these are logged to inform future online safety developments
- have a leading role in establishing and reviewing the school online safety policies/documents
- promote an awareness of and commitment to online safety education / awareness raising across the school and beyond
- liaise with curriculum leaders to ensure that the online safety curriculum is planned, mapped, embedded and evaluated
- ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents
- provide (or identify sources of) training and advice for staff/governors/parents/carers/learners
- liaise with (school/local authority/MAT/external provider) technical staff, pastoral staff and support staff (as relevant)
- receive regularly updated training to allow them to understand how digital technologies are used and are developing (particularly by learners) with regard to the areas defined In Keeping Children Safe in Education:
    - content
    - contact
    - conduct

– commerce

Network Manager

The Network Manager / Technical Staff / Co-ordinator for ICT / Computing is responsible for ensuring:

- that the *school's* technical infrastructure is secure and is not open to misuse or malicious attack
- that the *Maynard School* meets required online safety technical requirements and any *other relevant body* Online Safety Policy / Guidance that may apply.
- that users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
- the filtering policy (if it has one), is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person (see appendix "Technical Security Policy Template" for good practice)
- that they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- that the use of the network / internet / Learning Platform / remote access / email is regularly monitored in order that any misuse / attempted misuse can be reported to the Headteacher / Online Safety Officer for investigation / action / sanction
- that monitoring software / systems are implemented and updated as agreed in Maynard School policies

Teaching and Support Staff

Are responsible for ensuring that:

- School staff are responsible for ensuring that:
- they have an awareness of current online safety matters/trends and of the current school Online Safety Policy and practices
- they understand that online safety is a core part of safeguarding
- they have read, understood, and signed the staff acceptable use agreement (AUA)
- they immediately report any suspected misuse or problem to (insert relevant person) for investigation/action, in line with the school safeguarding procedures
- all digital communications with learners and parents/carers are on a professional level and only carried out using official school systems
- online safety issues are embedded in all aspects of the curriculum and other activities
- ensure learners understand and follow the Online Safety Policy and acceptable use agreements, have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations

- they supervise and monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other school activities (where allowed) and implement current policies regarding these devices
- in lessons where internet use is pre-planned learners are guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- where lessons take place using live-streaming or video-conferencing, there is regard to national safeguarding guidance and local safeguarding policies (n.b. the guidance contained in the SWGfL Safe Remote Learning Resource
- there is a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc
- they model safe, responsible, and professional online behaviours in their own use of technology, including out of school and in their use of social media.

Online Safety Group

The Online Safety Group provides a consultative group that has wide representation from the *Maynard School* community, with responsibility for issues regarding online safety and the monitoring the Online Safety Policy including the impact of initiatives. Depending on the size or structure of the *Maynard School* this group may be part of the safeguarding group. The group will also be responsible for regular reporting to the *Governing Body*.

Members of the Online Safety Group (or other relevant group) will assist the Online Safety Officer with:

- the production / review / monitoring of the school Online Safety Policy / documents.
- *the production / review / monitoring of the school filtering policy and requests for filtering changes.*
- mapping and reviewing the online safety / digital literacy curricular provision – ensuring relevance, breadth and progression
- monitoring network / internet / incident logs
- consulting stakeholders – including parents / carers and the students about the online safety provision
- monitoring improvement actions identified through use of the 360 degree safe self-review tool

Students:

- are responsible for using the *Maynard School* digital technology systems in accordance with the Student Acceptable Use Agreement
- 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 online-bullying.
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the *school's* Online Safety Policy covers their actions out of school, if related to their membership of the school

Parents / Carers

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

- digital and video images taken at school events
- access to parents' sections of the website / Learning Platform and on-line student records
- *their children's personal devices in the Maynard 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 / digital literacy is therefore an essential part of the school's online safety provision. Children and young people need the help and support of the school to recognise and avoid online safety risks and build their resilience.

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 tutorial / pastoral activities
- Students 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.

- 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 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.
- *Students should be helped to understand the need for the student 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 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.*
- *Where students 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 (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the Technical Staff (or other 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 online behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

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

- *Curriculum activities*
- *Letters, newsletters, web site, Learning Platform*
- *Parents / Carers evenings / sessions*
- *High profile events / campaigns e.g. Safer Internet Day*
- *Reference to the relevant web sites / publications e.g. 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 Maynard School Online Safety Policy and Acceptable Use Agreements.
- *It is expected that some staff will identify online safety as a training need within the performance management process.*
- *The Online Safety Officer will receive regular updates through attendance at external training events (e.g. 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 / team meetings / INSET days.*
- *The Online Safety Officer / Lead (or other nominated person) will provide advice / guidance / training to individuals as required.* Online Safety BOOST includes an array of presentation resources that the Online Safety coordinator can access to deliver to staff (https://boost.swgfl.org.uk/) It includes presenter notes to make it easy to confidently cascade to all staff

Training – Governors / Directors

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

- Attendance at training provided by the Local Authority / MAT / National Governors Association / or other relevant organisation (e.g. SWGfL).
- Participation in the Maynard School training / information sessions for staff or parents

Policy

Online Safety Policy

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

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

The school Online Safety Policy:

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

Acceptable use

The school has defined what it regards as acceptable/unacceptable use and this is shown in the tables below.

Acceptable use agreements

An Acceptable Use Agreement is a document that outlines a school's expectations on the responsible use of technology by its users. In most schools they are signed or acknowledged by their staff as part of their conditions of employment. Some may also require learners and parents/carers to sign them, though it is more important for these to be regularly promoted, understood and followed rather than just signed. There is a range of acceptable use agreements in the appendices.

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

- learner handbook
- staff induction and handbook
- splash screens

- digital signage
- posters/notices around where technology is used
- communication with parents/carers
- built into education sessions
- school website
- peer support.

Schools should discuss and agree which activities are acceptable/unacceptable. This will vary with the size/structure of the school and the ages of the learners. It is recommended that the school discuss and agree on these activities and to complete the following tables as guidance for members of the school community:

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not access online content (including apps, games, sites) to make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	Any illegal activity for example: • Child sexual abuse imagery* • Child sexual abuse/exploitation/grooming • Terrorism • Encouraging or assisting suicide • Offences relating to sexual images i.e., revenge and extreme pornography • Incitement to and threats of violence • Hate crime • Public order offences - harassment and stalking • Drug-related offences • Weapons / firearms offences • Fraud and financial crime including money laundering N.B. Schools should refer to guidance about dealing with self-generated images/sexting – UKSIC Responding to and managing sexting incidents and UKCIS – Sexting in schools and colleges					X
Users shall not undertake activities that might be classed as cyber-	• Using another individual's username or ID and password to access data, a program, or parts of a system that the user is not authorised to access (even if the initial access is authorised)					X

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
crime under the Computer Misuse Act (1990)	• Gaining unauthorised access to school networks, data and files, through the use of computers/devices • Creating or propagating computer viruses or other harmful files • Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords) • Disable/Impair/Disrupt network functionality through the use of computers/devices • Using penetration testing equipment (without relevant permission) N.B. Schools will need to decide whether these should be dealt with internally or by the police. Serious or repeat offences should be reported to the police. The National Crime Agency has a remit to prevent learners becoming involved in cyber-crime and harness their activity in positive ways– further information here					
Users shall not undertake activities that are not illegal but are classed as unacceptable in school policies:	Accessing inappropriate material/activities online in a school setting including pornography, gambling, drugs. (Informed by the school's filtering practices and/or AUAs)			X	X	
	Promotion of any kind of discrimination				X	
	Using school systems to run a private business				X	
	Using systems, applications, websites or other mechanisms that bypass the filtering/monitoring or other safeguards employed by the school				X	
	Infringing copyright				X	
	Unfair usage (downloading/uploading large files that hinders others in their use of the internet)			X	X	

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
	Any other information which may be offensive to others or breaches the integrity of the ethos of the school or brings the school into disrepute				X	

Consideration should be given for the following activities when undertaken for non-educational purposes: Schools may wish to add further activities to this list.	Staff and other adults				Learners			
	Not allowed	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission/awa
Online gaming								
Online shopping/commerce								
File sharing								
Social media								
Messaging/chat								
Entertainment streaming e.g. Netflix, Disney+								
Use of video broadcasting, e.g. YouTube, Twitch, TikTok								
Mobile phones may be brought to school								

Use of mobile phones for learning at school								
Use of mobile phones in social time at school								
Taking photos on mobile phones/cameras								
Use of other personal devices, e.g. tablets, gaming devices								
Use of personal e-mail in school, or on school network/wi-fi								
Use of school e-mail for personal e-mails								

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

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

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

Reporting and responding

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

> *"School and college leaders should create a culture where sexual harassment and online sexual abuse are not tolerated, and where they identify issues and intervene early to better protect children*

and young people. ..In order to do this, they should assume that sexual harassment and online sexual abuse are happening in their setting, even when there are no specific reports, and put in place a whole-school approach to address them. This should include:

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

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

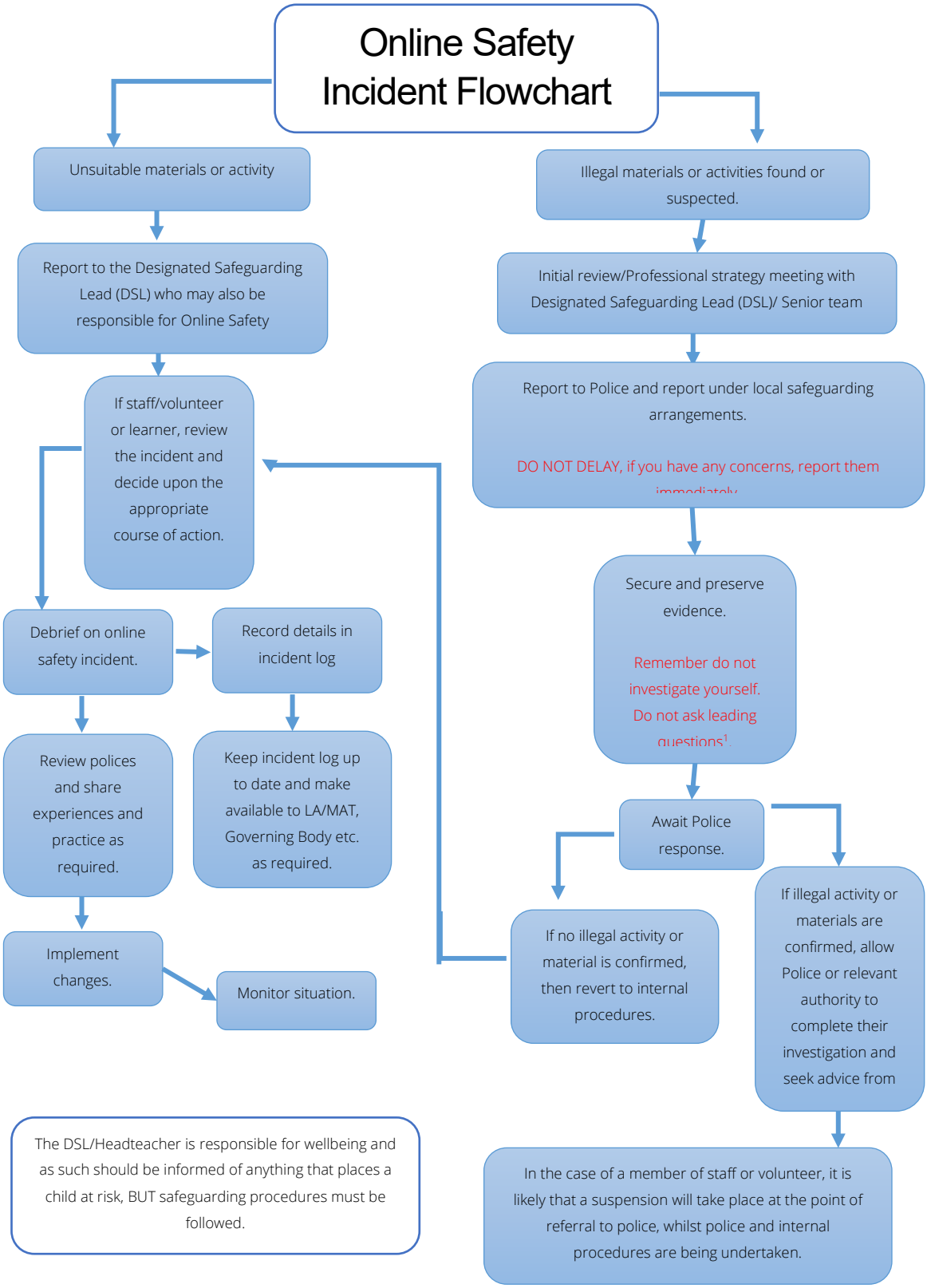
- there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the school safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies. (Schools may wish to consider the use of online/anonymous reporting systems, which can be used by all members of the school community e.g. SWGfL Whisper)
- all members of the school community will be made aware of the need to report online safety issues/incidents
- reports will be dealt with as soon as is practically possible once they are received
- the Designated Safeguarding Lead, Online Safety Lead and other responsible staff have appropriate skills and training to deal with online safety risks.
- if there is any suspicion that the incident involves any illegal activity or the potential for serious harm (see flowchart and user actions chart in the appendix), the incident must be escalated through the agreed school safeguarding procedures, this may include
    - Non-consensual images
    - Self-generated images
    - Terrorism/extremism
    - Hate crime/ Abuse
    - Fraud and extortion
    - Harassment/stalking
    - Child Sexual Abuse Material (CSAM)
    - Child Sexual Exploitation Grooming
    - Extreme Pornography
    - Sale of illegal materials/substances
    - Cyber or hacking offences under the Computer Misuse Act
    - Copyright theft or piracy
- any concern about staff misuse will be reported to the Headteacher, unless the concern involves the Headteacher, in which case the complaint is referred to the Chair of Governors and the local authority / MAT
- where there is no suspected illegal activity, devices may be checked using the following procedures:
    - one or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
    - conduct the procedure using a designated device that will not be used by learners and, if necessary, can be taken off site by the police should the need arise (should

illegal activity be subsequently suspected). Use the same device for the duration of the procedure.

- ensure that the relevant staff have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed, and attached to the form
- once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does, then appropriate action will be required and could include the following:
    - internal response or discipline procedures
    - involvement by local authority / MAT (as relevant)
    - police involvement and/or action

- it is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively
- there are support strategies in place e.g., peer support for those reporting or affected by an online safety incident
- incidents should be logged (insert details here). (A template reporting log can be found in the appendix, but many schools will use logs that are included with their management information systems (MIS).
- relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority; police; Professionals Online Safety Helpline; Reporting Harmful Content; CEOP.
- those involved in the incident will be provided with feedback about the outcome of the investigation and follow up actions (as relevant)
- learning from the incident (or pattern of incidents) will be provided (as relevant and anonymously) to:
    - *the Online Safety Group for consideration of updates to policies or education programmes and to review how effectively the report was dealt with*
    - *staff, through regular briefings*
    - *learners, through assemblies/lessons*
    - *parents/carers, through newsletters, school social media, website*
    - *governors, through regular safeguarding updates*
    - *local authority/external agencies, as relevant (The Ofsted Review into Sexual Abuse in Schools and Colleges suggested "working closely with Local Safeguarding Partnerships in the area where the school or college is located so they are aware of the range of support available to children and young people who are victims or who perpetrate harmful sexual behaviour"*

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


Online Safety Incident Flowchart
Unsuitable materials or activity
Report to the Designated Safeguarding Lead (DSL) who may also be responsible for Online Safety
If staff/volunteer or learner, review the incident and decide upon the appropriate course of action.
Debrief on online safety incident.
Record details in incident log
Review polices and share experiences and practice as required.
Keep incident log up to date and make available to LA/MAT, Governing Body etc. as required.
Implement changes.
Monitor situation.
Illegal materials or activities found or suspected.
Initial review/Professional strategy meeting with Designated Safeguarding Lead (DSL)/ Senior team
Report to Police and report under local safeguarding arrangements.
DO NOT DELAY, if you have any concerns, report them
Secure and preserve evidence.
Remember do not investigate yourself. Do not ask leading questions[1].
Await Police response.
If no illegal activity or material is confirmed, then revert to internal procedures.
If illegal activity or materials are confirmed, allow Police or relevant authority to complete their investigation and seek advice from
In the case of a member of staff or volunteer, it is likely that a suspension will take place at the point of referral to police, whilst police and internal procedures are being undertaken.
The DSL/Headteacher is responsible for wellbeing and as such should be informed of anything that places a child at risk, BUT safeguarding procedures must be followed.

School actions

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour/disciplinary procedures as follows: (the school will need to agree upon its own responses and place the ticks in the relevant columns. They may also wish to add additional text to the column(s) on the left to clarify issues. Schools have found it useful to use the charts below at staff meetings/training sessions)

Responding to Learner Actions

Incidents	Refer to class teacher/tutor	Refer to Head of Department / Principal Teacher / Deputy Head	Refer to Headteacher	Refer to Police/Social Work	Refer to local authority technical support for advice/action	Inform parents/carers	Remove device/ network/internet access	Issue a warning	Further sanction, in line with behaviour policy
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on User Actions on unsuitable/inappropriate activities).		X	X	X					
Attempting to access or accessing the school network, using another user's account (staff or learner) or allowing others to access school network by sharing username and passwords									
Corrupting or destroying the data of other users.									
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature									
Unauthorised downloading or uploading of files or use of file sharing.									

Using proxy sites or other means to subvert the school's filtering system.									
Accidentally accessing offensive or pornographic material and failing to report the incident.									
Deliberately accessing or trying to access offensive or pornographic material.									
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act.									
Unauthorised use of digital devices (including taking images)									
Unauthorised use of online services									
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.									
Continued infringements of the above, following previous warnings or sanctions.									

Responding to Staff Actions

Incidents	Refer to line manager	Refer to Headteacher/ Principal	Refer to local authority/MAT/HR	Refer to Police	Refer to LA / Technical Support Staff for action re filtering, etc.	Issue a warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities)		**X**	**X**	**X**				
Deliberate actions to breach data protection or network security rules.								
Deliberately accessing or trying to access offensive or pornographic material								
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software								
Using proxy sites or other means to subvert the school's filtering system.								
Unauthorised downloading or uploading of files or file sharing								
Breaching copyright or licensing regulations.								
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.								

Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature								
Using personal e-mail/social networking/messaging to carry out digital communications with learners and parents/carers								
Inappropriate personal use of the digital technologies e.g. social media / personal e-mail								
Careless use of personal data, e.g. displaying, holding or transferring data in an insecure manner								
Actions which could compromise the staff member's professional standing								
Actions which could bring the school into disrepute or breach the integrity or the ethos of the school.								
Failing to report incidents whether caused by deliberate or accidental actions								
Continued infringements of the above, following previous warnings or sanctions.								

Online Safety Education Programme

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

The 2021 Ofsted "Review of Sexual Abuse in Schools and Colleges" highlighted the need for:

> *"a carefully sequenced RSHE curriculum, based on the Department for Education's (DfE's) statutory guidance, that specifically includes sexual harassment and sexual*

violence, including online. This should include time for open discussion of topics that children and young people tell us they find particularly difficult, such as consent and the sending of 'nudes'.."

Keeping Children Safe in Education states:

"Governing bodies and proprietors should ensure online safety is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum ..."

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 (statements may need to be adapted, depending on school structure and the age of the learners).

- A planned online safety curriculum for all year groups matched against a nationally agreed framework e.g. Education for a Connected Work Framework by UKCIS/DCMS and the SWGfL Project Evolve and regularly taught in a variety of contexts.
- Lessons are matched to need; are age-related and build on prior learning
- Lessons are context-relevant with agreed objectives leading to clear and evidenced outcomes
- Learner need and progress are addressed through effective planning and assessment
- Digital competency is planned and effectively threaded through the appropriate digital pillars in other curriculum areas e.g. PHSE; SRE; Literacy etc
- it incorporates/makes use of relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-bullying week
- the programme will be accessible to learners at different ages and abilities such as those with additional learning needs or those with English as an additional language.
- vulnerability is actively addressed as part of a personalised online safety curriculum e.g., for victims of abuse and SEND.
- *learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school.* Acceptable use is reinforced across the curriculum, with opportunities to discuss how to act within moral and legal boundaries online, with reference to the Computer Misuse Act 1990. Lessons and further resources are available on the CyberChoices site.
- *staff should act as good role models in their use of digital technologies the internet and mobile devices*
- *in lessons where internet use is pre-planned, it is best practice that learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches*
- *where learners are allowed to freely search the internet, staff should be vigilant in supervising the learners and monitoring the content of the websites the young people visit*
- *it is accepted that from time to time, for good educational reasons, students may need to research topics, (e.g. racism, drugs, discrimination) that would normally result in internet searches being*

blocked. In such a situation, staff should be able to request the temporary removal of those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need

- the online safety education programme should be relevant and up to date to ensure the quality of learning and outcomes.

Contribution of Learners

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

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

Staff/volunteers

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

> "All staff should receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively."
>
> "Governing bodies and proprietors should ensure… that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning."

All staff will receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows: (select/delete as appropriate)

- a planned programme of formal online safety and data protection training will be made available to all staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly.

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

Governors

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

- attendance at training provided by the local authority/MAT or other relevant organisation (e.g., SWGfL)
- participation in school training / information sessions for staff or parents (this may include attendance at assemblies/lessons).

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

- Cyber-security training (at least at a basic level)
- Training to allow the governor to undestand the school's filtering and monitoring provision, in order that they can participate in the required checks and review.

Families

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

The school will seek to provide information and awareness to parents and carers through: (select/delete as appropriate)

- *regular communication, awareness-raising and engagement on online safety issues, curriculum activities and reporting routes*

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

Adults and Agencies

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

- online safety messages targeted towards families and relatives.
- *providing family learning courses in use of digital technologies and online safety*
- *providing online safety information via their website and social media for the wider community*
- *supporting community groups, e.g. early years settings, childminders, youth/sports/voluntary groups to enhance their online safety provision* (consider supporting these groups with an online safety review using 360 Groups or 360 Early Years).

Technology

The DfE Filtering and Monitoring Standards states that "**Your IT service provider may be a staff technician or an external service provider".** If the school has an external technology provider, it is the responsibility of the school to ensure that the provider carries out all the online safety and security measures that would otherwise be the responsibility of the school. It is also important that the technology provider is fully aware of the school Online Safety Policy/acceptable use agreements and the school has a Data Processing Agreement in place with them. The school should also check their local authority/other relevant body policies on these technical and data protection issues if the service is not provided by the authority and will need to ensure that they have completed a Data Protection Impact Assessment (DPIA) for this contract.

The school is responsible for ensuring that the school infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. The school should ensure that all staff are made aware of policies and procedures in place on a regular basis and explain that everyone is responsible for online safety and data protection. (Schools will have very different technical infrastructures and differing views as to how these technical issues will be

handled – it is therefore essential that this section is fully discussed by a wide range of staff – technical, educational, and administrative staff before these statements are agreed and added to the policy). A more detailed technical security policy template can be found in the Appendix.

Filtering & Monitoring

The DfE guidance (for England) on filtering and monitoring in "Keeping Children Safe in Education" states:

> "It is essential that governing bodies and proprietors ensure that appropriate filtering and monitoring systems are in place …governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the … risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified…
>
> The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty. To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards…"

The school filtering and monitoring provision is agreed by senior leaders, governors and the IT Service Provider and is regularly reviewed (at least annually) and updated in response to changes in technology and patterns of online safety incidents/behaviours

Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The DSL will have lead responsibility for safeguarding and online safety and the IT service provider will have technical responsibility

the filtering and monitoring provision is reviewed (at least annually) by senior leaders, the Designated Safeguarding Lead and a governor with the involvement of the IT Service Provider.

- checks on the filtering and monitoring system are carried out by the IT Service Provider with the involvement of a senior leader, the Designated Safeguarding Lead and a governor, in particular when a safeguarding risk is identified, there is a change in working practice, e.g. remote access or BYOD or new technology is introduced e.g. using SWGfL Test Filtering

Filtering

- the school manages access to content across its systems for all users and on all devices using the schools internet provision. The filtering provided meets the standards defined in the DfE F**ilteri**ng standards for schools and colleges and the guidance provided in the UK Safer Internet Centre Appropriate filtering.
- illegal content (e.g., child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation URL list and the police assessed list of unlawful terrorist content, produced on behalf of the Home Office. Content lists are regularly updated
- there are established and effective routes for users to report inappropriate content, recognising that no system can be 100% effective
- there is a clear process in place to deal with, and log, requests/approvals for filtering changes (see Appendix for more details).
- filtering logs are regularly reviewed and alert the Designated Safeguarding Lead to breaches of the filtering policy, which are then acted upon.
- *the school has (if possible) provided enhanced/differentiated user-level filtering (allowing different filtering levels for different abilities/ages/stages and different groups of users: staff/learners, etc.)*
- *younger learners will use child friendly/age-appropriate search engines e.g. SWGfL Swiggle*
- *the school has a mobile phone policy and where personal mobile devices have internet access through the school network, content is managed in ways that are consistent with school policy and practice.*
- *access to content through non-browser services (e.g. apps and other mobile technologies) is managed in ways that are consistent with school policy and practice.*

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

Monitoring

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

- The school monitors all network use across all its devices and services.
- monitoring reports are urgently picked up, acted on and outcomes are recorded by the Designated Safeguarding Lead, all users are aware that the network (and devices) are monitored.
- There are effective protocols in place to report abuse/misuse. There is a clear process for prioritising response to alerts that require rapid safeguarding intervention.
- Management of serious safeguarding alerts is consistent with safeguarding policy and practice.

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

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

Technical Security

Schools may wish to adopt a more detailed technical security policy and a policy template can be found at appendix C1.

The school technical systems will be managed in ways that ensure that the school meets recommended technical requirements (these may be outlined in local authority / MAT / other relevant body policy and guidance):

- responsibility for technical security resides with SLT who may delegate activities to identified roles.
- all users have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the IT service provider and will be reviewed, at least annually, by the SLT/Online Safety Group
- password policy and procedures are implemented. (consistent with guidance from the National Cyber Security Centre)
- the security of their username and password and must not allow other users to access the systems using their log on details.
- all users have responsibility for the security of their username and password and must not allow other users to access the systems using their log on details.
- all school networks and system will be protected by secure passwords. Passwords must not be shared with anyone. (see section on passwords in 'Technical security policy template' in the Appendix C1)
- the administrator passwords for school systems are kept in a secure place, e.g. school safe.
- there is a risk-based approach to the allocation of learner usernames and passwords. (see 'Technical security policy template' in the Appendix C1 for more information)
- there will be regular reviews and audits of the safety and security of school technical systems
- servers, wireless systems and cabling are securely located and physical access restricted
- appropriate security measures are in place (schools may wish to provide more detail which may need to be provided by the service provider) to protect the servers, firewalls, routers,

wireless systems and devices from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up-to-date endpoint software.

- there are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud,
- (insert name or role) is responsible for ensuring that all software purchased by and used by the school is adequately licenced and that the latest software updates (patches) are applied.
- an appropriate system is in place for users to report any actual/potential technical incident/security breach to the relevant person, as agreed)
- use of school devices out of school and by family members is regulated by an acceptable use statement that a user consents to when the device is allocated to them
- personal use of any device on the school network is regulated by acceptable use statements that a user consents to when using the network
- staff members are not permitted to install software on a school-owned devices without the consent of the SLT/IT service provider
- removable media is not permitted unless approved by the SLT/IT service provider
- systems are in place to control and protect personal data and data is encrypted at rest and in transit. (See school personal data policy template in the appendix for further detail)
- mobile device security and management procedures are in place (where mobile devices are allowed access to school systems). (Schools may wish to add details of the mobile device security procedures that are in use).
- guest users are provided with appropriate access to school systems based on an identified risk profile.

Mobile technologies

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

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

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

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

In preparing a mobile technologies policy the school should consider possible issues and risks. These may include:

- security risks in allowing connections to your school network
- filtering of personal devices
- breakages and insurance
- access to devices for all learners
- avoiding potential classroom distraction
- network connection speeds, types of devices
- charging facilities
- total cost of ownership.

A range of mobile technology strategies is possible. However, these need to be thoroughly researched, risk assessed and aligned with existing policy prior to implementation. A more detailed mobile technologies policy template can be found in the Appendix.

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

The school allows: (the school should complete the table below to indicate which devices are allowed and define their access to school systems).

	School devices	Personal devices

	School owned for individual use	School owned for multiple users	Authorised device[1]	Student owned	Staff owned	Visitor owned
Allowed in school	**Yes**	**Yes**	**Yes**	Yes/No	Yes/No	Yes/No
Full network access	Yes	Yes	Yes			
Internet only						
No network access						

Aspects that the school may wish to consider and include in their Online Safety Policy, mobile technologies policy or acceptable use agreements may include the following:

School owned/provided devices:

- *all school devices are managed though the use of Mobile Device Management software*
- *there is an asset log that clearly states whom a device has been allocated to. There is clear guidance on where, when and how use is allowed*
- *any designated mobile-free zone is clearly signposted*
- *personal use (e.g. online banking, shopping, images etc.) is clearly defined and expectations are well-communicated.*
- *the use of devices on trips/events away from school is clearly defined and expectation are well-communicated.*
- *liability for damage aligns with current school policy for the replacement of equipment.*
- *education is in place to support responsible use.*

Personal devices:

- *there is a clear policy covering the use of personal mobile devices on school premises for all users*
- *where devices are used to support learning, staff have been trained in their planning, use and implementation, ensuring that all learners can access a required resource.*

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

- *where personal devices are brought to school, but their use is not permitted, appropriate, safe and secure storge should be made available. (this needs to be shaped according to current mobile phone school policy)*
- *use of personal devices for school business is defined in the acceptable use policy and staff handbook. Personal devices commissioned onto the school network are segregated effectively from school-owned systems*
- *the expectations for taking/storing/using images/video aligns with the school's acceptable use policy and use of images/video policy. The non-consensual taking/using of images of others is not permitted.*
- *liability for loss/damage or malfunction of personal devices is clearly defined*
- *there is clear advice and guidance at the point of entry for visitors to acknowledge school requirements*
- *education about the safe and responsible use of mobile devices is included in the school online safety education programmes*

Social media

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

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

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

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

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

- guidance for learners, parents/carers

School staff should ensure that:

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

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

- a process for approval by senior leaders
- clear processes for the administration, moderation, and monitoring of these accounts – involving at least two members of staff
- a code of behaviour for users of the accounts
- systems for reporting and dealing with abuse and misuse
- understanding of how incidents may be dealt with under school disciplinary procedures.

Personal use

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

Monitoring of public social media

- As part of active social media engagement, the school may pro-actively monitor the Internet for public postings about the school.
- the school should effectively respond to social media comments made by others according to a defined policy or process.
- when parents/carers express concerns about the school on social media we will urge them to make direct contact with the school, in private, to resolve the matter. Where this cannot be resolved, parents/carers should be informed of the school complaints procedure.

School use of social media for professional purposes will be checked regularly by a senior leader and the Online Safety Lead to ensure compliance with the social media, data

protection, communications, digital image and video policies. In the event of any social media issues that the school is unable to resolve support may be sought from the Professionals Online Safety Helpline.

The social media policy template in Appendix C4 provides more detailed guidance on the school's responsibilities and on good practice.

Digital and video images

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

The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm (select/delete as appropriate):

- the school may use live-streaming or video-conferencing services in line with national and local safeguarding guidance / policies. Guidance can be found on the SWGfL Safer Remote Learning web pages and in the DfE Safeguarding and remote education
- when using digital images, staff will inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images.
- staff/volunteers must be aware of those learners whose images must not be taken/published. Those images should only be taken on school devices. The personal devices of staff should not be used for such purposes
- in accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other *learners* in the digital/video images
- *staff and volunteers are allowed to take digital/video images to support educational aims, but must follow school policies concerning the sharing, storage, distribution and publication of those images*
- *care should be taken when sharing digital/video images that learners are appropriately dressed*
- *learners must not take, use, share, publish or distribute images of others without their permission*
- *photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with Online Safety Policy*

- learners' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- written permission from parents or carers will be obtained before photographs of learners are taken for use in school or published on the school website/social media. (see parents and carers acceptable use agreement in the Appendix). Permission is not required for images taken solely for internal purposes
- parents/carers will be informed of the purposes for the use of images, how they will be stored and for how long – in line with the school data protection policy
- images will be securely stored in line with the school retention policy
- *learners' work can only be published with the permission of the learner and parents/carers.*

Online Publishing

The school communicates with parents/carers and the wider community and promotes the school through (amend as necessary):

- Public-facing website
- Social media
- Online newsletters
- *Other (to be described)*

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

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

The school public online publishing provides information about online safety e.g., publishing the schools Online Safety Policy and acceptable use agreements; curating latest advice and guidance; news articles etc, creating an online safety page on the school website.

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

Data Protection

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

The school:

- has a Data Protection Policy. (See appendix for template policy)

- implements the data protection principles and can demonstrate that it does so
- has paid the appropriate fee to the Information Commissioner's Office (ICO)
- has appointed an appropriate Data Protection Officer (DPO) who has effective understanding of data protection law and is free from any conflict of interest. The school may also wish to appoint a Data Manager and Systems Controllers to support the DPO
- has a 'Record of Processing Activities' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- the Record of Processing Activities lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis is listed
- has an 'information asset register' in place and knows exactly what personal data is held, where, why and which member of staff has responsibility for managing it
- information asset register lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis will have also been listed
- will hold the minimum personal data necessary to enable it to perform its function and will not hold it for longer than necessary for the purposes it was collected for. The school 'retention schedule" supports this
- data held is accurate and up to date and is held only for the purpose it was held for. Systems are in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- provides staff, parents, volunteers, teenagers, and older children with information about how the school looks after their data and what their rights are in a clear Privacy Notice (see Privacy Notice section in the appendix)
- has procedures in place to deal with the individual rights of the data subject, e.g. one of the dozen rights applicable is that of Subject Access which enables an individual to see/have a copy of the personal data held about them
- carries out Data Protection Impact Assessments (DPIA) where necessary e.g. to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier
- has undertaken appropriate due diligence and has data protection compliant contracts in place with any data processors
- understands how to share data lawfully and safely with other relevant data controllers.
- has clear and understood policies and routines for the deletion and disposal of data
- reports any relevant breaches to the Information Commissioner within 72hrs of becoming aware of the breach as required by law. It also reports relevant breaches to the individuals affected as required by law. In order to do this, it has a policy for reporting, logging, managing, investigating and learning from information risk incidents
- has a Freedom of Information Policy which sets out how it will deal with FOI requests

- provides data protection training for all staff at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff

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

- data will be encrypted, and password protected.
- device will be password protected. (Be sure to select devices that can be protected in this way)
- device will be protected by up-to-date endpoint (anti-virus) software
- data will be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete.

Staff must ensure that they: (schools may wish to include more school specific detail)

- at all times take care to ensure the safe keeping of personal data, minimising the risk of its loss or misuse
- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- can help data subjects understand their rights and know how to handle a request whether verbal or written and know who to pass it to in the school
- only use encrypted data storage for personal data
- will not transfer any school personal data to personal devices. Procedures should be in place to enable staff to work from home (i.e. VPN access to the school network, or a work laptop provided).
- use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data
- transfer data using encryption, a secure email account (where appropriate), and secure password protected devices.

The Personal Data Advice and Guidance in the appendix (B2) provides more detailed information on the school's responsibilities and on good practice.

Outcomes

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

- there is balanced professional debate about the evidence taken from the reviews/audits and the impact of preventative work e.g., online safety education, awareness, and training
- there are well-established routes to regularly report patterns of online safety incidents and outcomes to school leadership and Governors

- parents/carers are informed of patterns of online safety incidents as part of the school's online safety awareness raising
- online safety (and related) policies and procedures are regularly updated in response to the evidence gathered from these reviews/audits/professional debate
- the evidence of impact is shared with other schools, agencies and LAs to help ensure the development of a consistent and effective local online safety strategy.

Technical – infrastructure / equipment, filtering and monitoring

The Maynard School will be responsible for ensuring that the Maynard 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:

- Maynard School technical systems will be managed in ways that ensure that the Maynard School meets recommended technical requirements. Filtering is currently managed by securely
- There will be regular reviews and audits of the safety and security of Maynard 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 Maynard School technical systems and devices.
- All users (*at KS2 and above*) will be provided with a username and secure password by the Network Manager who *will keep an up-to-date record of users and their usernames.* Users are responsible for the security of their username and password *and will be required to change their password every 13 months.* (Younger students are given class log-ons and passwords for KS1 and below, but should consider whether this models good password practice and need to be aware of the associated risks – see appendix)
- The "master / administrator" passwords for the Maynard School ICT systems, used by the Network Manager (or other person) must also be available to the *Headteacher* or other nominated senior leader and kept in a secure place (e.g. Maynard School safe)

- the Network 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. 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 (see appendix for more details)
- Internet filtering / monitoring should ensure that children are safe from terrorist and extremist material when accessing the internet.
- *The Maynard School has provided enhanced / differentiated user-level filtering* (allowing different filtering levels for different ages / stages and different groups of users – staff / students etc.)
- *Maynard 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* (whisper) *for users to report any actual / potential technical incident / security breach to the relevant person, as agreed).*
- Appropriate security measures are in place to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices etc. from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up-to-date virus software.
- An agreed policy is in place (guest AUP) for the provision of temporary access of "guests" (e.g. trainee teachers, supply teachers, visitors) onto the school systems.
- **All staff devices containing school data will be password protected and where possible, data should be encrypted and stored in a private area (e.g. a personal user account on a shared family computer)**
- *Users cannot download executable files and install programmes on school devices* without permission from the network manager.
- *Users should* follow the Maynard IT data security policy *regarding the use of removable media (eg memory sticks / CDs / DVDs) by users on school devices.* ***Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.***

Mobile Technologies (including BYOD/BYOT)

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

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

- The school Acceptable Use Agreements for staff, students and parents / carers will give consideration to the use of mobile technologies
- The school allows: (the school should complete the table below to indicate which devices are allowed and define their access to school systems)

	School Devices			Personal Devices		
	School owned for single user	School owned for multiple users	Authorised device[2]	Student owned	Staff owned	Visitor owned
Allowed in school	*Yes*	*Yes*	*Yes*	*Yes/No*[3]	*Yes/No*[3]	*Yes/No*[3]
Full network access	*Yes*	*Yes*	*Yes*			
Internet only				*Yes*	*Yes*	*Yes*
No network access						

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 students 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

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

[3] The school should add below any specific requirements about the use of mobile / personal devices in school

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.
- Written permission from parents or carers will be obtained before photographs of students are published on the school website / social media / local press
- In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at Maynard School events for their own personal use (as such use in not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published / made publicly available on social networking sites, nor should parents / carers comment on any activities involving other *students* in the digital / video images.
- Staff and volunteers are allowed to take digital / video images to support educational aims, but must follow Maynard School policies concerning the sharing, distribution and publication of those images. Those images should only be taken on Maynard School equipment, the personal equipment of staff should not be used for such purposes.
- 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 Maynard 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.
- Students' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Student's work can only be published with the permission of the student and parents or carers.

Data Protection

Personal data will be recorded, processed, transferred and made available according to the current data protection legislation. See Maynard IT Security policy and Data Protection Policy.

Communications

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

Communication Technologies	*Staff & other adults*			*Students*				
	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 the school	y				y			
Use of mobile phones in lessons	y						y	
Use of mobile phones in social time	y							y
Taking photos on mobile phones / cameras	y						y	
Use of other mobile devices e.g. tablets, gaming devices	y				y			
Use of personal email addresses in Maynard School , or on Maynard School network			y					y
Use of Maynard School email for personal emails				y				y
Use of messaging apps		y						y
Use of social media		y						y
Use of blogs		y						y

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

- The official *Maynard School* email service may be regarded as safe and secure and is monitored. Users should be aware that email communications are monitored. *Staff and student should therefore use only the Maynard School email service to communicate with others when in school, or on Maynard School systems (e.g. by remote access).*
- Users must immediately report, to the nominated person – in accordance with the Maynard 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. (Online Safety BOOST includes an anonymous reporting app Whisper – https://boost.swgfl.org.uk/)

- Any digital communication between staff and students or parents / carers (email, social media, chat, blogs, VLE etc) must be professional in tone and content. *These communications may only take place on official (monitored) Maynard 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 at KS1, while students at KS2 and above will be provided with individual Maynard School email addresses for educational use.* (Schools / academies may choose to use group or class email addresses for younger age groups e.g. at KS1)
- *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 Maynard School website and only official email addresses should be used to identify members of staff.*

Social Media - Protecting Professional Identity

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

The Maynard School provides the following measures to ensure reasonable steps are in place to minimise risk of harm to students, 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. Online Safety BOOST includes unlimited webinar training on this subject: https://boost.swgfl.org.uk/)
- Clear reporting guidance, including responsibilities, procedures and sanctions
- Risk assessment, including legal risk

Maynard School staff should ensure that:

- No reference should be made in social media to students, parents / carers or Maynard School staff
- They do not engage in online discussion on personal matters relating to members of the school community

- Personal opinions should not be attributed to the *school*
- Security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information

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

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

Personal Use:

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

Monitoring of Public Social Media

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

The *school's* use of social media for professional purposes will be checked regularly by the senior risk officer and Online Safety Group to ensure compliance with the school policies. Online Safety BOOST includes Reputation Alerts that highlight any reference to the school in online media (newspaper or social media for example) https://boost.swgfl.org.uk/)

Dealing with unsuitable / inappropriate activities

Some internet activity e.g. accessing child abuse images or distributing racist material is illegal and would obviously be banned from Maynard 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 Maynard School believes that the activities referred to in the following section would be inappropriate in a Maynard School context and that users, as defined below, should not engage in these activities in / or outside the Maynard School when using Maynard School equipment or systems. The Maynard 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	Child sexual abuse images –The making, production or distribution of indecent images of children. Contrary to The Protection of Children Act 1978					X
	Grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003.					X
	Possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character) Contrary to the Criminal Justice and Immigration Act 2008					X
	Criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	Pornography				X	
	Promotion of any kind of discrimination				X	

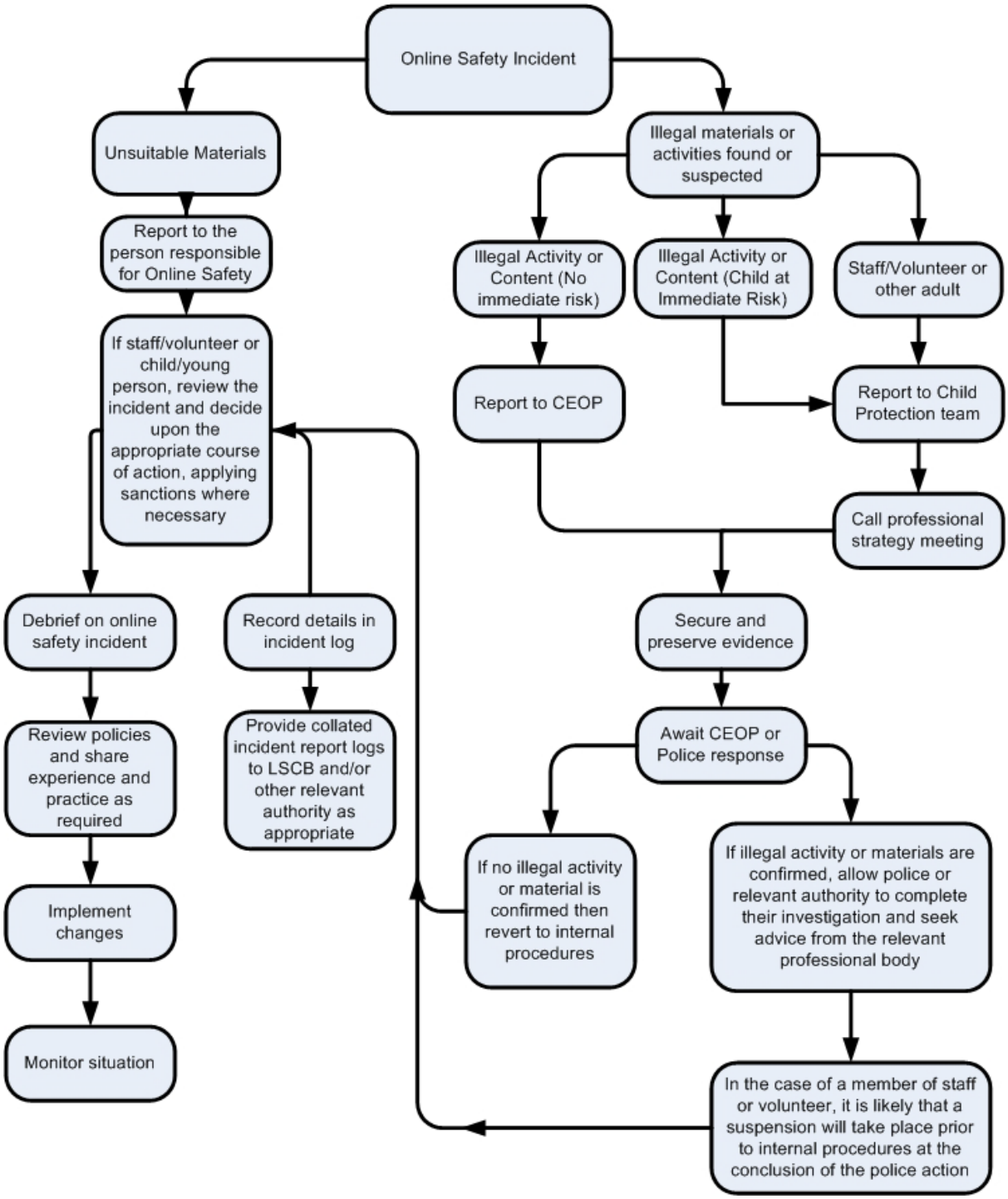
	threatening behaviour, including promotion of physical violence or mental harm				X	
	Promotion of extremism or terrorism				X	
	Any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Using school systems 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		
File sharing				x		
Use of social media				x		
Use of messaging apps				x		
Use of video broadcasting e.g. Youtube				x		

Responding to incidents of misuse

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

Illegal Incidents

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



Other Incidents

It is hoped that all members of the Maynard School community will be responsible users of digital technologies, who understand and follow Maynard 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 / Academy Group or national / local organisation (as relevant).
    - Police involvement and/or action
- If content being reviewed includes images of child abuse then the monitoring should be halted and referred to the Police immediately. Other instances to report to the police would include:
    - incidents of 'grooming' behaviour
    - the sending of obscene materials to a child
    - adult material which potentially breaches the Obscene Publications Act
    - criminally racist material
    - promotion of terrorism or extremism
    - 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 *Maynard 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.

Maynard School Actions & Sanctions

It is more likely that the Maynard 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:

	Actions / Sanctions								
Students Incidents	Refer to class teacher / tutor	Refer to Head of Department / Year / other	Refer to Headteacher	Refer to Police	Refer to technical support staff for action re filtering / security etc.	Inform parents / carers	Removal of network / internet access rights	Warning	Further sanction eg detention / exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		X	X	X					
Unauthorised use of non-educational sites during lessons					x				
Unauthorised / inappropriate use of mobile phone / digital camera / other mobile device	x				x				x

Unauthorised / inappropriate use of social media / messaging apps / personal email	x				x				x
Unauthorised downloading or uploading of files	x				x				x
Allowing others to access Maynard School network by sharing username and passwords	x				x				x
Attempting to access or accessing the Maynard School network, using another student's account	x				x				x
Attempting to access or accessing the Maynard 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
Continued infringements of the above, following previous warnings or sanctions	x	x	x		x	x	x		x
Actions which could bring the Maynard 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 filtering system	x		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	x		x
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act	x	x							x

Actions / Sanctions

Staff Incidents	Refer to line manager	Refer to Headteacher	Refer to Local Authority / HR	Refer to Police	Refer to Technical Support Staff for action re filtering etc.	Warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable / inappropriate activities).		X	X	X				
Inappropriate personal use of the internet / social media / personal email	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							
Careless use of personal data e.g. holding or transferring data in an insecure manner	x	x						
Deliberate actions to breach data protection or network security rules	x	x						x
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	x	x						x
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature	x							
Using personal email / social networking / instant messaging / text messaging to carrying out digital communications with students	x							
Actions which could compromise the staff member's professional standing	x	x						x
Actions which could bring the Maynard School into disrepute or breach the integrity of the ethos of the Maynard School	x	x						x

Using proxy sites or other means to subvert the school's filtering system	x							x
Accidentally accessing offensive or pornographic material and failing to report the incident	x					x		
Deliberately accessing or trying to access offensive or pornographic material	x	x						x
Breaching copyright or licensing regulations	x							
Continued infringements of the above, following previous warnings or sanctions	x	x				x		x

Appendix

Copies of the more detailed template policies and agreements, contained in the appendix, can be downloaded from:

SWGfL Online Safety Policy Templates

Acknowledgements

SWGfL would like to acknowledge a range of individuals and organisations whose policies, documents, advice and guidance have contributed to the development of this School Online Safety Policy Template and of the 360 degree safe Online Safety Self Review Tool:

- Members of the SWGfL Online Safety Group
- Avon and Somerset Police
- Representatives of SW Local Authorities
- Plymouth University Online Safety
- NEN / Regional Broadband Grids

Appendices

Student Acceptable Use Agreement for KS2 – KS5 students

Maynard School 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 students 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.

For my own personal safety:

- I understand that the Maynard 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 Maynard 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 Maynard School systems or devices for on-line gaming, on-line gambling, internet shopping, file sharing, or video broadcasting (e.g. YouTube), unless I have permission of 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 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 social media sites in school

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 Maynard 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 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, detentions, suspensions, contact with parents and in the event of illegal activities involvement of the police.

Bring Your Own Device Agreement

This agreement document applies to students who bring their own digital devices into school for educational purposes only. Such devices will be used in lessons by students when given express permission by their teacher to enhance learning. The school is allowing the device on the network and internet through our Wi-Fi access points.

Currently, L5 to U6 students are allowed to bring an iPad or laptop to lessons.

Students with digital devices being connected to the Maynard School network have to agree to the following conditions:

- Students will be restricted to one allowed device per person.
- Digital devices are subject to the school's "mobile phones and other electronic devices policy" and should remain switched off and in bags unless permission is given to use them during the school day. Students not in the sixth form should not use be using their own devices at break and lunch times unless engaged in supervised work e.g. in the library.
- Digital devices may be confiscated at any time for inappropriate use. Under the 2011 Education Act, the school retains the right to search digital devices and examine the data and files on the device (see Searching Student's Policy)

- ICT support will be only be given for personal digital devices at the discretion of the Network Manager or teacher.
- Digital Devices should not be connected to the school's peripherals such as printers, speakers or projectors.
- The charging of digital devices at school is not permitted. Devices should be fully charged at home with sufficient free memory to be able to engage in educational activities within lessons.
- Up-to-date antivirus software and all additional software updates must be installed where appropriate.
- Students will be responsible for the security and protection of personal digital devices. The school accepts no responsibility for loss or damage to personal digital devices. Devices should be covered by parents' home insurance. Students should be conscious of personal safety when carrying digital devices to, around and from school.

Agreement in relation to remote learning and associated platforms

It may be that in times of closure or remote learning the school requires you to use a variety of platforms to engage in distant learning. These are the rules to follow to safeguard yourselves in such instances:

- Do not share your online access usernames or passwords with anyone else.
- Do not copy links to private or limited access in school videos with anyone outside the school community.
- Only show your webcam when required by the teacher for that episode of the lesson (and if you feel comfortable in doing so).
- Only show your screen or desktop when required by the teacher for that episode of the lesson (and if you feel comfortable in doing so).
- Only use your microphone when required by the teacher for that episode of the lesson (and if you feel comfortable in doing so).
- If showing work or presenting on webcam ensure that you are appropriately dressed.
- If showing work or presenting on webcam ensure that any background location / image is appropriate.
- If you are contributing to the lesson with your microphone on please use appropriate language and be aware of any other background noise in the vicinity.
- Do not record any part of the lesson or share any school related folders, files or resources without prior permission.

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.

Student Acceptable Use Agreement Form

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

Name of Student: .....

Form / Class: .....

Signed: .....

Date: .....

Parent / Guardian Countersignature: .....

Digital Device brought to school (if applicable – e.g. iPad Air 16GB):……..……..

Student Acceptable Use Policy Agreement for KS1 Students

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 / tablet

Signed (child): .....

Signed (parent): .....

Staff (and Governor / 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 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 Maynard 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 learning and will, in return, expect staff and volunteers to agree to be responsible users.

Acceptable Use Policy Agreement

I understand that I must use school systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the systems and other users. I recognise the value of the use of digital technology for enhancing learning and will ensure that students 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 Maynard 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. (schools should amend this section in the light of their policies which relate to the personal use, by staff and volunteers, of school systems)

- 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 Maynard 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, 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 use social networking sites in school in accordance with the school's policies.
- I will only communicate with students and parents / guardians 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 (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 Maynard School equipment. I will also follow any additional rules set by the Maynard 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 Maynard 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 Maynard 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 Maynard School policies.
- I will not disable or cause any damage to Maynard 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 Maynard School eSafety Policy, Data Protection Policy and Data and Document Retention Policy'. Where digital personal data is transferred outside the secure local network, it must be encrypted. Paper based Protected and Restricted data must be held in lockable storage.
- I understand that data protection policy requires that any staff or student 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 Maynard 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).

When using the internet in a professional capacity at home or during remote learning situations I will:

- Always use school accounts and platforms to communicate with the students.
- Consider appropriateness of language, wardrobe and location and be aware of background noise and video at all times.
- Avoid one on one meetings or sessions. If this is unavoidable then invite other staff in the department, myself and SLT line manager into the session too this is essentially like teaching with an open door. Moreover, if one on one, make sure you record the session.
- Before recording any session alert the students to this fact and ensure you get permission. This may impact upon whether they wish to respond to questions or use their web cam feature.
- Before inviting any student to share webcam or recording or desktop just remind them to consider whether they are in appropriate wardrobe / locations and whether the screen would be appropriate to share.
- Remind students to not record any part of the lesson themselves or to share private links or videos anywhere outside the school community.

- If the lesson doesn't really require 'live' elements or webcams or microphones etc then don't use them.
- The webcams of students shouldn't remain on throughout the lesson, only when required and they are invited to do so. Same goes for microphones.
- We are not using 'Zoom' at present. It is not a secure Microsoft365 or linked school platform and there are privacy issues which have been widely reported.
- I'd invite your HoD or an SLT member into each Microsoft Teams chat and group you have - essentially creating an open-door effect.
- Don't share or comment on any private / confidential information on any online platform.

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 Maynard School digital technology equipment in school, but also applies to my use of Maynard 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 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 / Governor / Volunteer Name: .....

Signed: .....

Date: .....

Written by JF/PR	June 2018
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