

Loving, Learning,  
Community.

# **St Mary's CE Primary School Online Safety Policy**

**September 2023**



## Contents

Introduction .....	4
Online Safety Policy .....	6
Scope of the Online Safety Policy .....	8
Policy development, monitoring and review .....	8
Schedule for development, monitoring and review .....	9
Process for monitoring the impact of the Online Safety Policy .....	9
Policy and leadership.....	10
Responsibilities .....	10
Online Safety Group .....	Error! Bookmark not defined.
Professional Standards .....	18
Policy.....	18
Online Safety Policy.....	18
Acceptable use .....	19
User actions.....	20
Reporting and responding .....	24
Online Safety Incident Flowchart .....	27
Responding to Learner Actions.....	Error! Bookmark not defined.
Responding to Staff Actions.....	Error! Bookmark not defined.
Online Safety Education Programme.....	29
Contribution of Learners .....	31
Staff/volunteers.....	31
Governors .....	Error! Bookmark not defined.
Families .....	32
Adults and Agencies.....	Error! Bookmark not defined.
Technology.....	33
Filtering & Monitoring.....	33
Filtering .....	34
Monitoring.....	35
Technical Security.....	36
Mobile technologies.....	38
Social media.....	40
Digital and video images .....	42
Online Publishing.....	43

Data Protection.....	44
Outcomes.....	46

## Introduction

The requirement that learners can use digital technologies appropriately and safely is addressed as part of the wider duty of care to which all who work in schools are bound. Schools must, through their Online Safety Policy, meet their statutory obligations to ensure that learners are safe and are protected from potential harm, both on and off-site. It will also form part of the school's protection from legal challenge, relating to the use of digital technologies.

The DfE Keeping Children Safe in Education statutory guidance requires Local Authorities, Multi Academy Trusts, and schools in England to ensure learners are safe from harm:

*“It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to **online safety** empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate”*

*“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, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement”*

The DfE Keeping Children Safe in Education guidance also recommends:

***Reviewing online safety** ... Technology, and risks and harms related to it, evolve, and change rapidly. Schools and colleges should consider carrying out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. A free online safety self-review tool for schools can be found via the 360 safe self-review tool.*

The DfE Keeping Children Safe in Education guidance suggests that:

*The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:*

***content:*** *being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.*

***contact:*** *being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.*

***conduct:*** *online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and*

***commerce:*** *risks such as online gambling, inappropriate advertising, phishing and or financial scams.*

Schools in England are subject to an increased level of scrutiny of their online safety practices by Ofsted Inspectors during inspections, while the Counter Terrorism and Securities Act 2015 requires schools to ensure that children and young people are safe from terrorist and extremist material on the internet.

# **St Mary's CE Primary School Online Safety Policy**

This policy applies to all members of the school community (including staff, learners, volunteers, parents and carers, visitors, community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

Version: 1

Date created: 27/09/23

Next review date: 27/09/24



## Scope of the Online Safety Policy

This Online Safety Policy outlines the commitment of St Mary's CE Primary School to safeguard members of our school community online in accordance with statutory guidance and best practice.

This Online Safety Policy applies to all members of the school community (including staff, learners, governors, volunteers, parents and carers, visitors, community users) who have access to and are users of school digital systems, both in and out of the school. It also applies to the use of personal digital technology on the school site (where allowed).

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

## Policy development, monitoring and review

This Online Safety Policy has been developed by the

- *headteacher/senior leaders*
- *Designated safeguarding lead (DSL)*
- *staff – including teachers/support staff/technical staff*
- *governors*
- *parents and carers*

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



## Schedule for development, monitoring and review

<b>This Online Safety Policy was approved by the <i>school governing body</i> on:</b>	<b>October 2023</b>
<b>The implementation of this Online Safety Policy will be monitored by:</b>	<b>Mr Neil Gurman – Headteacher, Designated safeguarding lead, online safety lead,</b>
<b>Monitoring will take place at regular intervals:</b>	<b>Annually or earlier if required.</b>
<b>The <i>governing body</i> will receive a report on the implementation of the Online Safety Policy (which will include anonymous details of online safety incidents) at regular intervals:</b>	<b>This will be reported to the Full Governing Body on a termly basis as part of the Headteacher's Report to Governors.</b>
<b>The Online Safety Policy will be reviewed annually, or more regularly in the light of any significant new technological developments, new threats to online safety or incidents that have taken place. The next anticipated review date will be:</b>	<b>September 2024</b>
<b>Should serious online safety incidents take place, the following external persons/agencies should be informed:</b>	<b>Lancashire LADO:  01772 536694  lado.admin@lancashire.gov.uk</b>

## Process for monitoring the impact of the Online Safety Policy

The school will monitor the impact of the policy using:

- *logs of reported incidents*
- *Filtering and monitoring logs*
- *internal monitoring data for network activity*
- *surveys/questionnaires of:*
  - *learners*
  - *parents and carers*
  - *staff.*

# Policy and leadership

## Responsibilities

To ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviours, learning from each other and from good practice elsewhere, reporting inappropriate online behaviours, concerns, and misuse as soon as these become apparent. While this will be a team effort, the following sections outline the online safety roles and responsibilities of individuals<sup>1</sup> and groups within the school.

### Headteacher and senior leaders

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community and fostering a culture of safeguarding, though the day-to-day responsibility for online safety is held by the **Designated Safeguarding Lead – Mr Neil Gurman**, as defined in *Keeping Children Safe in Education 2023*.
- The Headteacher Mr Neil Gurman, Mrs Ashworth (Deputy Headteacher) and Mrs Hughes (KS1 Leader) are aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff<sup>2</sup>.
- The Headteacher is responsible for ensuring that the Designated Safeguarding Lead,, IT provider/technical staff, and other relevant staff carry out their responsibilities effectively and receive suitable training to enable them to carry out their roles and train other colleagues, as relevant.
- The Headteacher 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.
- The Headteacher and senior leaders will work with the **responsible Governor, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring**.

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<sup>1</sup> In a small school some of the roles described may be combined, though it is important to ensure that there is sufficient 'separation of responsibility' should this be the case.

<sup>2</sup> See flow chart on dealing with online safety incidents in 'Responding to incidents of misuse' and relevant local authority/MAT/ HR/other relevant body disciplinary procedures.

## Governors

The DfE guidance “Keeping Children Safe in Education” states:

“Governing bodies and proprietors should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children’s welfare .... this includes ... online safety”

“Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. 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)”

Governors are responsible for the approval of the Online Safety Policy and for reviewing the effectiveness of the policy.

This review will be carried out by the curriculum committee whose members will receive regular information about online safety incidents and monitoring reports. **Mrs K Girling – Safeguarding Governor**) will take on the role of Online Safety Governor to include:

- regular meetings with the Designated Safeguarding Lead / Online Safety Lead
- regularly receiving (collated and anonymised) reports of online safety incidents
- checking that provision outlined in the Online Safety Policy (e.g. online safety education provision and staff training is taking place as intended)
- Ensuring that the filtering and monitoring provision is reviewed and recorded, at least annually.
- The annual review will be conducted by Mr N Gurman, the DSL, and the IT service provider – Mr P Costelloe and involve the responsible safeguarding governor – Mrs K Girling - in-line with the [DfE Filtering and Monitoring Standards](#)
- reporting to relevant *governors meetings*
- Receiving (at least) basic cyber-security training to enable the governors to check that the school meets the [DfE Cyber-Security Standards](#)

The governing body will also support the school in encouraging parents/carers and the wider community to become engaged in online safety activities.

## Designated Safety Lead (DSL)

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”*

The responsibility for online safety is held by the DSL and cannot be delegated.

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
- 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

The Online Safety Lead will:

- also be the Designated Safeguarding Lead (DSL) – Mr Neil Gurman
- 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

## Curriculum Leads

Curriculum Leads will work with the DSL to develop a planned and coordinated online safety education programme .

This will be provided through:

- St Mary's CE Primary School computing curriculum
- PHSE and RSE programmes
- Worship, assemblies and workshops

- through relevant national initiatives and opportunities e.g. [Safer Internet Day](#) and [Anti-bullying week](#).

### Teaching and support staff

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 Mr Neil Gurman 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.
- 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.

## IT Provider

The DfE Filtering and Monitoring Standards says:

*“Senior leaders should work closely with governors or proprietors, the designated safeguarding lead (DSL) and IT service providers in all aspects of filtering and monitoring. Your IT service provider may be a staff technician or an external service provider.”*

*“Day to day management of filtering and monitoring systems requires the specialist knowledge of both safeguarding and IT staff to be effective. The DSL should work closely together with IT service providers to meet the needs of your setting. You may need to ask filtering or monitoring providers for system specific training and support.”*

*“The IT service provider should have technical responsibility for:*

- o maintaining filtering and monitoring systems*
- o providing filtering and monitoring reports*
- o completing actions following concerns or checks to systems”*

*“The IT service provider should work with the senior leadership team and DSL to:*

- o procure systems*
- o identify risk*
- o carry out reviews*
- o carry out checks”*

*“We are aware that there may not be full-time staff for each of these roles and responsibility may lie as part of a wider role within the school, college, or trust. However, it must be clear who is responsible, and it must be possible to make prompt changes to your provision.”*

At St Mary's CE Primary School it is the responsibility of the school to ensure that the provider carries out all the online safety measures that the school's obligations and responsibilities

require. It is also important that the provider follows and implements the schools Online Safety Policy and procedures.

The IT Provider is responsible for ensuring that:

- they are aware of and follow the school Online Safety Policy to carry out their work effectively in line with school policy
- the school technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets (as a minimum) the required online safety technical requirements as identified by the [DfE Meeting Digital and Technology Standards in Schools & Colleges](#) and guidance from local authority or other relevant body
- there is clear, safe, and managed control of user access to networks and devices
- 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
- the use of technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported to Mr Neil Gurman for investigation and action
- the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person.
- monitoring systems are implemented and regularly updated as agreed in school policies

### Learners

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement and Online Safety Policy.
- should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology.
- 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 and carers

St Mary's Primary School will take every opportunity to help parents and carers understand these issues through:

- publishing the school Online Safety Policy on the school website
- publish information about appropriate use of social media relating to posts concerning the school.
- seeking their permissions concerning digital images, cloud services etc
- parents'/carers' evenings, newsletters, website, social media and information about national/local online safety campaigns and literature.

*Parents and carers will be encouraged to support the school in:*

- *reinforcing the online safety messages provided to learners in school.*

## Community users

Community users who access school systems/website/learning platform as part of the wider school provision will be expected to sign a community user AUA before being provided with access to school systems.

The school encourages the engagement of agencies/members of the community who can provide valuable contributions to the online safety provision and actively seeks to share its knowledge and good practice with other schools and the community.

## Professional Standards

There is an expectation that required professional standards will be applied to online safety as in other aspects of school life i.e. policies and protocols are in place for the use of online communication technology between the staff and other members of the school and wider community, using officially sanctioned school mechanisms.

## Policy

### Online Safety 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
- 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:

- learner handbook
- staff induction and handbook
- posters/notices around where technology is used
- communication with parents/carers
- built into education sessions
- school website
- peer support

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	<b>Any illegal activity for example:</b> <ul style="list-style-type: none"> <li>• Child sexual abuse imagery*</li> <li>• Child sexual abuse/exploitation/grooming</li> <li>• Terrorism</li> <li>• Encouraging or assisting suicide</li> <li>• Offences relating to sexual images i.e., revenge and extreme pornography</li> <li>• Incitement to and threats of violence</li> <li>• Hate crime</li> </ul>					X

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
contain or relate to:	<ul style="list-style-type: none"> <li>Public order offences - harassment and stalking</li> <li>Drug-related offences</li> <li>Weapons / firearms offences</li> <li>Fraud and financial crime including money laundering</li> </ul> <p>N.B. Schools should refer to guidance about dealing with self-generated images/sexting – <a href="#">UKSIC Responding to and managing sexting incidents</a> and <a href="#">UKCIS – Sexting in schools and colleges</a></p>					
Users shall not undertake activities that might be classed as cyber-crime under the Computer Misuse Act (1990)	<ul style="list-style-type: none"> <li>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)</li> <li>Gaining unauthorised access to school networks, data and files, through the use of computers/devices</li> <li>Creating or propagating computer viruses or other harmful files</li> <li>Revealing or publicising confidential or proprietary information (e.g., financial / personal information, databases, computer / network access codes and passwords)</li> <li>Disable/Impair/Disrupt network functionality through the use of computers/devices</li> <li>Using penetration testing equipment (without relevant permission)</li> </ul> <p>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-</p>					X

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
	crime and harness their activity in positive ways– further information <a href="#">here</a>					
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	
	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	

<p>Consideration should be given for the following activities when undertaken for non-educational purposes:</p> <p>Schools may wish to add further activities to this list.</p>	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
Online gaming			X				X	
Online shopping/commerce		X			X			
File sharing			X				X	
Social media			X		X			
Messaging/chat			X					X
Entertainment streaming e.g. Netflix, Disney+			X		X			
Use of video broadcasting, e.g. YouTube, Twitch, TikTok		X						X
Mobile phones may be brought to school		X			X			
Use of mobile phones for learning at school	X				X			
Use of mobile phones in social time at school		X			X			

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

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"*

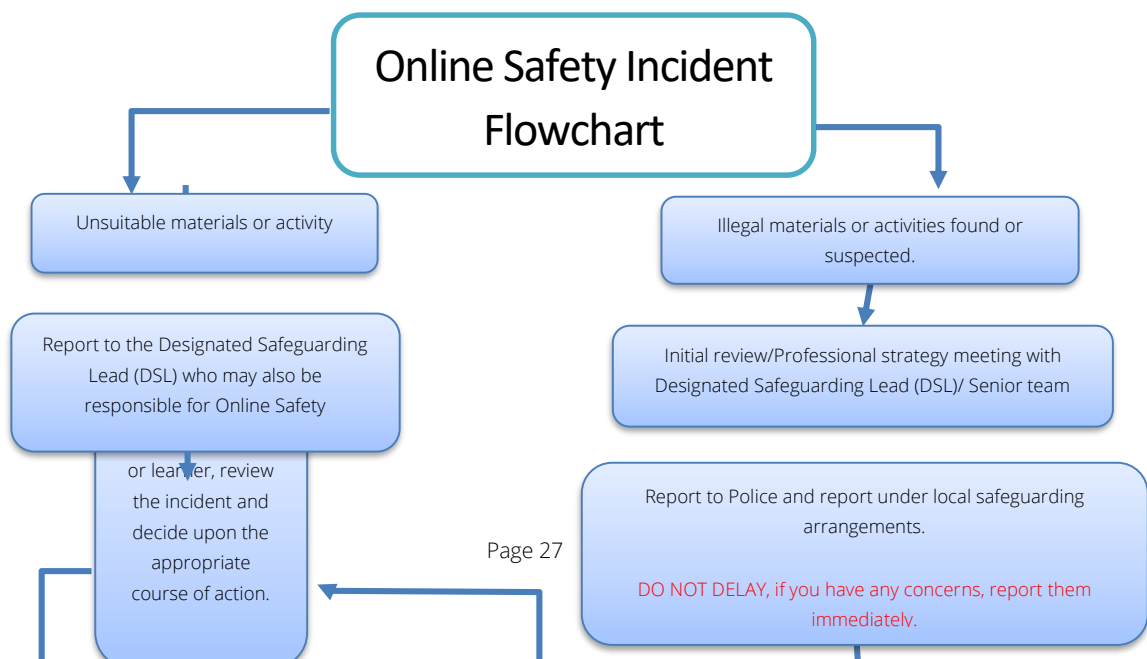
The school will take all reasonable precautions to ensure online safety for all school users but recognises that incidents may occur inside and outside of the school (with impact on the school) which will need intervention. The school will ensure:

- 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.
- 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, 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

- 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
    - 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 using CPOMS
- 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 appropriate.
- learning from the incident (or pattern of incidents) will be provided (as relevant and anonymously) 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.



### **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.

## 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. Please be aware this list is not exhaustive:

- 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; RSE; Literacy and computing – please be aware this list is not exhaustive.
- 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 Cyber Choices 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:

- *mechanisms to canvass learner feedback and opinion.*
- *learners contribute to the online safety education programme e.g. peer education, digital leaders leading lessons for younger learners, online safety campaigns*
- *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:

- 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 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 (or other nominated person) will provide advice/guidance/training to individuals as required.
- 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 or other relevant organisation
  - participation in school training / information sessions for staff or parents

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 understand 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:

- *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/](http://www.saferinternet.org.uk/); [www.childnet.com/parents-and-carers](http://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*

## 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.

## 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 **Filtering 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

The school technical systems will be managed in ways that ensure that the school meets recommended technical requirements :

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.

- 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.
- 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,
- Mr N Gurman 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.
- 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 are to be school 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 policies 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:

	School devices			Personal devices		
	School owned for individual use	School owned for multiple users	Authorised device <sup>3</sup>	Student owned	Staff owned	Visitor owned
Allowed in school	Yes	Yes	Yes	No	Yes	Yes
Full network access	Yes	Yes	Yes	No	No	No
Internet only				No	No	No
No network access				No	No	No

### School owned/provided devices:

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<sup>3</sup> 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.

- *all school devices are managed through 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 expectations 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.*
- *where personal devices are brought to school, but their use is not permitted, appropriate, safe and secure storage should be made available.*
- *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.

## **Digital and video images**

The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm the school may use live-streaming or video-conferencing services in line with national and local safeguarding guidance / policies.

- 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 is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other *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.
- 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 [public-facing website](#)

- Social media
- Online newsletters
- Text messages
-

The school website is managed/hosted by E4 Education. The school ensures that the 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;

## 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
- 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.
- 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,
- 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.
- 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:

- 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.
- 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.

## 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.

# Computer Misuse and Cyber Choices Policy

All key stakeholders, including the school IT service provider, have responsibility for the safeguarding of young people from computer misuse and are aware of the Cyber Choices programme led by the National Crime Agency (NCA) and managed locally by Regional Organised Crime Units (part of the national policing network). The risks to young people of crossing the line into committing cybercrimes is a safeguarding issue. This often happens without the individual even realising, young people need support in making the right #CyberChoices in their use of technology. Young people with an interest in technology, a high IQ, and an appetite to engage in risky behaviours are considered to be at a higher risk of committing a cyber offence, but many first-time offenders are also unaware of what the law governing cyber offences actually is. The average age of first-time cyber offenders in the UK has fallen significantly in recent years. The Cyber Choices programme works with individuals committing, or at risk of committing, cybercrimes which can only be carried out with technology, where devices are both the tool for committing the crime, and the target of the crime.

All staff are made aware of the safeguarding risks of computer misuse.

All staff are familiar with the [NCA Hacking it Legal Leaflet](#)\*, which explains Cyber Choices and the Computer Misuse Act 1990, and lists recommended resources for teachers to use.

Staff are aware of the role of their local Regional Organised Crime Unit as their point of contact for Cyber Choices referrals.

Learners agree to the Acceptable Use Policy (AUP) which outlines acceptable online behaviours and explains that some online activity is illegal. Acceptable computer 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 NCA Cyber Choices site.](#)

Any breach of the AUP or activity by a learner that may constitute a cybercrime, in school or at home, will be referred to the Designated Safeguarding Lead for consideration as a safeguarding risk.

Where the DSL believes that the learner may be at risk of committing cybercrimes, or to already be committing cybercrimes, a referral to the local [Cyber Choices](#) programme will

be made ([contact details for all Regional Organised Crime Units are available in the “what to do if you’re concerned” section at the bottom of the NCA Cyber Choices page](#)). Where the DSL is unsure if a learner meets the referral criteria, advice should be sought from the local Cyber Choices team.

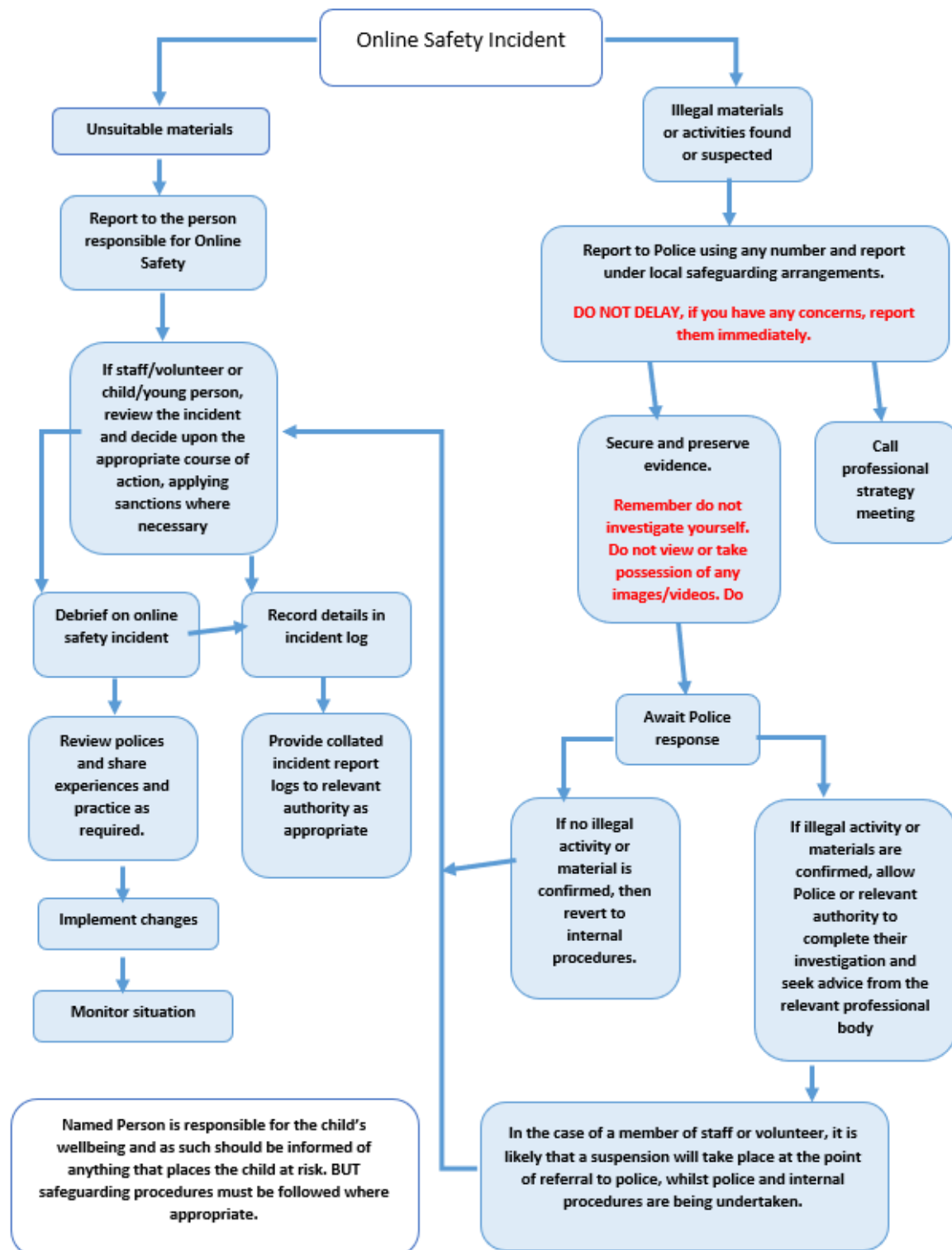
Parents also have the opportunity to report potential cybercrime directly to the local Cyber Choices team but are recommended to make school-based concerns through the DSL.

The IT service provider is aware of the safeguarding requirement to refer concerns about computer misuse to the Designated Safeguarding Lead and has a clear process to follow in order to do so.

*Information for parents about NCA Cyber Choices is available on the school website.*



## A10 Responding to incidents of misuse – flow chart



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

## Introduction

Effective technical security depends not only on technical measures, but also on appropriate policies and procedures and on good user education and training. This is informed by the Department for Education (DfE) guidance, [Keeping Children Safe in Education](#), and the [Digital and Technology Standards](#) and therefore applicable for schools and colleges in England. For schools and colleges outside England, this would be considered good practice, the school should also ensure that they remain compliant with national, local authority or MAT guidance, as relevant. The school is responsible for ensuring that the *school infrastructure/network* is as safe and secure as is reasonably possible and that:

- users can only access data to which they have right of access
- access to personal data is securely controlled in line with the school's personal data policy
- system logs are maintained and reviewed to monitor user activity
- there is effective guidance and training for users
- there are regular reviews and audits of the safety and security of school computer systems, including filtering and monitoring provision

Governors and senior leaders remain responsible for the school's technical security.

## Responsibilities

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. The management of technical security is the responsibility of Governors and Senior Leaders, supported in this by the Designated Safeguarding Lead, Online Safety Lead and IT Service Provider.

## Policy statements

The school is responsible for ensuring that their 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 receive guidance and training and will be effective in carrying out their responsibilities:

- school technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- cyber security is included in the school risk register.
- there will be regular reviews and audits of the safety and security of school technical systems.
- servers, wireless systems, and cabling must be securely located and physical access restricted.
- there are rigorous and verified back-up routines, including the keeping of network-separated (air-gapped) copies off-site or in the cloud,
- appropriate security measures (including updates) are in place to protect the servers, firewalls, switches, routers, wireless systems, workstations, mobile devices etc from accidental or malicious attempts which might threaten the security of the school systems and data, including operating systems.
- the school's infrastructure and individual workstations are protected by up-to-date software to protect against malicious threats from viruses, worms, trojans etc.
- responsibilities for the management of technical security are clearly assigned to appropriate and well-trained staff
- all users will have clearly defined access rights to school technical systems and accounts are deleted when the user leaves. *Details of the access rights available to groups of users will be recorded by the network manager/technical staff/other person and will be reviewed, at least annually, by the online safety group.*
- users will be made responsible for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security
- The IT Service Provider, in partnership with Governors/SLT/DSL, regularly monitors and records the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement.
- mobile device security and management procedures are in place (
- an appropriate system is in place via email to the DSL or CPOMS for users to report any actual/potential technical incident to the SLT and/or the DSL

## Password Security

A safe and secure username/password system is essential and will apply to all school technical systems, including networks, devices, email and learning platforms.

### Policy Statements:

- The password policy and procedures reflect NCSC and DfE advice/guidance.
- The use of passwords is reduced wherever possible, for example, using Multi-Factor Authentication (MFA) or (Single Sign On) SSO.
- Security measures are in place to reduce brute-force attacks and common passwords are blocked.
- School networks and system will be protected by secure passwords.
- Passwords are encrypted by the system to prevent theft.
- Passwords do not expire and the use of password managers is encouraged.
- Complexity requirements (e.g. capital letter, lower case, number, special character) are not used.
- Users are able to reset their password themselves.
- Passwords are immediately changed in the event of a suspected or confirmed compromise.
- No default passwords are in use. All passwords provided “out of the box” are changed to a unique password by the IT Service Provider.
- All accounts with access to sensitive or personal data are protected by [Multi-Factor Authentication methods](#).
- A copy of administrator passwords is kept in a secure location.
- All users (adults and learners) have responsibility for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.
- Passwords must not be shared with anyone.

## Filtering and Monitoring

### Introduction to Filtering

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

DfE Keeping Children Safe in Education requires schools to have “appropriate filtering”. DfE published Filtering and monitoring standards for schools and colleges in March 2023. Schools are recommended to use the UK Safer Internet Centre Definitions to help them determine if their filtering system is appropriate.

School will test their filtering for protection against illegal materials at: SWGfL Test Filtering at least annually or earlier if necessary.

Your filtering system should be operational, up to date and applied to all:

- users, including guest accounts.
- school owned devices
- devices using the school broadband connection.

Your filtering system should:

- filter all internet feeds, including any backup connections.
- be age and ability appropriate for the users and be suitable for educational settings.
- handle multilingual web content, images, common misspellings and abbreviations.
- identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them.
- provide alerts when any web content has been blocked.

Mobile and app content is often presented in a different way to web browser content. If your users access content in this way, you should get confirmation from your provider as to whether they can provide filtering on mobile or app technologies. A technical monitoring system should be applied to devices using mobile or app content to reduce the risk of harm.

## Introduction to Monitoring

Monitoring user activity on school and college devices is an important part of providing a safe environment for children and staff. Unlike filtering, it does not stop users from accessing material through internet searches or software. Monitoring allows you to review user activity on school and college devices. For monitoring to be effective it must pick up incidents urgently, usually through alerts or observations, allowing you to take prompt action and record the outcome.

Your monitoring strategy should be informed by the filtering and monitoring review. A variety of monitoring strategies may be required to minimise safeguarding risks on internet connected devices and may include:

- physically monitoring by staff watching screens of users
- live supervision by staff on a console with device management software
- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services

DfE Keeping Children Safe in Education requires schools to have “appropriate monitoring”. DfE published Filtering and monitoring standards for schools and colleges in March 2023.

## Filtering and Monitoring Responsibilities

DfE Filtering Standards require that schools and colleges identify and assign roles and responsibilities to manage your filtering and monitoring systems, and include

Role	Responsibility	Name / Position
Responsible Governor	Strategic responsibility for filtering and monitoring and need assurance that the standards are being met.	Karen Girling – Chair of Governors and safeguarding governor.
Senior Leadership	<p>Team Member Responsible for ensuring these standards are met and:</p> <ul style="list-style-type: none"> <li>• procuring filtering and monitoring systems</li> <li>• documenting decisions on what is blocked or allowed and why</li> <li>• reviewing the effectiveness of your provision</li> <li>• overseeing reports</li> </ul> <p>Ensure that all staff:</p> <ul style="list-style-type: none"> <li>• understand their role</li> <li>• are appropriately trained</li> <li>• follow policies, processes and procedures</li> <li>• act on reports and concerns</li> </ul>	Mr Neil Gurman – Headteacher and DSL
Designated Safeguarding Lead	<p>Lead responsibility for safeguarding and online safety, which could include overseeing and acting on:</p> <ul style="list-style-type: none"> <li>• filtering and monitoring reports</li> <li>• safeguarding concerns</li> <li>• checks to filtering and monitoring systems</li> </ul>	Mr Neil Gurman
IT Service Provider	<p>Technical responsibility for:</p> <ul style="list-style-type: none"> <li>• maintaining filtering and monitoring systems</li> <li>• providing filtering and monitoring reports</li> <li>• completing actions following concerns or checks to systems</li> </ul>	Local Authority Lancashire

<p>All staff</p> <p>need to be aware of reporting mechanisms for safeguarding and technical concerns. They should report if:</p>	<ul style="list-style-type: none"> <li>• they witness or suspect unsuitable material has been accessed</li> <li>• they can access unsuitable material</li> <li>• they are teaching topics which could create unusual activity on the filtering logs</li> <li>• there is failure in the software or abuse of the system</li> <li>• there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks</li> <li>• they notice abbreviations or misspellings that allow access to restricted material</li> </ul>	
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### Policy Statements

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

- There is a filtering and monitoring system in place that safeguards staff and learners by blocking harmful, illegal and inappropriate content.
- There is a monitoring system that enables the prompt investigation of a potential safeguarding incident and outcomes are logged.
- Roles and responsibilities for the management of filtering and monitoring systems have been defined and allocated.
- The filtering and monitoring provision is reviewed at least annually and checked regularly.
- There is a defined and agreed process for making changes to the filtering or monitoring system that involves a senior leader in the agreement of the change.



- Mobile devices that access the school's internet connection (whether school or personal devices) will be subject to the same filtering standards as other devices on the school systems.

## **Filtering and Monitoring Review and Checks**

To understand and evaluate the changing needs and potential risks of the school, the filtering and monitoring provision will be reviewed at least annually. The review will be conducted by members of the Safeguarding Governor, the designated safeguarding lead (DSL), and the IT technician provider. Additional checks to filtering and monitoring will be informed by the review process so that governors have assurance that systems are working effectively and meeting safeguarding obligations.

### **Reviewing the filtering and monitoring provision**

A review of filtering and monitoring will be carried out to identify the current provision, any gaps, and the specific needs of learners and staff.

The review will take account of:

- the risk profile of learners, including their age range, pupils with special educational needs and disability (SEND), pupils with English as an additional language (EAL)
- what the filtering system currently blocks or allows and why
- any outside safeguarding influences, such as county lines
- any relevant safeguarding reports
- the digital resilience of learners
- teaching requirements, for example, the RHSE and PSHE curriculum
- the specific use of chosen technologies, including Bring Your Own Device (BYOD)
- what related safeguarding or technology policies are in place
- what checks are currently taking place and how resulting actions are handled

To make the filtering and monitoring provision effective, the review will inform:

- related safeguarding or technology policies and procedures
- roles and responsibilities
- training of staff
- curriculum and learning opportunities
- procurement decisions
- how often and what is checked

- monitoring strategies

The review will be carried out as a minimum annually, or when:

- a safeguarding risk is identified
- there is a change in working practice, e.g. remote access or BYOD
- new technology is introduced

### Checking the filtering and monitoring systems

Checks to filtering and monitoring systems are completed and recorded as part of the filtering and monitoring review process. How often the checks take place will be based on the context, the risks highlighted in the filtering and monitoring review, and any other risk assessments. Checks will be undertaken from both a safeguarding and IT perspective.

When filtering and monitoring systems are checked this should include further checks to verify that the system setup has not changed or been deactivated. Checks are performed on a range of:

- school owned devices and services, including those used off site
- geographical areas across the site
- user groups, for example, teachers, pupils and guests

Logs of checks are kept so they can be reviewed. These record:

- when the checks took place
- who did the check
- what was tested or checked
- resulting actions

ST Mary's CE Primary School will use - **The SWGfL Filtering Standards checklist.**

### **Training/Awareness:**

It is a statutory requirement in England that staff receive training, at least annually, about safeguarding, child protection, online safety and filtering and monitoring.

### **Governors, Senior Leaders and staff are made aware of the expectations of them:**

- at induction
- at whole-staff/governor training
- through the awareness of policy requirements
- through the acceptable use agreements
- in regular updates throughout the year

Those with specific responsibilities for filtering and monitoring (Responsible Governor, DSL, or other relevant persons) will receive enhanced training to help them understand filtering and monitoring systems and their implementation and review.

### **Learners are made aware of the expectations of them:**

- in lessons
- through the acceptable use agreements

### **Further Guidance**

To further support schools and colleges in England, the Department for Education published **Digital and Technology standards**.

The UK Safer Internet Centre has produced guidance on "[Appropriate Filtering and Monitoring](#)"

SWGfL, on behalf of UK Safer Internet Centre and DfE developed further [Filtering and Monitoring](#) | [SWGfL](#) information for schools and colleges, including a checklist alongside further support for Governors

SWGfL provides a site for schools to test their filtering to ensure that illegal materials cannot be accessed: [SWGfL Test Filtering](#)

